



LOWER MINNESOTA RIVER WATERSHED DISTRICT

Executive Summary for Action

Lower Minnesota River Watershed District Board of Managers Meeting

Wednesday, October 9, 2024

Agenda Item

Item 6. A. - Metropolitan Airport Commission (MAC) Municipal Local Government Unit (LGU) Permit (Surface Water Management Plan and Ordinance Controls Review)

Prepared By

Linda Loomis, Administrator

Summary

The LMRWD has been working with the Metropolitan Airport Commission (MAC) to obtain a Municipal Local Government Unit (LGU) Permit. Young Environmental Consulting Group, on behalf of the LMRWD, has reviewed MAC's official controls to ensure they meet the standards required to obtain an LGU permit. Details of the review are attached

Young Environmental Consulting Group is recommending conditional approval of an LGU permit to the MAC. MAC adopt the draft MAC Standard Specifications: Section 01 89 30, Sediment and Erosion Control Inspection Form (Terracon), and Recommended Approach for LMRWD Rule D Compliance with MAC as LGU.

Please note that the MAX LGU permit will contain a special stipulation related to auditing, because of the proximity of MSP to critical water features and use of fuel and aviation related chemicals that could pose harm to on- and offsite water features via runoff. Audits are discussed in the recommendations found in Technical Memorandum – LMRWD – Metropolitan Airports Commission (MAC) Municipal Local Government Unit (LGU) Permit (Surface Water Management Plan and Ordinance Controls Review) dated October 2, 2024

Attachments

Technical Memorandum – LMRWD – Metropolitan Airports Commission (MAC) Municipal Local Government Unit (LGU) Permit (Surface Water Management Plan and Ordinance Controls Review) dated October 2, 2024

Recommended Action

Motion to conditionally approve a Municipal LGU permit for the Metropolitan Airport Commission subject to the adoption of the draft MAC Standard Specifications: Section 01 89 30, Sediment and Erosion Control Inspection Form (Terracon), and Recommended Approach for LMRWD Rule D Compliance with MAC as LGU. The permit will include special stipulation related to auditing.

Technical Memorandum



To: Linda Loomis, Administrator
Lower Minnesota River Watershed District (LMRWD)

From: Rachel Kapsch, Water Resources Scientist
Hannah LeClaire, PE, Water Resources Engineer
Erica Bock, Water Resources Scientist

Date: October 2, 2024

Re: LMRWD – Metropolitan Airports Commission (MAC) Municipal Local Government Unit (LGU) Permit (Surface Water Management Plan and Ordinance Controls Review)

On May 30, Marisa Trapp, with the Metropolitan Airports Commission (MAC), applied to the Lower Minnesota River Watershed District (LMRWD) for a municipal local government unit (LGU) permit. The documents offered as exhibits were MAC Standard Specifications: Section 01 89 30 — Erosion and Sediment Control (September 2024), a document demonstrating LGU Rule D Compliance entitled “Recommended Approach for LMRWD Rule D Compliance with MAC as LGU (September 2024),” MAC MSP Airport Construction Sediment Erosion and Control Inspection Form (Terracon), MSP Stormwater Pond Maintenance Standard Operating Procedures (SOP), Minimum Impact Design Standards (MIDS) Design Sequence Flow Chart, and documents responding to LMRWD comments during the review and standards revision process. The documents reflect MAC’s commitment to implementing LMRWD’s policy, regulations, exceptions, and criteria associated with LMRWD Rule B – Erosion and Sediment Control, and Rule D – Stormwater Management.

Currently, MAC is authorized to discharge stormwater under the airport’s NPDES Permit MN0002101. This permit requires monitoring and effluent limits for TSS and TP, which includes monitoring discharge from the MSP stormwater ponds to the Minnesota River. The effluent limits for TSS and TP are stricter than required by the LMRWD rules. The charts in Attachment 1 show that the airport has remained under the effluent limits for both TSS and TP since its permit was issued in 2013.

