



Level II Performance Review

Richfield-Bloomington Watershed Management Organization

Local Government Unit Final Report

November 25, 2014

Minnesota Board of Water and Soil Resources

520 Lafayette Road North

St. Paul, MN 55155

651-296-0768

www.bwsr.state.mn.us

This page was intentionally left blank.

Table of Contents

Report Summary	iv
Introduction	1
Findings	2
Conclusions--Action Items—Commendations	5
Recommendations and LGU Comments and Responses.....	6
Appendix A Plan Accomplishments.....	9
Appendix B Performance Standards	16
Appendix C Survey Results Summary.....	17
Appendix D Richfield-Bloomington WMO Comment Letter.....	22
Appendix E Program Data	26

This report has been prepared for the **Richfield-Bloomington Watershed Management Organization** by the Minnesota Board of Water and Soil Resources (BWSR) in partial fulfillment of the requirements of Minnesota Statutes, Chapter 103B.102, Subd.3.

Prepared by Don Buckhout (Don.Buckhout@state.mn.us; 651-296-0768).

This report is available in alternative formats upon request.

<p>PRAP Level II Report Summary</p>	<p>Richfield-Bloomington Watershed Management Organization</p>	
<p>What is a PRAP Performance Review?</p> <p>The Board of Water and Soil Resources supports Minnesota’s counties, watershed districts and soil and water conservation districts that deliver water and related land resource management projects and programs. In 2007 the Board set up a program (PRAP) to systematically review the performance of these local units of government to ensure their effective operation. Each year BWSR staff conduct routine reviews of several of these local conservation delivery entities. This document reports the results of one of those reviews.</p>	<p>Key Findings and Conclusions</p> <p>The Richfield Bloomington WMO has been quite effective at completing stormwater projects, maintaining urban water quality best management practices, and obtaining good cooperation and support from city staff and budgets. The result of collaboration between the two cities by means of the WMO has been effective and efficient stormwater management.</p> <p>The survey responses both internal and external reveal opportunities for a stronger role for the WMO in both increased public awareness and projects with partners.</p> <p>The challenge for this WMO is to ensure that this local collaboration extends beyond the city boundaries to consider a watershed perspective. The governance structure and the decision to contain the organization within the cities’ finances instead of as a separate organization with staff and budget could be limiting such a perspective.</p> <p>Resource Outcomes</p> <p>The RBWMO management plan does not contain goals for specific resource outcomes. Therefore, there is no information about resource changes resulting from projects undertaken by the WMO.</p> <p>Recommendation</p> <p>Conduct a strategic assessment of the WMO mission and purpose with a view towards adopting more of a watershed perspective. Consider expanding the watershed focus of the current WMO, or joining the Nine Mile Creek Watershed District.</p> <p>Commendations</p> <p>The RBWMO is commended for meeting 7 of BWSR’s benchmark performance standards.</p>	 <p>A map showing the geographical boundaries of the Richfield and Bloomington watersheds. The map is a black and white outline of the two cities' shapes, with a small black dot indicating a specific location within the combined area.</p>

Introduction

This is an information document prepared by the staff of the Board of Water and Soil Resources (BWSR) for the Richfield-Bloomington Watershed Management Organization (WMO). It reports the results of a routine performance review of that organization's water management plan implementation and overall organizational effectiveness in delivery of local water management projects and programs.

BWSR has reviewed the WMO's reported accomplishments of their management plan action items, determined the organization's compliance with BWSR's Level I and II performance standards, and surveyed members of the organization and their partner organizations.

This review is neither a financial audit nor investigation and it does not replace or supersede other types of governmental review of local government unit operations.

While the performance review reported herein has been conducted under the authority granted to BWSR by Minnesota Statutes Chapter 103B.102, this is a staff report and has not been reviewed or approved by the BWSR board members.

What is PRAP?

PRAP is an acronym for BWSR's Performance Review and Assistance Program. Authorized by the 2007 Minnesota legislature, the PRAP purpose is to support local delivery of land conservation and water management by periodically reviewing and assessing the performance of local units of government that deliver those services. These include soil and water conservation districts, watershed districts, watershed management organizations, and the local water management functions of counties.

BWSR has developed four levels of review, from routine to specialized, depending on the program mandates and the needs of the local governmental unit. A Level I review annually tabulates all local governmental units' compliance with basic planning and reporting requirements. In Level II, conducted by BWSR once every ten years for each local governmental unit, the focus is on the degree to which the organization is accomplishing its watershed management plan. A Level II review includes determination of compliance with BWSR's Level I and II statewide performance standards, a tabulation of progress on planned goals and objectives, a survey of board or water plan task force members and staff of the factors affecting plan implementation, a survey of LGU partners about their impressions of working with the LGU, and a BWSR staff report to the organization with findings, conclusions and recommendations. BWSR's actions in Levels III and IV include elements of Levels I and II and then emphasize assistance to address the local governmental unit's specific needs.

Findings

This section describes what BWSR learned about the performance of the Richfield-Bloomington WMO.

The Richfield-Bloomington Watershed Management Organization was formed on December 19, 1983, through a joint powers agreement under the authority conferred to the member parties in 1982 through the Metropolitan Surface Water Management Act. The agreement was amended and bylaws were adopted January 23, 1984. The Organization's purpose is to preserve and use natural water storage and retention systems within the Richfield-Bloomington Watershed to meet the purposes set forth in the Surface Water Management Act.

The area included within the jurisdiction of the WMO is 7.5 square miles of which 56% is in Richfield and 43% is in Bloomington.

A Board of Commissioners has been established as the governing body of the RBWMO. The Board is comprised of all the city council members from both cities--five from Richfield and seven from Bloomington. Administrative duties are carried out by one designated staff person from each city.

What is noteworthy regarding the RBWMO is that the organization does not conduct any watershed management work as an independent organization, but rather directs its member city departments to carry out programs and projects consistent with the WMO management plan. Consequently, the WMO commissioners do not have staff, enter contracts, nor administer funds.

Findings Part 1: Planning

The current version of the RBWMO watershed management plan was approved in 2008 as a 10-year plan. A plan amendment is currently in process. The plan includes goals and related policies and then identifies problems and related corrective actions.

Based on these elements and the resources in the watershed, the WMO implementation plan describes a total of 76 projects divided into issue areas (e.g., storm water management studies) and further organized by city. There are 28 projects assigned to Richfield and 48 assigned to Bloomington. These are listed in tables in Appendix A, pages 9-15. For each planned project or activity, the WMO staff has identified what has been accomplished and any next steps.

