

Minneapolis Community Environmental Advisory Committee (CEAC)

July 16, 2015

Dear Mayor Hodges and Minneapolis City Council:

Thank you for the opportunity to comment on the Stormwater Management Plan (SWMP) for the City of Minneapolis, updated in 2014. The plan lays out, in great detail, several programs that would lead to an increase in water quality throughout the city. Members of the Community Environmental Advisory Commission (CEAC) found the SWMP to provide strong guidance for relevant parties, but would like to offer a few comments that seek only to enhance the strengths of the document and improve its likelihood for success.

The comments below offer general observations given in response to themes in the document and have been approved by CEAC. More specific comments are attached separately.

- **Call out specific opportunities to connect community outreach to behavior change.** Areas throughout the document where addressing stormwater management issues involve community behavior change should be enhanced. A more explicit plan is needed focusing on the human element of behavior change that goes beyond providing information. Resources are available at the University of Minnesota and from other sources to aid in developing a more holistic community outreach program that will be more effective at achieving the desired natural resource outcomes. Another work plan sheet stating an intentional and strategic community engagement plan should be developed, and the ethos of such a plan should be built into the several SMPs which deal with community engagement and education.
- **Leverage partnership opportunities.** The public should be considered as participants in the process, and the city should take advantage of the opportunity to work with several partner organizations and volunteers to reduce resource pressures on city staff. For example, the Master Water Stewards program's purpose is to increase the force of people in the community doing water pollution prevention by training and developing community leaders. As the pilot project in Minnehaha Creek Watershed wraps up this year there will be about 100 Certified Master Water Stewards. The program is expanding to include MWMO and other watersheds next year including an on-line curriculum. It will be growing a team of trained and enthusiastic community members ready to work with the city to prevent stormwater-related pollution. There are several instances in the SWMP to utilize this volunteer body to advance the goals and work of the city.
- **Prioritize green infrastructure options in new development or reconstruction projects making it easier for developers and contractors to make the right choice.** A menu of green infrastructure options provided at the start of project planning could help to influence developers and planners to use green infrastructure options even when it is not required. This is particularly important when public works and transportation projects can be leverage to provide additional stormwater management benefits. Developing this menu and providing suggestions for ways to promote its use and effectiveness is something that the CEAC Water Subcommittee would be willing to support during this current term.

Thank you again for the opportunity to provide comment. We look forward to the opportunity to work with city staff to continue to improve water quality in Minneapolis.

Sincerely,

Anna Abruzzese, Chair

CEAC Members: Dylan Bradford Kesti, Anna Abruzzese, Andrew Murray, Alejandro Ojeda Saint-Martin, Allan Campbell, Jen Kader, Eduardo Cardenas, Shalini Gupta, Roxanne OBrien, Lisa Daniels, Michelle Stockness, Darrell Gerber, Meleah Houseknecht, James Nash, Brian Ross, Tony Hainault, Adam Arvidson

CEAC Detailed Comments to Stormwater Management Program (July 2015)

Thank you for the opportunity for the individuals signed below to comment on the Stormwater Management Program (SWMP) for the City of Minneapolis, updated in 2014. The SWMP is a requirement under the Municipal Separate Storm Sewer System (MS4) Phase I permit issued to the City of Minneapolis and the Minneapolis Park and Recreation Board. The plan lays out, in great detail, several programs that would improve water quality throughout the city. We find the SWMP to be a well thought out and thorough document especially with regard to scientific and engineering related elements.

We do offer some more detailed comments, suggestions, and requests for clarification:

- Page 13: Aren't there other types of loans besides bonds that are used to pay for capital project work?
- Page 15: In Table 1-4 there should be a row for mercury/methylated mercury since Mercury in Fish Tissue is one a common impairment for water bodies receiving Minneapolis municipal stormwater.
- Page 15: In Table 1-4, under coal plants, they also can release lead.
- Page 15: In Table 1-4, Fertilizers/Pesticides/Soil Treatments is missing e.coli (primarily from large ag sources but could be if individuals use untreated manure), cyanide (sodium cyanide and hydrogen cyanide used as a predecide/rodenticide and as an insecticide.), sulfate (likely ammonium sulfate, elemental sulfur, or gypsum to change pH or use along with other pesticides like glyphosate), pH (see intentional changes to soil pH above).
- SMP 1.1 or SMP 2.1: Explicitly list opportunities to grow and leverage the people in the community who can do some of the public education, non-point source projects, etc. One example is the Master Water Stewards (MWS) program at Freshwater Society (<http://freshwater.org/master-water-stewards-a-community-approach-to-protecting-water/>). The purpose of MWS is to increase the force of people in the community doing water pollution prevention by training and developing community leaders. As the pilot project in Minnehaha Creek Watershed wraps up this year there will be about 100 Certified Master Water Stewards. The program is expanding to include MWMO and other watersheds next year including an on-line curriculum. It will be growing team of trained and enthusiastic community members ready to work with the city to prevent stormwater related pollution. There are also other programs that the city might leverage.
- SMP 2.1: The 311 expansion to include environmental reporting is good but it is still limited. The smartphone apps tell you to call the phone number instead of making tools available in-app to report environmental violations. This should be expanded and coupled with other violations covered by the inspectors in order to provide GPS info and photos. It also needs to be advertised and encouraged as ways for the community to assist in addressing illicit discharges.
- SMP 2.2: The workplan is focused on more passive forms of public outreach -- make the information available in case someone comes looking for it. However, how/why would someone come looking for it? How is that going to result in changes reducing water impacts? There needs to be a workplan component to make sure that the information is used to bring about the changes needed. Who are partners to work with that can increase the effectiveness and reduce the resource pressures on city staff? Some could be pushed down to individual sections but there needs to be an overarching stated intent to be more intentional and strategic.
- SMP 3.7: Inserts with information included in billing will not reach those electing to have e-billing. What methods are being used to reach these individuals?

