City of St. Francis

MS4 SWPPP

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1 Executive Summary

The City of St. Francis has prepared a Stormwater Pollution Prevention Program (SWPPP). The SWPPP is a requirement of the National Pollutant Discharge Elimination System (NPDES) General Permit No. MNR040000, which authorizes the Municipal Separate Storm Sewer System (MS4) operators to discharge stormwater. The goal of the Stormwater Pollution Prevention Program, when implemented, is to reduce the discharge of pollutants into receiving waters to the maximum extent practicable.

The SWPPP requires the City to implement regulatory mechanisms for illicit discharge, construction site run-off, and post-construction stormwater management as well as enforcement response procedures if non-stormwater discharge does occur. Additionally, a map of the City's stormwater system must be developed and updated, and an inventory of all the stormwater ponds, wetlands, and lakes within the City must completed. These items are discussed further in Chapters 3-5.

There are also six minimum control measures outlined below that are required to be included in the SWPPP, with each using a number of different Best Management Practices (BMPs). The six minimum control measures are as follows:

1. Public Education and Outreach

Public education and outreach are a major component of the SWPPP. Through education and outreach programs the operator of a MS4 can reduce the impacts on the receiving waters. The City has an implementation plan that outlines their process to reach out to residents regarding illicit discharge and other pertinent stormwater issues.

2. Public Participation/Involvement

Public participation is encouraged to receive input from the public on the SWPPP. Public input may be used as a gauge to determine the effectiveness of the SWPPP and associated BMPs. Based on public input, the City of St. Francis may modify components of the SWPPP if deemed beneficial. A public hearing is held once per year during the City's council meetings.

3. Illicit Discharge Detection and Elimination

Chapter 8, Section 10 and Chapter 10, Section 93-12 of the City ordinance outline the regulatory mechanisms for illicit discharge. The City of St. Francis is required to prohibit non-stormwater discharges into the MS4. Annual inspections looking for illicit discharge indicators are conducted on all outfalls, structural BMPs, and one-fifth of stormwater ponds. If any possible illicit discharge is detected, the City implements its Emergency Response Procedure (ERP).

4. Construction Site Stormwater Runoff Control

All construction activities which disturb greater than one acre of land, and construction activities which disturb less than one acre but are part of a larger common plan of development or sale is regulated by City ordinance Chapter 10 – Section 93, which limits the amount of sediment entering downstream waters. The City conducts inspections on these developments to ensure compliance.

5. Post-Construction Stormwater Management in New Development and Redevelopment

City ordinance Chapter 10 – Section 93 regulates development and redevelopment to ensure there is no increase or a net decrease, respectively, in runoff volume, total phosphorus, and total suspended solids. All projects disturbing one or more acres of land or fall within the parameters of City ordinance 10-93 are required to be reviewed. The City evaluates these projects for compliance and analyzes all potential water resource related impacts before issuing a permit.

6. Pollution Prevention/Good Housekeeping

The City of St. Francis operates and maintains the storm sewer system in a manner so as to reduce the discharge of pollutants to the maximum extent practicable. Key components for good housekeeping are: inspecting the MS4 outfalls, stormwater ponds, all exposed stockpiles, and material handling and
storage areas, as well as ensuring all field staff are trained in recognizing and responding to stormwater issues. Records of the inspections are retained, including the date of the completion of repairs and major additional protection measures.

Additionally, the SWPPP should include proposed and completed projects for wasteload allocations (WLAs) that were listed before the current permit (2013) was published. While St. Francis does have WLAs, they were not specified until 2017.

Lastly, the SWPPP must be reviewed annually for compliance, and an annual MS4 report completed and submitted to the Minnesota Pollution Control Agency (MPCA). The annual reports can be found in the appendix.

2 Introduction

The City of St. Francis applied for the MS4 permit in 2017. The City must be in full compliance with the permit within 24 months. This report includes the wording of the MS4 permit spread out throughout the document. The full permit can be viewed in the appendix.

The SWPPP discusses and provides documentation for the various sections, which are laid out as follows:

Section 3: Regulatory Mechanisms

Section 4: Enforcement Response Procedures:

Section 5: Mapping and Inventory

Section 6: Minimum Control Measures

Section 7: Discharges to Impaired Waters with an EPA Approved TMDL that Includes an Applicable WLA

Section 8: Alum or Ferric Chloride Phosphorus Treatment Systems

Section 9: SWPPP Modification

Appendix A: 2013-2018 MS4 Permit

Appendix B: 2020 Annual MS4 Report

The SWPPP is a living document. It will be updated as new documentation is provided.

3 Regulatory Mechanisms

The first part of the SWPPP requires a regulatory mechanism that will allow the City to enforce three of the six MCM requirements of the MS4 permit: illicit discharge detection and elimination, construction site stormwater runoff control, and post-construction stormwater management. Examples of regulatory mechanism include contract language, an ordinance, permits, standards, etc. The City of St. Francis has chosen to implement three ordinances to cover the three MCMs.

3.1 Illicit Discharge Detection and Elimination

The illicit discharge detection and elimination is enforced by two City ordinances. One is under Chapter 8 Public Protection, Section 10: Illicit Discharges. The ordinance is attached at the end of this section (**Attachment 3A**) and can be found online at: https://library.municode.com/mn/st._francis/codes/code_of_ordinances?nodeId=CD_CH8PUPR_S10ILDI

The other ordinance is under Chapter 10: Zoning, Section 93: Stormwater Management – Stormwater Pollution Prevention, part 12 – Illicit Discharge. The ordinance is attached (**Attachment 3B**) at the end of this section, and the link to the online document is located at:

https://library.municode.com/mn/st._francis/codes/code_of_ordinances?nodeId=CD_CH10ZO_S93STMATOPOPR_10-93-12ILDI.

3.2 Construction Site Stormwater Runoff Control

The construction site stormwater runoff control is enforced by two City ordinances. They are both within Chapter 10: Zoning. The first one is under Section 16: General Performance Standards, part 4 – Erosion and Drainage. The ordinance is attached at the end of this section (**Attachment 3C**) and can be found online at: https://library.municode.com/mn/st._francis/codes/code_of_ordinances?nodeId=CD_CH10ZO_S16GEPEST_10-16-4ERDR

The second ordinance is under Section 93: Stormwater Management – Stormwater Pollution Prevention. This section details requirements for small sites and large sites, as well as including a segment on illicit discharge. The ordinance is attached (**Attachment 3B**) at the end of this section, and the link to the online document is located at: https://library.municode.com/mn/st._francis/codes/code_of_ordinances?nodeId=CD_CH10ZO_S93STMATOPOPR

3.3 Post-Construction Stormwater Management

The post-construction stormwater management is enforced under City ordinance Chapter 10: Zoning, Section 93: Stormwater Management – Stormwater Pollution Prevention. The ordinance is attached at the end of this section (Attachment 3B) at the end of this section, and the link to the online document is located at:
https://library.municode.com/mn/st._francis/codes/code_of_ordinances?nodeId=CD_CH10ZO_S93STMATOPOPR

Attachment 3A: City Ordinance 8.10

SECTION 10. - ILLICIT DISCHARGES

8-10-1. - Purpose.

The purpose of this ordinance is to control or eliminate storm water pollution associated with illicit discharges that may occur within the City.

8-10-2. - Scope.

The State of Minnesota requires illicit discharge limitations into surface waters; and the City Council desires to protect its surface waters; and to provide long-term planning to minimize the impact of illicit pollutants on storm water and groundwater; and to encourage "best management practices" for the control of these illicit discharges. This Ordinance develops regulations to manage illicit storm water discharge within the City.

8-10-3. - Definitions.

As used this Code, the following words and terms shall have the meanings stated:

A. *Contaminated.* Containing a harmful quantity of any substance.

B. *Contamination.* The presence of or entry of any substance which may be deleterious to the public health and/or the quality of the water into the public storm water system, Waters of the State, or Waters of the United States.

C. *Cosmetic Cleaning.* Cleaning done for cosmetic purposes to the exterior of buildings, motorized vehicles, parking lots, recreational vehicles or similar activity. It does not include industrial cleaning, cleaning associated with manufacturing activities, hazardous or toxic waste cleaning, or any cleaning otherwise regulated under federal, state, or local laws.

D. *Harmful Quantity.* The amount of any substance that will cause pollution of waters of the City, State or Nation that will cause lethal or sub-lethal adverse effects on the representative, sensitive aquatic monitoring organisms residing in waters.

E. *Mobile Commercial Cosmetic Cleaning.* Power washing, steam cleaning and any other mobile cosmetic cleaning operation of vehicles and/or exterior surfaces engaged for commercial purposes.

F. *National Pollutant Discharge Elimination System (NPDES).* The national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the federal Clean Water Act.

G. *Notice of Intent (NOI).* A written notice to the Minnesota Pollution Control Agency that the City plans on meeting the MS4 permit requirements.

H. *Point Source.* Any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff.

I. *Pollution.* The alteration of the physical, thermal, chemical, or biological quality of, or the contamination of, any Waters of the State or the storm sewer system, that renders the water harmful, detrimental, or injurious to humans, animal life, vegetation, or property, or to the public health, safety, or welfare, or impairs the usefulness or the public enjoyment of the water for any lawful or reasonable purpose.

J. *Release.* Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into groundwater, subsurface soils, surface soils, the storm sewer system or the Waters of the State.

8-10-4. - Administration.

The City of St. Francis Director of Public Works and the Director's authorized representatives are authorized to administer, implement, and enforce the provisions of this Ordinance.

8-10-5. - Discharge to city storm sewer system prohibited.

A. A person commits a violation if the person introduces or causes to be introduced into the St. Francis storm sewer system any discharge that is not composed entirely of storm water. The following are considered exempt discharge activities:

1. A discharge authorized by, and in full compliance with a site specific NPDES permit such as a storm water management plan permit for construction activities.
2. A discharge or flow resulting from firefighting by the Fire Department.
3. Agricultural storm water runoff.
4. A discharge or flow from water line flushing or disinfection that contains no harmful quantity of total residual chlorine or any other chemical used in line disinfection.
5. A discharge or flow from lawn watering, or landscape irrigation.
6. A discharge or flow from a diverted stream flow or natural spring.

7. A discharge or flow from uncontaminated pumped groundwater or rising groundwater.
8. Uncontaminated groundwater infiltration.
9. Uncontaminated discharge or flow from a foundation drain, sump pump, or footing drain.
10. A discharge or flow from a potable water source not containing any harmful substance or material from the cleaning or draining of a storage tank or other container.
11. A discharge or flow from air conditioning condensation that is unmixed with water from a cooling tower, emissions scrubber, emissions filter, or any other source of pollutant.
12. A discharge or flow from a riparian habitat or wetland.
13. A discharge or flow from cold water (or hot water with prior permission of the Director) used in street washing or cosmetic cleaning that is not contaminated with any soap, detergent, degreaser, solvent, emulsifier, dispersant, or any other harmful cleaning substance.
14. Drainage from a private residential swimming pool containing no harmful quantities of chlorine or other chemicals. Drainage from swimming pool filter backwash is prohibited.

B. No exemption shall be allowed under Section 10-9-4-A if:
1. The discharge or flow in question has been determined by the City to be a source of a pollutant or pollutants to the waters of the State or to the storm sewer system.
2. Written notice of such determination has been provided to the discharger.
3. The discharge has continued after the expiration of the time given in the notice to cease the discharge.

C. *A person commits a violation if the person introduces or causes to be introduced into the storm sewer system any harmful quantity of any substance.*

8-10-6. - Connection to sanitary sewer prohibited.

A person commits an offense if the person connects a line conveying sewage to the storm sewer system, or allows such a connection to continue.

8-10-7. - Nuisances.

A. An actual or threatened discharge to the storm sewer system that violates or would violate this Ordinance is hereby declared to be a nuisance.
B. A line conveying sewage or designed to convey sewage that is connected to the storm sewer system is hereby declared to be a nuisance.

8-10-8. - Emergency suspension of utility service and storm sewer system access.

A. Providing there are State regulations restricting the interruption of service, the City may, without prior notice, suspend water service, sanitary sewer service, and/or storm sewer system discharge access to a person discharging to the storm sewer system, Waters of the State, or Waste Water Treatment Plant when such suspension is necessary to stop an actual or threatened discharge which:
1. Presents or may present imminent and substantial danger to the environment or to the health or welfare of persons; or
2. Presents or may present imminent and substantial danger to the storm sewer system or Waters of the State.

B. When the St. Francis Director of Public Works determines that City-provided water and/or sanitary sewer service needs to be suspended pursuant to Section 8-10-8.A of this Code, the Director of Public Works is empowered to order such suspension.
C. As soon as is practicable after the suspension of service or storm sewer system discharge access, the Director of Public Works shall notify the violator of the suspension in person or by certified mail, return receipt requested, and shall order the violator to cease the discharge immediately. When time permits, the Director should also attempt to notify the violator prior to suspending service or access.
D. If the violator fails to comply with an order issued under Section 8-10-8.C of this Code, the Director may take such steps is deemed necessary to prevent or minimize damage to the storm sewer system or Waters of the State, or to minimize danger to persons.
E. The City shall not reinstate suspended services or storm sewer system access to the violator until:
1. The violator presents proof, satisfactory to the Director, that the non-complying discharge has been eliminated and its cause determined and corrected; and
2. The violator pays the City for all costs the City incurred in responding to abating, and remediating the discharge or threatened discharge; and
3. The violator pays the City for all costs the City will incur in reinstating service or access.

F. A violator whose service or access has been suspended or disconnected may appeal such enforcement action to the Director, in writing, within ten days of notice of the suspension.
G. The City may obtain a lien against the property to recover its response costs.
H. The remedies provided by this Section are in addition to any other remedies set out in this chapter. Exercise of this remedy shall not be a bar against, nor a prerequisite for, taking other action against a violator.

8-10-9. - Non-emergency suspension of utility service and storm sewer access.

A. The City may terminate the City-provided water supply, sanitary sewer connection, and/or storm sewer system access any person discharging to the

storm sewer system in violation of this ordinance, if such termination would abate or reduce the illicit discharge.

B. The Director of Public Works will notify a violator of the proposed termination of its water supply, sanitary sewer connection, and/or storm sewer system access. The violator may petition the Director for a reconsideration and hearing before the City Council.

C. The City shall not reinstate suspended services or storm sewer system access to the discharger until:

1. The violator presents proof, satisfactory to the Director, that the non-complying discharge has been eliminated and its cause determined and corrected; and
2. The violator pays the City for all costs the City will incur in reinstating service or storm sewer system access.

D. The remedies provided by this ordinance are in addition to any other remedies set out in this Section. Exercise of this remedy shall not be a bar against, nor a prerequisite for, taking other action against a violator.

E. A person commits a violation if the person reinstates water service, sanitary sewer service, and or storm sewer system access to premises terminated pursuant to this ordinance, without the prior approval of the Director of Public Works.

8-10-10. - Violation a misdemeanor.

Every person violates a section, subdivision, paragraph or provision of this Chapter when he performs an act thereby prohibited or declared unlawful, or fails to act when such failure is thereby prohibited or declared unlawful, and upon conviction thereof, shall be punished as for a misdemeanor except as otherwise stated in specific provisions hereof.

Attachment 3B: City Ordinance 10.93

SECTION 93. - STORMWATER MANAGEMENT—STORMWATER POLLUTION PREVENTION

10-93-1. - Purpose.

The purpose of this chapter is to control or eliminate stormwater pollution along with soil erosion and sedimentation within the City. It establishes standards and specifications for conservation practices and planning services, which minimize stormwater pollution, soil erosion, and sedimentation.

(Ord. 234 , SS, 10-16-2017)

10-93-2. - Scope.

Except where a variance is granted, any person, firm, sole proprietorship, partnership, corporation, state agency, or political subdivision proposing a land disturbance activity within the City shall submit to the City, for approval, a Stormwater Pollution Prevention Plan, as required by this section. No land shall be disturbed until the plan is approved by the City and conforms to the standards set forth herein.

(Ord. 234 , SS, 10-16-2017)

10-93-3. - Stormwater pollution prevention plan for small sites.

Every applicant for a building permit with more than twenty thousand (20,000) square feet but less than 1.0 acres of land disturbance, subdivision approval, or a permit to allow for excavation, filling, grading, or other such activity shall submit a Stormwater Pollution Prevention Plan to the City Engineer for review and approval. Sites that disturb less than 1.0 acre but are part of a larger development or connected action disturbing a cumulative 1.0 or more acres shall meet all the requirements of 10-93-4 STORMWATER POLLUTION PREVENTIONPLAN FOR LARGE SITES.

A. *Control Runoff.* Small Sites shall be designed to control runoff rate so as to not cause downstream flooding or erosion.
B. *Minimize Erosion.* Small Site Stormwater Pollution Prevention Plans shall be designed to minimize erosion and to contain sediment from exiting the site.
C. *Approval.* No building permit, subdivision approval, or permit to allow land disturbing activities shall be issued until the City approves this plan.

(Ord. 234 , SS, 10-16-2017)

10-93-4. - Stormwater pollution prevention plan for large sites.

In addition to meeting the requirements for Stormwater Pollution Prevention Plans for Small Sites, Large Site Stormwater Pollution Prevention Plans shall meet or exceed the following criteria:

A. Minnesota NPDES/SDS Construction Stormwater General Permit MN R100001 (Construction Stormwater Permit). Designed and implemented to meet or exceed the requirements of the Construction Stormwater Permit.
B. General Policy on Stormwater Runoff Rates and Water Quality for Large Sites.
    1. For new development stormwater runoff rates, volume, total suspended solids, and total phosphorus from the site shall not increase over the predevelopment values, based on the last 10-years of how that land was used. Also accelerated channel erosion must not occur as a result of the proposed activity.
        a. Stormwater peak discharge rates shall not increase for the 24-hour, 2-year, 10-year, and 100-year storm events.
        b. Volume, total suspended solids, and total phosphorous may not increase on an average annual basis.
        c. An instantaneous stormwater volume calculated as one inch of runoff from the new impervious surface shall be retained on-site.
    2. For redevelopment stormwater runoff rates, volume, total suspended solids, and total phosphorus must be managed from the predevelopment values, based on the last 10-years of how that land was used. Also accelerated channel erosion must not occur as a result of the proposed activity.
        a. Stormwater peak discharge rates shall not increase for the 24-hour, 2-year, 10-year, and 100-year storm events.
        b. Volume, total suspended solids, and total phosphorous must show a net reduction on an average annual basis.
        c. An instantaneous stormwater volume calculated as one inch of runoff from the new impervious surface shall be retained on-site.
    3. Infiltration prohibited. Infiltration shall be prohibited if one or more of the following circumstances are present:
        a. The site is required to obtain a NPDES/SDS Industrial Stormwater Permit and the permit prohibits infiltration;
        b. Where vehicle fueling and maintenance occur;
        c. Less than three (3) feet of separation is present from the bottom of the infiltration practice to the elevation of the seasonally saturated soils or top of bedrock;
        d. Where high levels of contaminants in the soil or groundwater will be mobilized by infiltrating stormwater.

