

MEMORANDUM

DATE: October 15, 2024

To: Honorable Mayor & City Council

CC: Dave Bennett, Director of Public Works/City Engineer; Jeff Schroepfer, Police Chief; Jake Reilly, Community Development Director; Lynette Peterson, City Clerk; Michelle Mahowald, Communications & Human Resources Director; Natalie Draper, Director of Library; Brenda Angelstad, Finance Director; Chris Hood, City Attorney

From: Ben Martig, City Administrator

RE: "Supplemental Agenda Background Memo" for October 15, 2024 No. 2.

Summary Report:

The following is an update on agenda items as supplemental background agenda information made available for Tuesday October 15, 2024:

21. 24-633 Present Draft Report of the Surface Water Waste Load Allocation Implementation Plan

Staff received some questions from a member of the City Council regarding this agenda item. Staff are sharing as added information for the entire City Council. The following are the questions posed and responses from Sean Simonson, Engineering Manager:

City Council Question: Can you explain further why the Waste Load Allocation Implementation Plan is important (for Council for Policy Considerations & Community of residents and businesses more broadly). Also, what would happen if we did nothing?

Staff Response:

- **MS4 Compliance** - The Minnesota Pollution Control Agency has given the city new stormwater pollution limits (Total Maximum Daily Load Waste Load Allocations) to meet as part of the latest Municipal Separate Storm Sewer System (MS4) General Permit. The city is currently not meeting these new TMDL WLAs for Total Phosphorous (TP) and Total Suspended Solids (TSS). Compliance dates for meeting the TMDL WLAs are not specifically mandated. The MS4 permit requires that the city "show progress" towards meeting the TMDL WLAs. Failure to take any documented action would result in a point deduction during an MPCA audit of the City's MS4 program, and potential fines.
- **Ecological/Environmental Impact** – Reducing the loads of TP and TSS entering the Cannon River will improve water quality and promote healthier aquatic ecosystems by increasing dissolved oxygen levels, improving water clarity, and decreasing levels of harmful bacteria.

City Council Question: What are the changing climate factors (e.g. more intense and frequent storms) that we are planning for?

Staff Response:

The intensity and frequency of storm events are likely to continue increasing in the coming years. The City updated its Surface Water Modeling 2020, and staff has been discussing with Council area's where structures are impacted. In addition, this work on the Water Quality Model developed by Barr will allow us to better understand the performance of existing Best Management Practices (BMP) and future implementation on new BMP's.

City Council Question: How does this study affect our stormwater fund, and the number of staff needed to care for these infrastructure recommendations?

Staff Response:

The City is long in the game related to water quality, some of this will take time to implement and we will need to invest more in neighborhood retrofits during improvement projects, and look at increased maintenance such as street sweeping.

I believe this provides Council with the high-level overview, and staff will work through the budget process related to staffing and equipment. There will also need to be more in-depth study on other BMP implementation. The Water Quality Model should help streamline storm water BMP modelling in which structures/areas are most impacted by TP and TSS loads. This will give city staff a better understanding of what areas need more or less frequent maintenance, coupled with new BMPs.