CITY OF LA CRESCENT
SWPPP
JANUARY 2018

Self-Assessment Description

Before beginning to select BMPs and Measurable Goals, city staff undertook a self-assessment of the City of La Crescent's storm water system. This was an evaluation of the City of La Crescent's conditions, needs, and practices. The objective of this process was to provide a knowledge base upon which to structure the City's SWPPP in order to meet the permits maximum extent practicable standard.

Materials included in the League of Minnesota Cities NPDES Phase II MS4 Guide Plan guided the self-assessment. This self-assessment process had two major components:

- The first workshop session organized as part of the League of Minnesota Cities Guide plan project included a self-assessment component led by Pat Collins of AMEC Earth & Environmental. This included:

< Discussion of physical and socio-political watershed and organizational conditions and issues that should guide the selection of BMPs and Measurable Goals.
< Review of two examples of cities with different characteristics to demonstrate how local conditions should shape the selections of BMPs and Measurable Goals.
< A series of exercises in which we considered the local conditions for our community and how they should guide our selection of BMPs and Measurable Goals.

- After the workshop session, we worked with the NPDES Phase II Program Assessment Questionnaire that was included in the League of Minnesota Cities Guide Plan notebook. This was a twelve-page document with a comprehensive list of questions that we used to guide us through a self-assessment activity, including consideration of a wide range of storm water approaches.

These items represent the City of La Crescent's knowledge of the local storm water system and the conditions that shape it. The City of La Crescent will use the results of this self-assessment process to guide the selection of BMPs and Measurable Goals that make up the SWPPP for the Permit Application.

Based on the self-assessment process, the City of La Crescent has considered the following factors in order to meet the Maximum Extent Practicable standard set forth in the permit:

- Sources of pollutants
- Potentially polluting activities being conducted in the watershed
- Sensitivity of receiving waters
- Uses of receiving waters
- Specific local concerns
- The size of the City of La Crescent
- Climate
- Implementation schedules

- Current ability to finance storm water programs
- Hydrology
- Geology
- Capacity to perform operation and maintenance
- Local land uses
- Rate and type of development
- Characteristics of our the City's watershed
- Organizational characteristics of the City of La Crescent.

In addition to the self-assessment process discussed above, the City of La Crescent has also considered the following non-storm water discharges to determine whether they should be identified as significant contributors of pollutants to the City's storm water system:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration
- Uncontaminated pumped ground water
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensation
- Irrigation water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharge or flows from fire fighting activities

During the self-assessment process, the City of La Crescent did not find any of the above referenced non-storm water discharges listed above to be significant contributors to the storm water system.

Minimum Control Measure Summary

This document summarizes the BMPs chosen by the City of La Crescent. Each BMP is categorized into one or more Minimum Control Measures to meet the Maximum Extent Practicable standard set in the Permit requirements. Where a BMP addresses more than one MCM, it is listed under every appropriate MCM.

Public Education and Outreach

1a-1 Distribute Educational Materials
1a-2 Illicit Discharge
1b-1 Implementation Plan
1c-1 Documentation

Public Participation/Involvement

2a-1 Comply with Public Notice Requirements
2a-2 Solicit Public Input and opinion on the Adequacy of the SWPPP
2a-3 Consider Public Input
2b-1 Document Written Input
2b-2 Document Responses
2b-3 Document Event
2b-4 Document Notice

Illicit Discharge, Detection and Elimination

3a-1 Storm Sewer System Map
3b-1 Regulatory Control Program
3c-1 Illicit Discharge Detection and Elimination Plan
3d-1 Detecting and Tracking the Source
3e-1 Employee Illicit Discharge Information Program
3f-1 Identification of Priority Areas
3g-1 Timely Response
3h-1 Documentation

Construction Site Stormwater Runoff Control

4a- Regulatory Mechanism
4a-1 Minimize Erosion
4a-2 Minimize Discharge
4a-3 Dewatering Activities
4a-4 Site Inspections/Rainfall Records

4a-5 BMP Maintenance
4a-6 Solid and Hazardous Waste Management
4a-7 Final Stabilization
4a-8 Temporary Sediment Basins
4b- Site Plan Review
4c- Public Input
4d - Site Inspections
4e- ERPs
4f- Documentation

Post-Construction Stormwater Management in New Development and Redevelopment

5a- Regulatory Mechanisms
5a-1 Plan Review and Approval
5a-2 Post-Construction Management Program
5a-2-a New Developments
5a-2-b Redevelopment Projects
5a-3 Management Limitations and Expectations
5a-3a Limitations
5a-3b Exceptions
5a-4 Mitigation Provision
5a-5 Long-Term Maintenance

Pollution Prevention/Good Housekeeping

6a- Facilities Inventory
6b N/A
6c N/A
6d Pond Assessment Procedures
6e Inspections
6f Maintenance
6g Employee Training
6h Documentation

Organizational Structure

The City of La Crescent has a Mayor and four City Council members, and 23 full-time City employees. The City Administrator-Public Works Director, the Utility/Maintenance Supervisor, and the City Engineer will be the individuals directly involved in the City's stormwater management program.