Based on the information provided, BWSR staff have rated the progress for each action, with ratings included in the Appendix A tables. For the 48 City of Bloomington projects, the city has met the targets or completed 8 items and has made progress on the remainder. Richfield has completed or met the targets for 10 of their 28 items, is working on 14 others, and has yet not started 3 projects and delayed one other because of landowner opposition.

Resource Outcomes

The Richfield-Bloomington WMO management plan does not contain goals for specific resource outcomes. Therefore, the report of plan accomplishments does not include information about resource changes resulting from projects undertaken by the WMO.

The report of plan accomplishments shows particularly good progress in completing capital improvement projects in both cities. In those cases where an item contains a specific target (e.g., sweep streets twice per year) the report accomplishments describe whether the target was met. The rating reflects that information. Many of the other planned actions are on-going and the accomplishments describe continued progress.

Findings Part 2: Performance Standards

BWSR has developed a set of performance standards that describe both **basic** and **benchmark** best management practices related to overall operation of the organization. The standards address four areas of operation: administration, planning, execution, and communication/coordination. The **basic** standards describe practices that are either legally required or fundamental to WMO operations. The **benchmark** standards describe practices that reflect a high level of performance. While all watershed management organizations should be meeting the basic standards, only the more ambitious ones will meet many benchmark standards. The results for the RBWMO are listed in Appendix B, page 16.

For its annual Level I performance review BWSR tracks all 18 watershed management organizations' compliance with three of the basic standards. This is reported in a publically accessible database on the BWSR website. The RBWMO shows compliance with

the two applicable Level I WMO performance standards for each of the past six years.

For this Level II review the evaluation includes a report of compliance with all the basic and benchmark standards for WMOs. Because the RBWMO does not have a budget, staff or finances, several of the basic practices standards do not apply. For the remaining nine basic practices, the RBWMO reports compliance with eight. The ninth is a listing of expenditures over the past ten years, for which the organization has none. Of the eleven benchmark standards that apply, the organization meets seven.

Findings Part 3: LGU Self-Assessment

The information for this part and the next is based on responses to surveys developed by BWSR to get the opinions of both board members and staff and from the WMO's partner organizations about performance. WMO support staff from the Cities of Richfield and Bloomington identified, at BWSR's request, their current WMO board members and staff, and those partner organizations with which they have an on-going working relationship. BWSR invited those people to take the on-line survey and their responses were received and analyzed by BWSR staff. The identity of survey respondents is unknown to both BWSR and the local governmental unit.

Part 3 summarizes the results from the survey of WMO commissioners and city support staff regarding the accomplishments of the organization over the past several years. A total 24 board members and city staff, were invited to take the survey and 16 (67%) responded, a good responses rate. However, there were substantial numbers (up to 75% depending on the question) who declined to answer certain questions. The full responses are reported in Appendix C, pages 17-21, and briefly summarized here.

Of those people from within the WMO who responded, 91 percent of commissioners and staff indicated that they "always" or "usually" consult their management plan or some other master planning document to guide their decisions on the board.

In listing the organizations most successful accomplishments, respondents mentioned the Wright's Lake sediment removal, Girard Alley flood control, and street sweeping most frequently. Other successes were enforcement of erosion control ordinances, water quality monitoring, and several of

the SMPs in Bloomington. Less than half of the survey respondents answered this question. In listing factors that have led to these successes, respondents offered strong staff support from the cities, coordination among city departments and the WMO, and adequate funding from the cities.

In listing the projects or programs that have not been successful, the 25 percent who responded listed the adopt-a-wetland program, Adam's Hill Pond treatment, and reducing runoff impacts from driveway sealcoating. Reasons given for difficulties with these items are low citizen interest or lack of information, and lack of funding.

When considering relationships with partner or potential partner agencies or organizations, respondents from the WMO identified good working relationships with neighboring watershed districts, Hennepin County, Three Rivers Park District, MnDOT, the Metropolitan Airports Commission and the US Fish and Wildlife Service. When asked for examples of partners with which improved working relationships would be beneficial, respondents listed the US Fish and Wildlife Service, Bloomington Planning Commission, and the Minnesota Pollution Control Agency.

Four respondents offered ideas for how to make the WMO more effective in accomplishing its goals and objectives. The consistent theme of all these ideas is to make the WMO and its work more visible to the public to help generate increased public interest and support for projects and programs.

Findings Part 4: Partners' Assessment

For the survey of partner organization representatives, a total of 35 were identified by WMO staff and invited by BWSR to take the survey. Sixteen (16) responded (46%), a normal response rate for these surveys. The partners were asked questions that focused on their working relationship with the WMO and their rating of the work done by the WMO. These responses are reported in Appendix C, pages 17-21, and summarized here.

The general trend of partner responses is lack of knowledge or familiarity with the work of the WMO. For example, in their rating of the WMO's performance in four areas—communication, quality of work, relationships with customers, and follow-through—the most frequent answer for each of these was "I don't know." (See following table.)

Several partners gave positive ratings to all four areas, there were also a few “acceptable” or “poor” ratings.

Performance Area	Partner Ratings (percent)				
	Strong	Good	Acceptable	Poor	Don't Know
Communication	25	0	17	25	33
Quality of Work	17	8	17	17	42
Relations with Customers	17	17	17	0	50
Timelines/ Follow through	25	0	25	8	42

When asked to rate their working relationship with the WMO, most partners described it positively with a few “acceptable, but a struggle at times” responses. Perhaps most tellingly, nearly half of the partners, or potential partners reported that there is potential for their organization to do more work together with the WMO.

These opinions from partners can be explained in part from the partners infrequent contact with the WMO-- 84% reported no contacts at all or only a few instances in the past three years. Another factor is the relatively brief time partners have in their current organizations, with 69 percent reporting less than 5 years.

Nevertheless, their responses to the survey confirm the WMO's own commissioners' assessment that the organization needs to do more to improve its visibility.

General Conclusions

The Findings above describe an organization that has been quite effective at completing stormwater projects, maintaining urban water quality best management practices, and obtaining good cooperation and support from city staff and budgets. The result of collaboration between the two cities by means of the WMO has been effective and efficient stormwater management.

The survey responses both internal and external reveal opportunities for a stronger role for the WMO in both increased public awareness and projects with partners.

The challenge for this WMO is to ensure that this local collaboration extends beyond the city boundaries to consider a watershed perspective. The governance structure and the decision to contain the organization within the cities' finances instead of as a separate organization with staff and budget could be limiting such a perspective.