Below is a summary of our review of the information provided by MAC and our recommendations.

SUMMARY

Project Name:	Metropolitan Airports Commission (MAC) LGU Permit
Location:	6040 28th Avenue South Minneapolis, MN 55450
LMRWD Rules:	Rule B – Erosion and Sediment Control Rule D – Stormwater Management
Recommended Board Action:	Conditional Approval

Rule B – Erosion and Sediment Control

Compliance with the LMRWD’s Rule B – Erosion and Sediment Control is captured in the MAC Standard Specifications: Section 01 89 30 – Erosion and Sediment Control (September 2024) document, and the MAC MSP Airport Construction Sediment and Erosion Control Inspection Form (Terracon). The MAC campus does not encompass any high-value resource areas or areas within the steep slopes overlay district.

As presented, the MAC’s regulatory standards and requirements for erosion and sediment control are parallel to the LMRWD’s requirements. Therefore, the MAC complies with LMRWD Rule B. No additional information is required.

Rule D – Stormwater Management

Compliance with the LMRWD’s Rule D—Stormwater Management is captured in a document titled “Recommended Approach for LMRWD Rule D Compliance with MAC as LGU (September 2024),” with supporting information provided in the MSP Stormwater Pond Maintenance Standard Operating Procedures (SOP), and MIDS Design Sequence Flow Chart.

As presented, the MAC’s regulatory standards and requirements for stormwater management are parallel to the LMRWD’s requirements. Therefore, the MAC complies with LMRWD Rule D. No additional information is required.

Recommendations

The MAC’s application for an LGU permit meets the requirements outlined within the LMRWD rules. We recommend conditional approval of the LGU permit conditioned on the adoption of the draft MAC Standard Specifications: Section 01 89 30, Sediment and Erosion Control Inspection Form (Terracon), and Recommended Approach for LMRWD Rule D Compliance with MAC as LGU.

The complexities of the MAC campus include multiple stormwater BMPs and features (future green roof(s), infiltration basins, etc.), proximity to critical water features (the Minnesota River), and use of fuel and aviation-related chemicals (deicers, etc.) that could pose harm to on- and offsite water features via runoff. For this reason, the MAC LGU permit will contain a special stipulation related to auditing. The LMRWD will conduct quarterly audits of the MAC within the first year of issuing the LGU permit. These audits will be conducted to ensure that LMRWD rules are being properly implemented. The LMRWD will conduct two audits of the MAC in the second year of the permit, followed by LMRWD’s regular auditing processes. If the MAC is found noncompliant, the

LMRWD will advise the LGU on how to correct the issue. However, if problems persist, the LMRWD reserves the right to revoke or suspend the LGU permit and require individual permits for projects conducted on MAC property.

MAC staff are encouraged to coordinate any updates to their standards with the LMRWD's permitting team.

