

5.0 Assessment of Problems and Corrective Actions

This section contains an assessment of existing and potential water resources issues known at the time of writing this local surface water management plan (LSWMP). These issues were identified through analysis of land and water resources data collected as part of preparing this plan and through the public-input process. These issues are grouped generally by goal theme:

- Water Quantity and Flooding
- Water Quality
- Erosion and Sedimentation
- Groundwater
- Wetlands
- Recreation, Habitat, and Natural Areas
- Enhance Public Participation, Information, and Education

Following the evaluation and completion of potential projects discussed in the subsections below, the City will use the following criteria to evaluate and prioritize the projects in Bloomington (note that the order below does not necessarily reflect the relative priority of the different evaluation metrics):

- Projects in areas with planned street reconstruction or other planned infrastructure construction/reconstruction projects
- Projects that leverage redevelopment or grant funding mechanisms
- Projects that protect emergency routes and other high-value public infrastructure (police/fire stations, schools, hospitals, nursing homes, etc.)
- Projects that address both a water quantity and quality goal (especially those that address a waste load reduction required by a total maximum daily load [TMDL] study)
- Projects that address regional flooding issues

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- Projects that mitigate flooding of extended durations or with significant ponding depths
 - Projects within areas of the City that have not benefited from previous flood mitigation projects, leveraging information in the 2014 Social Vulnerability Index information created by the Bloomington Public Health Department

5.1 Water Quantity and Flooding

5.1.1 Localized and Regional Flooding

Technical Paper 40 (TP-40) was published by the National Oceanic and Atmospheric Administration (NOAA) in 1961. This document provided engineering guidance about the frequency of recurrence for rainfalls of different depths. Engineers and planners used the rainfall frequency recurrence depths published in TP-40 to design infrastructure capable of managing these events for much of Bloomington.

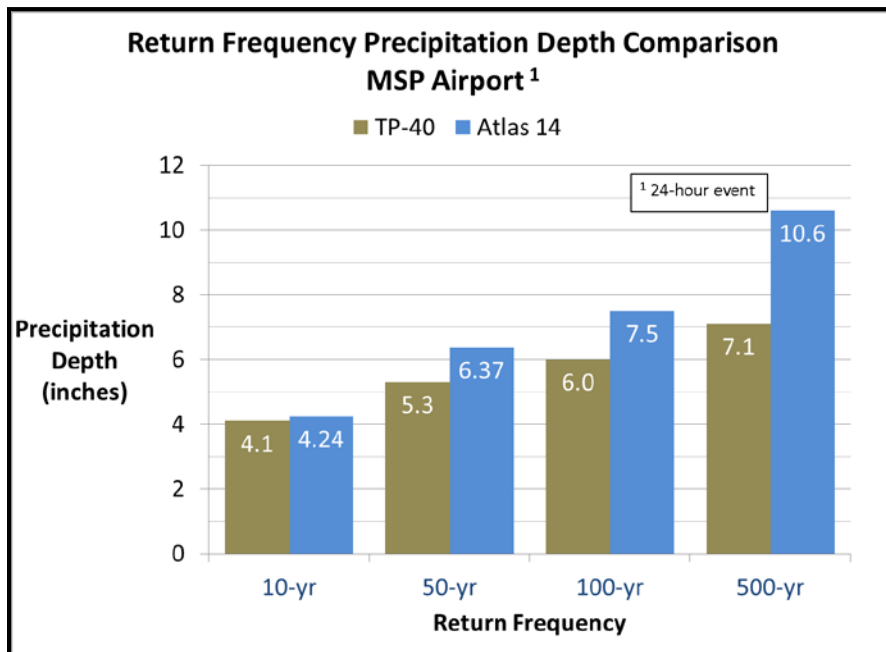
In 2013, NOAA published the Atlas 14 Precipitation Frequency Atlas of the United States, Volume 8 (Atlas 14), which includes precipitation frequency estimates for 11 Midwestern states, including Minnesota. Atlas 14 includes the period of record between 1961 and 2013, and, notably, the increasingly frequent intense rainfall events. In the Bloomington area, Atlas 14 precipitation depths exceed those in TP-40 for large events. For example, the 1-percent-chance 24-hour rainfall depth at the Minneapolis/St. Paul Airport increased from 6.0 inches to 7.5 inches. Figure 5-1 compares rainfall depths for TP-40 and Atlas 14 for the 10-, 50-, 100- and 500-year precipitation events. Atlas 14 rainfall depths will likely (a) increase the calculated flood discharges, (b) increase flood elevations, and (c) expand floodplains relative to those calculated using TP-40 data.