The WMO commissioners should undertake a deliberate evaluation of the organization's mission, purpose and structure, based on the results of this review and consultation with neighboring watershed management organizations and partners. A key question is what value does the WMO bring to the area that isn't adequately covered by the cities' acting to implement their own stormwater management plans? From BWSR's perspective, there at least two avenues to consider: expand the scope and influence of the WMO or disband the WMO and incorporate the area into the Nine Mile Creek Watershed District. (See Recommendation 1, page 6.)

Action Items

Action items are assigned based on lack of compliance with certain Basic Practice performance standards as reported in the Findings, Part 2. The RBWMO meets all of the relevant Basic Practice standards. Consequently, there are no action items for it to address.

Commendations

Commendations are issued based on compliance with BWSR's Benchmark performance standards, as reported in the Findings, Part 2 above. The RBWMO is commended for meeting the following Benchmark standards, which reflect practices that indicate organizational strength:

- Operational guidelines exist and current.
- Biennial Budget Request submitted within last 24 months.
- Water quality trends tracked for priority water bodies.
- Watershed hydrologic trends monitored / reported.
- Track progress for I & E objectives in Plan.
- Partnerships: cooperative projects/tasks done with neighboring districts and organizations, counties, cities, non-governmental organizations.
- Coordination with County/City/Twp by WMO Board members or staff.

Recommendations

This section contains a recommendation offered by BWSR to the Richfield-Bloomington WMO board members and staff to enhance the organization's delivery of effective water and related land resource management. BWSR financial assistance may be available to support the district's implementation of this recommendation.

Recommendation 1: Conduct a strategic assessment of the WMO mission and purpose with a view towards adopting more of a watershed perspective.

As described in the Conclusions section on page 5, BWSR believes that the RBWMO commissioners should undertake an evaluation of the WMO with the purpose of adopting more of a watershed approach to resource management. At least two options should be considered in this assessment.

Option A: Enhance the watershed perspective of the WMO and increase the scope of projects and programs beyond city stormwater management.

Potential implications of this approach are to give the WMO board an independent and more active role in determining resource needs and projects on a watershed basis. One result would be more frequent board meetings, which may mean a reduced board size, replacement of some city councilmembers with knowledgeable residents, and a budget and WMO financial account.

Option B: Explore a merger with the Nine Mile Creek WD.

Because of the small land area under the jurisdiction of the WMO, the commissioners should consider annexing the area with the Nine Mile Creek Watershed District. The cities would still be active partners in the work of the watershed, but they would no longer have the responsibilities of maintaining the WMO planning and governance. The Nine Mile Creek Watershed District has demonstrated the ability to work effectively with both cities as indicated in the survey results from this review.

LGU Comments and BWSR Responses

The RBWMO submitted written comments on the draft of this report dated October 3, 2014. The comments from that letter are summarized here with responses from BWSR. The complete text of the comments is in Appendix D, pages 22-25.

RBWMO Comment (page 1):...Implementing an effective and successful stormwater management plan throughout the watershed is critical to water management within the WMO.

BWSR Response: As stated in the PRAP report, the RBWMO has been effective at local stormwater management.

RBWMO Comment (page 2): If there are specific actions or projects that can be identified to help the RBWMO further achieve these goals we would be more than willing to discuss them and consider including those efforts in our next plan.

BWSR Response: Comment noted. The WMO comment is correct in noting that the next plan revision is an excellent time to both identify water and related land resource management issues and suggest actions to address them. As the plan revision date approaches, the WMO should solicit input from residents and neighboring water management partners to identify any such issues.

RBWMO Comment (page 2): As suggested in the performance review, raising awareness of the RBWMO is something that can be accomplished.

BWSR Response: Comment noted. Including the WMO name as a partner on collaborative projects, as the comment suggests, is an excellent step to take.

RBWMO Comment (page 2): Similarly, a strategic assessment of our mission and purpose will be included in the process of completing the next generation Watershed Management Plan.

BWSR Response: Comment noted.

RBWMO Comment: (page2) The RBWMO is not interested in a merger with the Nine Mile Creek Watershed District.

BWSR Response: This option was offered as a way for the cities to divest themselves of some of the responsibilities of regional water resource management. It may be appropriate to include such an option in the future strategic assessment.

RBWMO Comment (page 2): Pages iv and 5: Key Findings Conclusions and General Conclusions: Please remove or rephrase the reference to the low bar the WMO has set for itself. This comment suggests the WMO is not meeting requirements, when in fact the WMO is currently exceeding requirements.

BWSR Response: The text of this final report has been modified in light of this comment.

RBWMO Comment (page 2): Pages iv and 5: Key Findings Conclusions and General Conclusions- Remove the word "few" when referencing the urban water quality BMPs maintained by the WMO. The WMO should not be penalized because of its size. Both cities are active at maintaining structural stormwater BMPs in addition to other surface water areas such as Wood Lake, Smith Park Pond and Wrights Lake.

BWSR Response: The language in this final report has been modified to reflect this comment.

RBWMO Comment (page 2): Pages iv and 5: Key Findings, Conclusions and General Conclusions-Please expand, elaborate, provide examples, or better define what is meant by completing projects beyond city stormwater management....What type of projects should the WMO be implementing beyond what it has?

BWSR Response: This question is best answered in the context of the next plan revision by consulting with partners, neighboring water management entities and other WMO stakeholders. The ideas should be solicited using the outline of statutory goals listed in the WMO comment letter and in Minnesota Statutes 103B.201.

RBWMO Comment (page 3): Page 2: Findings Part 1: Planning-The third paragraph states that Bloomington has not started or has dropped two items. This is

incorrect. In Appendix A, page 8 the Activity "Review certificate of surveys for each building site proposed for development" is still in operation, but no certificate of surveys has been received since 2005; and on page 10, the Activity "Establish an erosion control hotline for receiving erosion control related phone calls" has been maintained on the city web page with names and contact information.

BWSR Response: This information has been corrected in Appendix A and the relevant discussion in Part 1 has also been corrected.

RBWMO Comment (page 3): I question the survey results indicating that an increased visibility of the WMO would "help generate increased public interest and support for projects and programs." That sounds like an unsubstantiated conclusion.

BWSR Response: The quoted statement was offered by one of the WMO board members or staff who completed the survey and is a statement of that respondent's opinion (see page 19). As the board explores this issue during the upcoming strategic assessment these opinions can be discussed and debated.