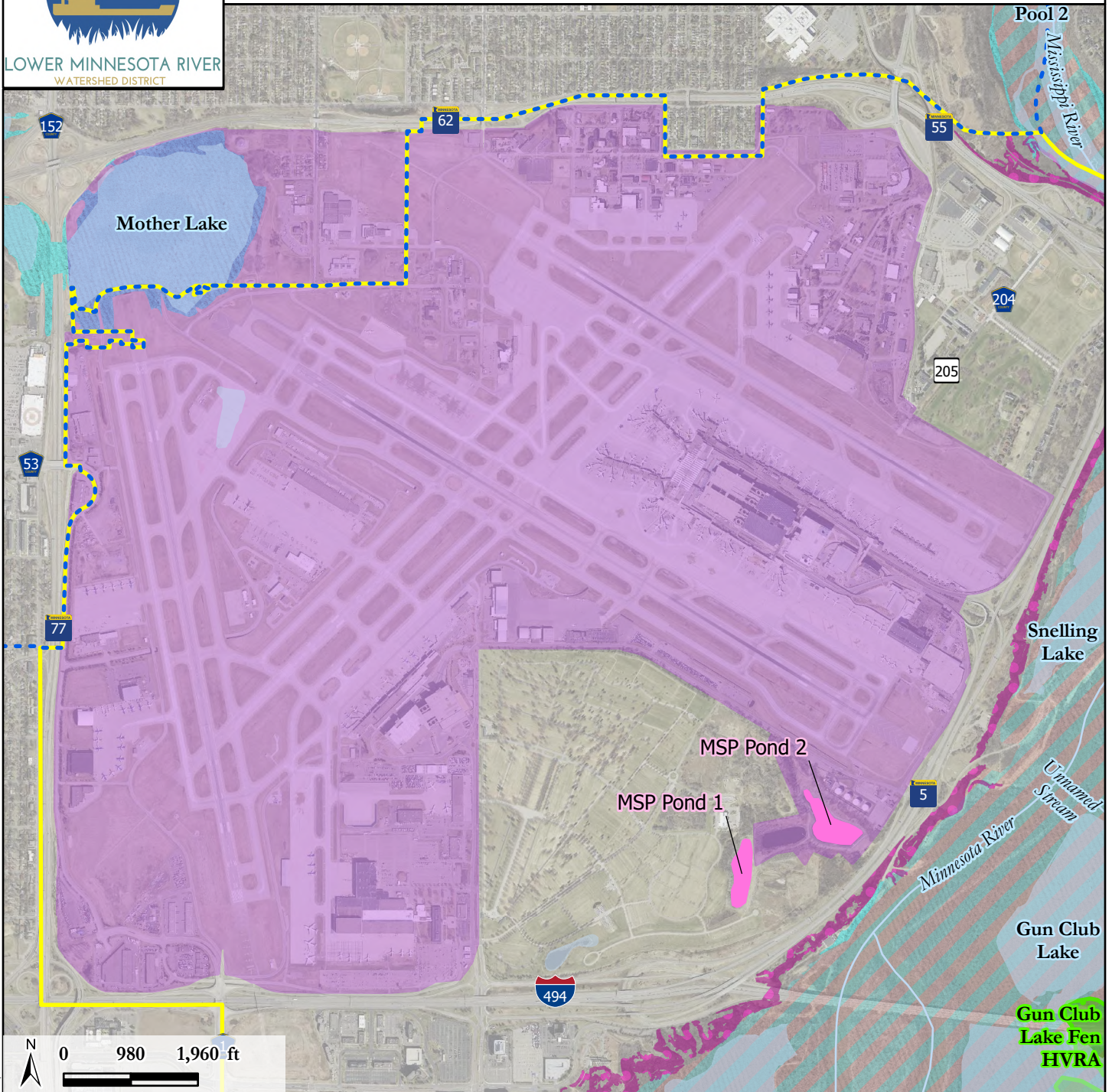
Attachments

- Figure 1 – MAC LGU Permit (2024-M-02) Coverage Area
- Attachment 1 – TSS and TP Effluent Limits Charts



