

IV-6 Annual Workplan and Budget Process

The estimated implementation program project costs (Table IV-5) do not include all administrative expenditures for the District. Each year, the District will prepare a workplan and budget for the succeeding year to include administrative costs as well as programs and projects identified within the approved watershed management plan. A “minor plan amendment” process will be initiated in May each year for major projects scheduled to be implemented in the succeeding year. Current information on estimated project costs will be distributed for review and comment to the affected local units of government, the Metropolitan Council, state review agencies, the District’s citizen advisory (CAC) and technical advisory (TAC) committees and St. Paul Community Councils. The type and amount of the local contribution, if any, will be identified. The 5-year CIP program (Table IV-3) will be updated each year through this process. A preliminary certified levy request and annual budget will be prepared and adopted by the Board of Managers by August each year following a public hearing. A final levy will be certified by the Board and submitted to the Ramsey County Dept. of Taxation by December each year.

Priorities

District priorities are generally reflected in the current Plan by the timeline shown in Table IV-3 for various implementation activities. General priorities were established through the processes of issue identification and problem assessment as the Plan was developed. The District has adopted a prioritization process effective September 21, 2000. The process is a tool to guide public input and Board discussion during development of the capital projects component of the workplan. Prioritizing criteria include: 1) degree of public use, 2) public safety, 3) public support, 4) demonstration project, 5) project timing relative to financing, 6) partnering or collaboration opportunities, 7) cost to benefit analysis, 8) water quality impacts and 9) ecological improvement. Each of these criteria is ranked as high, medium or low.

IV-7 Resource Based Performance Standards & Watershed Rules

The District will promulgate governing rules and regulations under MN Statutes 103D.341 for the protection and management of water resources within its jurisdiction. Rules will include performance standards and specifications and implementation policies and procedures for application by the district, agencies, and local governmental units within the watershed. Rules will cover the subjects of groundwater quality protection, surface water management, stormwater management, wetland conservation and implementation of the Wetland Conservation Act, erosion and sediment control, permitting, and, indirectly, land use development. Rules will be promulgated during the period of 2001 to 2004.

The District currently has several efforts in progress or contemplated for the near term several projects that will provide significant additional data to support the development of resource-based performance standards for stormwater. The projects that will provide additional data are primarily focused on the area of water quality. The following studies will provide important additional technical data and support for the District's Rules:

<u>Study</u>	<u>Completion Date</u>
• Impervious Surfaces Study	Done
• Stormwater Modeling (Water Quality)	May 2000
• Como Lake Strategic Management Plan	June 2001
• Lake McCarrons Strategic Management Plan	est. December 2001
• Wetland Management Plan	est. September 2001

Performance standards for Como Lake and Lake McCarrons are related to the water quality goals and desired uses for these waterbodies. Once the standards are identified through the strategic planning process, technical information developed from the Impervious Surfaces Study and the Stormwater Modeling Project is used to develop rules and capital improvement projects to meet the standard.

Additional regional and federal efforts to set standards for water quality are currently underway. The results of these efforts must also be considered and incorporated into the Watershed's standards and rules as they quantify water quality goals and standards. Current efforts at the regional, state, and federal levels that will provide additional input and guidance for the District in the future include:

- Metropolitan Council development of target pollution loads for all watersheds in the Twin Cities
- MPCA/USEPA National Pollutant Discharge Elimination System (NPDES) Phase I and II Stormwater Discharge permitting
- MPCA/USEPA Total Maximum Daily Loads (TMDL) Standards for impaired waterbodies

The Rules development and implementation process is expected to follow the general framework outlined below:

- Develop a memorandum of understanding (MOU) with all the member cities (together or individually) to allow the District some involvement in the development and redevelopment planning and review process. The MOU will identify District goals and standards to ensure consistency among city departments and may include a requirement for an annual meeting with the cities. The MOU could also address specific technical areas such as stormwater management, wetlands, floodplain management, minimization of impervious cover and groundwater protection. The MOU will also include a discussion of coordination activities with St. Paul related to implementation of the city's Phase I NPDES permit.

- If the MOU approach is not successful, the District could develop interim rules using existing guidelines and standards.
- Watershed Review and City Permitting - Coordinate the District's review and comments of proposed developments through member Cities so the Cities take the lead role in the actual permitting process.
- Revise Rules to Include Performance Standards - Develop specific resource-based stormwater and water quality performance standards using the information developed in the District's on-going studies through a complete Rules revision process involving the local, regional, and state officials. Utilize the District's Technical Advisory Committee (TAC) for review and input on the Rules. Consider updating and continuing the MOU after rules development to promote coordination between the District and member cities.
- Continue Watershed Review through City's Permitting - Continue coordination of the District's review of proposed developments with member Cities with the Cities providing the lead role in the actual permitting process. The timeline for District review should be consistent with the cities' 60-day review for development proposals.
- Evaluation of Rules Implementation - Conduct a review of the District's Rules implementation program every two years to ensure that the standards are being met, the Rules are useful and attainable, and that the District is providing sufficient support to the member Cities as they implement the Rules. Development of a local government report card process will be evaluated by the District. If implementation problems arise, the District would have the option to initiate its own permitting process.

Table IV-7. Timeline for Implementing Standards through MOU and Rules

	2001				2002			
	1	2	3	4	1	2	3	4
Develop MOU with Cities *	→	→						
Adopt and Sign MOUs		▲						
Finalize Como Lake and Lake McCarrons Plans	→	→	→	→				
Develop Resource - based performance standards and rule language				→	→	→		
Adopt Rules							▲	
Evaluate Rules								→

* Or develop interim rules if mou approach is not viable

The District will utilize guidance from the MAWD publication Watershed Rulemaking Handbook during its rulemaking process. The District has developed some preliminary model Rule language from an inventory and assessment of existing Rules of other Metropolitan Watershed Districts. The rule language includes up to three different levels of regulation for 17 different issue areas consistent with the issue areas of the Watershed

Rulemaking Handbook. The various model Rules will be used as a starting point for the District's rulemaking process.

Existing watershed standards that have already been developed that the District will adopt and incorporate into its interim and final Rules include:

- Metropolitan Council's Interim Water Quality Management Strategy for Non-Point Source Pollution
- MPCA's Protecting Water Quality

Generally the District will utilize a flexible approach to implementing its standards that minimizes the duplication and impacts to local units of government while maintaining the integrity of its standards.

The interim standards for water quality will be based on the NURP criteria for ponding or an equivalent level of treatment. In general, the District is interested in providing flexibility in meeting the desired level of treatment with appropriate measures suitable to the site. **Specifically, limiting runoff volumes by utilizing site designs that limit imperviousness or incorporating volume control practices such as infiltration practices is strongly encouraged by the District.** Protecting and integrating natural features in the site design will serve to protect the water resources of the District as well as provide amenities for the site and community. Water quantity controls must be provided to ensure no net increase in the impacts or potential for flooding on or off the site and where possible, address existing flooding problems.

IV-8 Administrative Procedures

Impacts on Local Government

The District Board of Managers has met with city representatives to identify the District's potential interactive role with the cities. All of the cities expressed a concern that the District requirements be consistent with neighboring Water Management Organizations. All of the cities have ongoing relationships with other joint-powers WMOs or watershed districts. Local implementation of Watershed District standards and rules, without duplicative permitting, is an approach supported by the cities. The existing local government regulatory programs and relationships with other WMOs are summarized in the following table and text.