1/20/2015

Wisconsin Department of Natural Resources
Storm Water Program-WT/3
PO Box 7921
Madison, WI 53707-7921

Subject: Exemption Request for MS4 Permit No. WI-S050181-1

To Whom It May Concern:

St. Croix County is requesting exemption for the WPDES-MS4 Permit where St. Croix County may own or operate infrastructure within the following MS4 designated areas:
1) City of Hudson and 2) Town of St. Joseph/Houlton Urbanized Area, (boundary maps enclosed)

The information required for an exemption and enclosed NOI-materials, is based on the criteria in NR216.023 (3): The system is not contributing substantially to the pollutant loadings of a physically interconnected municipal separate storm sewer system that is regulated under this chapter.

1) City of Hudson (over 10,000 in population)
   a. St. Croix County does not have any roadways within the jurisdictional boundaries of the City of Hudson. (letter from Highway Engineer enclosed)
   b. St. Croix County owns approximately 80 acres within the jurisdictional boundaries of the City of Hudson, however only 13 acres or 16% of the lot area is developed. The runoff water generated from the 13 acres drains to an internal depression where it is infiltrated. This depression is also utilized by the City of Hudson for additional storm water storage. (contour map and storm sewer map enclosed)

2) Town of St. Joseph/Houlton Urbanized Area
   a. The St. Croix River Crossing Transportation Project is currently underway which includes roadway changes within the Houlton Urbanized Boundary. Upon completion of the project in 2016/2017, St. Croix County will not have any roadway jurisdiction. (letter from Highway Engineer enclosed)

If you have any further questions regarding this request or need additional information, please contact myself or our storm water staff person, Tammy Wittmer, (715) 531-1906.

tamara.wittmer@co.saint-croix.wi.us.
Sincerely,

Ellen Denzer
St. Croix County
Community Development Director

cc: Matt Jacobson, Wastewater Specialist
    Tim Ramberg, St. Croix County Highway Commissioner
    Jim Elsbury, St. Croix County Facilities Director
    Cindy Campbell, County Clerk
    Pat Thompson, County Administrator
    Denny Darnold, City of Hudson Community Development Director
    Nicole Stewart, Town of St. Joseph Clerk

Enclosures: City of Hudson-Urban Boundary Map
            Houlton Urbanized Area Map
            NOI-Permit Application
            NOI-Section V: Summary of Activities
            Roadway jurisdiction letter-City of Hudson
            Contour Map-Site Map-City of Hudson/Government Center
            Storm sewer Map-City of Hudson
            Roadway jurisdiction letter-Houlton/St. Joseph
**Notice: Pursuant to ss. 283.33 and 283.37, Wis. Stats., and chs. NR 151 and 216, Wis. Adm. Code, this form is used to apply for coverage under Wisconsin Pollutant Discharge Elimination System (WPDES) Municipal Separate Storm Sewer System (MS4) General Permit No. Wi-S050181-1. This form and any required attachments constitute the permit application. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin’s Public Records Laws (ss. 19.31-19.36, Wis. Stats.).**

**Instructions:** Complete all sections of this permit application. If additional space is needed to respond to a question, attach additional pages. Provide descriptions below that explain the program activities that you expect to develop and implement to comply with the MS4 general permit. Information on the MS4 general permit and the MS4 storm water program are available at: [http://dnr.wi.gov/topic/stormwater/municipal/](http://dnr.wi.gov/topic/stormwater/municipal/). Section 3 of the MS4 general permit contains the compliance schedule that directs when the individual program activities need to be developed and submitted to the Department for review. The detailed programs that are developed and submitted to the Department for review may deviate from the program activities described below if necessary. The descriptions provided below are necessary for the Department to verify that the municipality’s program activities comply with the permit.

### Section I: Applicant Information

**Name of Municipality**

St. Croix County

<table>
<thead>
<tr>
<th>Mailing Address</th>
<th>City</th>
<th>State</th>
<th>ZIP Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>1101 Carmichael Road</td>
<td>Hudson</td>
<td>WI</td>
<td>54016</td>
</tr>
</tbody>
</table>

**County(s) in which Applicant is located**

St. Croix

**Type of Municipality:** (check one)

- □ County
- □ City
- □ Village
- □ Town
- □ Other (specify)

### Section II: Local Contact Information

**Name of Municipal Contact Person**

Ellen Denzer

**Title**

Community Development Director

<table>
<thead>
<tr>
<th>Mailing Address</th>
<th>City</th>
<th>State</th>
<th>ZIP Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>1101 Carmichael Road</td>
<td>Hudson</td>
<td>WI</td>
<td>54016</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Email address</th>
<th>Phone Number (incl. area code)</th>
<th>Website address, if available</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="mailto:ellen.denzer@co.saint-croix.wi.us">ellen.denzer@co.saint-croix.wi.us</a></td>
<td>715-386-4673</td>
<td></td>
</tr>
</tbody>
</table>

