



May 28, 2015

Mr. John Loomis,  
SWWD - Water Resource Program Manager  
2302 Tower Drive  
Woodbury MN, 55125

Re: SWWD Watershed Management Plan 10 Year Update  
BWSR Input Follow-up to February 12, 2015 Meeting

Dear Mr. Loomis:

I have been remiss in following up on our initial February 12, 2015 plan update meeting with written comments. Please accept my apologies and consider these additional comments as you work on the SWWD's 10-Year Plan Update. For your information I have also recently completed 60-day review comments on a couple other Watershed 10-yr Plan Updates which influence these comments.

In general the key components of Metro Watershed Plans are: an inclusive and interactive development process; Goals that produce measurable results addressing prioritized issues; through a comprehensive prioritized implementation section that also coordinates the activities of the District with the other entities managing water and land resources in the watershed. Additional details on these key components are provided on the BWSR website at <http://www.bwsr.state.mn.us/planning/keycomponents.html>. The District is preparing the plan in accordance with the revised Rule 8410 which will likely be adopted by the time the plan is submitted. A few specific plan items that I wanted to call your attention to are identified below:

- *Inclusive Plan Development Process:* Per our previous meeting it is our understanding that the District will use both the traditional CAC as well as other methods to obtain public and LGU input in the identification of issues and potential solutions. Be sure to document the process followed in obtaining input, assessing the input and identifying priority issues. As part of the process of evaluating the success of the previous plan I would suggest that the District compare the plan's 10-yr implementation program budget against the District's corresponding annual income and the actual total annual expenditures. If the District's annual average for each of these items is significantly out of balance the District should determine why and make changes as needed in the new plan. For example, if the 10-yr implementation program budget is significantly greater than actual expenditures it would indicate the District had a problem implementing its previous plan.
- *Measurable Goals:* The plan will need to identify the procedure the District will follow for evaluating the progress in meeting the established goals, which must be done a minimum of every two years.

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- *Implementation Actions (refer to revised Rule 8410 for additional requirements):*
  - Prioritized Implementation Program (Capital Improvement Program). The implementation program should be clear in identifying what implementation actions the District will accomplish in the next ten years regardless of whether or not they receive any new grant funding. The District could then include additional, prioritized implementation activities that would be implemented if grant funds for implementation of higher priority projects are obtained.
    - *Be realistic in what the District has the capacity to accomplish, but at the same time do not be afraid to stretch those capabilities.*
  - Include a procedure to evaluate progress for implementation activities at a minimum of every two years.
  - Define the District's process for evaluating implementation of local water plans.
  - Define who is responsible for inspection, operation and maintenance of stormwater facilities in the District.
  - If the District has or proposes an incentive type program it needs to be defined in the plan (the plan can also include a reference to District website for more detailed information on the program).

Please continue to invite me to both CAC/Public Input and TAC meetings. My priority will be the TAC meetings but I will try to attend some of the other CAC/Public input meetings to help me better understand the District.

Sincerely,



Daniel A. Fabian, P.E.  
Metro BC

Cc: Jim Haertel, BWSR, (via email)