RBWMO Comment (page 3): The feedback that partner organizations reported that there "is potential for their organization to do more work together with the WMO" is a fair comment. However, the conclusion is a bit misleading. Our partners fail to realize when they work with the partner cities they are working with the RBWMO.

BWSR Response: This contention may very well be true. When the WMO conducts their strategic assessment it should include engagement with partners to further explore this issue.

RBWMO Comment (page 3): Please expand on your definition of adopting more of a watershed perspective.

BWSR Response: In general, a watershed perspective requires consideration for what happens to water and related resources from the headwaters to the outlet of drainage systems. It requires that those entities which manage resources within that system have awareness of and responsibility for the resource objectives of that watershed. For the RBWMO a watershed perspective,

at a minimum, would include close collaboration and communication with the Lower Minnesota River Watershed District to ensure that the water quantity and quality contributions from the RBWMO drainage area benefit, or at least do no harm to, the resource objectives within that organization's jurisdiction.

RBWMO Comment (page 3): Page 6, Recommendations, Option A, Water quality monitoring data of several surface water areas within the WMO indicate very good water quality. Several projects have been completed on WMO surface waters...all to improve the water quality within the WMO from a regional or watershed basis.

BWSR Response: Comment noted.

RBWMO Comment (page 3): Recommendations, Option A, is Option A suggesting the WMO invest more time and money into marketing the WMO? If so, what is to be gained by spending funds on marketing?.

BWSR Response: Marketing need not involve any expenditures, but rather to take advantage of existing media to reach a target audience. The marketing is a means to an end that could serve to accomplish objectives that emerge from a strategic assessment or other future program priorities.

Appendix A. Plan Accomplishments

LGU Name: City of Bloomington
 Type of Management Plan: Watershed Management Plan
 Date of Last Plan Revision: Adopted August 2008

Date of This Assessment: June 2014

GOAL No. 1: RBWMO SECTION V. – STORM WATER MANAGEMENT PROGRAMS

TABLE 9a - City of Richfield

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Perform LGU and permitting authority role	Ongoing	Ongoing	Continue to perform permitting role.	○	
Perform water quality and quantity management and routine pond cleanout to meet water quality and TMDL standards	Ongoing	Ongoing	Continue to monitor and provide improvement projects and maintenance on water quality lakes and ponds.	○	
Conduct erosion control inspections of construction sites	Ongoing	Ongoing	Continue to conduct erosion control inspections.	○	
Maintain and update GIS database, storm sewer map, and hydrologic model	Ongoing	Ongoing	Last updated in 2013.	○	
Maintain and update RBWMO & City website for surface water management education	Ongoing	Ongoing	Website developed in 2008.	○	
Prepare and distribute information in City utility billings	Ongoing	Ongoing	Every utility bill has storm water education pieces included as well as notes on the actual bill.	○	
Sweep streets twice per year	Ongoing	Ongoing	Streets are swept at least 4x per year; more depending on the length of the season.	◇	
Inspect 20% of storm sewer system including outfalls, ponds, and structural pollution control devices	Ongoing	Ongoing	100% of storm sewer outfalls, ponds, and structures are inspected annually.	◇	
Conduct water quality monitoring for major water bodies	Ongoing	Ongoing	WQ monitoring has been conducted seasonally since 2009.	○	
Prepare and submit annual SWPPP report and MCWD report	Annually	Annually	Completed annually.	◇	

Continue management of Wood Lake Perimeter Treatment System	Ongoing	Ongoing	Inspected and maintained as needed.	○	Recommend skimmer be added to inlet into main body of the lake.
---	---------	---------	-------------------------------------	---	---

GOAL No. 2: RBWMO SECTION V. – SURFACE WATER MANAGEMENT OPERATION AND MAINTENANCE PROGRAMS
TABLE 9b – City of Bloomington
Objective A: In-place Programs

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Storm Sewer Mainline Inspections	Ongoing	Ongoing	23,418 LF of CCTV Inspection (within RBWMO)	○	
Annual Storm Sewer Inspections	Ongoing	Ongoing	161 manholes, 195 catch basins (within RBWMO)	○	
Storm Sewer Maintenance Projects	Ongoing	Ongoing	2009, 2010, 2011, 2012 Projects	○	
Sweep streets twice annually in all areas, and early in priority areas	Ongoing	Ongoing	2008 - 2014	○	
Work cooperatively with the activities of the watershed districts & watershed management organizations	Ongoing	Ongoing	Co-sponsor raingarden workshops, presence at City of Bloomington biennial home improvement fair	○	
Provide review of all plans for new development or redevelopment of sites within the City to meet all applicable standards. Includes cost for City staff as well as any consultant review time.	Ongoing	Ongoing	2009; 7 Sites 2010; 9 Sites 2011; 5 Sites 2012; 14 Sites 2013; 13 Sites	○	
Review certificate of surveys for each building site proposed for development.	Ongoing	Ongoing	No certificate of surveys within RBWMO received	○	
Continue the program of permitting and inspecting privately owned storm sewer connections to the City system.	Ongoing	Ongoing	27 project sites	○	
Perform Local Government Unit (LGU) Role for Wetland Conservation Act	Ongoing	Ongoing	7 WCA Actions with 25+ wetland-related land owner contacts	○	
Sponsor Curb-side-clean-up day	Ongoing	Ongoing	2008-2014	○	
Engineering staff inspection & enforcement of erosion control measures required for site development activities within the City with the NPDES Erosion Control Program now being administered by the MPCA.	Ongoing	Ongoing	27 Project sites	○	

Revisit and redefine water quality monitoring program to establish existing quality, identify concerns and/or needs for Corrective Actions. It is anticipated that the monitoring program would help determine the quality of water discharged from the City,	Ongoing	Ongoing	Water quality monitoring of Smith park Pond 2009-2014. WHEP monitoring of Wrights Lake	○	
Continue implementation of the Wetland Vegetation Treatment Policy	Ongoing	Ongoing	includes Smith park pond	○	
Update City's GIS system to show infrastructure improvements	Ongoing	Ongoing	Continual updating as projects are implemented or to correct data	○	
Continue implementation of Drainage and Erosion Control Ordinance and determine if any revisions are needed	Ongoing	Ongoing	Continued	○	

Objective B: Programs Identified in the Wetland Protection and Management Plan - Bloomington

