

*Amendments*

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**Amendments****Response to Public Comments*****Public Hearing***

Pursuant to Chapter 2, Section 14 of the City of Minneapolis' NPDES Permit #MN0061018, a public hearing was conducted to receive public comment on this year's Annual Report on April 20<sup>th</sup>, 2004 during the Minneapolis City Council Transportation and Public Works Committee meeting. The hearing notice was published in Finance and Commerce and was also mailed to interested parties. The following parties were invited to attend and/or submit written comments:

Bassett Creek Water Management Commission (BCWMC)  
Minnehaha Creek Watershed District (MCWD)  
Mississippi Watershed Management Organization (MWMO)  
Shingle Creek Watershed Management Commission (SCWMC)  
Minnesota Board of Water and Soil Resources  
Minnesota Center for Environmental Advocacy (MCEA)  
Minnesota Department of Natural Resources (DNR), Division of Waters  
Metropolitan Council  
City of St. Paul, Sewer Utility Department  
Blue Water Association  
Clean Water Action  
Friends of Mississippi  
The Kestrel Design Group  
Mississippi Corridor Neighborhood Coalition  
Minnesota Environmental Partnership  
Mississippi River Basin Alliance  
Mississippi River Revival  
Neighborhood Revitalization Program  
Seward Neighborhood

Written comments were received from Minnehaha Creek Watershed District.

***Response to Comments***

1. Comment recommends that the citizen education/outreach program be expanded to promote volunteer cleaning of storm drains to remove debris following significant rain events: Due to the intermittent nature of significant rain events, scheduling volunteer clean up of storm drains would need to be administered through neighborhood organizations. Currently the

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Minneapolis Park and Recreation Board (MPRB) works with Friends of the Mississippi River to train volunteers and implement a catch basin stenciling project with neighborhoods and schools. Catch basin cleaning could possibly be done through this program provided there is increased funding and staffing to expand this volunteer project. Implementing public education to encourage citizens to clean catch basins on an individual basis will be examined considering such issues as safety, liability, and proper disposal. Specific proposals by MCWD or others for a citizen education/outreach program to promote volunteer cleaning of storm drains and corresponding funding options are welcomed.

2. Comment suggests making education of city staff on erosion control and discharge of construction waste/soil a component of the NPDES stormwater education program: We agree education is important in terms of reducing and eliminating erosion control violations, for both City and private projects disturbing topsoil. The City of Minneapolis has been sending staff to erosion control training and will continue to educate staff on erosion control and discharge of construction waste/soil.
3. Comment suggests inspecting stormwater outfalls more frequent than once every 5-year period: The City's permit requires inspecting 20% of the stormwater outfalls on a rotating basis at different locations during the effective period of this permit. City of Minneapolis Sewer Maintenance staff inspected 264 and 84 outfalls in 2002 and 2003, which is 89% of the total 390 outfalls. The City of Minneapolis will strive to maintain the greatest level of effort for this task given available resources and workload on a yearly basis. The minimum effort will be to meet our permit's requirements.
4. Comment suggests The Report should reflect the timing of grit chamber cleaning and street sweeping. It notes that if these activities occur after snow melt ends and rain events have washed sediments and debris from the streets, sweeping will miss the majority of material to be removed and may result in the need for more frequent cleaning of grit chambers: The random nature of the weather makes it impossible to use street sweeping as a stand-alone method to remove pollutant from watershed. We do concentrate our efforts in early spring and fall leave drop season to increase the efficiency of the operation. Public Works staff has reviewed literature that indicates a frequency of 50 times per year is necessary to achieve 90% removal of pollutants. Obviously, there is high cost associated with this frequency of sweeping. The citywide sweeping of Minneapolis costs nearly \$1,200,000. The City has determined that it is much more cost effective to concentrate sweeping at high loading times of the year (spring and fall), and utilize treatment devices to capture pollutants in the interim

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periods. Street Maintenance does sweep in the wintertime to reduce the amount of materials on the roadways of Minneapolis. The difficulty of doing a comprehensive sweeping in winter is selecting the days in an efficient and effective manner as the materials found on the streets are usually frozen to the pavement. The Sewer Maintenance department adjusts the frequency of treatment device cleaning based on inspections. The detailed inspection and cleaning information is listed in the Report on pages A-109 through A-117. The precipitation event data is also available in the NPDES monitoring section on page A-5. In addition to the efforts mentioned above, Minneapolis Public Works (MPW) and MPRB together began monitoring installed treatment devices in order to improve performance. The goals of this monitoring program include:

- Measure device effectiveness for specific units and site applications
- Determine optimal cleaning schedules (once the chamber is full, the device stops working, and material may also be washed out of the chamber)
- Develop better specification requirements and selection criteria for future installations, for MPW as well as private developers in Minneapolis

A report on the Powderhorn BMP monitoring program is provided beginning on page A-30.

5. Comment praises the City's improved storage of salt and other deicing material: We agree that this is an important BMP that will help reduce chloride transport to surface water. The City will continue to improve the method of storing and applying deicing materials.
6. Comment notes that the MCWD provided the Hydrologic/Hydraulic and Pollutant Loading model to the City: We thank the MCWD for this valuable analysis and planning tool and look forward to utilizing it with our citywide stormwater modeling effort. We are also hopeful that the revised flood profiles predicted by the model would enable the regulatory flood plain to be revised in the benefit of our residents who currently pay flood insurance.
7. Comment advises that six lakes in Minneapolis are on the Minnesota Pollution Control Agency's (MPCA) Impaired Waters List, and the MCWD has obtained a grant to improve these waters: We look forward to working together with MCWD and the MPRB on this effort.