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- SMP 3.8: For street stenciling, why are "Drains to Lake" and "Drains to Creek" stencils only available in English. Include options for multi-lingual stencils or using images?
- SMP 3.9: Could the training be expanded to or required of any private contractor operating within the city? (Special Service Districts, Parking lots, etc.) Is there any check-in to ensure compliance? Is there any measurement or tracking in place to demonstrate progress?
- SMP 4.1 & 4.2: Programs only call for a general "establishment of vegetative cover" without criteria for what type of vegetative cover is acceptable. Given anecdotal and first-hand experience in use of fast-establishing seed to establish ground cover without regard to long term impact, this language should be tightened. For instance, while sweet clover is great for erosion control and quickly establishes, it should not be included in the seed mix for vegetative cover. Is there specific language governing this elsewhere, or could it be included here that non-native, invasive, and/or overabundant seed stocks should not be incorporated?
- SMP 5.1: How are sites selected? What criteria is used? Who is doing the evaluation? What barriers are there that could limit the number of "problem properties" that are able to be reviewed? Could volunteer groups with training, like Master Water Stewards, or non-city staff be utilized?
- SMP 5.2: Who is inspecting and certifying the projects? Is this another area where volunteers or non-city staff could be used?
- SMP 5.4: When streets are redone, what options are being considered to leverage the opportunities to gain additional stormwater benefits by reducing volume, pollutant load, and/or rate and at what point in the project development process is this considered? Is there a menu of options to choose from such as bump outs, tree boxes, raingardens the project managers can select from where applicable? Does the land covered in this category include MPRB boulevards?
- SMP 5.5:
 - What are the projects, and who is developing them? What is the criteria?
 - Is the flooding data going to be public? This would help with outreach and in aiding the development of ownership from the local community. The information makes the problem less of an unknown, increasing the likelihood for enduring behavior change. Also, use Master Water Stewards for outreach and project implementation.
- SMP 5.6: What pilot programs are being considered? Who proposes these, and what mechanisms are in place to allow for public input/idea generation?
- SMP 6.1.2: For the public involvement metrics, would there be interest amplifying an "Adopt-a-Storm Drain" program? Local schools, neighborhood groups, etc. may be interested in this opportunity in addition to Master Water Stewards.
- SMP 6.1.11: To whom will this mapping data be available? Will it be a part of the information available through the open data policy? Can it be provide in an easy to understand and use form for the general public? Interactive web GIS technologies can make it simple for community members to find out where their stormwater goes.
- SMP 6.3: Will the manuals developed be available for public consumption/as examples for best management practices? Also, for fleet washing and other heavy water use practices, is stormwater reuse being considered as a way to even further reduce runoff volume?
- SMP 6.5: Sweeping up of excess deicers when an excess occurs should be included in the practice. Also, parks should not encourage excess use of deicers by making the correct method the easy method (appropriate application tools) and by not leaving the deicers easily accessible to the public (i.e., not immediately next to the door with a giant cup available for anyone to grab and use).
- SMP 6.6:
 - Is any consideration being given to design the right-of-ways to better intercept the flow? Breaking up impervious surface and using catchments of different kinds has been mentioned elsewhere in

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- the SWMP, but not here. In other words, is consideration being given to design elements that direct water into boulevards, medians, sunken islands, etc.?
- Assessment – add tracking of infrastructure changes
 - "Public participation" needs to be more specific – and needs to be meaningful. Showing up to a meeting shouldn't be the only thing that counts – what does participation actually look like on the ground? How are communities beyond white, middle class, property owners being reached?
 - Will roots be left intact during sidewalk construction? After finding the role sidewalk construction played in the loss of trees to high winds it should be explicitly stated that this work will not damage or threaten important natural stormwater management elements except where absolutely necessary.
 - Leveraging of groups like Master Water Stewards should be called out in this SMP.
 - SMP 8.2: Can the language be made any stronger? Increasing specificity for how outreach will be done will help, as would as identifying language for non-city contractors. Possible suggestions are: "Working through neighborhood associations, business associations, and other similar groups, increase the number of property managers and maintenance staff..." or "Ensure all special service districts, commercial districts, or other areas of the city with high levels of impervious surfaces or deicer use follow city-stated BMPs" or something to that effect. Remove the "coffee shop employee" reference and instead reference the need for proper training of all employees especially at businesses those with heavily trafficked sidewalk areas.

Thank you again for the opportunity to provide comment. We look forward to the opportunity to work with city staff to continue to improve water quality in Minneapolis.

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