### Section III: Water Quality Concerns

**Yes**

**No**

- □ X Does any part of the MS4 discharge to an outstanding resource water (ORW) or exceptional resource water (ERW) listed under s. NR 102.10 or 102.11, Wis. Adm. Code? (A list of ORWs and ERWs may be found on the Department’s Internet site at: [http://dnr.wi.gov/topic/surfacewater/orwerw.html](http://dnr.wi.gov/topic/surfacewater/orwerw.html))

- □ X Does any part of the MS4 discharge to an impaired waterbody listed in accordance with section 303(d)(1) of the federal Clean Water Act, 33 USC § 1313(d)(1)(C)? (A list of Wisconsin impaired waterbodies may be found on the Department’s Internet site at: [http://dnr.wi.gov/topic/impairedwaters/](http://dnr.wi.gov/topic/impairedwaters/))

### Section IV: Potential Permit Exemption

**Yes**

**No**

- □ X Section NR 216.023, Wis. Adm. Code, allows certain MS4s that have less than 1000 people residing in an urbanized area to be waived from municipal storm water permit coverage.

- □ □ Do you believe that the MS4 may be eligible for this potential exemption as described in s. NR 216.023, Wis. Adm. Code?

If yes, please provide documentation supporting a permit exemption including the following (Attach additional pages if necessary):

- Total municipal area in square miles
- Total municipal population (2010 U.S. census)
- MS4 service area within Urbanized Area in square miles
- Municipal population within Urbanized Area (2010 U.S. census)
- Additional information supporting an exemption under s. NR 216.023, Wis. Adm. Code

**Note:** Urbanized Area information is available from the USEPA at:

[http://water.epa.gov/powwaste/npdes/stormwater/Urbanized-Area-Maps-for-NPDES-MS4-Phase-II-Stormwater-Permits.cfm](http://water.epa.gov/powwaste/npdes/stormwater/Urbanized-Area-Maps-for-NPDES-MS4-Phase-II-Stormwater-Permits.cfm)
Section V: Summary of Municipal Storm Water Program Activities

Describe the programs or activities the municipality is doing or will do to comply with the requirements of the MS4 general permit. Attach additional pages if necessary.

A. Public Education and Outreach

Describe the public education and outreach program activities that the municipality will implement to comply with section 2.1 of the MS4 general permit.

See attachment for items A-F.

B. Public Involvement and Participation

Describe the public involvement and participation program activities that the municipality will promote to comply with section 2.2 of the MS4 general permit.

C. Illicit Discharge Detection & Elimination

Describe the illicit discharge detection and elimination program authority and activities that the municipality will develop and implement to comply with section 2.3 of the MS4 general permit.

D. Construction Site Pollution Control

Describe the construction site pollutant control program authority and activities that the municipality will develop and implement to comply with section 2.4 of the MS4 general permit.

E. Post-Construction Site Storm Water Management

Describe the post-construction storm water management program authority and activities that the municipality will develop and implement to comply with section 2.5 of the MS4 general permit.

F. Pollution Prevention

Describe the pollution prevention program activities that the municipality will implement to comply with section 2.6 of the MS4 general permit.

Section VI: Certification

I hereby certify that I am an authorized representative of the municipality that is the subject of this application for general permit coverage, and that the information provided is true and complete, to the best of my knowledge. I understand that Wisconsin law provides severe penalties for submitting false information.

Authorized Representative Name: Ellen Denzer
Title: Director Community Development
Signature: Ellen Denzer
Date Signed: 1-23-15
Phone Number (incl. area code): 715-386-4673
Email address: ellen.denzer@co.saint-croix.wi.us

Return this completed form to: Wisconsin Department of Natural Resources
Storm Water Program – WT73
PO Box 7921
Madison, WI 53707-7921
Section V: Summary of Municipal Storm Water Program Activities

A. Public Education and Outreach

The Community Development Department offers a variety of outreach activities directly related to storm water. Below is a summary of activities offered in 2014:

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hudson School Contacts</td>
<td>3760</td>
</tr>
<tr>
<td>Earth Day at YMCA Camp St. Croix</td>
<td>226</td>
</tr>
<tr>
<td>NEMO boat tour</td>
<td>119</td>
</tr>
<tr>
<td>Artful Raingarden Class</td>
<td>5</td>
</tr>
<tr>
<td>TOTAL</td>
<td>4110</td>
</tr>
</tbody>
</table>