LOWER MINNESOTA RIVER
WATERSHED DISTRICT

Figure I - MAC LGU Permit (2024-M-02) Coverage Area



Legend

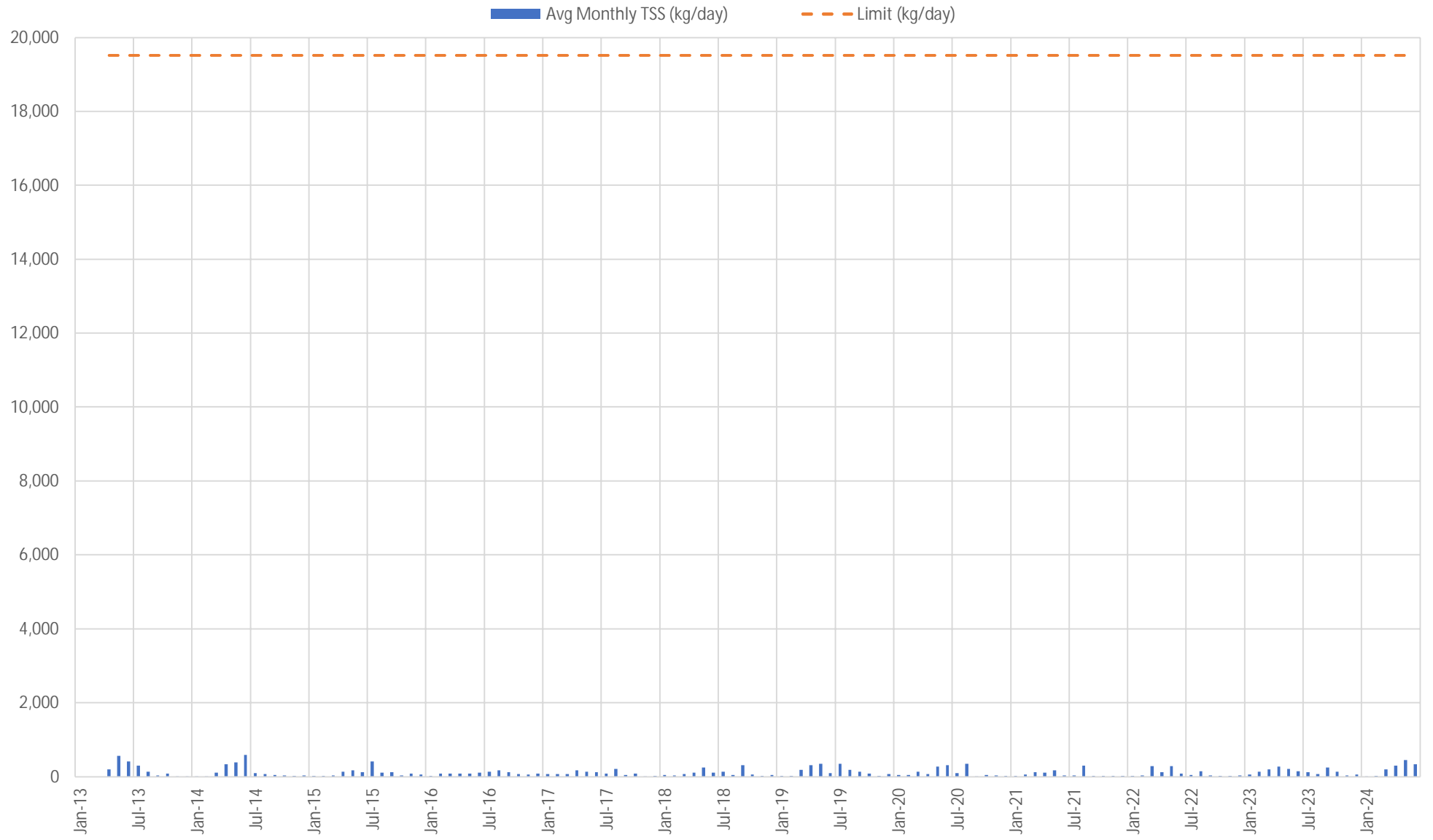
- LMRWD Boundary
- Minnehaha Creek Watershed District
- MAC Campus
- MSP Pond
- Public Waters
- Public Waterbodies
- High Value Resource Area
- Steep Slope Overlay District
- 100-yr Floodplain
- Floodway

