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

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013

Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at http://www.pca.state.mn.us/ms4.

Submittal: This *MS4 SWPPP Application for Reauthorization* form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Oakdale *County: Washington
(city, county, municipality, government agency or other entity)

*Mailing address: 1584 Hadley Avenue North

*City: Oakdale *State: MN *Zip code: 55128

*Phone (including area code): 651.730.2705 *E-mail: Craig.Waldron@ci.oakdale.mn.us

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Bachmeier *First name: Brian
(department head, MS4 coordinator, consultant, etc.)

*Title: Public Works Director/City Engineer

*Mailing address: 1584 Hadley Avenue North

*City: Oakdale *State: MN *Zip code: 55128

*Phone (including area code): 651-730-2730 *E-mail: brian.bachmeier@ci.oakdale.mn.us

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: First name:
(department head, MS4 coordinator, consultant, etc.)

Title:

Mailing address:

City: State: Zip code:

Phone (including area code): E-mail:

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this *MS4 SWPPP Application for Reauthorization* form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

☒ Yes - *I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.*

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Brian Bachmeier
(This document has been electronically signed)

Title: Public Works Director/City Engineer Date (mm/dd/yyyy): 12/30/13

Mailing address: 1584 Hadley Avenue North

City: Oakdale State: MN Zip code: 55128

Phone (including area code): 651-730-2730 E-mail: brian.bachmeier@ci.oakdale.mn.us

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☒ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Valley Branch Watershed District	MCM1, MCM3, MCM4 (construction sites)
Ramsey-Washington Watershed District	MCM1, MCM3, MCM4 (construction sites), MCM 5, MCM6 (training)
South Washington Watershed District	MCM1, MCM3, MCM4 (construction sites)
The Kohlman Lake, Excessive Nutrients TMDL Implementation Plan is being executed by the RWMWD and the MS4 will coordinate its submittal information and compliance schedule information for an applicable Waste Load Allocation (WLA).	Part III. E. Approved TMDL and Applicable WLA.

B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships.*

The entities listed above are included since the City of Oakdale partners with them on a regular, but informal basis. There are no formal agreements in place, however we recognize their public & staff educational efforts, and they currently retain permitting authority for development projects in our community.

If necessary, the City will explore formal partnerships with the watershed districts for possible execution in 2014.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☒ Ordinance ☐ Contract language
   ☐ Policy/Standards ☐ Permits
   ☐ Rules
   ☐ Other, explain: _____

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   City of Oakdale Code of Ordinances - Chapter 23 Water, Sewer & Utilities, Article IV Illicit Discharges

   Direct link:

   http/www.ci.oakdale.mn.us

   ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg.*

2. If **no:**

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date

permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Chapter 21, Subdivisions, Section 21-27

Chapter 5, Building Regulations, Sections 5-9(c)

Oakdale Surface Water Management Plan

Direct link:

www.ci.oakdale.mn.us

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We will pursue amendments to our local regulations to comply with the regulatory requirements of the general permit within 12 months after permit coverage is extended to the City of Oakdale.

C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

1.	Best Management Practices (BMPs) to minimize erosion.	☒ Yes	☐ No
2.	BMPs to minimize the discharge of sediment and other pollutants.	☒ Yes	☐ No
3.	BMPs for dewatering activities.	☐ Yes	☒ No
4.	Site inspections and records of rainfall events	☐ Yes	☒ No
5.	BMP maintenance	☐ Yes	☒ No
6.	Management of solid and hazardous wastes on each project site.	☐ Yes	☒ No
7.	Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means.	☒ Yes	☐ No
8.	Criteria for the use of temporary sediment basins.	☐ Yes	☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We currently reference the Ramsey Soil & Waters Conservation District Erosion & Sediment Control Handbook. This handbook is no longer being printed. The City of Oakdale will be updating our Construction Site Stormwater Runoff Control ordinance to be at least as stringent as the NPDES/SDS CWS General Permit.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities? ☒ Yes ☐ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☒ Ordinance ☐ Contract language
   ☒ Policy/Standards ☐ Permits
   ☐ Rules
   ☐ Other, explain: _____

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   Chapter 21 Sudivisions

   Surface Water Management Plan

   Direct link:

   www.ci.oakdale.mn.us

   ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

   a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of Total Suspended Solids (TSS).
      3) Stormwater discharges of Total Phosphorus (TP).

   b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of TSS.
      3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

   a. Limitations

      1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No

         a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
         b) Where vehicle fueling and maintenance occur.
         c) With less than three (3) 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 the infiltrating stormwater.