4. Infiltration restricted. Higher engineering review shall be required when the infiltration device will be constructed in areas:
    a. Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn R. 4720.5100, subp. 13;
    b. Where soil infiltration rates are more than 8.3 inches per hour;
    c. Other areas as determined by the City Engineer.
5. For projects where site constraints limit the ability to provide the required control practices within the project boundary; the project shall provide for downstream improvements for that portion that cannot be treated within the project boundaries. Such projects may include:
    a. Linear projects where reasonable effort has been made to obtain sufficient right-of-way to install required control practices and said efforts have been unsuccessful;
    b. Sites where infiltration is prohibited;
    c. Other locations as determined by the City.
6. *Sequencing.* Projects that cannot fully meet the stormwater requirements of this section must demonstrate the site constraints through a sequencing analysis subject to review and approval of the City Engineer. Prior to consideration of off-site mitigation, the applicant must demonstrate on-site treatment to the maximum extent practicable given the site constraints.
7. Projects that have made reasonable effort but have been unable to fully meet volume, total suspended solids and total phosphorus requirements within the project limits may, upon authorization by the City, utilize the following methods to meet that portion not met onsite:
    a. Provide treatment that yields the same benefits in an offsite location to the same receiving water that receives runoff from the project site. If this is not feasible then;
    b. Provide treatment that yields the same benefits in an offsite location within the same Minnesota Department of Natural Resources catchment area as the project site. If this is not feasible then;
    c. Provide treatment that yields the same benefits in an offsite location within an adjacent Minnesota Department of Natural Resources catchment area up-stream of the project site. If this is not feasible then;
    d. Provide treatment that yields the same benefits at a site approved by the City.
    e. Offsite mitigation authorized by the City shall be completed within 24-months of the beginning of construction on the permitted site.
8. Applicants shall provide documentation showing compliance with the rate and quality requirements of this section. Acceptable documentation shall be:
    a. *For Rate and Volume.* Calculations shall be by a methodology listed in the Minnesota Pollution Control Agency's publication, "The Minnesota Stormwater Manual" or other method approved by the City.
    b. For total suspended solids and total phosphorus: Calculations shall be done using the Minimal Impact Design Standards (MIDS) Calculator available on the MPCA website, P8 or other method approved by the City.
    c. Prepared and certified by a Professional Engineer.

(Ord. 234 , SS, 10-16-2017)

10-93-5. - Minimum stormwater pollution prevention measures and related items for all sites.

These minimum control measures are required where bare soil is exposed for all sites.

A. *Easements.* If a stormwater management plan involves directing some or all of the site's runoff, the applicant or his designated representative shall obtain from adjacent property owners any necessary easements or other property interests concerning the flowing of such water. It shall be the responsibility of the applicant to obtain any necessary easements or other property interests to allow permanent access to the stormwater management facilities for inspection and maintenance purpose.

B. *Temporary Stockpiles.* Temporary stockpiling of fifty (50) or more cubic yards of excess soil on any lot or other vacant area will not be allowed without issuance of a grading permit for the earth moving activity in question.
    1. For soil stockpiles greater than ten (10) cubic yards, the toe of the pile must be more than twenty-five (25) feet from a road, drainage channel or stormwater inlet. If left for more than seven (7) days, they must be stabilized with mulch, vegetation, tarps or other means. If left for less than seven (7) days, erosion from stockpiles must be controlled with silt fences or rock check dams.
    2. If for any reason a soil stockpile of any size is located closer than twenty-five (25) feet from a road, drainage channel or stormwater inlet, and left for more than seven (7) days, it must be covered with tarps or controlled in some other manner.

C. *Mining Operations.* All sand, gravel or other mining operations taking place on the development site shall have any necessary authorization from the MPCA to discharge under the Minnesota National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) General Permit MNR050000 for Industrial Stormwater Multi-Sector (ISW) and all required Minnesota Department of Natural Resources permits.

D. *Sweeping.* Traveled surfaces including but not limited to streets, parking lots, sidewalks and trails must be cleaned and swept whenever

tracking of sediments occurs but no later than the end of each business day. Establishment of a regular sweeping schedule is encouraged.

E. *Catch basins.* All newly installed and rehabilitated catch basins immediately prior to rivers, lakes, streams, or wetlands must be provided with a minimum three (3) foot sump area for collecting coarse-grained material or a permanent sedimentation pond between the outlet and such water bodies.

F. *City Inspections.* The applicant shall be responsible for all required erosion and sediment inspections required in the approved Stormwater Pollution Prevention Plan. The City may perform inspections to ensure conformance with this section. The applicant and/or builder shall provide access to the site and address any deficiencies noted by the City to maintain proper erosion and sediment control at all sites within the timeframes noted in this section and the Construction Stormwater Permit. In cases where cooperation is withheld, construction stop orders may be issued by the City, until erosion and sediment control measures are compliant with the Construction Stormwater Permit and this section. Follow up erosion and sediment control/grading inspections must then be scheduled and passed before the construction stop order is lifted or any other inspections will be done.

G. *Inspection and Maintenance.* All stormwater pollution control management facilities must be designed to minimize the need of maintenance, to provide easy vehicle and personnel access for maintenance purposes, and be structurally sound. The City or its designated representative shall inspect all stormwater management facilities during construction and during the first year of operation.

H. *Private Facilities.* Where private facilities are allowed by the City Council the applicant must provide as part of the design a plan of operation and maintenance. The plan must indicate the responsible party or parties charged with the long term maintenance, repair, or replacement of the facilities. The plan shall also include information on the intended final ownership of the properties containing such facilities and the means by which inspection, maintenance, repair, or replacement when necessary shall be funded and accomplished and the party that will be responsible for the operation and maintenance. The details shall be included in an agreement that shall be recorded against the property being developed. In addition, the agreement shall provide for:

1. Access in perpetuity for inspection of the facilities by the City.
2. Access in perpetuity for maintenance of the facilities should the City find that storm water facility maintenance is required and upon written notice the property owners fail to take corrective action with the cost of such maintenance to be paid by the property owner.
3. If upon inspection, the City finds that any private stormwater management facilities require maintenance, repair, or replacement, but such deficiencies do not create a critical or imminent threat to adjacent properties, the environment, or other stormwater facilities; the party or parties responsible for the continued operation of the facilities shall be given written notice of the findings.
4. If upon inspection, the City finds that any private stormwater water management facilities require maintenance, repair, or replacement and such deficiencies create a critical or imminent threat to adjacent properties, the environment, or other stormwater facilities, the City may take immediate corrective action and charge the costs to the properties identified in the agreement as benefiting from the private stormwater facilities. The City Council shall, by appropriate resolution, assess the costs including appropriate administrative fees against said properties, and certify the same to the County Assessor of Anoka County, Minnesota.

(Ord. 234 , SS, 10-16-2017)

10-93-6. - Permanent stormwater pollution controls.

A. *Stormwater Fees.* The applicant shall install or construct, and pay all appropriate City Stormwater Fees for all stormwater management facilities necessary to manage increased runoff, so that the proposed stormwater runoff rates and water quality meet the criteria in this section.

B. *Maintenance of Existing Facilities.* Maintenance of existing permanent pollution controls that do not have adequate capacity to meet the runoff and water quality criteria of this section shall not be accepted in lieu of new or retrofit permanent stormwater pollution controls.

C. *Community Stormwater Management Facilities.* The applicant shall also make an in-kind or monetary contribution to the development and maintenance of community stormwater management facilities designed to serve multiple land disturbing and development activities undertaken by one or more persons, including the applicant.

D. *Calculations.* All calculations and information used in the design shall be submitted along with the Stormwater Pollution Prevention Plan for the review and approval of the City Engineer.

E. *Minimum Design Standards for all Stormwater Facilities.*

1. At a minimum these facilities must conform to the most current technology as reflected in the current version of the Minnesota Pollution Control Agency's publication, "The Minnesota Stormwater Manual" and the Construction Stormwater Permit, and the Upper Rum River Watershed Management Organization's Watershed Management Plan including all amendments.
2. Major stormwater facilities (i.e., ponds, pond outlet systems, and major conveyance systems) shall be designed for a return period of one hundred (100) years.
3. All minor drainage systems (i.e., piped collection systems and minor conveyance systems) shall be designed for a return period of ten (10) years.
4. Minimum building (low floor) elevations shall be above in-situ, designed or designated water levels. The lowest building floor elevation shall be three (3) feet above mottled soils or the highest known or anticipated water table, whichever is higher. The City Engineer may allow deviation from these separations if the applicant submits evidence certified by a Licensed Geotechnical Engineer that a lesser separation can be

achieved. Certification by a Licensed Geotechnical Engineer shall include field monitoring of the groundwater with piezometers to establish the highest anticipated ground water elevation.

5. Minimum opening elevations shall be above designed or designated flood levels. The minimum building opening elevation shall be one and a half (1.5) feet above the 100-year flood level or emergency overflow elevation. The 100-year flood level shall be the highest 100-year level resulting from a single event analysis; the 100-year, 10-day snowmelt event; a multiple day runoff event analysis, or the critical event analysis.
6. Landlocked runoff basins shall be sized to handle back-to-back 100-year SCS twenty-four (24) hour rainfall events, the ten (10) inch SCS twenty-four (24) hour rainfall event or the 100-year, 10-day snowmelt snow melt event, whichever produces the higher peak pond elevation (Landlocked high water level). The lowest building floor elevation around landlocked basins shall be two (2) feet above the Landlocked high water level.
7. Emergency overflows or outlets to drainage systems shall be provided to any landlocked area if the available stormwater storage capacity is inadequate to prevent flooding of residences and if the available downstream conveyance system capacity is adequate to accept additional flow.
8. The area of a pond's HWL plus one (1) foot of freeboard shall be contained entirely within an outlot that is owned by the City or within a drainage and utility easement..

(Ord. 234 , SS, 10-16-2017)

10-93-7. - Review.

The City Engineer shall review the Stormwater Pollution Prevention Plan.

A. *Permit Issued.* If the City determines that the Stormwater Pollution Prevention Plan meets the requirements of this section, the City shall issue a permit valid for a specified period of time that authorizes the land disturbance activity contingent on the implementation and completion of the approved plan.
B. *Denial.* If the City determines that the Stormwater Pollution Prevention Plan does not meet the requirements of this section, the City shall not issue a permit for the land disturbance activity. All land use and building permits must be suspended until the applicant has an approved Stormwater Pollution Prevention Plan.

(Ord. 234 , SS, 10-16-2017)

10-93-8. - Modification of plan.

An approved Stormwater Pollution Prevention Plan may be modified upon submission of a written application for modification to the City, and after written approval by the City Engineer. In reviewing such an application, the City Engineer may require additional reports and data.

(Ord. 234 , SS, 10-16-2017)

10-93-9. - Financial securities.

The applicant shall provide security for the performance of the work described and delineated on the approved grading plan involving the Stormwater Pollution Prevention Plan related remedial work in an amount of $2,000 per gross acre or $750 for each single or twin family home, whichever is greater. This security must be available prior to commencing the project. The form of the securities must be;

A. *Currency.* The first $10,000 (in U.S. currency) or fifteen (15) percent, whichever is greater, of this financial security must be by cash deposit to the City.
B. *Deposit.* Deposit, either with the City, a responsible escrow agent, or trust company, at the option of the City, money, negotiable bonds of the kind approved for securing deposits of public money or other instruments of credit from one or more financial institutions, subject to regulation by the state and federal government wherein said financial institution pledges that the funds are on deposit and guaranteed for payment. The type of security must be of a type acceptable to the City.
C. *Financial Security.* The City may request a greater financial security, if the City considers that the development site is especially prone to erosion or the resource to be protected is especially valuable.
D. *Maintaining the Financial Security.* If at any time during the course of the work the security falls below fifty (50) percent of the required deposit, the applicant shall make another deposit in the amount necessary to restore the cash deposit to the required amount.
    1. If the applicant does not bring the financial security back up to the required amount within seven (7) days after notification by the City that the amount has fallen below fifty (50) percent of the required amount the City may:
        a. Withhold the scheduling of inspections and/or the issuance of a Certificate of Occupancy.
        b. Revoke any permit issued by the City to the applicant for the site in question or any other of the applicant's sites within the City's jurisdiction.
E. *Proportional Reduction of the Financial Security.* When more than half of the development's exposed soil area achieves final stabilization, the City may reduce the total required amount of the financial security by half, if recommended by the City Engineer.

F. *Action Against the Financial Security.* The City may act against the financial security if any of the conditions listed below exist. The City shall use funds from this security to finance remedial work undertaken by the City, a private contractor hired by the City, or to reimburse the City for all direct costs incurred in the process of remedial work including, but not limited to, staff time, consultant time, and attorney's fees.

1. The applicant ceases land disturbing activities and/or filling and abandons the work site prior to completion of final stabilization.
2. The applicant fails to conform to the grading plan and/or the Stormwater Pollution Prevention Plan as approved by the City.
3. The permanent stormwater control measures required by this section fail within one year of site final stabilization.
4. The applicant fails to reimburse the City for corrective action taken under this section.

G. *Returning the Financial Security.* Any unspent amount of the financial security deposited with the City for faithful performance of the Stormwater Pollution Prevention Plan and any Stormwater Pollution Prevention Plan related remedial work may be released one full year after the completion of the installation of all stormwater pollution control measures as shown on the grading and/or Stormwater Pollution Prevention Plan and establishment of final stabilization.

(Ord. 234 , SS, 10-16-2017)

10-93-10. - Right of entry and inspection.

A. *Powers.* The permitee shall allow the City and their authorized representatives, upon presentation of credentials to:

1. Enter upon the permitted site for the purpose of obtaining information, examination of records, conducting investigations or surveys.
2. Bring such equipment upon the permitted development as is necessary to conduct such surveys and investigations.
3. Examine and copy any books, papers, records, or memoranda pertaining to activities or records to be kept under the terms and conditions of this permitted site.
4. Inspect the stormwater pollution control measures required as part of the Storm Water Pollution Prevention Plan.
5. Sample and monitor any items or activities pertaining to permits issued by the City.

(Ord. 234 , SS, 10-16-2017)

10-93-11. - Notification of failure of the stormwater pollution prevention plan.

A. *Notification by the City.* The initial contact will be to the party or parties listed on the application and/or the Stormwater Pollution Prevention Plan. Forty-eight (48) hours after notification by the City or seventy-two (72) hours after the failure of erosion control measures, whichever is less, the City, at its discretion, may begin corrective work.

B. *Erosion Off-Site.* If erosion breaches the perimeter of the site, the applicant shall immediately develop a cleanup and restoration plan, obtain the right-of-entry from the adjoining property owner, and implement the cleanup and restoration plan within forty-eight (48) hours of obtaining the adjoining property owner's permission. In no case, unless written approval is received from the City, shall more than seven (7) calendar days lapse without corrective action being taken. If in the discretion of the City, the applicant does not repair the damage caused by erosion, the City may do the remedial work required and charge the cost to the applicant.

C. *Erosion into Streets, Wetlands or Water Bodies.* If eroded soils (including tracked soils from construction activities) enter or appear likely to enter streets, wetlands or other water bodies, prevention strategies, cleanup and repair must be immediate. The applicant shall provide all traffic control and flagging required to protect the traveling public during the cleanup operations.

D. *Failure to Do Corrective Work.* When an applicant fails to conform to any provision of this policy within the time stipulated, the City may take the following actions:

1. Withhold the scheduling of inspections and/or the issuance of a Certificate of Occupancy.
2. Revoke any permit issued by the City to the applicant for the site in question or any other of the applicant's sites within the City's jurisdiction.
3. Direct the correction of the deficiency by the City or by a separate contract. The issuance of a permit constitutes a right-of entry for the City or its contractor to enter upon the construction site for the purpose of correcting deficiencies in erosion control.
4. All costs incurred by the City in correcting stormwater pollution control deficiencies must be reimbursed by the applicant. If payment is not made within thirty (30) days after costs are incurred by the City, payment will be made from the applicant's financial securities as described in this section.
5. If there is an insufficient financial amount, in the applicant's financial securities as described in this section to cover the costs incurred by the City, then the City may assess the remaining amount against the property. As a condition of the permit, the owner shall waive notice of any assessment hearing to be conducted by the City, concur that the benefit to the property exceeds the amount of the proposed assessment, and waive all rights by virtue of Minnesota Statute 429.081 to challenge the amount or validity of assessment.

(Ord. 234 , SS, 10-16-2017)

10-93-12. - Illicit discharge.

No person shall throw, deposit, place, leave, maintain, or keep nor permit to be thrown, placed, left, maintained or kept, any refuse, rubbish, garbage, or any other discarded or abandoned objects, articles, accumulations, or pollutants, in or upon any street, alley, sidewalk, storm drain, inlet, catch basin conduit or drainage structure, business place, or upon any public or private plot of land in the City, so that the same might enter a public water, except in containers, recycling bags, or other lawfully established waste disposal facility.

A. *Illegal Discharges.* No person shall cause any illegal discharge to enter the municipal storm water system unless such discharge:
    1. Consists of non-storm water that is authorized by an NPDES point source permit obtained from the MPCA; or
    2. Is associated with firefighting activities.
B. *Good Housekeeping Provisions.* Any owner or occupant of property within the City shall comply with the following good housekeeping requirements:
    1. No person shall leave, deposit, discharge, dump, or otherwise expose any chemical or septic waste in an area where discharge to streets or storm drainage system may occur. This section shall apply to both actual and potential discharges.
    2. Runoff of water from residential property shall be minimized to the maximum extent practicable. Runoff of water from the washing down of paved areas in commercial or industrial property is prohibited unless necessary for health or safety purposes and not in violation of any other provisions in the City's codes.
C. *Storage of Materials, Machinery, and Equipment.* Objects, such as motor vehicle parts, containing grease, oil or other hazardous substances, and unsealed receptacles containing hazardous materials, shall not be stored in areas susceptible to runoff. Any machinery or equipment which is to be repaired or maintained in areas susceptible to runoff shall be placed in a confined area to contain leaks, spills, or discharges.
D. *Removal of Debris and Residue.* All motor vehicle parking lots located in areas susceptible to runoff shall be swept to remove debris. Such debris shall be collected and properly disposed. Fuel and chemical residue or other types of potentially harmful material, such as animal waste, garbage or batteries, which is located in an area susceptible to runoff, shall be removed as soon as possible and disposed of properly in accordance with all State and Local requirements.

(Ord. 234 , SS, 10-16-2017)

10-93-13. - Enforcement.

The City is responsible for enforcement of this section.

A. The City has adopted Enforcement Response Procedures (ERP) that includes increasing penalties for Illicit Discharges of Pollutants. The ERP is hereby referenced as part of this section.
B. Any person who has violated or continues to violate the provisions of this section, may be subject to the enforcement actions outlined in this section or may be restrained by injunction or otherwise abated in a manner provided by law.
C. In the event the violation constitutes an immediate danger to public health or public safety, the City is authorized to enter upon the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property. The City is authorized to seek costs of the abatement as outlined in this section.

(Ord. 234 , SS, 10-16-2017)

10-93-14. - Abrogation and greater restrictions.

No part of this section is intended to repeal, abrogate, or impair any existing easements, covenants, or deed restrictions. However, where this section imposes greater restrictions, the provisions of this section shall prevail. All other ordinances inconsistent with this section are hereby repealed to the extent of the inconsistency only.

(Ord. 234 , SS, 10-16-2017)

10-93-15. - Severability.

The provisions of this section are severable, and if any provisions of this section, or application of any provision of this section to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this section must not be affected thereby.

(Ord. 234 , SS, 10-16-2017)

Attachment 3C: City Ordinance 10.16.4

10-16-4. - Erosion and drainage.

A. *Minnesota Pollution Control Agency (MPCA) Requirements:* Every applicant for a building permit, subdivision approval, or a grading permit to allow land disturbing activities shall adhere to erosion control measure standards and specifications contained in the MPCA publication "Protecting Water Quality in Urban Areas", as may be amended, or as approved by the City Engineer and applicable City's stormwater management requirements as stated in Chapter 93 of this Ordinance.