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
1.Implementation of community education plan increasing awareness concerning proper water resource management	Ongoing	Ongoing	partnership with Watershed Partners, articles in Bloomington Briefing, info on city website	○	
2.Adopt-a-wetland program	Ongoing	Ongoing	Program available through Adopt-a-bit-of-Bloomington, currently no wetlands adopted. Use of STS crew to clean up around wetland areas	○	
3.Wetland Health Evaluation Program	Ongoing	Ongoing	Continued partnership with Hennepin County to implement program 2008-2014 – Wrights Lake	○	
4. Implement invasive exotic species vegetation control program	Ongoing	Ongoing	Purple loosestrife, buckthorn busts, garlic mustard removal events	○	

Objective C: New programs identified in the Surface Water Management Plan - Bloomington

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
USFWS and watershed Districts to address water quality issues of MN River Valley and Hyland Lake	Ongoing	Ongoing	Partnership with LMRWD to implement Long Meadow lake Outfall project, Contributing to 3 Rivers project on Hyland lake TMDL	○	

City will administer the education activity implementation plan to address each minimum control measure	Ongoing	Ongoing	Various education media types employed to reach general public, and training for employees regarding applicable MCM's	○	
Public notice of annual report and annual public meeting to inform public on the status of the SWPPP and annual report	Annually	Annually	Stand alone public meeting held annually	✧	
Publish water resource articles in the Bloomington Briefing	Ongoing	Ongoing	46 articles published 2009-2013	○	
maintain City's Website as a tool for residents to research water resources related topics	Ongoing	Ongoing	Informational handouts and links to external references available	○	
Establish an erosion control hotline number for receiving erosion control related phone calls	Ongoing	Ongoing	Webpage maintained with contact information and email address for erosion control	○	
Promote the use of Hennepin County Hazardous Waste Disposal Center	Ongoing	Ongoing	Continued promotion of the Hennepin County Hazardous Waste disposal facility provides residents a resource for proper disposal of hazardous wastes.	○	
Develop a complaint line for IDDE	Ongoing	Ongoing	Bloomington Engineering and Environmental Health Divisions are contacts for IDDE	○	
Develop map of city's storm sewer system	Ongoing	Ongoing	continual updating of City's storm sewer GIS map to update infrastructure, private storm sewer systems, and errors in the data	○	
Develop an inspection program to detect non stormwater discharges	Ongoing	Ongoing	IDDE integrated into annual storm sewer inspection program	○	
Sanitary sewer video inspections	Ongoing	Ongoing	160,574 LF of CCTV Inspection (within RBWMO)	○	
Annual sanitary sewer maintenance	Ongoing	Ongoing	2009, 2010, 2011, 2013 Work Orders	○	
Training program to reduce pollutant loading from municipal operations	Ongoing	Ongoing	Integrated into the City's OSHA safety training program for all public works employees regarding storm water pollution control prevention from municipal operations	○	
Erosion control training for employees responsible for erosion control inspections	Ongoing	Ongoing	Two certified inspectors on staff performing inspections for private developments. Other City infrastructure inspectors also required to be certified	○	
Provide turf establishment/permanent erosion control on all City improvement projects	Ongoing	Ongoing	Required on all City projects	○	

Use of inlet protection on all City construction projects	Ongoing	Ongoing	Required on all City projects	○	
Implement shore area regulations within the City	Ongoing	Ongoing	Routinely implemented; Buildings and structures, Zoning, and Zoning and land development	○	
Implement special zoning overlay districts	Ongoing	Ongoing	Routinely implemented; Zoning, and Zoning and land development	○	
Continue routine meetings with other water resources staff from neighboring communities	Ongoing	Ongoing	Member of MCSC steering committee, water resource coordinators group, other conferences and trainings	○	
Maintain records of inspection activities as required by SWPPP	Ongoing	Ongoing	Ongoing recordkeeping of inspection activities for State issues MS4 permit	○	

GOAL No. 3: RBWMO SECTION V. – TABLE 10 – STORM WATER MANAGEMENT STUDIES – City of Bloomington

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Implement IDDE regulatory mechanism	2008	2008	City Code Sec. 11.31 and City Code Sec. 12.03	◇	
Publish or distribute information IDDE	2013	2014	Bloomington Briefing article on IDDE	○	
Update Wetland function and values inventory	2008	2010	Functions and values assessments on approximately 240 wetlands in Bloomington	◇	
Administer mechanism to control post-construction runoff rate	Ongoing	Ongoing	Performed during plan review, rules contained within CSWMP	○	
Erosion control ordinance	2008-2012	2008-2009	City Code Sec 16.01	◇	

GOAL No. 3: RBWMO SECTION V. – TABLE 10 – STORM WATER MANAGEMENT STUDIES – City of Richfield

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Develop buffer management plan for wetlands	2008	2008	In-place buffers were evaluated and determined to be sufficient.	○	The City continues to identify additional park areas and wetland buffer areas.
Complete Adam's Hill Pond water quality feasibility study to identify options to provide additional water quality treatment for area.	2009	2009	Conducted pilot test to reduce phosphorus. Completed and presented the results to NMCWD for cost share project.	◇	On hold for further project development.
Complete Wood Lake water quality feasibility study to identify options to provide additional water quality treatment for area.	2017	2017	[not started yet]	□	

Review and update erosion control ordinance to be in conformance with this Plan and NPDES	2008	2006	Section 721 (2006) Section 428 (2002; 2010; 2011)	◇	
Update Water Resource Management ordinance to be in conformance with this plan	2009	2002	Section 429 (2002; 2011; 2012)	◇	
Develop wetland ordinance (or include with water resource management ordinance)	2009	2010	Section 427 (2010; 2011)	◇	
Complete water quality and quantity feasibility study to address improvements in for Problem Area 26 : Wilson Pond to the west of 15th Avenue between 73rd and 75th Streets and Washington Park areas.	2012	2012 2017	As part of 76 th Street Reconstruction additional capacity was included to accommodate future improvement projects to address issue.	○	Currently looking at citywide feasibility to address flooding issues prior to Citywide Mill & Overlay Project.
Review road salt application practices and review alternative products (as available)	2009	2010	Have reduced salt usage substantially (more than 50%).	○	
Develop shoreland ordinance	2012	2015	[not started yet]	□	
Complete TMDL feasibility study once TMDL studies are complete	2017	2017	[not started yet]	□	
Support Mn/DOT in addressing Problem Area 46 : I-494 and Portland Avenue area	2017	ongoing	Attend meetings with MnDOT as requested.	○	

GOAL 4: RBWMO SECTION V. – TABLE 11 - Capital Improvement Projects – City of Bloomington