      2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No

         a) With predominately Hydrologic Soil Group D (clay) soils.
         b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
         c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn.

R. 4720.5100, subp. 13.

d) Where soil infiltration rates are more than 8.3 inches per hour.

3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

   a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
      1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
      2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
      3) Locations in the next adjacent DNR catchment area up-stream
      4) Locations anywhere within the permittee's jurisdiction.

   b. 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. ☐ Yes ☒ No

   c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No

   d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No

   e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No

   f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

   a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No

   b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No

   c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). 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 in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B.2,3,4,5: Currently developers and contractors working on sites greater than one acre in size are required to get watershed district permits that address these provisions. The City of Oakdale will develop similar requirements for those sites less than one acre in size. The language will be drafted with 3 months, a hearing held within 6 months, and ordinances adopted within the 12 month permit coverage extension.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs.*
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

   We will produce draft written procedures that will satisfy these requirements within three months. We will pursue ordinance revisions within the 12 month permit coverage extension.

B. Describe your ERPs:

We currently use the authority of the City Buidling Official as created by the Building Code, to issue Stop Work Orders for those situations where the construciton site is found to be in violation of the erosion control provisions of Chapter 5 Building Reguations, of the City Code.

When the City of Oakdale finds that any person has violated, or continues to violate, any provision of our illicit discharge ordinance, the City of Oakdale may serve upon that person a written Warning Notice, specifying the particular violation believed to have occurred and requesting the discharger to immediately investigate the matter and to seek a resolution whereby any offending discharge will cease. Investigation and/or resolution of the matter in response to the Warning Notice in no way relieves the alleged violator of liability for any violations occurring before or after receipt of the Warning Notice. Nothing in this subsection shall limit the authority of the City of Oakdale to take any action, including emergency action or any other enforcement action, without first issuing a Warning Notice. c) Notice of Violation. Whenever the City of Oakdale finds that a person has violated probation or failed to meet a requirement of this Article, the City of Oakdale may order compliance bywritten notice of violation to the responsible person.

The City of Oakdale has a Stormwater Utility Charge. There is a credit for onsite treatment. If the property owner fails to properly maintain the onsite treatment facility, we suspend the credit for onsite treatment until such time they properly restore the effectiveness of the onsite treatment facility.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

We have a GIS map of our storm sewer system. Record drawings are linked to the base map which provides access to the construction plans.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☒ Yes ☐ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction 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. ☐ Yes ☒ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☐ Yes ☒ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☐ Yes ☒ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We started the pond inventory in 2009. The format of the required submital changed between 2009 & 2013. We will be reformatting and updating the pond inventory within the 12 month permit coverate extension.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: http://www.pca.state.mn.us/ms4 , according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no,** the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

   Members of our Enviormental Management Commission write articles that are published in our local newspaper throughout the year. We include environmental articles in our quarterly news letter. We hold the annual hearing to provide an opportunity for residents to comment on our storm water program.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Prepare environmentally based articles for Oakdale/Lake Elmo Review – Local newspaper	Seasonally appropriate topics are provided to the newspaper for publication at least six times a year. Free copies of the paper are delivered to the 10,000 homes in the community on a weekly basis.
Publish Oakdale Update newsletters – Water Quality	Storm water education article section in each issue sent to every home in Oakdale on a quarterly basis.
Cable Access for Environmental Mgmt Commission	Cable televised commission meetings on a monthly basis.
Social Media	We currently use multiple platforms to post messages or link to an interesting stormwater related article at least once a year. Our goal is to continue to add to the number of followers/subscribers.
City Website	Environmental information section, available online www.ci.oakdale.mn.us. We will continue to maintain our website, track hits, and determine if it needs updates on a bi-monthly basis.

BMP categories to be implemented	**Measurable goals and timeframes**

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brian Bachmeier, Public Works Director/City Engineer

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

We hold the annual hearing to provide an opportunity for residents to comment on our storm water program.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Comply with public notice requirements	Publish notice of the meeting in the local paper 30 days prior to the hearing. Post notices of the meeting in the City Hall public notice board 30 days prior to the meeting.
Solicit Public input and opinions on the Adequacy of the SWPPP	At the hearing, the public has the opportunity to testify and provide comments to the City Council.
Conduct public hearing for each permit year	Conduct the meeting in May of each year. Have at least ten people attend the meeting.
Review and consider public input	Provide a written response within 30 days to any concerns or suggestions brought to the city councils attention.