B. *Prohibited Development:* No land shall be developed and no use shall be permitted that results in water runoff causing flooding, erosion, or deposit of sediment on adjacent properties. Such runoff shall be properly channeled into a storm drain, watercourse, ponding area, or other public facilities subject to the review and approval of the City Engineer.

C. *Stormwater Management:* All residential, commercial, industrial, and institutional developments shall satisfy the provisions of the Subdivision Ordinance in regard to stormwater management and the City's Stormwater Management Plan.

D. *City Engineer Approval:* In the case of all single-family lots, multiple-family lots, business, industrial and institutional developments, the drainage and erosion control plans shall be subject to the City Engineer's written approval. No modification in grade and drainage flow through fill, cuts, erection of retaining walls or other such actions shall be permitted until such plans have been reviewed and received written approval from the City Engineer.

E. *Approval Of Erosion Control Measures:* Proposed erosion control measures may be approved by the City Engineer as part of grading plan review. Erosion control may be specified by the City Engineer as part of a site survey for individual building permits. Erosion control measures may also be specified by the City Engineer as needed and deemed appropriate during the construction and post-construction periods separate from the above.

F. *Storm Sewer Inlets:* All storm sewer inlets which are functioning during construction shall be protected so that sediment laden water does not enter the conveyance system without first being filtered or otherwise treated to remove sediment.

G. *Stormwater Channels:* All on-site stormwater conveyance channels shall be designed and constructed to withstand the design volume of stormwater with appropriate stabilization to prevent scour and erosion. Erosion controls shall be provided at the outlets of all storm sewer pipes.

H. *Sediment Control Practices:* All temporary and permanent erosion and sediment control practices shall be maintained and repaired whenever necessary to assure the continued performance of their intended function.

I. *Tracking:* Each site shall have graveled roads, access drives and parking areas of sufficient width and length to prevent sediment from being tracked onto public or private roadways. Any sediment reaching a public or private road shall be removed by street cleaning (not flushing) before the end of each workday.

J. *Seeding:* All disturbed ground left inactive for seven (7) or more days shall be stabilized by seeding or sodding or by mulching or covering or other equivalent control measure.

K. *Sites One Acre and More:* For sites with more than one (1) acre or more disturbed at one time, or if a channel originates in the disturbed area, one or more temporary or permanent sedimentation basins shall be constructed. Each sedimentation basin shall have a surface area of at least one (1) percent of the area draining to the basin and at least three (3) feet of depth and constructed in accordance with accepted design specifications. Sediment shall be removed to maintain a depth of three (3) feet. The basin discharge rate shall also be sufficiently low as to not cause erosion along the discharge channel or the receiving water.

L. *Sites Under One Acre:* For sites with less than one (1) acre disturbed at one time, silt fences, straw bales, or equivalent control measures shall be placed along all side slope and down slope sides of the site. If a channel or area of concentrated runoff passes through the site, silt fences shall be placed along the channel edges to reduce sediment reaching the channel. The use of silt fences, straw bales, or equivalent control measures must include a maintenance and inspection schedule.

M. *Removal:* All temporary erosion control devices including silt fence, gravel, hay bales or other measures shall be removed from the construction site and properly disposed of or recycled. This removal and disposal shall occur within thirty (30) days of the establishment of permanent vegetative cover on the disturbed area.

N. *Site Dewatering:* Water pumped from the site shall be treated by temporary sedimentation basins, grit chambers, sand filters, up flow chambers, hydro-cyclones, swirl concentrators or other appropriate controls as appropriate. Water may not be discharged in a manner that causes erosion or flooding of the site or receiving channels of a wetland. All dewatering shall be in accordance with all applicable County, State, and Federal rules and regulations.

O. *Waste And Material Disposal:* All waste and unused building materials (including garbage, debris, cleaning wastes, waste water, toxic materials or hazardous materials) shall be properly disposed of off-site and not allowed to be carried by runoff into a receiving channel or storm sewer system.

P. *Foundation, Garage Floor:* Unless approved by the City Engineer, the top of the foundation and garage floor of all structures shall be at least eighteen (18) inches above the grade of the crown of the street. Elevations shall be in accordance with the approved grading plan for the development.

Q. *Stop Work Order:* The City's Building Official or City Engineer may issue stop work orders for any violation of this Ordinance.

4 Enforcement Response Procedures

4.1 ERP Method

The MS4 permit requires the City to have written enforcement response procedures (ERPs) to enforce and compel compliance with the regulatory mechanisms for illicit discharge, construction stormwater runoff control, and post-construction stormwater management. The City of St. Francis has a written ERP document, which is attached at the end of this section (**Attachment 4A**).

4.2 ERP Documentation

Any enforcement response procedures conducted by the City must be documented. The documentation must include:

1. Name of the person responsible for violating the terms and conditions of the City's regulatory mechanism
2. Date(s) and location(s) of the observed violation(s)
3. Description on the violation(s), including reference(s) to relevant City ordinance
4. Corrective action(s) (including completion schedule) issued by the City
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Attachment 4A: Enforcement Response Procedures

CITY OF ST. FRANCIS

Enforcement Response Procedures

(ERPs) for

MS4 Permit Violations

2016

Under the terms of the General NPDES/SDS Permit MNR040000, the City is required to develop and implement adequate enforcement authority for illicit discharges into its Municipally Separate Storm Sewer System (MS4). The purpose of these Enforcement Response Procedures is to communicate how the enforcement tools available to the City will be used to achieve compliance. The Enforcement Response Procedures also specify criteria by which City personnel can determine the enforcement action most appropriate to instances of non-compliance. This plan is a document of the City's procedure to be followed when a construction stormwater requirement, illicit discharge and post-construction violation is discovered. This plan is a guide; any of the enforcement responses may be used at the City's discretion. The City may also choose to pursue an enforcement case by skipping intermediate steps.

I. Description of Each Type of Enforcement Response

A. Written Notices

1. Field Compliance Order

a) Upon visiting the site, a City representative may observe issues on non-compliance. If the non-compliance has not yet resulted in a discharge of pollution, including sediment, the City's representative will issue a written warning, either by email or letter specifying the nature of the violation, the required corrective action and a follow-up inspection date. The Field Compliance Order will note that failure to comply resulting in a discharge of pollution is likely to result in a civil penalty.

2. Notice of Violation (NOV)/Civil Penalty/Permit Revocation

a) If, upon a site inspection, a City representative observes non-compliance that has resulted in a discharge of pollution, including sediment, the representative will issue:

(1) A Notice of Violation for discharges that can be satisfactorily corrected without evidence of property or environmental damage.

i) The NOV will specify the nature of the violation, the required corrective action and a follow-up inspection date.

ii) The NOV will require the party committing the violation (perpetrator) to submit an explanation of the violation and a plan for the satisfactory correction and prevention of the violation conditions, including specific required actions within five (5) days.

iii) If corrective action is not satisfactorily completed by the follow-up inspection date, the City Representative will:

- Revoke the current building or construction permits where applicable. Revoked permits shall only be reinstated after the permitee has reapplied for the permit, complete with a permit fee and an approved plan for preventing similar pollutant discharges.
- Issue a Civil Penalty where no building or construction permits exist.

3. Consent Orders

a) Consent Orders are written agreements that allow the perpetrator to accept responsibility for the discharge and provide the opportunity to voluntarily clean-up and/or correct a pollutant or sediment discharge as a way to reduce the additional damage penalty associated with cleanup costs.

(1) Consent Orders will only be issued to perpetrators that can provide documentation verifying that the perpetrator is qualified to handle the required cleanup.

(2) The City Administrator is empowered to enter into consent orders with the perpetrator on behalf of the City.

(3) Where the discharge and cleanup area affects private (third party) properties, Consent Orders must be approved by all parties affected.

b) A consent order will include specific corrective actions to be taken to correct the illicit or sediment discharge together with specified time periods to finish the corrective actions.

4. Civil Penalty

a) Civil penalty procedures established herein are intended to provide the public and the City with an informal, cost effective, and expeditious method for addressing violations.

b) The City Administrator or designee shall, upon determining that there has been a violation, notify the violator. Said notice shall set forth the nature, date and time of violation, the name of the official issuing the notice, and the amount of the scheduled penalty.

(1) Civil penalties will depend on the extent of the damages.

i) The minimum automatic fine shall be as set forth in the City Municipal Fee Schedule, except that the City may waive all or part of the financial penalty for the first offense if timely and substantial effort has been made to correct the discharge.

ii) Consent Orders as described herein may be accepted in lieu of damage penalties.

iii) In addition to civil penalties, the City may recover all damages proximately caused by the violator to the City, which may include:

- reasonable expenses incurred in investigating violations of, and enforcing compliance with City Ordinances regulating the illicit discharge of pollutants or sediment, or any other actual damages caused by the violation.
- The costs of the City's maintenance of stormwater facilities when the user of such facilities fails to maintain them.

c) Once such notice is given, the alleged violator may, within five business days of the date of issuance of the notice, pay the amount set forth on the schedule of penalties for the violation, or may request a hearing in writing, as is provided for hereafter. The penalty may be paid in person or by mail, and payment shall be deemed to be an admission of the violation.

(1) Any person contesting a civil penalty may, within five business days of the date of issuance of the notice, request a hearing by a hearing officer who shall forthwith conduct an informal hearing to determine if a violation has occurred. The hearing officer shall have authority to dismiss the violation or reduce or waive the penalty. If the violation is sustained by the hearing officer, the violator shall pay the penalty imposed.

(2) A City representative designated in writing by the City Clerk-Administrator shall be the hearing officer. The hearing officer is authorized to hear and determine any controversy relating to civil penalties provided for in this article.

5. Cease and Desist Order

a) The City Administrator or designee may issue a Cease and Desist Order effectively stopping all work on a site where there is a clear violation, continued violation, or blatant disregard for:
   (1) City Ordinances regulating the illicit discharge of pollutants or sediment
   (2) Building or Construction Stormwater permit requirements
   (3) Previously issued Field Compliance Orders, Notices of Violation, or Civil Penalty associated with the site of the illicit or sediment discharge.

b) This order requires that the violator must comply with the order and must take appropriate remedial or preventive action as may be needed to properly address a continuing or threatened violation; including halting all operations on the site except for authorized cleanup, terminating the discharge and installing appropriate control measures.

c) If not previously issued, all Cease and Desist Orders shall automatically include a Civil Penalty.

B. Suspension, Revocation or Modification of Permit

1. The City may suspend, revoke or modify any City issued permit authorizing the land development project or any other project of the applicant or other responsible person within the City.
2. A suspended, revoked or modified permit may be reinstated after the applicant or other responsible person has taken the remedial measures set forth in the Written Notice (See Section A) or has otherwise acceptably corrected the violation(s) described therein.

C. Additional Measures

1. Legal Action
   a) The City may bring legal action to enjoin continuing violation. Pursuant to the City's Ordinance; the City may, through the City Attorney, petition the appropriate court(s) for issuance of preliminary or permanent injunctions to restrain or compel activities by a violator.
2. Future Permits
   a) The City may withhold permits from Contractors with outstanding Civil Penalties until all Civil Penalties have been paid.
   b) Contractors that have had two or more Civil Penalties within the previous 12-calendar months shall be required to deposit a cash surety equal to double the surety amount normally required for each permit obtained.
   c) Contractors that work without required permits or under permits obtained by others in an attempt to avoid the requirements of this section shall be subject to the provisions of this ERP including but not limited to Civil Penalties, Cease and Desist Order, Suspension and/or Revocation of related permits, and Legal Action.

II. NPDES Permit Referrals

A. For a known project site involving a construction activity, an industrial stormwater discharge, or an illicit discharge that should be covered by a state NPDES permit, and is known not to have a state NPDES permit, the City shall provide the following information to the MPCA:
   1. Construction project or industrial facility location;
   2. Name of owner or operator;
   3. Estimated construction project size or type of industrial activity (including SIC code if known); and
   4. Records of communication with the owner or operator regarding filing requirements.

B. Where the City has used progressive enforcement to achieve compliance with this chapter and in the judgment of the City has not been successful, the City may refer the violation to the MPCA. For the purposes of this provision, "progressive enforcement" shall mean two (2) follow-up inspections and two (2) Written Notices. The following information shall be supplied to the MPCA:
   1. Construction project or industrial facility location;
   2. Name of owner or operator;
   3. Estimated construction project size or type of industrial activity (including SIC code if known)
   4. Records of communication with the owner or operator regarding the violation, including at least two follow-up inspections, two warning letters or notices of violation, and any response from the owner or operator.

III. Recordkeeping & Tracking

A. All non-compliance instances shall be tracked either electronically or using paper files. This tracking will include all records and documents related to stormwater ordinance violations at the site and be stored in the enforcement case file.

B. The minimum required documentation must include the following items:
   1. Name of owner/operator;
   2. Location of construction project or industrial facility;
   3. Description of violation;
   4. Required schedule for returning to compliance;
   5. Description of enforcement responses used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner;
   6. Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violation, etc.);
   7. Any referrals to different departments or agencies; and
   8. Date violation was resolved.

C. The City shall use the non-compliance records and tracking to identify any chronic violators, and use this information to work toward reducing the rate of noncompliance relapse.

1. This will include tracking violations, applying incentives and/or disincentives, and increasing the inspection frequency of the consistently noncompliant operator's sites.
2. If the operator fails to take corrective actions, the City must pursue progressive enforcement and, if need be, perform the necessary work and assess against the owner the costs incurred for repairs.

D. The City shall keep enforcement files in compliance with the City's records retention policy but no less than a minimum of three (3) years after the file is closed consistent with the MS4 General Permit conditions. Files retention may be either paper or digital files.

IV. Enforcement Action Matrices

A. Construction Site Stormwater Ordinance Violations

1. See Table 1 for the enforcement action matrix for noncompliance with construction requirements. In general, the severity of the enforcement measure increases moving down the matrix.
2. For parties who fail to obtain a required permit prior to begin of land disturbance work, the initial enforcement action may be more stringent than for a project that has an approved plan but has failed to comply with the approved plan.
    a) The City has the ability to stop project work for non-permittees. Stopping work generally includes **all** work on the site except for work to address the noncompliance that caused the order.
    b) Non-permittees may be required to perform corrective actions as advised by the City and to develop the required erosion control and/or stormwater plan submittals to submit to the City for review and approval.
    c) Once the corrective actions have been successfully completed and the submitted stormwater plan has been approved by the City, the City will issue the violator a written notice that the situation has been resolved.
    d) If the corrective actions or the submitted plan cannot be approved, the City will issue a written notice to the violator describing what was deficient and what step(s) are needed to resolve the situation.

Table 1. Enforcement Action Matrix for Noncompliance with Construction Requirements.

<table>
<tr><th>Type of Violation</th><th>Failure to Obtain Permit Prior to Starting Work</th><th>Minor Violations (Failure to Install, Maintain or Upgrade Measures on Erosion and Sediment Control Plan)</th><th>Minor Violations (Failure to Install, Maintain or Upgrade Measures on Erosion and Sediment Control Plan for a Priority Area)</th><th>Major Violation (Failure to Install, Maintain or Upgrade Measures on Erosion and Sediment Control Plan that Resulted in a Sediment Release from the Project Site)</th><th>Repeat Violation by a Party (Same Site)</th><th>Repeat Violation by a Party (Different Site than initial Noncompliance Site)</th></tr>
<tr><td rowspan="5">Enforcement Measures For Use (Increasing Severity Moving Down the Chart)</td><td rowspan="2">Cease and Desist Order</td><td>Field Compliance Order</td><td>Field Compliance Order</td><td>NOV</td><td>Civil Penalty and/or Consent Order</td><td>NOV</td></tr>
<tr><td>NOV</td><td>NOV</td><td>Civil Penalty with or without Consent Order</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td>Civil Penalty with or without Consent Order</td></tr>
<tr><td rowspan="3">Legal Action</td><td>Civil Penalty with or without Consent Order</td><td>Civil Penalty with or without Consent Order</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td rowspan="3">Legal Action</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td></tr>
<tr><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td rowspan="2">Legal Action</td><td rowspan="2">Legal Action</td></tr>
<tr><td>Legal Action</td><td>Legal Action</td></tr>
</table>

This plan is a guide; any of the enforcement responses may be used at the City's discretion and the City may choose to escalate an enforcement case by skipping intermediate steps. Penalties (Civil, Recovery of Damages and Costs, Etc.) may be assessed as described in the stormwater ordinance and as allowed by law at the City's discretion.

B. Illicit Discharge Ordinance Violations

1. See Table 2 for the enforcement action matrix for failure to remove illicit discharges.
2. The action matrix was set up to provide varying suggested degrees of response to noncompliance documented by the City.
3. In general, the severity of the enforcement measure increases moving down the matrix.

Table 2. Enforcement Action Matrix for Failure to Remove Illicit Discharges.

<table>
<tr><th>Type of Violation</th><th>First Violation</th><th>Repeat Violation by a Party (Same Site)</th><th>Repeat Violation by a Party (Different Site than Initial Noncompliance Site)</th></tr>
<tr><td rowspan="6">Enforcement Measures For Use (Increasing Severity Moving Down the Chart)</td><td rowspan="2">Field Compliance Order</td><td>NOV</td><td rowspan="2">NOV</td></tr>
<tr><td>Civil Penalty with or without Consent Order</td></tr>
<tr><td>NOV</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td>Civil Penalty with or without Consent Order</td></tr>
<tr><td>Civil Penalty with or without Consent Order</td><td rowspan="3">Legal Action</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td></tr>
<tr><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td rowspan="2">Legal Action</td></tr>
<tr><td>Legal Action</td></tr>
</table>

This plan is a guide; any of the enforcement responses may be used at the City's discretion and the City may choose to escalate an enforcement case by skipping intermediate steps. Penalties (Civil, Recovery of Damages and Costs, Etc.) may be assessed as described in the stormwater ordinance and as allowed by law at the City's discretion.

C. Noncompliance with Post-Construction Requirements

1. See Table 3 for the enforcement action matrix for noncompliance with post- construction requirements.
2. The action matrix was set up to provide varying suggested degrees of response to noncompliance documented by the City.
3. In general, the severity of the enforcement measure increases moving down the matrix.

Table 3. Enforcement Action Matrix for Noncompliance with Post-Construction Requirements

<table>
<tr><th>Type of Violation</th><th>First Failure to Remove Illicit Discharge</th><th>Repeat Violation by a Party (Same Site)</th><th>Repeat Violation by a Party (Different Site than initial Noncompliance Site)</th></tr>
<tr><td rowspan="6">Enforcement Measures For Use (Increasing Severity Moving Down the Chart)</td><td rowspan="2">Field Compliance Order</td><td>NOV</td><td rowspan="2">NOV</td></tr>
<tr><td>Compliance Order or Consent Order</td></tr>
<tr><td>NOV</td><td>Civil Penalty with or without Consent Order</td><td>Civil Penalty with or without Consent Order</td></tr>
<tr><td>Civil Penalty with or without Consent Order</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td></tr>
<tr><td>Cease and Desist Order and/or Suspension, Revocation or Modification of Permit</td><td rowspan="2">Legal Action</td><td rowspan="2">Legal Action</td></tr>
<tr><td>Legal Action</td></tr>
</table>

This plan is a guide; any of the enforcement responses may be used at the City's discretion and the City may choose to escalate an enforcement case by skipping intermediate steps. Penalties (Civil, Recovery of Damages and Costs, Etc.) may be assessed as described in the stormwater ordinance and as allowed by law at the City's discretion.