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Smith Pond/Wrights lake. Install trap manhole at Wrights lake	2010	2010	Replaced 80 LF of CMP arch pipe with 73" RCP and R&R 96" Dia MH. ~\$17K	◇	
Airport South Long Meadow Lake outlet	2008	2012	Replaced 36" CMP from E Old Shakopee Road to Long Meadow Lake~\$316,500	◇	
Airport South Pond C	2010	2008	Reconstruct existing regional storm water quality facility ~\$1.55M	◇	
Wrights Lake Excavation	2012	2012-2013	Sediment/PAH contaminated material removal ~\$1.05M	◇	

GOAL 4: RBWMO SECTION V. – TABLE 11 - Capital Improvement Projects – City of Richfield

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
Construct Richfield Lake Water Quality perimeter system	2009	2008	Completed in 2008.	✧	
Undertake improvements to address Problem Area 9: 68th Street between Newton and Oliver	2010	NA	Neighborhood rejected the City's proposal.	□	
Undertake improvements to address Problem Area 12: Girard alley flooding	2009	2010	Completed in 2010.	✧	
Undertake improvements to address Problem Area 40: 65th and 66th at Newton and Morgan Avenues	2012	Ongoing	The City purchased the most at-risk home and graded the lot to hold a little more water.	○	The upcoming reconstruction of 66 th Street (2016/2017) will provide opportunity to further address these issues.
Construct Augsburg Pond Lift Station and Forcemain	2009	2008	Addressed flooding issues at 73 rd & 1 st .	✧	
Construct active treatment system at Adam's Hill Pond	2009	UKN	Completed feasibility study and demonstration project. Delayed until a future date.	○	

Indicator symbol for Progress Rating: □=not started/dropped ○=on-going progress ✧=completed/target met

Appendix B. Watershed Management Organization Performance Standards

LGU Name: RICHFIELD - BLOOMINGTON

Performance Area	Performance Standard	Level of Review	Rating	
	<ul style="list-style-type: none"> ■ Basic practice or Statutory requirement ★ High performance (optional) standard (see instructions for explanation of standards) 	I Annual Compliance II BWSR Staff Review & Assessment	Yes, No, or Value	
			YES	NO
Administration	■ Activity report: annual, on-time	I	X	
	■ Financial report & audit completed on time	I		NA
	■ eLink Grant Report(s): submitted on time	I		NA
	■ Consultant RFP: within 2 yrs for professional services	II		NA
	■ Personnel policy: exists and reviewed/updated within last 5 yrs	II		NA
	■ Data practices policy: exists and reviewed/updated within last 5 yrs	II	X	
	★ Board training: orientation and cont ed record for each board member	II		X
	★ Staff training: orientation and cont ed record for each staff member	II		NA
	★ Operational guidelines exist and current	II	X	
Planning	■ Watershed Management Plan: up-to-date	I	X	
	■ Capital Improvement Program: reviewed every 2 years	II	X	
	■ City/twp. local water plans not yet approved	II		0%
	★ Biennial Budget Request submitted within last 24 months	II	X	
	★ Strategic plan identifies short-term activities & budgets based on state and local watershed priorities	II		X
Execution	■ Total expenditures per year (past 10 years)	II		no expenditures
	★ Water quality trends tracked for priority water bodies	II	X	
	★ Watershed hydrologic trends monitored / reported	II	X	
Communication & Coordination	■ Website: contains annual report, financial statement, board members, contact info, grant report(s), watershed mgmt plan	I	X	
	■ Functioning advisory committee: recommendations on projects, reports; 2-way communication with Board	II	X	
	■ Communication piece: sent within last 12 months	II	X	
	★ Website: contains meeting notices, agendas & minutes; updated after each board mtg; additional content	II		X
	★ Track progress for I & E objectives in Plan	II	X	
	★ Obtain stakeholder input: within last 5 yrs	II		X
	★ Partnerships: cooperative projects/tasks done with neighboring districts and organizations, counties, cities, non-governmental organizations	II	X	
	★ Coordination with County/City/Twp by WMO Board members or staff	II	X	

Appendix C. Summary of Survey Results

Survey Overview:

The survey was developed by BWSR staff for the purpose of identifying information about the local government unit’s performance from both board members and staff and from the unit’s partner organizations. WMO support staff from the Cities of Richfield and Bloomington identified, at BWSR’s request, their current WMO board members, staff, and partner organizations with which they have an on-going working relationship. BWSR staff invited those people to take the on-line survey and their responses were received and analyzed by BWSR staff. The identity of survey respondents is unknown to both BWSR and the local governmental unit.

In this case, 59 total persons, 24 board members and city staff, and 35 partner organization representatives, were invited to take the survey. Board members and staff answered a different set of survey questions than the partners. Thirty-two (32) people responded (54%), 16 board members/staff (67%) and 16 partners (46%), a normal response rate for these surveys. However, there were substantial numbers from both groups (20-75% depending on the question) who declined to answer questions. Both sets of responses are summarized below. Some responses were edited for clarity or brevity.

RBWMO Board Member and Staff Questions and Responses

How often does your organization use some sort of master plan to guide decisions about what you do?. (response percent)	
Always	55
Usually	36
Seldom	9
Never	0

Comments:

- The WMO has an approved watershed management plan and the city has an approved capital improvement plan
- Making sure we have integrity around water runoff in each project we approve
- Guides capital projects.
- All redevelopment projects within the WMO must meet the items outlined in the management plan; sump manholes are required in all redevelopments over 5 acres as well as a maintenance agreement with the city.
- New to program; no knowledge of this.

List your organization’s most successful programs and projects during the past 3-5 years.
Implementation/enforcement of city ordinance related to stormwater development in the WMO; erosion control inspection and enforcement; education programs; SMP-1 through SMP-13 from Chapter 5 of the WMO plan have been very successful
1. Wright’s Lake sediment removal maintenance project, 2. Street sweeping 2X/year, 3. Construction erosion control inspection program, 4. Water Quality monitoring
Wright’s Lake excavation and sediment removal; Girard Alley flooding; enforcement of sediment and erosion control for site development activities; water quality monitoring; street sweeping 2X per year; sponsoring curbside cleanup day

Girard Alley Flooding Improvement Project (2010); Water Quality Monitoring; Wright's Lake Dredging; Street Sweeping (4X /year)

Reducing water runoff; reducing phosphorus in fertilizers

Stormwater BMPs and Wright's Lake dredging

What things have helped make these projects and programs successful?