In 2017, the City updated its hydrologic and hydraulic models to include Atlas 14 precipitation depths. The model allows the City to evaluate and plan for future improvements along local roadways as well as coordinate projects along county and Minnesota Department of Transportation (MNDOT) roadways. It is also useful for reviewing development and redevelopment projects and evaluating stormwater infrastructure system modifications needed to reduce flooding potential within the City.

The updated hydrologic and hydraulic modeling analyses of the current stormwater system identified several areas throughout the City where the desired 1-percent annual-chance event level of protection may not currently be provided. The storm sewer system was designed to minimize impacts to the extent reasonable and possible at the time the existing improvements were installed. However, it may not be feasible to achieve the 1-percent

annual-chance event level of protection in all areas under current conditions. The City will place a high priority on providing 1-percent-annual-chance level of protection for the City's stormwater detention and conveyance systems, where detention is provided (e.g., low-point intersections, ponds, planned flood areas, etc.). Existing systems (level of service, conveyance, and detention) that currently do not provide 1-percent annual-chance level of protection will be modified to provide that level of protection when feasible. Appendix B includes tables and maps for the modeled Atlas 14 1-percent-annual-chance event.

Figure 5-1 Precipitation Depth Comparison for TP-40 and Atlas 14



5.1.2 Flooding and Stormwater Rate Control between the City and Adjoining Entities

In certain locations, Bloomington contributes stormwater flows to Richfield, Edina, Eden Prairie, and the Minnesota Valley National Wildlife Refuge. In other locations, Bloomington receives flows from Edina and Eden Prairie. The City's storm sewer system was designed to minimize impacts to and from these entities based on the precipitation-frequency estimates at the time of construction. The City has cooperative working relationships with these entities.

Corrective Action:

Agreements with these entities are in place. The City will continue to work to make improvements to the existing stormwater system as warranted. In addition, the City will compile, review, and if necessary, update agreements concerning flooding and stormwater rate control between the City and adjoining entities.

5.1.3 Future Flooding Risk and Uncertainty

According to NOAA's Atlas 14 assessment, annual and summer precipitation amounts in the Midwest are trending upward, as is the frequency of high-intensity storms. Higher-intensity precipitation events typically produce more runoff than lower-intensity events with similar total precipitation amounts. Higher rainfall intensities are, therefore, more likely to overwhelm the capacity of land surfaces to infiltrate and attenuate runoff. Precipitation records in the Twin Cities area also show that average annual precipitation has increased (Minnesota Climatology Working Group, 2016).

NOAA identified a range of estimates for the 100-year 24-hour rainfall event and presents them as 90-percent confidence limits in Atlas 14. The lower limit is 5.91 inches, while the upper limit is 9.46 inches for the period of record prior to 2013.

It is important to remember that while Atlas 14 provides an updated record of precipitation for use in planning, it does not reflect the potential increases in precipitation that Bloomington could experience in the future. Increasing precipitation amounts will place greater stress on natural resources and stormwater infrastructure and increase flood risk.