BMP categories to be implemented	**Measurable goals and timeframes**

3. Do you have a process for receiving and documenting citizen input? ☒ Yes ☐ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brian Bachmeier, Public Works Director/City Engineer (Annual City Council meeting to provide the opportunity for the public to comment on our stormwater program.)

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

We have an illicit discharge ordinance.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted ☐ Yes ☒ No

during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No

c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No

d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, 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. ☐ Yes ☒ No

e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No

f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No

g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No

h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We will pursue updating our illicit discharge program to include likely priority areas as outlined in the Permit (Part III.D.3.f). We will incorporate these prioritation efforts within 10 months after the permit coverage is extended.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Ordinances	Annually review and revise ordinances to ensure compliance with laws and permit provisions.
Inspections	City employees are continually looking for illicit discharges while they perform their normal duties. We follow up on reports and document the number spotted. Resident reports of suspicious discharges are also investigated and documented.
Training	Public works staff and project inspectors annually participate in training to spot and how to handle illicit discharges.

BMP categories to be implemented	**Measurable goals and timeframes**
Identification of Priority Areas	Determine high risk areas and establish an appropriate inspection schedule

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

We will develop a spreadsheet that will contain the date, time and address of any reported illicit connections or discharges. We will describe the discharge and if its associated with a business. We will put this information into GIS so we can track and target our inspections more efficiently.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Brian Bachmeier, Public Works Director/City Engineer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

   Review of all building permit applciations that disturb land areas. Site inspections are conducted in conjunction with other required construction inspections, such as: foundation, framing, plumbing, roofing, and prior to issuance of Certificate of Occupancy.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):

   a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No

   b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No

   c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No

   d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):

      1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No

      2) Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No

      3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☐ Yes ☒ No

      4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No

   e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☐ Yes ☒ No

   f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☐ Yes ☒ No

   g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

   If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

   2.c-d: We will develop inspection procedures and checklists in compliance with these permit requirements within the 12 month permit extension period.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Maintain a GIS Storm Sewer Map	New or reconstructed storm sewer revisions are reflected on the city's base map within 90 days of project completion.
Review ordinances and update as needed	Review ordinances for updates each year
Inspections	Conduct inspections at construction sites tied to critical construction progress including: foundations, framing, grading, paving, and prior to the issuance of the Certificate of Occupancy.
Distribute information on construction grading/erosion control	Provide educational material to contractors as part of the spring load limit notice. Materials to include site erosion control

	practices, silt fence maintenance, and frequent street sweeping.

BMP categories to be implemented	Measurable goals and timeframes

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Brian Bachmeier, Public Works Director/City Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

   The City of Oakdale has a Stormwater Utility Charge. There is a credit for onsite treatment. If the property owner fails to properly maintain the onsite treatment facility, we suspend the credit for onsite treatment until such time they properly restore the effectiveness of the onsite treatment facility.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No

3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):

   a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), 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? ☐ Yes ☒ No

   b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No

   c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No

   d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

   If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

   3.a-d: We will develop site plan review procedures and checklists for documenting legal mechanisms for long term maintenance of structural stormwater BMP's. This effort will be completed within the 12 month permit extension period.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Permit Application System	Process all applications within 2 weeks of receipt
Inspections	Inspections are conducted following NPDES identified rainfall events and on a weekly basis until the site is stabilized
Encourage the use of structural and non-structural BMP's during the rewivew of new and redevelopment projects	Encourage applicants to visit the city's web site engineering section to review the Engineering Guidelines manual which includes a checklist and example of a properly prepared erosion control plan
Stormwater Utility Fee Adjustments	In the event we identify an inadequately maintained privately owned water quality treatment basin, we give the owner one

	month to address the deficiency. In the event that fail to rectify the deficiency, we remove their onsite treatment credit which results in an increase in their storm sewer utility rate
Ordinance regulating new and redevelopment projects	We currently require all development applicants to secure all other appropriate agency permits including watershed district permits. These permits need to be issued prior to the issuance of the building permit.