SAMPLE INSPECTION AND MAINTENANCE AGREEMENT FOR PRIVATE STORMWATER MANAGEMENT FACILITIES

The term "STORMWATER MANAGEMENT FACILITIES" may refer to water quality and/or water quantity facilities (i.e. detention basins, retention basins, swales, pipes, oil/water separators, sand filtering devices, etc.) which are located OUTSIDE the public road right-of-way (ROW).

Property Identification ("Property"): _____ City Use: _____

Map: _____ Parcel No. _____ Land Disturbance Permit No. _____
Record Book: _____ Page No. _____

Project Name: _____
Project Address: _____
Owner(s): _____
Owner Address: _____
City: _____ State: _____ Zip Code: _____

SEE LEGAL DESCRIPTION ATTACHED HERETO AS EXHIBIT A.

This Inspection and Maintenance Agreement ("Agreement") is made and entered into this ____ day of _____, of the year, 20__, by and between _____ (hereinafter called the "Owner", whether one or more) and The City of St. Francis (hereinafter called "City").

WITNESSETH, that

WHEREAS, the City is required by federal and state surface water quality regulations and its National Pollutant Discharge Elimination System (NPDES) permit to prevent surface water quality degradation from development or redevelopment activities within its jurisdiction, and the City has adopted surface water quality regulations as required and such regulations are contained in the Stormwater Management chapter of the City Code; and

WHEREAS, the Owner of the Property identified above has or will construct certain stormwater management facilities on the Property, and has developed a Stormwater Maintenance Plan (Plan), as may be amended from time to time for the maintenance of those facilities. The City has reviewed and approved the Plan, and retains a copy in its records. A drawing showing the general area of the facilities covered by the Plan is attached to this Agreement for ease of identification.

NOW, THEREFORE, in consideration of the benefits received by the Owner as a result of the approval by the City of the Plan, the Owner does hereby covenant and agree with the City as follows:

1. The Owner shall provide adequate long term maintenance and continuation of the stormwater control measures described in the Plan, to ensure that all stormwater facilities are and remain in proper working condition. The Owner shall perform inspection and preventive maintenance activities in accordance with the Plan.

2. The Owner shall maintain a copy of the Plan on site, together with a record of inspections and maintenance actions required by the Plan. The Owner shall document the times of inspections, remedial actions taken to repair, modify or reconstruct the system, the state of control measures and notification of any planned change in responsibility for the system. The City may require that the Owner's records be submitted to the City.

3. If it is later determined that the City's NPDES permit clearly directs Owners or the City to manage stormwater treatment systems differently than specified in the Plan, the direction of the NPDES permit shall override the provisions of the Plan.

4. The Owner hereby grants permission to The City, its authorized agents, and employees the right of ingress, egress and access to enter the Property at reasonable times and in a reasonable manner for the purpose of inspecting, operating, installing, constructing, reconstructing, maintaining or repairing the facilities. The Owner hereby grants to the City the right to install and maintain equipment to monitor or test the performance of the stormwater control system for quality and quantity upon reasonable notice to the Owner. Whenever possible, The City shall notify the Land Owner prior to entering the property and shall use its best efforts not to disturb the Land Owner's use and enjoyment of the Property while conducting said inspections.

5. In the event, the City determines that the stormwater facilities are not being maintained in good working order and gives written notice to the Owner to repair, replace, reconstruct or maintain said facilities within a reasonable time (maximum time specified will be 30 days), and the Owner fails to comply with the City's notice within the time specified, Owner authorizes the City or its agents to enter upon the Property to repair, reconstruct, replace or perform maintenance on said facilities at the Owner's expense. It is expressly understood and agreed that the City is under no obligation to maintain or repair said facilities, and in no event shall this Agreement be construed to impose any such obligation on the City.

6. In the event, the City, pursuant to this Agreement, performs work of any nature, or expends any funds in the performance of said work for labor, use equipment, supplies, materials, and the like, the Owner shall reimburse the City upon demand, within forty-five (45) days of receipt of written request for reimbursement for all costs incurred by the City. If the City has not received said payment from the Owner by the end of said forty-five (45) day period,

the City may use any other remedies available by law to collect such balances plus reasonable expenses of collection, court costs, and attorney fees.

7. It is the intent of this Agreement to assure the City of proper maintenance of onsite stormwater facilities by the Owner; provided, however, that this Agreement shall not be deemed to create or affect any additional liability of any party for damage alleged to result from or be caused by stormwater management.

8. The Owner and the Owner's heirs, executors, administrators, assigns, and any other successors in interest, shall indemnify and hold the City and its agents and employees harmless for, and defend against at its own expense, any and all damages, accidents, casualties, occurrence, claims, or attorney's fees which might arise or be asserted, in whole or in part, against the City from the construction, presence, existence, or maintenance of the storm water control facilities subject to the Plan and this Agreement. In the event a claim is asserted against the City, its officers, agents or employees, the City shall notify the Owner, who shall defend at Owner's expense any suite or other claim. If any judgment or claims against the City shall be allowed, the Owner shall pay all costs and expenses in connection therewith. The City will not indemnify, defend or hold harmless in any fashion the Owner from any claims arising from any failure, regardless of any language in any attachment of other document that the Owner may provide.

9. No waiver of any provision of this Agreement shall affect the right of any party thereafter to enforce such provision or to exercise any right or remedy available to it in the event of any other default.

10. The Owner shall record this Agreement with the Register of Deeds of Anoka County, this Agreement shall constitute a covenant running with the land, and shall be binding upon the Owner and the Owner's heirs, administrators, executors, assigns, and any other successors in interest.

11. The Owner shall have the facilities inspected in accordance with City's stormwater management ordinance and certify to the City that the constructed facilities conform and purport substantially to the approved Plan. If the constructed condition of the facility or its performance varies significantly from the approved Plan, appropriately revised calculations shall be provided to the City and the Plan shall be amended accordingly.

12. The Owner agrees that for any systems to be maintained by a property owner's association, deed restrictions and covenants for the subdivision or other development will include mandatory membership in the property owner's association responsible for providing maintenance of the system, will require the association to maintain the stormwater system, will prohibit termination of this covenant by unilateral action of the association, and provide for

unpaid dues or assessments to constitute a lien upon the property of an owner upon recording a notice of non-payment.

13. This Agreement must be re-approved and re-executed by the City if all or a portion of the Property is subdivided or assembled with other property.

Owner: _____ Date: _____
Signature by Individual

Owner: _____ Date: _____
Signature by Individual

STATE OF _____)
)
COUNTY OF _____)

Personally appeared before me, the undersigned Notary Public of the state and county mentioned, _____, with whom I am personally aquatinted (or proved to me on the basis of satisfactory evidence), and executed this Agreement (Inspection and Maintenance Agreement for Private Stormwater Management Facilities) for the purposes contained herein.

Witness my hand an official seal at office, this _____ day of _____, of the year _____.

_____
Notary Public

_____
My Commission Expires:

Accepted By:

_____
For the City of St. Francis

STATE OF Minnesota

COUNTY OF Anoka

Personally appeared before me, the undersigned Notary Public of the state and county mentioned, _____, with whom I am personally aquatinted (or proved to me on the basis of satisfactory evidence), and executed this Agreement (Inspection and Maintenance Agreement for Private Stormwater Management Facilities) on behalf of the City of St. Francis for the purposes contained herein.

Witness my hand and official seal at office, this _____ day of _____, of the year _____ .

_____

Notary Public

_____

My Commission Expires:

5 Mapping and Inventory

5.1 Mapping

The City shall develop and or update a storm sewer system map that contains the following:

1. City's entire small MS4 as a goal, but at minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate
3. Structural stormwater BMPs that are part of the MS4
4. All receiving waters

The City's MS4 map is shown in **Attachment 5A**.

5.2 Inventory

The City shall complete an inventory of:

1. All ponds with the MS4 that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. Stormwater ponds do not include areas of temporary ponding, such as ponds that exist only during a construction project or short-term accumulations of water in road ditches.
2. All wetlands and lakes with the MS4 that collect stormwater via constructed conveyances.

The inventory can be found in **Attachment 5B**. The inventory was submitted to the MPCA on (date?).

Attachment 5A: Storm Sewer Map

City of St. Francis
MS4 Map

K:\cad_eng\PROJECTS\GIS\SF901\MS4 Map.mxd

Attachment 5B: MS4 Inventory

Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 Pond, Wetland, and Lake Inventory Form

Municipal Separate Storm Sewer System (MS4) Program

Name of MS4 Permitee	Date Form Completed	Unique ID Numbe	Type of Feature (Pond, Wetland or Lake)	Feature Common Name (If Applicable)	X Coordinate (Longitude) Decimal Degrees	Y Coordinate (Latitude) Decimal Degrees
St. Francis	5/31/2018	SP1	Storm Pond		-93.37705083460	45.38358565620
St. Francis	5/31/2018	SP2	Storm Pond		-93.37144694760	45.38379283120
St. Francis	5/31/2018	SP3	Storm Pond		-93.36856712200	45.38379421040
St. Francis	5/31/2018	SP4	Storm Pond		-93.36865667670	45.38432945550
St. Francis	5/31/2018	SP5	Storm Pond		-93.36906188800	45.38234622570
St. Francis	5/31/2018	SP6	Storm Pond		-93.35561926020	45.38445591370
St. Francis	5/31/2018	SP7	Storm Pond		-93.35437335160	45.38343916330
St. Francis	5/31/2018	SP8	Storm Pond		-93.35330582600	45.38233483460
St. Francis	5/31/2018	SP9	Storm Pond		-93.35189071640	45.38315920450
St. Francis	5/31/2018	SP10	Storm Pond		-93.36428653580	45.38056631410
St. Francis	5/31/2018	SP11	Storm Pond		-93.36371176320	45.38085818470
St. Francis	5/31/2018	SP12	Storm Pond		-93.35512495130	45.38504113530
St. Francis	5/31/2018	SP13	Storm Pond		-93.35197974420	45.37722795480
St. Francis	5/31/2018	SP14	Storm Pond		-93.35159642640	45.37822055570
St. Francis	5/31/2018	SP15	Storm Pond		-93.35140676320	45.37855639750
St. Francis	5/31/2018	SP16	Storm Pond		-93.33682061840	45.41157729050
St. Francis	5/31/2018	SP17	Storm Pond		-93.33415022850	45.41215404590
St. Francis	5/31/2018	SP18	Storm Pond		-93.33405829120	45.41167110970
St. Francis	5/31/2018	SP19	Storm Pond		-93.33282192730	45.41145404280
St. Francis	5/31/2018	SP20	Storm Pond		-93.33187598670	45.41171824580
St. Francis	5/31/2018	SP21	Storm Pond		-93.32960480070	45.41180332420
St. Francis	5/31/2018	SP22	Storm Pond		-93.31614816040	45.40660611780
St. Francis	5/31/2018	SP23	Storm Pond		-93.31350192780	45.41087447700
St. Francis	5/31/2018	SP24	Storm Pond		-93.31225596290	45.41066898840
St. Francis	5/31/2018	SP25	Storm Pond		-93.30844542880	45.41190387440
St. Francis	5/31/2018	SP26	Storm Pond		-93.31137223530	45.40862273740
St. Francis	5/31/2018	SP27	Storm Pond		-93.33398666960	45.39012968330
St. Francis	5/31/2018	SP28	Storm Pond		-93.33365111020	45.38927254340
St. Francis	5/31/2018	SP29	Storm Pond		-93.33384480190	45.39109335600
St. Francis	5/31/2018	SP30	Storm Pond		-93.33477441510	45.38852241420
St. Francis	5/31/2018	SP31	Storm Pond		-93.34116230870	45.38824136280
St. Francis	5/31/2018	SP32	Storm Pond		-93.34103062720	45.38753687800
St. Francis	5/31/2018	SP33	Storm Pond		-93.34193461750	45.38658686380
St. Francis	5/31/2018	SP34	Storm Pond		-93.37639077640	45.38815253830
St. Francis	5/31/2018	SP35	Storm Pond		-93.37476347440	45.38743637230
St. Francis	5/31/2018	SP36	Storm Pond		-93.38151034780	45.38682657990
St. Francis	5/31/2018	SP37	Storm Pond		-93.37475676090	45.38959120990
St. Francis	5/31/2018	SP38	Storm Pond		-93.33458764090	45.39363500490
St. Francis	5/31/2018	SP39	Storm Pond		-93.33775777460	45.39354253080

St. Francis	5/31/2018	SP40	Storm Pond		-93.33637722060	45.39258556970
St. Francis	5/31/2018	SP41	Storm Pond		-93.33726549460	45.39270840160
St. Francis	5/31/2018	SP42	Storm Pond		-93.33912276930	45.39274652280
St. Francis	5/31/2018	SP43	Storm Pond		-93.36985120960	45.39462012230
St. Francis	5/31/2018	SP44	Storm Pond		-93.37020772430	45.39392753270
St. Francis	5/31/2018	SP45	Storm Pond		-93.37744302920	45.39257114810
St. Francis	5/31/2018	SP46	Storm Pond		-93.37576474570	45.39130910450
St. Francis	5/31/2018	SP47	Storm Pond		-93.37558612740	45.39280022270
St. Francis	5/31/2018	SP48	Storm Pond		-93.37381522190	45.39376319030
St. Francis	5/31/2018	SP49	Storm Pond		-93.37601795190	45.39371550200
St. Francis	5/31/2018	SP50	Storm Pond		-93.37436974440	45.39125417970
St. Francis	5/31/2018	SP51	Storm Pond		-93.37479571890	45.38984994310
St. Francis	5/31/2018	SP52	Storm Pond		-93.38045826820	45.39400723630
St. Francis	5/31/2018	SP53	Storm Pond		-93.38024899800	45.39227762180
St. Francis	5/31/2018	SP54	Storm Pond		-93.37388527080	45.39515957690
St. Francis	5/31/2018	SP55	Storm Pond		-93.36996198080	45.39712013310
St. Francis	5/31/2018	SP56	Storm Pond		-93.36956512310	45.39747641270
St. Francis	5/31/2018	SP57	Storm Pond		-93.36637035810	45.39789081910
St. Francis	5/31/2018	SP58	Storm Pond		-93.35127779670	45.39658187320
St. Francis	5/31/2018	SP59	Storm Pond		-93.33538315530	45.39582273040
St. Francis	5/31/2018	SP60	Storm Pond		-93.33388152390	45.39597885280
St. Francis	5/31/2018	SP61	Storm Pond		-93.33244577690	45.39636200410
St. Francis	5/31/2018	SP62	Storm Pond		-93.33395848220	45.39481152440
St. Francis	5/31/2018	SP63	Storm Pond		-93.33153385070	45.39477511380
St. Francis	5/31/2018	SP64	Storm Pond		-93.33044783340	45.39475446800
St. Francis	5/31/2018	SP65	Storm Pond		-93.33104385500	45.39534509100
St. Francis	5/31/2018	SP66	Storm Pond		-93.35434405520	45.38526228870
St. Francis	5/31/2018	SP67	Storm Pond		-93.33873650930	45.38559194640
St. Francis	5/31/2018	SP68	Storm Pond		-93.33788485270	45.38558584070
St. Francis	5/31/2018	SP69	Storm Pond		-93.33740169180	45.38664697560
St. Francis	5/31/2018	SP70	Storm Pond		-93.33636201000	45.38645377900
St. Francis	5/31/2018	SP71	Storm Pond		-93.33522540500	45.38703988790
St. Francis	5/31/2018	SP72	Storm Pond		-93.33502669500	45.38580523040
St. Francis	5/31/2018	SP73	Storm Pond		-93.33368212310	45.38674762160
St. Francis	5/31/2018	SP74	Storm Pond		-93.33105768620	45.38585162810
St. Francis	5/31/2018	SP75	Storm Pond		-93.33181148590	45.38582873170
St. Francis	5/31/2018	SP76	Storm Pond		-93.33359832320	45.38513409810
St. Francis	5/31/2018	SP77	Storm Pond		-93.33108740570	45.38707871010
St. Francis	5/31/2018	SP78	Storm Pond		-93.34400018740	45.39026187860
St. Francis	5/31/2018	SP79	Storm Pond		-93.34225224740	45.39060664270
St. Francis	5/31/2018	SP80	Storm Pond		-93.34191892030	45.39069412720
St. Francis	5/31/2018	SP81	Storm Pond		-93.38141431190	45.39041259790
St. Francis	5/31/2018	SP82	Storm Pond		-93.37626727540	45.38983724580
St. Francis	5/31/2018	SP83	Storm Pond		-93.37660888810	45.38950353580
St. Francis	5/31/2018	SP84	Storm Pond		-93.37649114430	45.38914248420
St. Francis	5/31/2018	SP85	Storm Pond		-93.37048252880	45.38985331980
St. Francis	5/31/2018	SP86	Storm Pond		-93.36910202150	45.39132337930

St. Francis	5/31/2018	SP87	Storm Pond		-93.36155213480	45.38952887520
St. Francis	5/31/2018	SP88	Storm Pond		-93.35760493270	45.39218255890
St. Francis	5/31/2018	SP89	Storm Pond		-93.35718155600	45.39161727470
St. Francis	5/31/2018	SP90	Storm Pond		-93.34802133720	45.39066386970
St. Francis	5/31/2018	SP91	Storm Pond		-93.34495546840	45.39145510510
St. Francis	5/31/2018	SP92	Storm Pond		-93.34443889030	45.39163526770
St. Francis	5/31/2018	SP93	Storm Pond		-93.34430229860	45.39247170290
St. Francis	5/31/2018	SP94	Storm Pond		-93.34069674460	45.39028958730
St. Francis	5/31/2018	SP95	Storm Pond		-93.34016032500	45.39027415210
St. Francis	5/31/2018	SP96	Storm Pond		-93.34032172510	45.39197089660
St. Francis	5/31/2018	SP97	Storm Pond		-93.33620463390	45.39178388710
St. Francis	5/31/2018	SP98	Storm Pond		-93.33202161010	45.39235898360
St. Francis	5/31/2018	SP99	Storm Pond		-93.34679505230	45.38634261210
St. Francis	5/31/2018	SP100	Storm Pond		-93.36650174090	45.38696323900
St. Francis	5/31/2018	SP101	Storm Pond		-93.36478168580	45.38305255130
St. Francis	5/31/2018	SP102	Storm Pond		-93.36397795710	45.38300373650
St. Francis	5/31/2018	SP103	Storm Pond		-93.36616044120	45.38221211230
St. Francis	5/31/2018	SP104	Storm Pond		-93.34433014750	45.39540493580
St. Francis	5/31/2018	SP105	Storm Pond		-93.36999891670	45.38032369230
St. Francis	5/31/2018	SP106	Storm Pond		-93.36959155780	45.38038527750
St. Francis	5/31/2018	SP107	Storm Pond		-93.35279185270	45.38681029140
St. Francis	5/31/2018	SP108	Storm Pond		-93.34774344750	45.38740769140
St. Francis	5/31/2018	SP109	Storm Pond		-93.34771819750	45.38781740460
St. Francis	5/31/2018	SP110	Storm Pond		-93.31212895470	45.41248472520
St. Francis	5/31/2018	SP111	Storm Pond		-93.35532840130	45.39709905980
St. Francis	5/31/2018	SP112	Storm Pond		-93.36046306190	45.39568612930
St. Francis	5/31/2018	SP113	Storm Pond		-93.36450202690	45.39595931760
St. Francis	5/31/2018	SP114	Storm Pond		-93.36684691460	45.39345229530
St. Francis	5/31/2018	SP115	Storm Pond		-93.37951341440	45.38637524170
St. Francis	5/31/2018	SP116	Storm Pond		-93.40342103700	45.40931478540
St. Francis	5/31/2018	SP117	Storm Pond		-93.40325304340	45.40666506990
St. Francis	5/31/2018	SP118	Storm Pond		-93.39764528340	45.40658943330
St. Francis	5/31/2018	SP119	Storm Pond		-93.39604710130	45.40781992840
St. Francis	5/31/2018	SP120	Storm Pond		-93.39561241910	45.40944628100
St. Francis	5/31/2018	SP121	Storm Pond		-93.35904784120	45.39147645510
St. Francis	5/31/2018	SP122	Storm Pond		-93.28957645240	45.39955951250
St. Francis	5/31/2018	SP123	Storm Pond		-93.28572261660	45.40007275420
St. Francis	5/31/2018	SP124	Storm Pond		-93.28576883760	45.40091782760
St. Francis	5/31/2018	SP125	Storm Pond		-93.28853015180	45.40314496120
St. Francis	5/31/2018	SP126	Storm Pond		-93.28674467720	45.40294845170
St. Francis	5/31/2018	SP127	Storm Pond		-93.28469948850	45.40429388300
St. Francis	5/31/2018	SP128	Storm Pond		-93.29212743780	45.40415443940
St. Francis	5/31/2018	SP129	Storm Pond		-93.29119343180	45.40590893900
St. Francis	5/31/2018	SP130	Storm Pond		-93.28911455820	45.40624409570
St. Francis	5/31/2018	SP131	Storm Pond		-93.29348204550	45.40301806810
St. Francis	5/31/2018	SP132	Storm Pond		-93.40221855730	45.40357545090
St. Francis	5/31/2018	SP133	Storm Pond		-93.36285117210	45.39013386030