Recent work conducted for the Minnehaha Creek Watershed District (through a NOAA grant), provides the information required to consider long-term extreme weather trends in the Twin Cities area. The lower estimate for the mid-21st century 100-year 24-hour rainfall estimate was approximately 7.3 inches, which is similar to the current mean (50th percentile) 100-year rainfall depth published in Atlas 14 (7.5 inches). The middle estimate

is 10.2 inches, which is similar to the upper limits of Atlas 14 (95th percentile). Because of these similarities, some cities and watershed districts in the Twin Cities Metro Area have chosen to use the precipitation depth pertaining to the 95th percentile limit of Atlas 14 as a surrogate for a “moderate climate change scenario.”

Corrective Actions:

- The City will continue to consider potential climate changes in its evaluation and management of flood risk by completing modeling of the 95th-percent confidence limit of the Atlas 14 range to assess the prioritization of flood control projects throughout the City and to assess the vulnerability of the City’s stormwater infrastructure.
- The City will maintain its warning systems to alert residents about extreme events, including flash flooding and road closures.

5.1.4 Hydrologic and Hydraulic Modeling

Hydrologic and hydraulic models were used to develop flood elevations and inundation maps that show the approximate extents of inundation for the 100-year, 24-hour Atlas 14 rainfall event for most of the city (Appendix B). These models are considered planning level estimates based on the best information readily available at the time of development. These models are limited by the accuracy of the input data (LiDAR, storm sewer system elevations, hydrologic soil types, and the amount of impervious surface).

At the time of writing this LSWMP, the following areas of the City are not covered by hydrologic and hydraulic models to help guide development/redevelopment requirements:

- Hopkins Road: 600 acres
- 3rd Avenue: 230 acres
- 10th Avenue: 90 acres
- 11th Avenue: 350 acres

Corrective Actions:

- The City will annually update the hydraulic models of the city to reflect additional information collected or corrections made to the data, such as changes to the storm sewer system or topography resulting from development, redevelopment, or other improvement projects.

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- The City will develop hydrologic and hydraulic models for the “unmodeled” parts of the City identified above.

5.2 Water Quality

5.2.1 Impaired Waters

5.2.1.1 Hyland Lake

Hyland Lake has been added to the Impaired Waters List in 2018 for nutrient/eutrophication biological indicators (draft list).

Corrective Actions:

- The City will work with Three Rivers Park District and other agencies (e.g., Hennepin County, Riley-Purgatory-Bluff Creek Watershed District [RPBCWD], Minnesota Department of Natural Resources [MnDNR], etc.) to maintain or improve Hyland Lake’s water quality, as recommended in the 2017 Hyland Lake Use Attainability Analysis (UAA) report and the Hyland Lake TMDL study. Preliminary drafts of the TMDL report indicate the likely primary recommended action for the City will be BMP maintenance.
- The City partnered with Three Rivers Park District to help fund curly leaf pondweed treatments of Hyland Lake to help control the lake’s internal load of phosphorus and further improve water quality.
- The City will work with RPBCWD and Three Rivers Park District to implement a project to control phosphorus in Hyland Lake. The project is expected in 2019.

5.2.1.2 Lower Penn Lake

In 2018, Lower Penn Lake was added to the state’s Impaired Waters List for nutrients/eutrophication biological indicators (draft list).

Corrective Action:

- The City will work with Hennepin County, Nine Mile Creek Watershed District (NMCWD), U.S. Army Corps of Engineers (USACE), and the MnDNR to maintain or improve water quality in Penn Lake by incorporating the recommendations of the 2010 Lower Penn Lake Management Plan as well as the recommendations from the Penn Lake TMDL (pending).

5.2.1.3 Nine Mile Creek

Nine Mile Creek was added to the State’s Impaired Waters List for fish bioassessments in 2004 (with TMDL completion dates extending to 2029), chloride in 2009, and fecal coliform in 2018 (draft list).