The City has dedicated staff for this work and city ordinances/policies/procedures are in place to implement and enforce and funds have been provided by the city council.

1. Support of the City Council/RBWMO Board for projects such as Wright's Lake Sediment Excavation, and understanding issues such as PAH contamination 2. Trained staff for erosion control inspection 3. Funding for additional street sweeping and support from City Administration

- Support from the board and other agencies to complete large projects such as Wrights lake excavation
- Trained and knowledgeable staff to enforce erosion control requirements and perform water quality monitoring.
- Coordination with other City departments to complete street sweeping with an efficient and priority area focused approach and organization of annual curb-side clean up

Proper planning, funding, support from residents and policy makers, coordination from other agency and department staff members.

Richfield built new city hall with reducing water runoff in its design.

During the past 3-5 years, which of your organization's programs or projects have shown little progress or been on hold?

Adopt a wetland (mentioned twice)

Adam's Hill Pond Active Treatment

Reducing pollution from driveway sealcoating from coal based products

List the reasons why the organization has had such difficulty with these projects and programs.

Limited interest in low-profile wetlands. High profile parks seem to get more volunteers.

There has been limited to no interest from citizens or groups within the community. Volunteers are more geared towards park clean-up type activities. The WHEP program with Hennepin County does provide for citizen involvement with various wetland areas.

The Adam's Hill Pond project has been put on hold while we work on a similar project cooperatively with Minnehaha Creek Watershed District. Without a funding commitment from Nine Mile Creek WD the Adam's Hill project will likely not move forward. Efforts on that project may pick up once the current project is completed (2015).

Not enough knowledge to the general public.

Regarding the various organizations and agencies with which you could cooperate on projects or programs...

List the ones with which you work well already

BWSR, DNR, neighboring watershed districts, USFWS, Hennepin county, MnDOT

Hennepin County, Three Rivers Park District, Nine Mile Creek WD, Lower MN River WD, MnDOT

Hennepin county, Met Council, Nine Mile Creek WD, MnDOT, Lower MN River WD, adjoining cities

Richfield Community Services Comm., Nine Mile Creek WD, Minnehaha Ck WD, MnDOT, Metro Council, Hennepin County, Bloomington, Minneapolis, Metropolitan Airports Comm., Edina

City of Bloomington, Woodlake Nature Center

List the ones with which better collaboration would benefit your organization

USFWS (looking forward to the rehab of the Long Meadow Lake Bridge and Old Cedar)

Bloomington Planning commission

MPCA

None

If you don't know much about your organization's working relationships with partners, enter "I don't know"

What could your organization do that would make you more effective in accomplishing your plan goals and objectives?

More public exposure and participation. We recently had a poster board and staff available at the Bloomington Home Fair, interest from public in rainwater gardens was mentioned.

The RBWMO could be more active in the community and generate more public interest for the WMO. Additional public support could potentially assist with identifying and implementing additional water resource projects.

The member cities could work together and develop more of a 'face' to the WMO. This performance evaluation has helped me to realize that although we work well and efficiently on behalf of the WMO, in the past we haven't done a good job of crediting the WMO and advertising it as much as we could. We have discussed initiating a branding effort to help give the WMO more of a presence in our communities and coordinating more of our SWPPP education efforts through the RBWMO.

Maybe have a Facebook or Twitter page?

How long have you been with the organization you currently serve? (percentage)	
Less than 5 years	44
5 to 15 years	33
More than 15 years	22

RBWMO Partner Organization Questions and Responses

Question: How often have you interacted with this organization during the past three years? Select the response closest to your experience. (response percent)	
Not at all	42
A few times	42
Several times a year	8
Monthly	8
Almost every week	0
Daily	0

If you chose “not at all” when was the last time you interacted with this organization?

-It will be the first one

-I'm newly elected planning commissioner so have not worked with them before

-I'm a new member of the partner organization so I have not interacted with the organization yet.

Is the amount of work you do in partnership with this organization...(percent)	
Not enough, there is potential for us to do more together	45
About right	55
Too much, they depend on us for work they should be doing for themselves	0
Too much, we depend on them for work we should be doing ourselves or with others	0

Comments:

-As a new planning commissioner I don't know, but look forward to learning more

-We do not partner often as watershed organizations, but there are many opportunities where we could.

Based on your experience working with them, please rate the organization as a partner with you in the following areas:

Performance Characteristic	Rating (percent of responses)				
	Strong	Good	Acceptable	Poor	I don't know
Communication (they keep us informed; we know their activities; they seek our input)	25	0	17	25	33
Quality of work (they have good projects and programs; good service delivery)	17	8	17	17	42
Relationships with Customers (they work well with landowners and clients)	17	17	17	0	50
Timelines/Follow-through (they are reliable and meet deadlines)	25	0	25	8	42

How is your working relationship with this organization? (percent)

Powerful, we are more effective working together	13
Strong, we work well together most of the time	37
Good, but it could be better	25
Acceptable, but a struggle at times	25
Poor, there are almost always difficulties	0

Comments from Partners about their working relationship with the Richfield-Bloomington WMO.

-I need to be informed about their activities

-Never have worked with them

-Like to have a stronger working relationship

-I interact with the support staff for the WMO more as representatives of the cities rather than of the WMO; we have a good relationship that way; but our relationship as watershed organizations could be strengthened.

How long have you been with the organization you currently serve? (percentage)

Less than 5 years	69
5 to 15 years	23
More than 15 years	8

Appendix D. Richfield-Bloomington WMO Comment Letter



October 3, 2014

Don Buckhout
PRAP Coordinator
Board of Water and Soil Resource
520 Lafayette Road North
St. Paul, MN 55155

RECEIVED
OCT 03 2014
Bd. of Water & Soil Resources
St. Paul

RE: Richfield-Bloomington Watershed Management Organization Level II Performance Review

Dear Mr. Buckhout:

Thank you for the opportunity to respond and offer comments on the Local Government Unit Review Draft of the Level II Performance Review. Overall it appears that the Board of Water and Soil Resources misunderstands the purpose and goals of the RBWMO. This misunderstanding leads to unrealistic expectations of the organizations "potential" and subsequently how the RBWMO should be operating.

The 7.5 square mile area that makes up the Richfield-Bloomington Watershed Management Organization (RBWMO) includes 3 lakes, 5 ponds, and several depression areas. With no major creeks or rivers the majority of surface water flow within the watershed is generated by stormwater runoff. The majority of this stormwater runoff is conveyed by storm sewer systems in a southeasterly direction through a series of ponds and wetlands to the Minnesota River. As a result, implementing an effective and successful stormwater management plan throughout the watershed is critical to water management within the WMO.