St. Francis	5/31/2018	SP134	Storm Pond		-93.36292389190	45.38940323270
St. Francis	5/31/2018	SP135	Storm Pond		-93.36275058200	45.38943954290
St. Francis	5/31/2018	SP136	Storm Pond		-93.34619884900	45.38720249140
St. Francis	5/31/2018	SP137	Storm Pond		-93.34819628430	45.39606068340
St. Francis	5/31/2018	WP1	Wastewater Pond		-93.37212580490	45.37972127350
St. Francis	5/31/2018	WP2	Wastewater Pond		-93.37005167160	45.37933653170
St. Francis	5/31/2018	WP3	Wastewater Pond		-93.37214083540	45.37899326800
St. Francis	5/31/2018	WP4	Wastewater Pond		-93.37146796050	45.37837019010
St. Francis	5/31/2018	WP5	Wastewater Pond		-93.37023452720	45.37835930010
St. Francis	5/31/2018	WP6	Wastewater Pond		-93.37334277650	45.37838941100
St. Francis	5/31/2018	WP7	Wastewater Pond		-93.37240565320	45.37837980750
St. Francis	5/31/2018	WP8	Wastewater Pond		-93.37340716570	45.37936970160
St. Francis	5/31/2018	WP9	Wastewater Pond		-93.37448149880	45.37890846560
St. Francis	5/31/2018	WP10	Wastewater Pond		-93.37487023200	45.37940200890
St. Francis	5/31/2018	WP11	Wastewater Pond		-93.37467568700	45.37987225210
St. Francis	5/31/2018	WL1	Wetland		-93.50942435930	45.38521950930
St. Francis	5/31/2018	WL2	Wetland		-93.50146637140	45.38455916280
St. Francis	5/31/2018	WL3	Wetland		-93.49980894620	45.38435780000
St. Francis	5/31/2018	WL4	Wetland		-93.49805436880	45.38490172320
St. Francis	5/31/2018	WL5	Wetland		-93.49654434050	45.38509442020
St. Francis	5/31/2018	WL6	Wetland		-93.42365986610	45.38318903840
St. Francis	5/31/2018	WL7	Wetland		-93.42565663770	45.38466678300
St. Francis	5/31/2018	WL8	Wetland		-93.44703658780	45.38324199550
St. Francis	5/31/2018	WL9	Wetland		-93.44707641310	45.38434567140
St. Francis	5/31/2018	WL10	Wetland		-93.47098638640	45.38522828520
St. Francis	5/31/2018	WL11	Wetland		-93.47444130330	45.38343215850
St. Francis	5/31/2018	WL12	Wetland		-93.47295069510	45.38413963700
St. Francis	5/31/2018	WL13	Wetland		-93.47694454660	45.38395629810
St. Francis	5/31/2018	WL14	Wetland		-93.46284222990	45.38435315470
St. Francis	5/31/2018	WL15	Wetland		-93.46348524160	45.38365116690
St. Francis	5/31/2018	WL16	Wetland		-93.47932998180	45.38401972370
St. Francis	5/31/2018	WL17	Wetland		-93.48125586000	45.38408955350
St. Francis	5/31/2018	WL18	Wetland		-93.48281029880	45.38493842860
St. Francis	5/31/2018	WL19	Wetland		-93.48104771210	45.38512437330
St. Francis	5/31/2018	WL20	Wetland		-93.50293744010	45.38501650920
St. Francis	5/31/2018	WL21	Wetland		-93.50587864430	45.38478979350
St. Francis	5/31/2018	WL22	Wetland		-93.50488522100	45.38436041700
St. Francis	5/31/2018	WL23	Wetland		-93.50449666160	45.38453929820
St. Francis	5/31/2018	WL24	Wetland		-93.46974751710	45.38408546820
St. Francis	5/31/2018	WL25	Wetland		-93.46805906410	45.38484261720
St. Francis	5/31/2018	WL26	Wetland		-93.46727408520	45.38506597700
St. Francis	5/31/2018	WL27	Wetland		-93.45435970680	45.38583770930
St. Francis	5/31/2018	WL28	Wetland		-93.40071319100	45.38413532640
St. Francis	5/31/2018	WL29	Wetland		-93.39351744040	45.38451073620
St. Francis	5/31/2018	WL30	Wetland		-93.50029807310	45.38492188820
St. Francis	5/31/2018	WL31	Wetland		-93.50879461310	45.38442448190
St. Francis	5/31/2018	WL32	Wetland		-93.50074294090	45.38755506310

St. Francis	5/31/2018	WL33	Wetland		-93.50257102050	45.38742625910
St. Francis	5/31/2018	WL34	Wetland		-93.41506965130	45.38494325950
St. Francis	5/31/2018	WL35	Wetland		-93.41472593340	45.38456680520
St. Francis	5/31/2018	WL36	Wetland		-93.41451817110	45.38495603540
St. Francis	5/31/2018	WL37	Wetland		-93.26343468410	45.39466196740
St. Francis	5/31/2018	WL38	Wetland		-93.26330300430	45.39509985960
St. Francis	5/31/2018	WL39	Wetland		-93.26362727130	45.39516720510
St. Francis	5/31/2018	WL40	Wetland		-93.26388205480	45.39556568060
St. Francis	5/31/2018	WL41	Wetland		-93.26410489530	45.41038313350
St. Francis	5/31/2018	WL42	Wetland		-93.26448435670	45.41309324210
St. Francis	5/31/2018	WL43	Wetland		-93.26455802760	45.41362718980
St. Francis	5/31/2018	WL44	Wetland		-93.26508033480	45.41049960400
St. Francis	5/31/2018	WL45	Wetland		-93.26380973660	45.38637129490
St. Francis	5/31/2018	WL46	Wetland		-93.26338717470	45.39590542600
St. Francis	5/31/2018	WL47	Wetland		-93.34908380000	45.38399758140
St. Francis	5/31/2018	WL48	Wetland		-93.34860756690	45.38331983360
St. Francis	5/31/2018	WL49	Wetland		-93.34869639800	45.38456483000
St. Francis	5/31/2018	WL50	Wetland		-93.34489299590	45.38375568960
St. Francis	5/31/2018	WL51	Wetland		-93.34359148890	45.38196079420
St. Francis	5/31/2018	WL52	Wetland		-93.32513719010	45.38403252490
St. Francis	5/31/2018	WL53	Wetland		-93.31713043100	45.38390853050
St. Francis	5/31/2018	WL54	Wetland		-93.31463524880	45.38411525540
St. Francis	5/31/2018	WL55	Wetland		-93.28533731940	45.38339217850
St. Francis	5/31/2018	WL56	Wetland		-93.31789744380	45.38344565510
St. Francis	5/31/2018	WL57	Wetland		-93.27659134770	45.38311328690
St. Francis	5/31/2018	WL58	Wetland		-93.27602409710	45.38417439480
St. Francis	5/31/2018	WL59	Wetland		-93.32907599050	45.37736506230
St. Francis	5/31/2018	WL60	Wetland		-93.33981846720	45.38203526190
St. Francis	5/31/2018	WL61	Wetland		-93.33647532530	45.38091131070
St. Francis	5/31/2018	WL62	Wetland		-93.34360540850	45.38023069040
St. Francis	5/31/2018	WL63	Wetland		-93.34224034370	45.38034747410
St. Francis	5/31/2018	WL64	Wetland		-93.34183522090	45.37871939170
St. Francis	5/31/2018	WL65	Wetland		-93.34471159880	45.37853438470
St. Francis	5/31/2018	WL66	Wetland		-93.34643248120	45.38013070800
St. Francis	5/31/2018	WL67	Wetland		-93.36724715440	45.38049328130
St. Francis	5/31/2018	WL68	Wetland		-93.31055874250	45.38456826520
St. Francis	5/31/2018	WL69	Wetland		-93.27546235190	45.38452821220
St. Francis	5/31/2018	WL70	Wetland		-93.27434827850	45.38449230990
St. Francis	5/31/2018	WL71	Wetland		-93.26961336080	45.38327312130
St. Francis	5/31/2018	WL72	Wetland		-93.35609473080	45.37636739420
St. Francis	5/31/2018	WL73	Wetland		-93.35399335280	45.37693715390
St. Francis	5/31/2018	WL74	Wetland		-93.35410936890	45.37684746850
St. Francis	5/31/2018	WL75	Wetland		-93.35338785640	45.37670308860
St. Francis	5/31/2018	WL76	Wetland		-93.35231300920	45.37693098850
St. Francis	5/31/2018	WL77	Wetland		-93.34475117860	45.37790906530
St. Francis	5/31/2018	WL78	Wetland		-93.34076198930	45.37734663590
St. Francis	5/31/2018	WL79	Wetland		-93.34051401900	45.37826650090

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St. Francis	5/31/2018	WL81	Wetland		-93.34021960760	45.37639361390
St. Francis	5/31/2018	WL82	Wetland		-93.34086246660	45.37584289110
St. Francis	5/31/2018	WL83	Wetland		-93.34182286070	45.37685415550
St. Francis	5/31/2018	WL84	Wetland		-93.34331272630	45.37685786020
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St. Francis	5/31/2018	WL88	Wetland		-93.34247395150	45.37575106720
St. Francis	5/31/2018	WL89	Wetland		-93.34474294450	45.37553911710
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St. Francis	5/31/2018	WL93	Wetland		-93.34009421580	45.37548724310
St. Francis	5/31/2018	WL94	Wetland		-93.33814955140	45.37580843780
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St. Francis	5/31/2018	WL102	Wetland		-93.33327664730	45.37696513950
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St. Francis	5/31/2018	WL112	Wetland		-93.35632255380	45.38132497160
St. Francis	5/31/2018	WL113	Wetland		-93.35901833800	45.38181725690
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St. Francis	5/31/2018	WL115	Wetland		-93.35767535300	45.38176940950
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St. Francis	5/31/2018	WL118	Wetland		-93.34465704530	45.37921311380
St. Francis	5/31/2018	WL119	Wetland		-93.33692547390	45.37435522440
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St. Francis	5/31/2018	WL124	Wetland		-93.37650158170	45.37727554510
St. Francis	5/31/2018	WL125	Wetland		-93.49619613020	45.40310178430
St. Francis	5/31/2018	WL126	Wetland		-93.49255062240	45.40126717080

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St. Francis	5/31/2018	WL156	Wetland		-93.29157565960	45.40705859570
St. Francis	5/31/2018	WL157	Wetland		-93.30818506170	45.40531642840
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St. Francis	5/31/2018	WL164	Wetland		-93.34963824380	45.40422537920
St. Francis	5/31/2018	WL165	Wetland		-93.38234925640	45.40367815760
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St. Francis	5/31/2018	WL216	Wetland		-93.46982256690	45.41343444190
St. Francis	5/31/2018	WL217	Wetland		-93.46882183170	45.41356463420
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St. Francis	5/31/2018	WL220	Wetland		-93.46747875250	45.41211947890

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St. Francis	5/31/2018	WL680	Wetland		-93.49976614130	45.39638198780
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St. Francis	5/31/2018	WL682	Wetland		-93.50359256130	45.39564110950
St. Francis	5/31/2018	WL683	Wetland		-93.49338844740	45.39461420300
St. Francis	5/31/2018	WL684	Wetland		-93.49531652730	45.39475482750
St. Francis	5/31/2018	WL685	Wetland		-93.49558751120	45.39503256310
St. Francis	5/31/2018	WL686	Wetland		-93.48768225230	45.39664004300
St. Francis	5/31/2018	WL687	Wetland		-93.49041882620	45.39615230540
St. Francis	5/31/2018	WL688	Wetland		-93.48756440300	45.39456692960
St. Francis	5/31/2018	WL689	Wetland		-93.48656530560	45.39495552920
St. Francis	5/31/2018	WL690	Wetland		-93.48512708270	45.39745166700

St. Francis	5/31/2018	WL691	Wetland		-93.48394505620	45.39767816010
St. Francis	5/31/2018	WL692	Wetland		-93.48276188950	45.39756480760
St. Francis	5/31/2018	WL693	Wetland		-93.48428339810	45.39627948060
St. Francis	5/31/2018	WL694	Wetland		-93.48321006670	45.39604520290
St. Francis	5/31/2018	WL695	Wetland		-93.48261969960	45.39575170200
St. Francis	5/31/2018	WL696	Wetland		-93.48221560380	45.39624317690
St. Francis	5/31/2018	WL697	Wetland		-93.47791339960	45.39727195680
St. Francis	5/31/2018	WL698	Wetland		-93.47910798860	45.39532877130
St. Francis	5/31/2018	WL699	Wetland		-93.47707554740	45.39558405810
St. Francis	5/31/2018	WL700	Wetland		-93.47027791780	45.39781676300
St. Francis	5/31/2018	WL701	Wetland		-93.46459464860	45.39764191330
St. Francis	5/31/2018	WL702	Wetland		-93.45926806120	45.39800201830
St. Francis	5/31/2018	WL703	Wetland		-93.45828352120	45.39652498590
St. Francis	5/31/2018	WL704	Wetland		-93.45884981120	45.39461627600
St. Francis	5/31/2018	WL705	Wetland		-93.45930503000	45.39391032390
St. Francis	5/31/2018	WL706	Wetland		-93.45860068600	45.39529702170
St. Francis	5/31/2018	WL707	Wetland		-93.45658868570	45.39500711610
St. Francis	5/31/2018	WL708	Wetland		-93.45740943630	45.39417787550
St. Francis	5/31/2018	WL709	Wetland		-93.45550977280	45.39596103190
St. Francis	5/31/2018	WL710	Wetland		-93.45263159820	45.39578525830
St. Francis	5/31/2018	WL711	Wetland		-93.45313264750	45.39680844020
St. Francis	5/31/2018	WL712	Wetland		-93.43788374290	45.39449762690
St. Francis	5/31/2018	WL713	Wetland		-93.43768819630	45.39516165740
St. Francis	5/31/2018	WL714	Wetland		-93.42353670470	45.39671807380
St. Francis	5/31/2018	WL715	Wetland		-93.42317602770	45.39620063380
St. Francis	5/31/2018	WL716	Wetland		-93.41741340150	45.39650608630
St. Francis	5/31/2018	WL717	Wetland		-93.41727672580	45.39680949090
St. Francis	5/31/2018	WL718	Wetland		-93.41569513720	45.39532267900
St. Francis	5/31/2018	WL719	Wetland		-93.40284265600	45.39790504300
St. Francis	5/31/2018	WL720	Wetland		-93.40100758190	45.39642884100
St. Francis	5/31/2018	WL721	Wetland		-93.39965628150	45.39651333280
St. Francis	5/31/2018	WL722	Wetland		-93.39908950870	45.39623899480
St. Francis	5/31/2018	WL723	Wetland		-93.39783976840	45.39685210790
St. Francis	5/31/2018	WL724	Wetland		-93.37356259070	45.39727508440
St. Francis	5/31/2018	WL725	Wetland		-93.37331259130	45.39762628520
St. Francis	5/31/2018	WL726	Wetland		-93.37282927100	45.39697420550
St. Francis	5/31/2018	WL727	Wetland		-93.37258730920	45.39728763090
St. Francis	5/31/2018	WL728	Wetland		-93.37300086530	45.39610272380
St. Francis	5/31/2018	WL729	Wetland		-93.37236686860	45.39568810680
St. Francis	5/31/2018	WL730	Wetland		-93.37233370910	45.39541620120
St. Francis	5/31/2018	WL731	Wetland		-93.37312873030	45.39549867910
St. Francis	5/31/2018	WL732	Wetland		-93.35724592080	45.39810432250
St. Francis	5/31/2018	WL733	Wetland		-93.35582315030	45.39721042150
St. Francis	5/31/2018	WL734	Wetland		-93.34647349500	45.39687141530
St. Francis	5/31/2018	WL735	Wetland		-93.34595355150	45.39655506050
St. Francis	5/31/2018	WL736	Wetland		-93.34719305820	45.39686380590
St. Francis	5/31/2018	WL737	Wetland		-93.34270036560	45.39722658450