Corrective Actions:

- The City will coordinate with the NMCWD to improve water quality within the Nile Mile Creek watershed to meet the goals outlined by the NMCWD in the Nine Mile Creek UAA.
- The City will implement the [Nine Mile Creek Watershed Chloride TMDL report](#) load-allocation reductions and implement the recommendations of the Twin Cities Metropolitan Area Chloride Management Plan, such as:
 - Winter maintenance education for plow drivers
 - Annual calibration of spreaders
 - Use of treated salt
 - Road temperature sensor in all plow trucks
 - Use of salt brine—recent \$200,000 upgrade in equipment to improve brine production, making the operation more efficient
 - SMART salting level 2 certification—2017
 - Cooperative brine making—provide brine to other agencies—2018
 - New salt storage/brine facility—2025
 - Automated vehicle locating (AVL)—electronic monitoring of salt application—2020

5.2.1.4 Minnesota River

The Minnesota River is on the State’s Impaired Waters 303(d) List for high turbidity (South Metro Mississippi—Turbidity (TSS) TMDL Project)

Corrective Action:

- The City will implement the South Metro Mississippi River Turbidity TMDL load reductions by continuing to enforce its sedimentation and erosion control standards through grading permits, preservation and repair of eroded bluffs, and compliance with the requirements of the South Mississippi Turbidity TMDL

The Minnesota River is also on the State's Impaired Waters 303(d) List for mercury in fish tissue and in the water column.

- The mercury in Minnesota fish comes almost entirely from atmospheric deposition, with approximately 90% originating outside of Minnesota. Because the main source of mercury comes from outside the state and the atmospheric deposition of mercury is relatively uniform across the state, the MPCA developed a statewide TMDL (approved by EPA in 2008) to address the problem on a regional level.

Corrective action:

- None at this time.

The Minnesota River is also on the State's Impaired Waters 303(d) List for Polychlorinated Biphenyls (PCBs). Although the commercial production of PCBs was banned in 1979, PCBs remain a concern due to their ability to persist in the environment and bioaccumulate in living tissues. Human exposure through the consumption of fish is the principal public health concern with PCBs in the environment. The State of Minnesota is currently considering options for addressing PCB impairments on a statewide level.

Corrective action:

- None at this time.

The Minnesota River is on the State's Impaired Waters 303(d) List for low dissolved oxygen concentrations and excess nutrients (phosphorus). The Lower Minnesota River Low Flow Dissolved Oxygen TMDL was approved by the EPA in TMDL 2004. The emphasis of the TMDL report and its implementation plan is on wastewater treatment facilities, although agriculture, noncompliant individual sewage treatment systems and stormwater each play a role in the reduction efforts. The assignment of wasteload reductions of phosphorus from stormwater was limited to areas upstream of the City of Bloomington; the city has no formal wasteload reduction requirements to meet to satisfy the requirements of this TMDL.

Corrective action:

- The pollution prevention and phosphorus reduction strategies outlined in this this Plan and the city's SWPPP are sufficient to meet the City's responsibilities in reducing nutrient loads to the Minnesota River and improving dissolved oxygen concentrations to meet the requirements of the Lower Minnesota River Low Flow Dissolved Oxygen TMDL. No further action is required at this time.

5.2.1.5 Bush Lake

Bush Lake is impaired for mercury. The mercury in Minnesota fish comes almost entirely from atmospheric deposition, with approximately 90% originating outside of Minnesota. Because the main source of mercury comes from outside the state and the atmospheric deposition of mercury is relatively uniform across the state, the MPCA developed a statewide TMDL (approved by EPA in 2008) to address the problem on a regional level.

Corrective Action:

- None at this time.

5.2.2 Nuisance Algal Blooms and Aquatic Vegetation

Many of the City's water bodies experience algal blooms and nuisance aquatic vegetation, even if they are not technically considered "impaired".

Corrective Actions:

- The City will continue to implement its fertilizer ordinances to limit application of phosphorus, as indicated in §10.51 and 10.52 of City code.
- The City will implement its Stormwater Pollution Prevention Program (SWPPP), which includes numerous best management practices (BMPs) intended to reduce pollutant loading.
- The City will continue to monitor large water bodies for aquatic invasive species in collaboration with other organizations and agencies; and develop of a Rapid Response Plan for the management of specific aquatic invasive species in Bush Lake. The City will post information on its website regarding nuisance and potentially hazardous algal blooms.

