

The MS4 General permit (Permit) is designed to reduce the amount of sediment and other pollutants that enter state waters from stormwater systems. Entities regulated by the MS4 general permit must develop a Stormwater Pollution Prevention Program (SWPPP or Program) and adopt best management practices (BMPs).

In compliance with Permit requirements, the City of St. Louis Park has developed Standard Operating Procedures (SOPs) for each of the six minimum control measure (MCM), Emergency Response Procedures (ERPs), and supplemental documentation. These documents are available upon request. The items documented below serve as the 2023 annual assessment of MCM activities completed.

MCM-1: Public education and outreach activities

Permit requirement: Permittees shall develop and implement a public education program and distribute educational materials that inform the public of the impact stormwater discharges have on water bodies and that include actions citizens, businesses, and other local organizations can take to reduce the discharge of pollutants to stormwater.

The following are activities completed in compliance with the Permit and the city's Program:

- Distributed educational materials on two stormwater-related issues (permit requirement 16.3), including:
 - **Rainwater Rewards Program:**
 - The rainwater rewards program installed 35 rain gardens and received \$24,000 in grant funding from the Clean Water, Land, and Legacy amendment.
 - **The effects of yard waste on water quality.**
- Organized and facilitated the Metro Blooms Resilient Yard Workshop, Turf Alternative Workshop, Resilient Shorelines, and Healthy Soils Workshop, part of the Rainwater Rewards Program, with a total of 100 attendees.
- Distributed various stormwater management-related educational materials (permit requirements 16.4-16.6), including two postings on pet waste, four on smart salting, and one on illicit discharges.
 - Circulated stormwater and environmental educational materials at Westwood Hills Nature Center, which receives over 32,000 visitors annually.
 - Published 12 stormwater articles in Park Perspective, Park and Recreation Guide, Star Tribune, and Sun Sailor with distribution methods of newspapers and online website postings. Topics included the Rainwater Rewards Program, Yard Waste Management, Winter Maintenance, Pet Waste, and the Adopt-a-Drain program.
 - Received approximately 2,700 clicks on the city's website about Program information.
 - Published 34 social media posts about stormwater management topics, including the Rainwater Rewards Program, Yard Waste Management, Winter Maintenance,

Pet Waste, and the Adopt-a-Drain program. Targeted residents, businesses, commercial facilities, and institutions.

MCM-2: Public involvement and participation

Permit requirement: Permittees shall implement a public participation/involvement program to solicit public input on the Program.

The following are activities completed (see Table 1) in compliance with the Permit sections 17.3-17.7 and the city’s Program:

Table 1 Public Events and Meetings Held (2023)

Activities	Date	Quantity/ Units
Adopt-a-Drain	Open throughout the year	288 Participants
		517 Drains adopted
MPCA Environmental Focus Group Partner	Attended one meeting	8 members
Steering Committee for the Minnesota Cities Stormwater Coalition	Monthly	200+ Member Cities
Metro Watershed Partners	Quarterly meetings	50+ Partners
Annual Open House at Westwood Hills Nature Center	April 20, 2023	0 Attendees
Annual Rain Barrel Pick-up event	May 7, 2023	156 Attendees/Barrels sold
	May 9, 2023	
City Council S.S. Report	June 12, 2023	N/A
Ecotacular	June 17, 2023	50+ Attendees

The Program materials are posted on the city’s website [here](#); comments are welcomed at any time and the comments received are available upon request.

MCM-3: Illicit discharge detection and elimination (IDDE)

Permit requirement: Permittees shall implement and enforce a program to detect and eliminate illicit discharges into the city's storm sewer system.

The following are activities completed in compliance with the Permit sections 18.8 -18.17 and the city's Program:

- Observed eight (8) illicit discharges and responded with verbal warnings and letters of warning. ERPs and response documentation are available upon request (Permit Requirement 18.13-18.14 and 18.17).
- Identified and inspected areas within the city that have an elevated potential for illicit stormwater discharges or high-priority areas as described in Permit Requirement 18.10. Maps of the high-priority areas are available upon request.
- Implemented a comprehensive training program (Permit Requirement 18.8-18.9) for city field staff, including:
 - Park and Recreation staff and Public Works (May 24)
 - Engineering (May 25)
 - Firefighters (May 9,11,16)
 - Police Officers on (March 6, 7, 8)
 - Building and Energy (May 11)
- Distributed illicit discharge detection and elimination information on social media focused on reaching target audiences, including residents, businesses, institutions, and commercial facilities.
- Developed a new Illicit discharge inspection and tracking mapping database using cartograph (Permit Requirement 18.10-18.12). Inspection reports and maps are available upon request.

MCM-4: Construction site stormwater runoff control

Permit requirement: Permittees shall implement and enforce a construction site stormwater runoff control program that reduces pollutants in stormwater runoff related to construction activity.

The following are activities completed in compliance with the Permit sections 19.3-19.15 and the city's Program:

- Reviewed 26 construction plans and issued 26 erosion control permits (Permit Requirement 19.3-10).
- Performed 385 construction site inspections (Permit Requirement 19.7-19.9).
- Collected damage deposits for erosion control permits to aid in maintaining compliance.
- Issued six written notices of violation for noncompliance for projects greater than one acre (Permit Requirement 19.12 and 19.15), which the contractor responded to our violation notification.

- Provided training to Engineering, and Building and Energy staff on May 11 and 25 (Permit Requirement 19.11)

MCM-5: Post-construction runoff control

Permit requirement: Permittees shall implement and enforce a post-construction stormwater management program that prevents or reduces water pollution after construction activity is completed.

The following are activities completed in compliance with the Permit sections 20.3-20.17 and the city’s Program:

- Completed stormwater management plan reviews for four projects (Permit Requirement 20.3-20.14).
- Maintained mapped GIS inventory of structural stormwater BMPs not owned or operated by the permittee (Permit Requirement 20.16). Maps are available upon request.
- Engineering staff received training on February 2, May 4, September 29, and/or October 12 (Permit Requirement 20.18).

MCM-6: Pollution prevention/good housekeeping for municipal operations

Permit requirement: Permittees shall develop and implement an operations and maintenance program that prevents or reduces the discharge of pollutants from permittee-owned and operated facilities.

The following are activities completed in compliance (Table 2) with the Permit sections 21.3-21.14 and the city’s Program:

Table 2 Pollution Prevention/Good Housekeeping Practices Completed (2023)

Maintenance or operational activity	Location/Element	Quantity
Inspected	Storm sewer outfalls	172
	Stormwater ponds	61
	Stormwater management best practices (Under Ground vaults, tree trenches, pervious pavers, rain gardens)	23
Maintained	Storm sewer, sump manholes, and grit pit	9
Removed	Westdale Pond	800 cubic yards of accumulated sediment
Swept	Streets and alleys	1,871 miles and removed 5,911 cubic yards of material

Planned weather postponed maintenance	Storm sewer outfall replacements	5
	Lamplighter Pond	5,500 cubic yards of accumulated sediment

In addition to the information presented in the table above, the city tallied 919 tons of chlorides used; provided Program-specific training to city staff, which are responsible for winter maintenance activities, via in-house training and Smart Salting Training; and worked with Operations to evaluate existing policies and practices to improve the process and reduce pollution potential.