St. Francis	5/31/2018	WL738	Wetland		-93.31749097730	45.39581146060
St. Francis	5/31/2018	WL739	Wetland		-93.31563994060	45.39819486850
St. Francis	5/31/2018	WL740	Wetland		-93.31420612930	45.39692644950
St. Francis	5/31/2018	WL741	Wetland		-93.31156425310	45.39689657960
St. Francis	5/31/2018	WL742	Wetland		-93.30962908110	45.39690903390
St. Francis	5/31/2018	WL743	Wetland		-93.29313645020	45.39663384100
St. Francis	5/31/2018	WL744	Wetland		-93.29309908340	45.39613719170
St. Francis	5/31/2018	WL745	Wetland		-93.28763306860	45.39647240370
St. Francis	5/31/2018	WL746	Wetland		-93.28406936280	45.39523787030
St. Francis	5/31/2018	WL747	Wetland		-93.28027696310	45.39660522990
St. Francis	5/31/2018	WL748	Wetland		-93.28105787750	45.39608901390
St. Francis	5/31/2018	WL749	Wetland		-93.28065299300	45.39596851470
St. Francis	5/31/2018	WL750	Wetland		-93.28021371210	45.39583842760
St. Francis	5/31/2018	WL751	Wetland		-93.27989667260	45.39578388830
St. Francis	5/31/2018	WL752	Wetland		-93.28098120520	45.39517981920
St. Francis	5/31/2018	WL753	Wetland		-93.27707583600	45.39615357450
St. Francis	5/31/2018	WL754	Wetland		-93.27687729740	45.39554018980
St. Francis	5/31/2018	WL755	Wetland		-93.27404677050	45.39500912310
St. Francis	5/31/2018	WL756	Wetland		-93.27000947270	45.39615162000
St. Francis	5/31/2018	WL757	Wetland		-93.26930257680	45.39616485400
St. Francis	5/31/2018	WL758	Wetland		-93.26965714290	45.39536273100
St. Francis	5/31/2018	WL759	Wetland		-93.26858923380	45.39546635930
St. Francis	5/31/2018	WL760	Wetland		-93.26807695240	45.39559071620
St. Francis	5/31/2018	WL761	Wetland		-93.26721689890	45.39380759110
St. Francis	5/31/2018	WL762	Wetland		-93.26649064490	45.39325787750
St. Francis	5/31/2018	WL763	Wetland		-93.26657183890	45.39252958850
St. Francis	5/31/2018	WL764	Wetland		-93.39377906330	45.38506870310
St. Francis	5/31/2018	WL765	Wetland		-93.37370169530	45.38502803870
St. Francis	5/31/2018	WL766	Wetland		-93.34895221470	45.38537856950
St. Francis	5/31/2018	WL767	Wetland		-93.32970876290	45.38660960040
St. Francis	5/31/2018	WL768	Wetland		-93.32805783050	45.38554730390
St. Francis	5/31/2018	WL769	Wetland		-93.32682592640	45.38626191640
St. Francis	5/31/2018	WL770	Wetland		-93.32643132150	45.38703452200
St. Francis	5/31/2018	WL771	Wetland		-93.32582745940	45.38695822330
St. Francis	5/31/2018	WL772	Wetland		-93.32701493610	45.38688193080
St. Francis	5/31/2018	WL773	Wetland		-93.32401418110	45.38651983830
St. Francis	5/31/2018	WL774	Wetland		-93.31845504810	45.38580474100
St. Francis	5/31/2018	WL775	Wetland		-93.30962558610	45.38494152370
St. Francis	5/31/2018	WL776	Wetland		-93.30939005710	45.38565308140
St. Francis	5/31/2018	WL777	Wetland		-93.31022385280	45.38567412070
St. Francis	5/31/2018	WL778	Wetland		-93.31013823750	45.38597145130
St. Francis	5/31/2018	WL779	Wetland		-93.31042313600	45.38560825830
St. Francis	5/31/2018	WL780	Wetland		-93.31187760680	45.38598874340
St. Francis	5/31/2018	WL781	Wetland		-93.30856915030	45.38591304590
St. Francis	5/31/2018	WL782	Wetland		-93.30540772030	45.38606983800
St. Francis	5/31/2018	WL783	Wetland		-93.30251643990	45.38577996590
St. Francis	5/31/2018	WL784	Wetland		-93.28629998310	45.38652961810

St. Francis	5/31/2018	WL785	Wetland		-93.27578935560	45.38563112680
St. Francis	5/31/2018	WL786	Wetland		-93.27500291540	45.38496224750
St. Francis	5/31/2018	WL787	Wetland		-93.28000993370	45.38865803800
St. Francis	5/31/2018	WL788	Wetland		-93.50272905930	45.39228186380
St. Francis	5/31/2018	WL789	Wetland		-93.50627782460	45.39222176290
St. Francis	5/31/2018	WL790	Wetland		-93.50861394270	45.39113971080
St. Francis	5/31/2018	WL791	Wetland		-93.50852280950	45.39363028350
St. Francis	5/31/2018	WL792	Wetland		-93.50984158580	45.39320322560
St. Francis	5/31/2018	WL793	Wetland		-93.51023084300	45.39449528660
St. Francis	5/31/2018	WL794	Wetland		-93.50295718640	45.39021715980
St. Francis	5/31/2018	WL795	Wetland		-93.50229605980	45.39084622940
St. Francis	5/31/2018	WL796	Wetland		-93.49208480250	45.39109755110
St. Francis	5/31/2018	WL797	Wetland		-93.47787789760	45.39051098110
St. Francis	5/31/2018	WL798	Wetland		-93.47717673060	45.39128098590
St. Francis	5/31/2018	WL799	Wetland		-93.46341253200	45.39078051040
St. Francis	5/31/2018	WL800	Wetland		-93.46090939680	45.39017365240
St. Francis	5/31/2018	WL801	Wetland		-93.46058822800	45.38947411500
St. Francis	5/31/2018	WL802	Wetland		-93.45850806170	45.38893760600
St. Francis	5/31/2018	WL803	Wetland		-93.45732138860	45.39069654820
St. Francis	5/31/2018	WL804	Wetland		-93.45705777450	45.38978824250
St. Francis	5/31/2018	WL805	Wetland		-93.45599624960	45.38950740830
St. Francis	5/31/2018	WL806	Wetland		-93.45050936770	45.39166776610
St. Francis	5/31/2018	WL807	Wetland		-93.45164186060	45.39058963230
St. Francis	5/31/2018	WL808	Wetland		-93.45195484100	45.38955485370
St. Francis	5/31/2018	WL809	Wetland		-93.43301581140	45.39137587360
St. Francis	5/31/2018	WL810	Wetland		-93.43427073580	45.39144664690
St. Francis	5/31/2018	WL811	Wetland		-93.39077489730	45.39044199080
St. Francis	5/31/2018	WL812	Wetland		-93.33512009980	45.39229717990
St. Francis	5/31/2018	WL813	Wetland		-93.33029064940	45.39146580970
St. Francis	5/31/2018	WL814	Wetland		-93.31844544160	45.39070377030
St. Francis	5/31/2018	WL815	Wetland		-93.31750242480	45.38928825070
St. Francis	5/31/2018	WL816	Wetland		-93.31889936470	45.38847767970
St. Francis	5/31/2018	WL817	Wetland		-93.32496475370	45.38864246500
St. Francis	5/31/2018	WL818	Wetland		-93.31871762550	45.38773565090
St. Francis	5/31/2018	WL819	Wetland		-93.31468209480	45.38836193550
St. Francis	5/31/2018	WL820	Wetland		-93.31314596030	45.38779218970
St. Francis	5/31/2018	WL821	Wetland		-93.31250869080	45.38841488970
St. Francis	5/31/2018	WL822	Wetland		-93.31336818320	45.38894312300
St. Francis	5/31/2018	WL823	Wetland		-93.31272140660	45.39197210440
St. Francis	5/31/2018	WL824	Wetland		-93.31231244590	45.39126720150
St. Francis	5/31/2018	WL825	Wetland		-93.31133966070	45.39171735440
St. Francis	5/31/2018	WL826	Wetland		-93.31161680190	45.38873771340
St. Francis	5/31/2018	WL827	Wetland		-93.31117873260	45.38906922210
St. Francis	5/31/2018	WL828	Wetland		-93.30883793250	45.38869919450
St. Francis	5/31/2018	WL829	Wetland		-93.30967177450	45.38865343920
St. Francis	5/31/2018	WL830	Wetland		-93.30983590560	45.38990649150
St. Francis	5/31/2018	WL831	Wetland		-93.30844464130	45.39125240570

St. Francis	5/31/2018	WL832	Wetland		-93.30117058230	45.38933410620
St. Francis	5/31/2018	WL833	Wetland		-93.28774904350	45.38999303400
St. Francis	5/31/2018	WL834	Wetland		-93.28666399530	45.39260132510
St. Francis	5/31/2018	WL835	Wetland		-93.27593857340	45.39001556010
St. Francis	5/31/2018	WL836	Wetland		-93.27466802560	45.38959553840
St. Francis	5/31/2018	WL837	Wetland		-93.27280083950	45.39069969520
St. Francis	5/31/2018	WL838	Wetland		-93.26998339170	45.39059641250
St. Francis	5/31/2018	WL839	Wetland		-93.26827827280	45.39107838550
St. Francis	5/31/2018	WL840	Wetland		-93.26896568080	45.38917984280
St. Francis	5/31/2018	WL841	Wetland		-93.26820785050	45.38840077180
St. Francis	5/31/2018	WL842	Wetland		-93.26950053580	45.39277351760
St. Francis	5/31/2018	WL843	Wetland		-93.27601586360	45.38736980670
St. Francis	5/31/2018	WL844	Wetland		-93.27679406600	45.38701676480
St. Francis	5/31/2018	WL845	Wetland		-93.27773208580	45.38713509330
St. Francis	5/31/2018	WL846	Wetland		-93.27721101870	45.38850754600
St. Francis	5/31/2018	WL847	Wetland		-93.28502685670	45.38881917800
St. Francis	5/31/2018	WL848	Wetland		-93.30183408390	45.38826449860
St. Francis	5/31/2018	WL849	Wetland		-93.30170959880	45.38766729610
St. Francis	5/31/2018	WL850	Wetland		-93.42650657710	45.41206206350
St. Francis	5/31/2018	WL851	Wetland		-93.41600468950	45.41349477190
St. Francis	5/31/2018	WL852	Wetland		-93.38806173090	45.38936385690
St. Francis	5/31/2018	WL853	Wetland		-93.41283280710	45.39176173370
St. Francis	5/31/2018	WL854	Wetland		-93.44884192530	45.38559601210
St. Francis	5/31/2018	WL855	Wetland		-93.28992764030	45.41293377660
St. Francis	5/31/2018	WL856	Wetland		-93.28990515950	45.41165309580
St. Francis	5/31/2018	WL857	Wetland		-93.29010195570	45.41192819450
St. Francis	5/31/2018	WL858	Wetland		-93.28929168550	45.41190897310
St. Francis	5/31/2018	WL859	Wetland		-93.28804326910	45.41139603090
St. Francis	5/31/2018	WL860	Wetland		-93.34548205750	45.41306068560
St. Francis	5/31/2018	WL861	Wetland		-93.37557386250	45.40444153030
St. Francis	5/31/2018	WL862	Wetland		-93.26879263150	45.39679198150
St. Francis	5/31/2018	WL863	Wetland		-93.26923090030	45.39679417330
St. Francis	5/31/2018	WL864	Wetland		-93.26967468270	45.39680234870
St. Francis	5/31/2018	WL865	Wetland		-93.27011462240	45.39680311340
St. Francis	5/31/2018	WL866	Wetland		-93.40139966370	45.40390562450
St. Francis	5/31/2018	WL867	Wetland		-93.35093722540	45.39643002510

6 Minimum Control Measures

There are six Minimum Control Measures: public education and outreach, public participation/involvement, illicit discharge detection and elimination, construction site stormwater runoff control, post-construction stormwater management, and pollution prevention/good housekeeping for municipal operations. The requirements and implementation of each are detailed in this section.

6.1 Public Education and Outreach

The MS4 permit requires a public education program to inform the public on the impact of stormwater discharges have on water bodies and ways to reduce the discharge of pollutants to stormwater.

6.1.1 Education Materials

The program must include distribution of educational materials or equivalent outreach focused on:

1. Specifically selected stormwater-related issue(s) of high priority to the City to be emphasized during this permit term (e.g., TMDL reduction targets, changing local business practices, promoting adoption of residential BMPs, lake improvements through lake associations, responsible management of pet waste, household chemicals, yard waste, deicing materials, etc.)
2. Illicit discharge recognition and reporting illicit discharges to the City

The City of St. Francis has chosen to focus on reducing chlorides in stormwater. Distribution of materials includes publishing articles in the quarterly newsletter, *St. Francis Newsletter*, and posting articles on the City's Facebook page, and providing a stormwater webpage on the City's website, which can be found at: https://www.stfrancismn.org/eng/page/stormwater-program.

6.1.2 Implementation Plan

The MS4 permit requires an implementation plan that includes the following information:

1. Target audience(s), including measureable goals for each audience
2. Responsible person(s) in charge of overall plan implementation
3. Specific activities and schedules to reach measureable goals for each target audience
4. A description of any coordination with and/or use of other stormwater education and outreach programs being conducted by other entities, if applicable.
5. Annual evaluation to measure the extent to which measurable goals for each target audience are attained.

The City's implementation plan document can be found in **Attachment 6A**.

6.1.3 Documentation

Documentation for compliance with the MCM Public Education is required. Documentation should contain the following:

1. A description of any specific stormwater related issues identified by the City
2. All information required in the implementation plan
3. Any modifications made to the program as a result of the annual evaluation mentioned in the implementation plan
4. Activities held, including dates, to reach measureable goals
5. Quantities and descriptions of educational materials distributed, including dates distributed.

The implementation plan is in Attachment 6A. The newsletter and Facebook posts are attached by the year they were published in **Attachment 6B**.

Attachment 6A: Public Education Implementation Plan

Minimum Control Measures (MCM) 1: Public Education and Outreach

Implementation Plan

An implementation plan is required as part of the Stormwater Pollution Prevention Program (SWPPP) MCM 1. Permittees need to develop a plan for an education program that distributes educational materials or equivalent outreach that informs the public of the impact stormwater discharges have on water bodies. The program must include specifically selected stormwater-related issue(s) of high priority to the permittee and also illicit discharge recognition and reporting. The City of St. Francis has selected chlorides as a topic of high priority. The implementation plan consists of five parts, and are described below.

1. **Target audience, including measurable goals for each audience**

   The target audiences are the local residents of Saint Francis and the building contractors. The goal for the residents is to have the educational material (discussed below) reach at least 7,000 people per year. The goal for the contractors is to have every building and grading permit applicant receive a construction site erosion control flyer.

2. **Responsible person(s) in charge of overall plan implementation**

   The Public Works Director will be in charge of the implementation plan. Currently, Paul Teicher holds that position.

3. **Specific activities and schedules to reach measurable goals**

   Saint Francis's implementation plan focuses on four activities: distributing flyers to building permit applicants, publishing articles for the newsletter, posting material on facebook, and maintaining a stormwater-related webpage. The City of St. Francis provides a flyer on construction site erosion control to all building permit applicants. The City keeps track of the number of flyers handed out by recording the number of building permits issued. There are at least two articles related to stormwater issues published in each of quarterly St. Francis Newsletter per year, which is mailed to all residents and businesses in the City as well as being posted online. Beyond printed materials, the City will emphasize important issues by posting on facebook, which tracks the number of people following the page. They will also maintain a webpage stemming from their home page about stormwater topics and log the number of webpage hits.

4. **Description of any coordination with or use of other stormwater education programs**

   Saint Francis is a member of the Anoka County Municipal Well head Protection Group, which established a cooperative program called Know the Flow to educate the residents in Anoka County about the local water resource issues. The City publishes a message about Know the Flow in every newsletter.

5. **Annual evaluation to measure the extent to which goals are attained**

   The efforts of reaching the goal of 7,000 residents and every building permit applicant will be evaluated at the SWPPP Public Hearing held in the summer of every year.

Attachment 6B: Education Materials

Published on *St. Francis, Minnesota* (https://www.stfrancismn.org)

Engineering

Illegal Dumping - Stormwater Information

We are receiving many reports of illegal dumping into stormwater ponds happening all around the City.

Although grass or yard waste can seem natural and harmless, excess grass clippings and yard waste does pose a threat to the health of our waters. Once they are in the water they begin to decay and then release nutrients that contribute to the green stuff or algae (toxic algae blooms) you see on the surface of the water. An excess of algae will use up the oxygen in the water, which in turn suffocates any aquatic species living in the water. This can also be very toxic to your pets.

Refrain from dumping leaves and grass clippings, etc., into any Stormwater Pond near your home. Please make sure your lawn care services are also aware of this law. The City will incur costs to clean up any illegal dumping and it could potentially raise your stormwater fees and can result in a citation for illegal dumping.

City Code/Summary: 10-93-12. – Illicit Discharge.

No person shall throw, deposit, place, leave, maintain, or keep nor permit to be thrown, placed, left, maintained or kept, any refuse, rubbish, garbage, leaves, grass or any other discarded or abandoned objects, articles, accumulations, or pollutants, in or upon any street, alley, sidewalk, storm drain, inlet, catch basin conduit or drainage structure, business place, or upon any public or private plot of land in the City, so that the same might enter a public water, except in containers, recycling bags, or other lawfully established waste disposal facility.

If you see anyone violating this City Code, please contact the Public Works Department at 763-233-5200 to report them.

Thank you for your cooperation. Keeping grass and yard waste out of the streets and stormwater ponds is an important act of protection for our waters.

Stormwater Program [1]
Municipal Stormwater Billing and Payment [2]

Source URL: https://www.stfrancismn.org/eng

Links
[1] https://www.stfrancismn.org/eng/page/stormwater-program
[2] https://www.stfrancismn.org/eng/page/municipal-stormwater-billing-and-payment

Water Meter Replacement Program

As many of you know, the city has been working with Ferguson Water Works to change over or retro-fit nearly 1750 meters city-wide. This project will modernize the way your water meter is read, going from a touch pad system to Advanced Metering Infrastructure (AMI).

For many years, the city hired a company who would go around to each account and obtain readings from a touch pad on the side of your home or business. This method of meter reading had its issues such as locked or frozen gates, broken wires and bad touch pads that prevented the vendor from obtaining readings. These issues were requiring staff to re-read over fifty accounts each month or more.

So, what is AMI? It is a meter reading technology that collects and transmits meter readings using a radio signal, not a touch pad. There are two data collectors that are installed in St. Francis, one on the east side of the river and one on the west side. These data collectors collect meter readings from a unit called an MIU that is installed on the side of a home or business and is directly wired to the water meter.

What are the benefits of AMI? The MIU does the work! Using radio technology, this eliminates the need for human interface at each account. The new reading system collects readings every fifteen minutes, instead of once a month, improving customer service with dealing with suspected high-water usage. Another feature of AMI is the leak detection capabilities. When the system is completely up and running, this will alert staff to possible leaks that could be accruing within the home or business.

With a project of this size and switching from one technology for meter reading to another, issues and problems can arise. The new AMI technology is collecting and sending more water use information and data, requiring a new way to collect the data, new software and file formatting.

We apologize for any inconvenience that this new transition might have created for residents and business owners. Your patience is greatly appreciated. Thank you!

Rain Gardens

Your Personal Contribution to Cleaner Water

Homeowners in many parts of the country are catching on to rain gardens – landscaped areas planted to wild flowers and other native vegetation that soak up rain water, mainly from the roof of a house or other building. The rain garden fills with a few inches of water after a storm and the water slowly filters into the ground rather than running off to a storm drain. Compared to a conventional patch of lawn, a rain garden allows about 30% more water to soak into the ground.

Why are rain gardens important? As cities and suburbs grow and replace forests and agricultural land, increased stormwater runoff from impervious surfaces becomes a problem. Stormwater runoff from developed areas increases flooding; carries pollutants from streets, parking lots and even lawns into local streams and lakes; and leads to costly municipal improvements in stormwater treatment structures.

By reducing stormwater runoff, rain gardens can be a valuable part of changing these trends. While an individual rain garden may seem like a small thing, collectively they produce substantial neighborhood and community environmental benefits. Rain gardens work for us in several ways:

- Increasing the amount of water that filters into the ground, which recharges local and regional aquifers.
- Helping protect communities from flooding and drainage problems.
- Helping protect streams and lakes from pollutants carried by urban stormwater—lawn fertilizers and pesticides, oil and other fluids leak from cars, and numerous harmful substances that wash off roofs and paved areas.
- Enhancing the beauty of yards and neighborhoods.
- Providing valuable habitat for birds, butterflies and many beneficial insects.

Rain Garden frequently asked questions

Does a rain garden form a pond?

No. The rain water will soak in so the rain garden is dry between rainfalls. Note: Some rain gardens can be designed to include a permanent pond, but that type of rain garden is not addressed in this publication.

Are they breeding grounds for mosquitoes?