BMP categories to be implemented	Measurable goals and timeframes

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Brian Bachmeier, Public Works Director/City Engineer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

   We have our current Storm Water Pollution Prevention Plan.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

   We currently have an asset inventory for the city owned assets. We will enhance the asset inventory to identify if the facility/asset contributes pollutants to stormwater discharges. This effort will be completed within the 12 month permit extension period.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Semi-annual street sweeping	Spring cleanup and fall leaf pickup
Inspection/repair of structural treatment devices	Annually
Inspection of storm water ponds	20% each year
Inspection of MS4 outfall	20% each year

BMP categories to be implemented	Measurable goals and timeframes
Employee training	Develop training materials to address requirements of new permit. Completed within 12 months of permit extension
Facilities Inventory & BMP development	Develop inventory and BMP's to address: dumpsters, vehicle cleaning, application of herbicides/pesticides, and fertilizers,
Inspection Maintenance Yard	Once a month during the months of April-October

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☒ Yes ☐ No

   a. If **no**, continue to 6.

   b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm. Is a map including the following items available for your MS4:

      1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☒ Yes ☐ No

      2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☒ No

   c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☒ No

6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No

7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☒ Yes ☐ No

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:

   a. Addresses the importance of protecting water quality? ☐ Yes ☒ No

   b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No

   c. Includes 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? ☐ Yes ☒ No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

   If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

   We are currently updating our second generation wellhead protection plan. It is scheduled to be completed by June 2015. We will implement the recommendations of that plan over the next five years. We are currently examining methods for assessing poinds to determine TSS and TP effectievenes. This study will develop procedures for determing effectivenss of stormwater treatment. A schedule will be implemented in year 2-5. We will evaluate our training programs and develop additional curriculum for our staff. We will keep douementation of inspections, maintenance and training as required by the general permit within twelve months of the date of permit coverage is exetneded.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

    Brian Bachmeier, Public Works Director/City Engineer

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☒ Yes ☐ No

   1. If **no**, continue to section VII.

   2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention**:** *MS4NameHere_TMDL.*

      This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

   This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VIII. Add any Additional Comments to Describe Your Program

TMDL Wasteload Allocation Excel Spreadsheet PART II.D.6.a.-e.

Copy and paste from the Master List MS4 TMDL Spreadsheet for your MS4 to the space below.

Attach this completed form with your SWPPP Document at the time of submittal. At a ***minimum,*** *provide all of the information "*"* *items (TMDL Project Name, Type of WLA, Numeric WLA, Unit, Flow Condition, and Pollutant of Concern).*

Permittee name	Preferred ID	TMDL project name*	Waterbody ID	Type of WLA*	Numeric WLA*	Unit*	Percent reduction	Flow condition*	Waterbody name	Pollutant of concern*	Date approved
Oakdale City	MS400042	Kohlman Lake TMDL	62-0006	Individual	0.33	lbs/122 days	24%	N/A	Kohlman Lake	Phosphorus	3/23/2010
Oakdale City	MS400042	Lake St. Croix Nutrient TMDL	82-0001	Categorical	24.1	lbs/day	34%	N/A	Lake St. Croix	Phosphorus	8/8/2012

Compliance Schedule PART II.D.6.f.-g.

Is your MS4 currently meeting its WLA for any approved TMDLs? **Go to:** Table 1 **Go to:** Strategies… **Go to:** Table 2

☑ **NO** (Complete Table 1, Strategies for continued BMP implementation beyond the term of this permit, and Table 2 below)
☑ **YES** (See Lake St. Croix information provided below)

If YES, indicate the WLAs (may be grouped by TMDL Project) you believe are reasonably being met. For each WLA, list the implemented BMPs and provide a narrative strategy for the long-term continuation of meeting each WLA. PART II.D.6.g.(1)-(2)

Kohlam Lake
RWMWD 's approach to addressing TMDL's is to implement their strategies to the extent practical. In the event they can't reach compliance, they will then work with the local agencies on the remaining WLA and BMP strategies. The BMP's and milestone's noted below are in the event additional local agency measures are necesary.

Lake St. Croix
It is our understanding that the VBWD will be indicating "Yes," that it is currently meeting its WLA for the Lake St. Croix TMDL (which is currently the only approved TMDL for the VBWD MS4) and will include the following discussion:
o Lake St. Croix Nutrient TMDL: 34% Total Phosphorus Reduction
Per Appendix B (County Implementation Plans) of the approved Implementation Plan for the Lake St. Croix Nutrient TMDL (Original October 2012, Revised February 2013): The plan developed for Washington County (which is assumed to fully encompass the VBWD (there is a very small portion of VBWD within Ramsey County, where no county plan was developed.)) performed the adjustment of the baseline loading estimates from the TMDL report. In the case of VBWD, the existing conditions TP loading from the TMDL report was reduced by 40% to account for landlocked areas within the watershed. The monitored annual load from VBWD was estimated based on 9 years of data. The monitoring data suggests that the actual loading from VBWD currently meets the estimated WLA for VBWD. Therefore, VBWD is operating under the assumption that it is meeting its WLA for the Lake St. Croix TMDL.