LMRWD Watershed Location Map



Young Environmental
Consulting Group, LLC

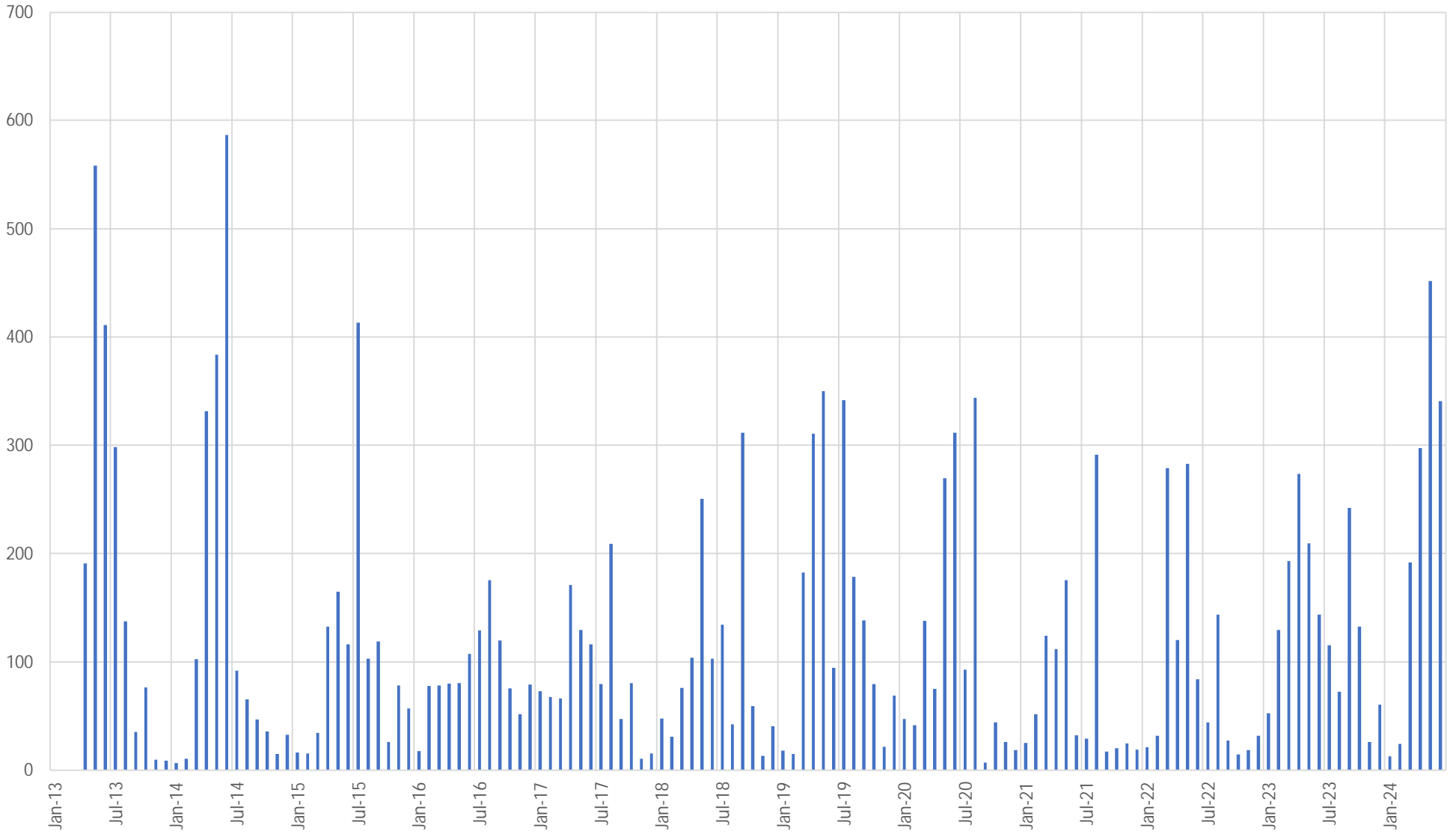
MSP - TSS Compliance Summary (19,520 kg/day calendar month average limit)



MSP - TSS Compliance Summary

(19,520 kg/day calendar month average limit)

■ Avg Monthly TSS (kg/day)



MSP - Total Phosphorus Compliance Summary

(1,134 kg/yr 12-month rolling sum limit)

12- Month Rolling Total Phosphorus (kg/yr) Limit (kg/yr)