No. Mosquitoes need seven to 12 days to lay and hatch eggs, and standing water in the rain garden will last for a few hours after most storms. Mosquitoes are more likely to lay eggs in bird baths, storm sewers, and lawns than in a sunny rain garden. Also rain gardens attract dragonflies, which eat mosquitoes!

Do they require a lot of maintenance?

Rain gardens can be maintained with little effort after the plants are established. Some weeding and watering will be needed in the first two years, and perhaps some thinning in later years as the plants mature.

Is a rain garden expensive?

It doesn't have to be. A family and a few friends can provide the labor. The main cost will be purchasing the plants, and even this cost can be minimized by using some native plants that might already exist in the yard or in a neighbor's yard.

Minnesota Department of Natural Resources. Rain Gardens. A How-to Manual for Homeowners. Retrieved from https://files.dnr.state.mn.us/waters/watermgmt_section/shoreland/raingardenmanual.pdf.

Chlorides in wastewater

Public Works staff would like to remind residents to make sure their water softeners are operating efficiently. As many of you know, when the MPCA renewed our wastewater permit in 2015, we were given a chloride limit; this is where we need your assistance. The main cause of high chlorides in wastewater is from water softeners. When a water softener goes into regeneration mode, the salt water (chlorides) used to regenerate the softener is discharged into the City's wastewater system. High chloride levels can have a negative effect on the ecosystem of streams, rivers and lakes. The drinking water in St. Francis is around 13 grains per gallon. Adjusting your softeners accordingly will help in keeping chloride levels down.

2019 Water Consumer Consumption Report

The 2019 Consumer Consumption Report is now available at www.stfrancismn.org/publicworks/page/annual-water-reports

Please contact Public Works at 763-235-2300 if you have questions about St. Francis' drinking water. You can also ask for information about how you can take part in decisions that may affect water quality.

Minnesota's Stormwater Manual

The Minnesota Stormwater Manual:

- Serves as a valuable resource for professional stormwater managers
- Welcomes newcomers to the stormwater field
- Provides practical stormwater management practices
- Receives regular review and edits
- Exists due to continuing efforts of the Stormwater Steering Committee

Whether you're new to stormwater or you've been working in the field for years, you'll find the Minnesota Stormwater Manual wiki has what you're looking for. It offers quick ways to search for information, provide feedback to the MPCA and update the contents. You will find the latest in stormwater management, including BMPs, models and regulations. Find Minnesota's Stormwater Manual at the following website at https://stormwater.pca.state.mn.us/index.php/Main_Page

Clean, Drain, Dispose – It's the Law!

Most anglers and boaters follow Minnesota's Clean, Drain, Dispose laws to help prevent the spread of aquatic invasive species (AIS). You can help protect our valuable Minnesota waters by not transporting AIS to another waterbody.

Clean all aquatic plants, zebra mussels and other prohibited invasive species from watercraft, trailers and other water-related equipment before leaving any water access or shoreline.

- It is illegal to transport prohibited invasive species – including zebra mussels, dead or alive.

Drain water-related equipment (boat, ballast tanks, bait containers, motor) and drain bilge, live well and bait well by removing drain plugs before leaving any water access.

- Keep drain plugs out while transporting watercraft.

Dispose of unwanted bait, minnows, leeches and worms in the trash.

- It is illegal to release bait into a waterbody or release aquatic animals from one waterbody to another.
- It is illegal to release worms in the state; worms are not native to Minnesota.
- If you want to keep your live bait, you must drain all the lake or river water and refill the bait container with bottled or tap water.

Recommended Actions

To further decontaminate your watercraft or equipment, it's important to spray, rinse and dry everything before going into another waterbody. Do one or more of the following:

- Dry for at least five days.
- Spray with high pressure water.
- Rinse with very hot water. To reduce the risk of spreading zebra mussels, use water over 120°F and spray each area for at least two minutes or 140°F water for at least 10 seconds.

For additional information, visit mndnr.gov/ais.

Don't flush wipes

Did you know that flushable wipes are really not flushable? While marketing labels would lead us to believe otherwise, the truth is flushable or disposable wipes do not break down even after standing in water for days, weeks or months. Wipes clog pipes and pumps.

Always discard wipes in a garbage can. Do not flush your disposable wipes. Improper disposal of wipes and other household items is a common cause of sewer service line backups for homeowners and municipal systems. Little wipes can cause big issues, which are costly to fix.

We understand that there's probably an increased use of disinfecting and personal wipes. Despite what the labels may say or how they're advertised, they're not flushable and only cause problems in the wastewater collection system, primarily by plugging lift station pumps.

Do your part and toss wipes into the garbage can.

Rum River gets attention from local watershed organization, students

Jamie Schurbon
UPPER RUM RIVER WATERSHED MANAGEMENT ORGANIZATION

The Rum River is one of six state wild, scenic and recreational rivers. Quaint and quiet along much of its length, the river is a recreational hot-spot for fishing and canoeing. Its waters, after they join with the Mississippi River, are also a drinking water source for the Twin Cities. This important river has a local entity, the Upper Rum River Watershed Management Organization (URRWMO) that cares for it.

The URRWMO has found partnerships with St. Francis High School science classes and the American Legion. Students have visited the river near the high school to inventory invertebrates (bugs, crawfish, snails, etc.) living in the river. They were accompanied by professionals from the Anoka Conservation District, who set the scientific protocols and used the resulting data. Because each invertebrate has a unique pollution tolerance and habitat requirement, students could calculate metrics of river health. They found the Rum River in northern Anoka County is in good health and has remained so over the years.

The program to combine education and data collection is ongoing, thanks to support from the American Legion. While over 1,000 high school students monitored the river's health from 2000 to 2015, the program's funding source faltered thereafter. The program shut down for three years. In 2019 the program was restarted, thanks to financial help from the American Legion. That year 40 students again entered the river with nets. The funding and work is planned to continue in 2020.

Leadership for this and other river stewardship is provided by the URRWMO. The URRWMO is a special purpose unit of government formed by the cities of Bethel, East Bethel, Ham Lake, Oak Grove, Nowthen and St. Francis. Its purpose is to manage the area's waters, particularly those that flow across City boundaries. For more information visit www.URRWMO.org.

Anoka/Washington County Head Start—Early Head Start

The Anoka/Washington County Head Start-Early Head Start program is accepting applications for the 2020-21 program year. They serve eligible families with children from birth to five and pregnant women. A variety of options are available for families including part-day classes, full-day classes and partnerships with childcare providers. Classrooms are located in communities across Anoka and Washington Counties. For more information, please visit their website at www.accap.org/head-start/enrollment-4 or call the enrollment hotline at 763-783-4314.

Car Seat Safety Clinic

We are working on how to safely hold a car seat safety clinic in the near future. Please monitor the St. Francis Police Department's Facebook page and the City of St. Francis website for future dates.

Certified child passenger safety technicians will check for recalls and ensure all child restraints are installed by manufacturer specifications.

Each seat check typically takes 30 minutes (per seat, per car) and you will leave confident that you will be able to correctly install the seat and secure your child safely every time!

Please bring:

- Your child for proper fitting
- Your car seats and/or boosters
- Your car's manual (if available)
- Your child restraint device manual
- Your vehicle

Fireworks dos and dont's

The police understand the desire to show your patriotism through the use of fireworks. Please remember, consumer fireworks may not be used on public property (i.e. parks, roads, alleys, schools, government property, etc.). Purchasers of consumer fireworks must be at least 18 years old. Explosive and aerial fireworks are prohibited for public sale, possession and use. Prohibited fireworks include firecrackers, bottle rockets, missiles, roman candles, mortars and shells. There are several violations that can be enforced in regards to possessing or displaying unlawful fireworks. It is unlawful for any person to use or discharge legal fireworks between the hours of 10:00 p.m. and 8:00 a.m. in the City limits.

If you have any questions, please feel free to contact the St. Francis Police Department at 763-753-1264.

6.2 Public Participation/Involvement

The City is required to have a program to solicit public input on the SWPPP. The City is required to:

1. Provide a minimum of one opportunity annually for the public to provide input on the adequacy of the SWPPP. Public meetings can be conducted to satisfy this requirement provided appropriate local public notice requirements are followed and opportunity to review and comment on the SWPPP is provided.
2. Provide access to the SWPPP document, annual reports, and other documentation that supports or describes the SWPPP (e.g., Regulatory Mechanism(s), etc.) for public review, upon request.
3. Consider public input, oral and written, submitted by the public to the City, regarding the SWPPP.

The City conducts a public meeting in combination with its Council meeting once a year during the summer. Minutes of the SWPPP meetings are shown in **Attachment 6C**.

As a part of all the MCMs, there must be documentation. The City shall document the following information:

1. All relevant written input submitted by persons regarding the SWPPP.
2. All responses from the permittee to written input received regarding the SWPPP, including any modifications made to the SWPPP as a result of the written input received.
3. Date(s) and location(s) of events held for purposes of compliance with this requirement.
4. Notices provided to the public of any events scheduled to meet this requirement, including any electronic correspondence (e.g., website, e-mail distribution lists, notices, etc.)

Notices for the public meetings are presented in **Attachment 6D**.

Attachment 6C: Minutes of Annual Public SWPPP Meeting

6.3 Illicit Discharge Detection and Elimination

Several components of the illicit discharge requirements of the MS4 permit have already been addressed by earlier sections in this document, including: mapping and regulatory mechanism. The illicit discharge regulatory mechanism is discussed is Section 3: Regulatory Mechanisms, and the MS4 map is provided in Section 4: Mapping and Inventory. There are several other requirements.

6.3.1 Detection

Each of the following actions must also be conducted to be in compliance with the illicit discharge MCM.

1. The City must incorporate illicit discharge detection into all inspection and maintenance activities. Further details on inspection and maintenance activities are further discussed in Section 6.6.
2. Detecting and tracking source of illicit discharges should be done using visual inspections. The City may also include the use of mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures that may be effective investigate tools
3. All field staff must be trained in illicit discharge recognition (including conditions which could cause illicit discharges) and reporting illicit discharges for further investigation.

Training materials and training sign-in sheet are shown in **Attachment 6E**.

6.3.2 Priority Areas

The City must identify priority areas likely to have illicit discharges, including at a minimum evaluating land uses associated with business/industrial actives, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Based on this evaluation, the City shall conduct additional illicit discharge inspections in those areas identified as having a higher likelihood for illicit discharges.

Priority Areas are identified in **Attachment 6F**.

6.3.3 Response Time

For timely response to known, suspected, and reported illicit discharges, the City should implement the following:

1. Procedures for investigating, locating, and eliminating source of illicit discharge
2. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the MS4. The procedures shall also include the immediate notification of the MN Dept. of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. §115.061.

    115.061 Duty to Notify; Avoiding Water Pollution

(a) Except as provided in paragraph (b), it is the duty of every person to notify the agency immediately of the discharge, accidental or otherwise, of any substance or material under its control which, if not recovered, may cause pollution of waters of the state, and the responsible person shall recover as rapidly and as thoroughly as possible such substance or material and take immediately such other action as may be reasonably possible to minimize or abate pollution of waters of the state caused thereby.

(b) Notification is not required under paragraph (a) for a discharge of five gallons or less of petroleum, as defined in section 115C.02, subdivision 10. This paragraph does not affect the other requirements of paragraph (a)

3. When source is found, ERPs required to eliminate illicit discharge and require any needed corrective action(s)

6.3.4 Documentation

Documentation of illicit discharges must contain:

1. Date(s) and location(s) of IDDE inspections conducted
2. Reports of alleged illicit discharges received, including date(s) of report(s) and any follow-up action(s) taken
3. Date(s) of discovery of all illicit discharges
4. Identification of outfalls or other areas where illicit discharges have been discovered
5. Sources (including description and the responsible party) of known illicit discharges
6. Actions taken by permittee, including dates, to address discovered illicit discharges

Attachment 6D: Illicit Discharge Training

Attachment 6F: Illicit Discharge Priority Areas

Attachment 6G: Illicit Discharge Detection and Elimination Documentation

No known illicit discharges in the City of St. Francis

6.4 Construction Site Stormwater Runoff Control

6.4.1 Regulatory Mechanism

The MS4 permit requires a regulatory mechanism that establishes erosion and sediment controls and waste controls that is at least as stringent as the MOCA's general permit to Discharge Stormwater Associated with Construction Activity. The Regulatory Mechanism must require owners and operators of construction activity to develop site plans that must be submitted to the City for review and approval prior to the start of construction. The MS4 permit has a checklist of items that are required to be in site plan. The checklist and the pertaining City code is below:

1. BMPs to minimize erosion: City Code 10.16.4, 10.93.3
2. BMPs to minimize discharge of sediment and other pollutants: City Code 10.16.4, 10.93.3, and 10.93.5
3. BMPs for dewatering activities: City Code 10.16.4N
4. Site inspections and records of rainfall events: 10.93.5
5. BMP maintenance: 10.93.5, 10.93.6
6. Management of solid and hazardous wastes on each project site: 10.16.4O
7. Final stabilization upon completion of construction activity: 10.93.9
8. Criteria of use of temporary sediment basins 10.16.4K

6.4.2 Written Procedures

Besides the regulatory mechanism, the City is also required to have written procedures for City's site plan review, public input, site inspections, and enforcement response procedures.

6.4.2.1 Site Plan Review

The MS4 permit requires written procedures for site plan reviews conducted by the City. The procedure shall include notification to owners and operators proposing construction activity of the need to apply for and obtain coverage under the MPCA's Construction Permit No. MN R100001. The City's written procedure is found City's Zoning Ordinance 10.9: Administration – Site and Building Plan Review.

6.4.2.2 Public Input

The City should also have written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity by the public to the City. This procedure is stated in the City's Zoning ordinance 10.3.9. A resident can also submit their concerns online on the City's website: https://www.stfrancismn.org/contact.

6.4.2.3 Site Inspections

Additionally, the City should have written procedures for conducting site inspections. The procedures should include:

1. Methods for identifying priority sites for inspection
2. Identify frequency at which site inspections will be conducted
3. Identify name(s) of individual(s) or position titles responsible for conducting site inspections
4. Checklist or other written means to document site inspections

This is currently being developed as of March 2019 – have draft ready.

6.4.2.4 Enforcement Response Procedure

The MS4 permit also lists having an ERP, which is discussed in Section 4 of this document.

6.4.3 Documentation

There needs to be documentation for each site plan review, including: project name, location, total acreage to be disturbed, owner and operator of the proposed construction activity, and any stormwater related comments and supporting documentation used by the City to determine project approval.

Additionally, each site inspections needs to be documented, which consists of inspection checklists or other written means used to document site inspections.

Attachment 6G: Written Procedures

Attachment 6I: Site Plan Review

Attachment 6J: Site Inspections

6.5 Post-Construction Stormwater Management

6.5.1 Regulatory Mechanism

There are multiple parts that are required to be included in the post-construction stormwater management regulatory mechanism. These parts include BMP plans, new development and redevelopment conditions, limitations and exceptions, mitigation, and long-term maintenance.

6.5.1.1 BMP plans

The regulatory mechanism must require that site plans with post-construction stormwater management BMPs be submitted to the City for review and approval, prior to the start of construction activity. The City's Zoning Ordinance 10.93.6 meets this requirement, which can be found in **Attachment 3B**.

6.5.1.2 New development and Redevelopment

The City must require the use of any combination of BMPs, with the highest preference given to Green Infrastructure techniques and practices, in order to meet the following conditions:

1. For new development projects – no net increase from pre-project conditions on an annual average basis of:
    a. Stormwater discharge volume
    b. Stormwater discharge of Total Suspended Solids
    c. Stormwater discharge of Total Phosphorus
2. For redevelopment projects – a net reduction from pre-project conditions on an annual average basis of:
    a. Stormwater discharge volume
    b. Stormwater discharge of Total Suspended Solids
    c. Stormwater discharge of Total Phosphorus

The City's Zoning Ordinance 10.93.4 (**Attachment 3B**) addresses this requirement.

6.5.1.3 Limitations and Exceptions

Some sites are easily susceptible to degradation or may easily contaminate adjacent areas, so the MS4 permit outlines several limitations where infiltration is either prohibited or restricted.

1. Infiltration techniques are prohibited in areas (City's Zoning Ordinance 10.93.4.B.3):
    a. Where industrial facilities are not authorized under NPDES/SDS permit
    b. Where vehicle fueling and maintenance occur
    c. With less than three feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.

d. Where high levels of contaminants in soil or groundwater will be mobilized by infiltrating stormwater

2. Infiltration techniques are restricted in areas (City's Zoning Ordinance 10.93.4.B.4):
    a. With predominately clay soils
    b. Within 1,000 feet up-gradient or 100 feet down-gradient of active karst features
    c. Within drinking water supply management area
    d. Where soil infiltration rate are more than 8.3 inches per hour

3. Additionally, linear projects where the lack of right-of-way precludes the installation of volume control practices may allow exceptions. A reasonable attempt must be made to obtain right-of-way during the project planning process. This provision can be found in the City's Zoning Ordinance 10.93.4.B.5.a.

6.5.1.4 Exceptions

Some construction sites are problematic for volume control, so there are several exceptions allowed. The City may allow for lesser volume control under the following circumstances (City's Zoning Ordinance 10.93.4.B.5):

1. The site contains infiltration related limitations previously described, **and**
2. Uses other techniques besides infiltration to reduce volume

6.5.1.5 Mitigation

Some sites cannot cost effectively meet the conditions for post-construction stormwater management for TSS and/or TP on site. The City shall ensure TSS and/or TP requirements are addressed through mitigations with the following conditions (City's Zoning Ordinance 10.93.4.B.7):

1. Mitigation projects are selected in the following order of preference:
    a. Locations that yield benefits to the same receiving water that receives runoff
    b. Locations within the same DNR catchment area
    c. Locations in the next adjacent DNR catchment area up-stream
    d. Locations anywhere within the permittee's jurisdiction
2. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP.
3. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this Part.
4. Mitigation projects shall be completed within 24 months after the start of the original construction activity.

5. The City shall determine, and document, who is responsible for long-term maintenance on all mitigation projects of this Part.
6. If the City receives payment for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management, the City shall apply any such payment received to a public stormwater project, and all projects must be in compliance with this part.

6.5.1.6 Long-term maintenance

The City shall provide for the establishment of the legal mechanism(s) between the City and owners and operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the City. This only includes structural stormwater BMPs constructed after the effective date of the 2013 permit that are directly connected to the City's MS4 and are in the City's jurisdiction. The legal mechanism shall include (City's Zoning Ordinance 10.93.5, 6, & 10):

1. Allow the City to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, preform necessary maintenance, and asses costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator has not conducted maintenance.
2. Include conditions that are designed to preserve the City's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the City, when those responsibilities are legally transferred to another party.
3. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the require stormwater management. If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management continue to be met.

6.5.2 Site Plan Review

The City shall have written procedures for site plan reviews conducted by the City prior to the start of construction activity, to ensure compliance with requirements of the Regulatory Mechanism(s) (City's Zoning Ordinance 10.93.7).