1. Of the school contacts, 1523 were specifically related to water. The other school contacts were presentations on topics such as: soils, forest, animals, GPS, rocks, recycling.
   ~Hudson Middle School 8th grade did annual surface water testing at Willow River State Park.
   ~This fall the Hudson School District implemented Inquiry Units in the elementary schools.
   ~5th grade specifically is focusing on surface water and the St. Croix River.
2. Earth Day 2014 specifically focused on water and we brought in the Science Museum of MN to do their water show.
3. NEMO boat tour – a cruise on the St. Croix with topics focused on protecting the St. Croix River water quality.
4. Artful Raingarden Class – sponsored by the Phipps. Students in Hudson learned how raingardens protect the St. Croix River and then created artwork for the 7th & St. Croix St. raingarden.

B. Public Involvement and Participation

A priority of the Community Development Department over the next 2-years is to evaluate Stormwater and Erosion Control as a stand-alone County-wide ordinance. Stormwater is currently regulated based on location within a zoning district and type of disturbance (greater than 10,000 square feet). This project will be a large undertaking, but we see the benefit in aligning all county ordinances to the same standards.

In addition, our department is part of a technical team with the St. Croix River Crossing Highway 64 Corridor Communities, Stormwater & Wastewater Coalition. This larger group has identified several stormwater related projects and will be determining the priorities within the next few months. Model ordinances, urban storm sewer mapping, urban subwatershed mapping and rural runoff modeling are all on the list.
C. Illicit Discharge Detection & Elimination

For County Land/Facilities located within the City of Hudson, there’s a low risk for illicit discharges from county facilities and activities. The main Government Center is connected to City Sewer where all waste streams are directed. Stormwater runoff is directed internally where it is naturally infiltrated.

The services are provided at the Government Center:
Administration (HR, Finance, IT, Legal)
Building Services
Court House
County Clerk, Treasurer, Register of Deeds
Community Development
Sheriff, Jail, Emergency Services

D. Construction Site Erosion Control

County land use ordinances address construction site erosion control based on 1) location within a zoning district and 2) by type of activity (disturbance area and slopes). For more information click the link below for all Land Use Ordinances.

http://www.co.saint-croix.wi.us/index.asp?Type=B_LIST&SEC={D1648D84-3ECE-4FC7-85BC-D55386B8D210}

E. Post-Construction Site Storm Water Management

Same information stated in D. above applies.

F. Pollution Prevention

The Building Services department oversees all facility maintenance activities. With over 65 acres of Natural Open Space, there is an awareness and priority to protect what we have. Because public safety is a top priority, good housekeeping practices are implemented daily. Facilities are inspected regularly and repairs are made as needed.
January 12, 2015

Tammy Wittmer, Planning Specialist
St. Croix County Community Development
1101 Carmichael Road
Hudson, WI 54016

RE: Absence of County Highways in City of Hudson

Tammy,

St. Croix County does not have any roadways under its jurisdictional maintenance responsibility within the municipal boundaries of the City of Hudson. County Highway route designation signage remains in place along Vine Street (CTH UU), Carmichael Road north of I-94 (CTH A) and Carmichael Road south of I-94 (CTH F). This is done for transportation continuity purposes to assist the traveling public.

CTH N terminates before it enters the City of Hudson and becomes Stageline Road under Town of Hudson or City of Hudson jurisdiction depending on municipal boundaries.

Please let us know if you have any additional questions or comments.

Sincerely,

Jeffrey S. Durkee, P.E.
St. Croix County Highway Engineer

CC: Tim Ramberg, St. Croix County Highway Commissioner
    Todd Rehnelt, St. Croix County Highway Asst. Commissioner
January 12, 2015

Tammy Wittmer, Planning Specialist
St. Croix County Community Development
1101 Carmichael Road
Hudson, WI 54016

RE: Town of St. Joseph (Houlton Area) and St. Croix County MS4

Tammy,

Upon completion of the new Stillwater Bridge near Houlton in 2016/2017, CTH E west of the new 35/64 four-lane Highway will either be obliterated or jurisdictionally transferred to the Town of St. Joseph. Agreements to this effect have been negotiated over the past several years and are in place. Therefore, upon completion of the new Stillwater Bridge in late 2016 or early 2017, St. Croix County will not have jurisdictional maintenance responsibility over any roadway within the MPA boundary of the urbanized area around Houlton.

Please let us know if you have any additional questions or comments.

Sincerely,

[Signature]

Jeffrey S. Durkee, P.E.
St. Croix County Highway Engineer

CC: Tim Ramberg, St. Croix County Highway Commissioner
    Todd Rehnelt, St. Croix County Highway Asst. Commissioner