Effectiveness of the RBWMO

The RBWMO was established to manage the natural water drainage, retention, and stormwater management occurring within the areas of Richfield and Bloomington that were not included in an already established watershed district. The intent identified in the Joint Powers Agreement, and consistently achieved, is to fulfill the original mandates of Minnesota Statutes 473.875 to 473.883, inclusive to achieve the following goals:

- **Reduce to the greatest practical extent the public capital expenditures necessary to control excessive volumes and rates of runoff.** The current structure of the RBWMO is both efficient and effective at meeting this goal.
- **Improve water quality.** The RBWMO has completed the following projects to efficiently and successfully meet this goal:
 - Richfield Lake Perimeter Ponds
 - Wrights Lake Restoration
 - Wrights Lake Forebay Construction
 - Smith Park Improvement Project
 - Running Park Pond Forebay Construction

RBWMO - Pg. 1

- Airport South Long Meadow Lake Outlet
- Airport South Pond C
- **Prevent flooding and erosion from surface flows.** The current structure of the RBWMO is both efficient and effective at meeting this goal. The following projects have been completed to address flooding:
 - Augsburg Park Lift Station
 - 73rd & 1st Storm Sewer
- **Promote groundwater recharge.** The current structure of the RBWMO is both efficient and effective at meeting this goal. Where well head protection is not an issue, infiltration is encouraged.
- **Protect and enhance fish and wildlife habitat and water recreational activities.** Wood Lake Nature Center is a 150-acre natural area dedicated to environmental education, wildlife observation, and outdoor recreation.
- **Secure other benefits associated with the proper management of surface water within the RBWMO.**

If there are *specific* actions or projects that can be identified to help the RBWMO further achieve these goals we would be more than willing to discuss them and consider including those efforts in our next plan.

Moving Forward

As suggested in the performance review, **raising awareness of the RBWMO** is something that can be accomplished. Both member cities work well with our partners and collaborate on water quality projects as well as educational efforts. As work on these types of efforts continue the RBWMO name could be, and should be, included as a partner.

Similarly, a **strategic assessment of our mission and purpose** will be included in the process of completing the next generation Watershed Management Plan.

The RBWMO is **not interested in pursuing a merge with the Nine Mile Creek Watershed District**. There are no apparent benefits to having residents pay additional taxes to a watershed district.

Performance Review Comments

Please consider the following specific requests and questions pertaining to the language included in the Local Government Unit Review Draft of the Level II Performance Review for the RBWMO.

1. **Pages iv and 5:** Key Findings, Conclusions and Recommendations and General Conclusions

Comment: Please remove or rephrase the reference to the low bar the WMO has set for itself. This comment suggests the WMO is not meeting requirements, when in fact the WMO is currently exceeding the requirements.

Comment: Remove the word “few” when referencing the urban water quality BMPs maintained by the WMO. The WMO should not be penalized because of its size. Both City’s are active at maintaining structural stormwater BMPs in addition to other surface water areas such as Wood Lake, Smith Park Pond, and Wrights Lake.

Comment: Please expand, elaborate, provide examples, or better define what is meant by completing projects beyond city stormwater management. There are no major creeks or rivers

within the watershed and the majority of surface water within the watershed is generated by stormwater runoff which is conveyed by storm sewer systems. What type of projects should the WMO be implementing beyond what it has?

2. Page 2: Findings Part 1: Planning

Comment: The third paragraph states that Bloomington has not started or has dropped two items. This is incorrect:

- In Appendix A on Page 8; the Planned Action or Activity; “*Review certificate of surveys for each building site proposed for development*” is shown as being dropped. This planned action is still in operation however, no certificate of surveys have been received since 2005, thus the progress report shows zero had been reviewed.
- Page 10 planned action or activity “*Establish an erosion control hotline for receiving erosion control related phone calls*” has not been dropped. This information has simply been merged into the City of Bloomington’s erosion control web page displaying contact names, numbers, and email addresses.

3. Page 3: Findings Part 3: LGU Self Assessment

Comment: I question the survey results indicating that an increased visibility of the WMO would “*help generate increased public interest and support for projects and programs*”. That sounds like an unsubstantiated conclusion. The projects and programs that are delivered have received adequate support on their own merits, adding another layer of government would not likely help generate additional interest and/or support.

4. Page 4: Findings Part 3: LGU Self Assessment

Comment: The feedback that partner organizations reported that there “*is potential for their organization to do more work together with the WMO*” is a fair comment. However, the conclusion is a bit misleading. Our partners fail to realize when they work with the partner cities they are working with the RBWMO. Regardless of whether they realize that or not, they *are* working together and partnering with the RBWMO. If our partners were more aware of the RBWMO there would be essentially NO CHANGE in the education, or projects completed to date.

5. Page 6: Recommendations

Comment: Please expand on your definition of adopting more of a watershed perspective.

6. Page 6: Recommendations; Option A

Comment: Water quality monitoring data of several surface water areas within the WMO indicate very good water quality. In addition, several projects have been completed on WMO surface waters such as: Wrights Lake, Smith Park Pond, Richfield Lake, and Taft-Legion. These projects all serve to improve the water quality within the WMO from a regional or watershed basis.

Comment: Is Option A suggesting the WMO invest more time and money into marketing the WMO? If so, what is to be gained by spending funds on marketing?

Time Required

The total time required for the RBWMO staff to complete the review process was 50 hours. Thank you for the opportunity to provide comments. If you have questions or need additional information or clarification, please contact staff as noted below:

- Bryan Gruidl; 952-563-4867 or bgruidl@BloomingtonMN.gov; or
- Kristin Asher; 612-861-9795 or KAsher@cityofrichfield.org

Sincerely,



Sue Sandahl
RBWMO Chair, City of Richfield
6700 Portland Avenue South
Richfield, MN 55423

Appendix E. Program Data

Time required to complete this review

Richfield-Bloomington WMO Staff: 50 hours

BWSR Staff: 25 hours

Schedule of Level II Review

BWSR PRAP Process Events

- June 16-July 11: Survey of WMO Board members, staff and Partner Organization Representatives
- Sept. 9, 2014: Board meeting; present draft PRAP report to Board and staff
- Date: Send Final PRAP Report

NOTE: BWSR uses review time as a surrogate for tracking total program costs. Time required for PRAP performance reviews is aggregated and included in BWSR's annual PRAP report to the Minnesota Legislature.