6.5.3 Documentation

Documentation should include:

1. Any supporting documentation used by the City to determine compliance, including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance.
2. All supporting documentation associated with mitigation projects authorized by the City
3. Payments received and used for this mitigation

4. All legal mechanism drafted in for long-term maintenance including date(s) of the agreement(s) and name(s) of all responsible parties involved

Attachment 6K: Site Plan Review Checklist

Attachment 6L: Site Plan Reviews

Attachment 6M: Mitigation Projects Documentation

6.6 Pollution Prevention/Good Housekeeping for Municipal Operations

The City shall develop and implement an operations and maintenance program that prevents or reduces the discharge of pollutants from City owned/operated facilities and operations to the small MS4. The program shall include:

1. Facilitates inventory

   The City shall develop and maintain an inventory of City owned/operated facilities that contribute pollutants to stormwater discharges. Facilities may include, but is not limited to: composting, equipment storage and maintenance, hazardous waste disposal, hazardous waste handling and transfer; landfills, solid waste handling and transfer, parks, pesticide storage, public parking lots, public golf courses; public swimming pools, public works yards, recycling, salt storage, vehicle storage and maintenance (e.g., fueling and washing) yards, and materials storage yards.

2. Development and implementation of BMPs for inventoried facilitates and municipal operations

   Considering the source of pollutants and sensitivity of receiving waters (e.g., Outstanding Resource Value Waters (ORVWs), impaired waters, trout streams, etc.), the City shall develop and implement BMPs that prevent or reduce pollutants in stormwater discharges from the small MS4 and from:

   a. All inventoried facilities that discharge to the MS4, and
   b. The following municipal operations that may contribute pollutants to stormwater discharges, where applicable:
      i. Waste disposal and storage, including dumpsters
      ii. Management of temporary and permanent stockpiles of materials such as street sweepings, snow, deicing materials (e.g., salt), sand and sediment removal piles
      iii. Vehicle fueling, washing and maintenance
      iv. Routine street and parking lot sweeping
      v. Emergency response, including spill prevention plans
      vi. Cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste and wastewater
      vii. Use, storage, and disposal of significant materials
      viii. Landscaping, park, and lawn maintenance
      ix. Road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving
      x. Right-of-way maintenance, including mowing
      xi. Application of herbicides, pesticides, and fertilizers
      xii. Cold-weather operations, including plowing or other snow removal practices, sand use, and application of deicing compounds

3. Development and implementation of BMPs for MS4 discharges that may affect Source Water Protection Areas

The City shall incorporate BMPs into the SWPPP to protect any of the following drinking water sources that the MS4 discharge may affect, and the City shall include the map of these sources with the SWPPP if they have been mapped:

a. Wells and source waters for DWSMAs identified as vulnerable
b. Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health

4. Pond Assessment Procedures and Schedule
   The City shall develop procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all City owned/operated ponds constructed and used for the collection and treatment of stormwater. The schedule (which may exceed this permit term) shall be based on measureable goals and priorities established by the permittee.

5. Inspections
   a. Unless inspection frequency is adjusted as described below, the City shall conduct annual inspections of structural stormwater BMPs (excluding stormwater ponds which are under a separate schedule below) to determine structural integrity, proper function and maintenance needs. Inspections of structural stormwater BMPs shall be conducted annually unless the permittee determines if either of the following conditions apply:

      i. Complaints received or patterns of maintenance indicate a greater frequency is necessary, or
      ii. Maintenance or sediment removal is not required after completion of the first two annual inspections; in which case the permittee may reduce the frequency of inspections to once every two years.

   b. Prior to the expiration date of this permit, the permittee shall conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.

   c. The permittee shall conduct quarterly inspections of stockpiles, and storage and material handling areas as inventoried, to determine maintenance needs and proper function of BMPs.

6. Maintenance

   Based on inspection findings, the City shall determine if repair, replacement, or maintenance measures are necessary in order to ensure the structural integrity, proper function, and treatment effectiveness of structural stormwater BMPs. Necessary maintenance shall be completed as soon as possible to prevent or reduce the discharge of pollutants to stormwater.

7. Employee Training

The City shall develop and implement a stormwater management training program commensurate with employee's job-duties as they relate to the City's SWPPP, including reporting and assessment activities. The City may use training materials from the United States Environmental Protection Agency (USEPA), state and regional agencies, or other organizations as appropriate to meet this requirement. The employee training program shall:

a. Address the importance of protecting water quality
b. Cover the requirements of the permit relevant to the job duties of the employee
c. Include a schedule that establishes initial training for new and/or seasonal employees, and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements

8. Documentation

Document the following:

a. Date(s) and description of findings of all inspections conducted
b. Any adjustments to inspection frequency
c. A description of maintenance conducted, including dates, as a result of inspection findings
d. Pond sediment excavation and removal activities, including:
    i. The unique ID number of each stormwater pond from which sediment is removed
    ii. The volume (e.g., cubic yards) of sediment removed from each stormwater pond
    iii. Results from any testing of sediment from each removal activity
    iv. Location(s) of final disposal of sediment from each stormwater pond
e. Employee stormwater management training events, including a list of topics covered, names of employees in attendance, and date of each event

Attachment 6N: Facility Inventory

Attachment 6O: Source Water Protection Areas

Attachment 6P: Pond Assessment Procedures and Schedule

Attachment 6Q: Annual Inspection Documentation

Attachment 6R: Employee Training Documentation

7 Discharges to Impaired Waters With an EPA Approved TMDL that Includes an Applicable WLA

While St. Francis does have TMDL WLA requirements listed in the Rum River WRAPS, the wasteload allocations (WLAs) were established before the 2013 MS4 permit. Thus, St. Francis is not required to report on activities that would make progress on their WLAs. The TMDLs are listed below.

The City of St. Francis MS4 has three wasteload allocations (WLAs) from the Rum River TMDL Report, which was approved by the EPA on September 26, 2017. Two of the WLAs are for *E. coli*, one for Cedar Creek and one for Seelye Brook. Both streams were listed as impaired for *E. coli* in 2015.

Cedar Creek is approximately 28.6 miles long and begins near the City of Isanti, flows south into East Bethel and Oak Grove, and eventually joins the Rum River. Around 618 acres of the southeast corner of St. Francis is within Cedar Creek's subwatershed. Monthly samples were taken from June through August between 2006 and 2015. The standard for *E. coli* should not exceed 126 colony-forming units (or most probable number) per 100 mL. All but two data points were above the standard, as shown in the figure below.

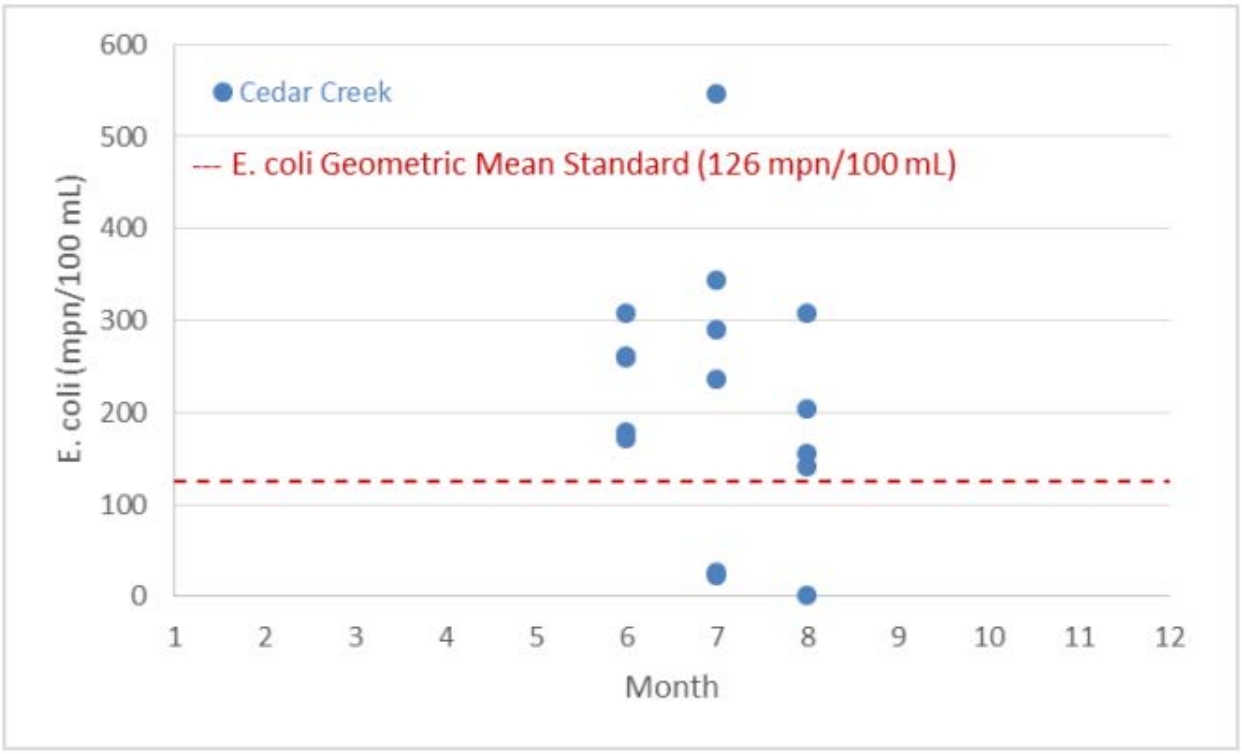

Figure 7-1. Graph taken from Figure 3-15 in the Rum River TMDL Report. Singe Sample *E. coli* concentrations by month in Cedar Creek (S003-203) from 2006 through 2015.

St. Francis's contributing area to Cedar Creek's subwatershed is 1.2%, so the City's *E. coli* allocation is 1.2% of the allowable load. E. coli loads correlate with the flow of the stream. There are five levels of

flow: very high, high, mid, low, and very low. There is a corresponding E. coli allocation for each of the five flow levels, as shown in the table below.

	E. coli TMDL Component (billions of organisms/day)				
Flow Zone	Very High	High	Mid	Low	Very Low
St. Francis MS4	3.59	1.88	1.16	0.82	0.43

Table 7-1. Table taken from Table 4-4 in the Rum River TMDL Report. Cedar Creek *E. coli* Total Maximum Daily Load Summary for the City of St. Francis.

Seelye Brook is approximately 12.4 miles long and begins in Isanti County, flows through the west side of St. Francis, and joins the Rum River in Oak Grove. More than half of the samples points taken in the summer months between 2006-2015 exceeded the 126 mpn/100mL *E. coli* standard as shown in the graph below.

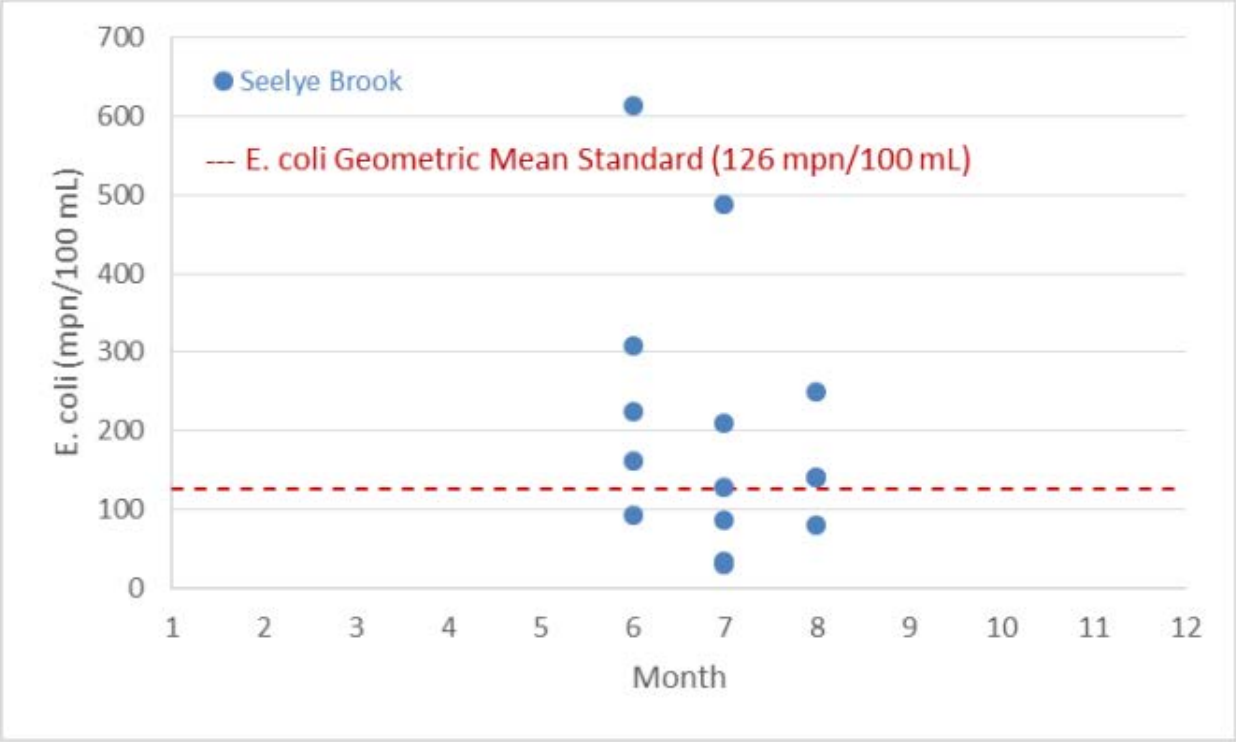

Figure 7-2. Graph taken from Figure 3-15 in the Rum River TMDL Report. Singe Sample *E. coli* concentrations by month in Seelye Brook (S003-204) from 2006 through 2015.

Around 6,481 acres of St. Francis contributes to Seelye Brook's subwatershed, which is 25% of the contributing watershed. Therefore, St. Francis MS4 has 25% of the allowable load for their *E. coli* allocation.

	E. coli TMDL Component (billions of organisms/day)				
Flow Zone	Very High	High	Mid	Low	Very Low
St. Francis MS4	104.73	45.84	26.10	14.65	7.20

Table 7-2. Table taken from Table 4-6 in the Rum River TMDL Report. Seelye Brook *E. coli* Total Maximum Daily Load Summary for the City of St. Francis.

The third TMDL is for dissolved oxygen (DO) for Trott Brook, which was listed as impaired for DO in 2015. The 4.4-mile length of Trott Brook begins in Sherburne County, travels south, turns east into the City of Ramsey, and then flows into Rum River. The DO monitoring consisted of 33 samples between 2006 – 2015. Approximately 33 percent of the sample points fell below the minimum daily standard DO standard of 5 mg/L, as shown in Figure ??.

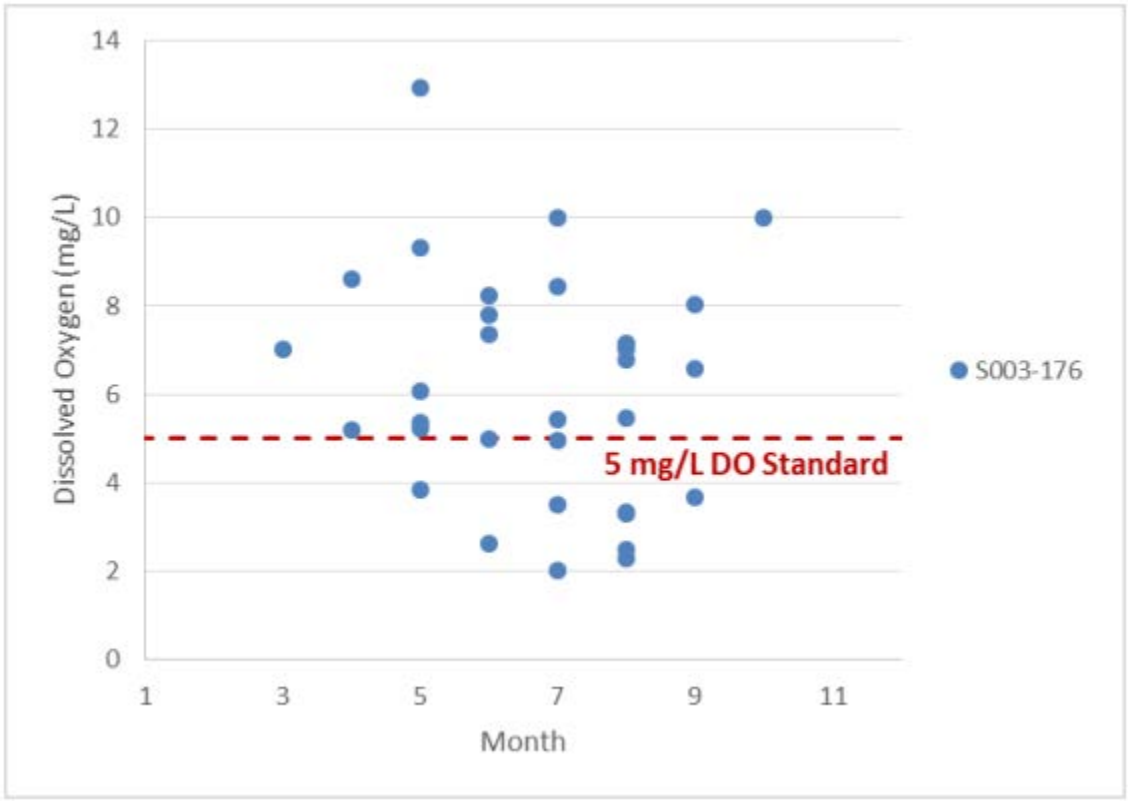

Figure 7-3. Graph taken from Figure 3-18 in the Rum River TMDL report. Seasonal variation of dissolved oxygen samples in Trott Brook from 2006 to 2015.

The City of St. Francis has 47 acres of contributing area to the Trott Brook watershed, which is less than one-percent of the MS4 load. The allowable oxygen demand, consisting of sediment oxygen demand (SOD); nitrogenous oxygen demand (NOD); and biochemical oxygen demand (BOD) combined, is 1 pound per day.

8 Alum or Ferric Chloride Phosphorus Treatment Systems

Not applicable for the City of St. Francis

9 SWPPP Modification

1. Annual SWPPP Assessment

   The City shall conduct an Annual Assessment of their SWPPP to determine program compliance, the appropriateness of BMPs, and progress towards achieving the measurable goals identified in their SWPPP document. The Annual SWPPP Assessment shall be performed prior to completion of each Annual Report.

2. Annual Reporting

   The City shall submit an Annual Report to the Agency by June 30th of each calendar year. The Annual Report shall cover the portion of the previous calendar year during which the permittee was authorized to discharge stormwater under this permit. The Annual Report shall be submitted to the Agency, on a form provided by the Commissioner, that will at a minimum, consist of the following:

   a. The status of compliance with permit terms and conditions, including an assessment of the appropriateness of BMPs identified by the permittee and progress towards achieving the identified measurable goals for each of the MCMs. The assessment must be based on results of information collected and analyzed, including monitoring (if any), inspection findings, and public input received during the reporting period.

   b. The stormwater activities the permittee plans to undertake during the next reporting cycle

   c. A change in any identified BMPs or measurable goals for any of the MCMs

   d. Information required to demonstrate progress in meeting applicable WLAs

   e. Information required to be recorded or documented

   f. A statement that the City is relying on a partnership(s) with another regulated Small MS4(s) to satisfy one or more permit requirements (if applicable), and what agreements the permittee has entered into in support of this effort

3. Record Keeping

   a. The City shall keep records required by the NPDES permit for at least **three** years beyond the term of this permit. The permittee shall submit records to the Commissioner only if specifically asked to do so.

   b. The permittee shall make records, including components of the SWPPP, available to the public at reasonable times during regular business hours.

   c. The permittee shall retain copies of the permit application, all documentation necessary to comply with SWPPP requirements, all data and information used by the permittee to complete the application process, and any information developed as a requirement of this permit or as requested by the Commissioner, for a period of at least three (3) years beyond the date of permit expiration.

Appendix A: 2013 – 2018 MS4 Permit

Appendix B: 2020 MS4 Annual Report