However, the VBWD continues to implement its Rules and Regulations for Stormwater Runoff Management (Rule 2) that align with the MPCA Minimal Impact Design Standards (MIDS). Additionally, the VBWD is performing a Watershed Restoration and Protection Strategies Study (WRAPS) with the MPCA to complete TMDLs for select impaired waters and identify projects to improve and protect water resources throughout the watershed and ultimately Lake St. Croix. The VBWD is also in the process of updating its Watershed Management Plan, which may incorporate some of the projects identified as part of the WRAPS study. Also, the VBWD received Clean Water Fund (CWF) grant funds to implement ravine restoration/rehabilitation projects in the Valley Creek watershed to protect trout/spawning habitat and ultimately reduce TSS and TP loads to Lake St. Croix. Also, in 2013, the VBWD completed an erosion inventory along Kelle's Creek to identify any areas of the creek that will require stabilization to prevent additional TSS and TP loading to Lake St. Croix.

If VBWD is meeting its WLA, it seems that all MS4s that drain to VBWD should also be meeting the WLA. The BMP's and milestone's noted below are in the event additional local agency measures are necesary.

Table 1

Fill in the following table with your Interim Milestones, BMP IDs, and Implementation Dates. Replace "TMDL Project Name & Pollutant" Columns with each TMDL Project Name and the corresponding pollutant. Then put an "X" in the boxes for the TMDL that corresponds with each BMP. PART II.D.6.f.(1)-(2)

NOTE:
It is recommended to assign each Interim Milestone (BMP) a BMP ID. You will be required to report on the status of each Interim Milestone and include a BMP ID for all structural BMPs as part of the MS4 Annual Report (see Part III.E.), so including those ID numbers at the time of application may be useful in tracking implementation efforts. If a pond that will be included in the pond inventory (Part III.C.2.) is to be applied toward a WLA, use the same ID for both the pond inventory and TMDL tracking. Non-structural BMPs are not required to have an ID, but it may be useful to assign it an ID for internal MS4 recordkeeping.

MPCA recommends the Implementation Dates align with the submittal of MS4 Annual Reports. Dates selected may not reflect the actual date a BMP is implemented, but shall indicate a BMP will be implemented on that date or before for that reporting year.

Interim Milestone (Best Management Practice)	BMP ID	Implementation Date	Kohlman Lake TMDL-Phosphorus	Lake St. Croix Nutrient TMDL - Phosphorus
Public education and outreach	KL -1	12/31/2014	X	
Evaluate effectiveness of street sweeping and modify as determined appropriate	KL-2	12/31/2015	X	
Comply with watershed district development rules	KL-3	12/31/2014	X	
Update engineering guidelines and details for construction projects	KL-4	12/31/2014	X	
Inpsection & maintenance of structural BMP's	KL-5	12/31/2016	X	
Model existing phosphorus reduction levels to confirm if we're currently meeting the WLA	LSC-1	12/31/2014		X
Evaluate viable BMP's to reach goal reduction	LSC-2	12/31/2015		X
Implement appropriate MCM-1 strategies	LSC-3	12/31/2015		X
Implement appropriate MCM-3 strategies	LSC-4	12/31/2016		X
Implement appropriate MCM-4 & 5 strategies	LSC-5	12/31/2017		X
Implement appropriate MCM-6 strategies	LSC-6	12/31/2018		X

Strategies for continued BMP implementation beyond the term of this permit. PART II.D.6.f.(3)

The City intends to explore opportunities to retrofit existing BMPs in the watersheds of each TMDL to maximize their pollutant removal capacity. Upon reevaluation of the TMDL waters on a ten-year monitoring cycle conducted by the state, the City will consider any necessary modifications to this approach.

Table 2
Target dates the applicable WLA(s) will be achieved. PART II.D.6.f.(4)

TMDL Project	Target Date to Achieve WLA
Kohlman Lake TMDL	2018
Lake St. Croix Nutrient TMDL	2022