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- The City will implement recommendations from the Normandale Lake Study (Nine Mile Creek Watershed District). As of 2017, stakeholders were seeking input from the USACE to finalize recommendations.

5.2.3 Pond and Ditch Maintenance

5.2.3.1 Stormwater ponds and wetlands

Many of the City's stormwater ponds and wetlands are impacted by stormwater runoff particularly in terms of sedimentation and the accumulation of pollutants, most notably phosphorus and polycyclic aromatic hydrocarbons (PAHs) which are of growing concern, since they can greatly increase disposal costs for dredged sediments.

Corrective Actions:

- The City will budget for pond and BMP maintenance in accordance with the City's MS4 SWPPP.
- The City will follow the Minnesota Pollution Control Agency's (MPCA's) requirements for managing dredged materials. The City also recognizes the need for more research focused on identifying alternative ways to safely dispose of this material and help cities manage the contaminated sediments.

5.2.3.2 Nine Mile Creek/County Ditch No. 1

Ongoing maintenance is needed (i.e., bog control) for Nine Mile Creek/County Ditch No. 1, downstream of Normandale Lake.

Corrective Action:

- The City will coordinate monitoring and maintenance efforts with the NMCWD, as needed.

5.2.4 Streambank and Bluff Erosion

Hennepin County Emergency Management has identified slope stability (erosion/landslides) as a concern due to changes in precipitation intensity.

Corrective Actions:

- The City will work with the U.S. Fish and Wildlife Service (USFWS), Lower Mississippi River Watershed District (LMRWD), and USACE to address stormwater and erosion concerns within the Minnesota River Valley.

- The City will leverage the LMRWD's inventory of gullies along the Minnesota River Bluff in Hennepin County to identify vulnerable slopes for targeted stabilization projects in collaboration with other organizations.
- The City will continue to enforce the Bluff Protection Overlay District provisions (§19.38 of City code).
- The City will continue to enforce the Erosion and Sediment Control provisions (§16.08 of City code).

5.3 Erosion and Sedimentation

During large and intense rainfall events, soil erosion has the potential to deliver sediment to water bodies within the City. Sediment deposits reduce depth of water and degrade basin water quality.

Erosion areas of particular concern include the shorelines of Nine Mile Creek, Minnesota River bluff areas, storm sewer outfalls in the Minnesota River Valley, and active construction sites.

Corrective Actions:

- The City will continue to enforce the City's existing erosion-control ordinance and inspections.
- The City will continue to monitor and repair, as needed, erosion-control measures. Work with other agencies and property owners for each of these areas, as appropriate.
- The City will continue to remove sediment deltas at storm sewer inlets and outlets (including forebays).
- The City will continue implementation of the City's MS4 SWPPP.
- The City will continue to enforce the City's steep-slope ordinance.
- The City will determine areas at risk of future erosion to assist in planning for maintenance and repair projects.
- The City will continue ongoing review and improvement of the City's erosion-control inspection program for new development and redevelopment.

5.4 Groundwater

The City recognizes the threat of groundwater pollution as a result of stormwater infiltration and the need to protect groundwater supply through conservation and reuse efforts.

5.4.1 Lyndale Avenue Corridor Superfund Site and other Sensitive Areas

The Lyndale Avenue Corridor Superfund Site is bounded by 83rd Street to the north, 98th Street to the south, Nicollet Avenue to the east, and Bryant Avenue to the west. The primary contaminants of concern are trichloroethylene (TCE) and perchloroethylene (PCE). Other areas throughout the City may also be vulnerable to pollution from stormwater infiltration (see Section 4.4).

Corrective Actions:

The City will enforce and follow the practices and standards outlined in the following documents to restrict infiltration in the Lyndale Avenue Corridor Superfund Site and other sensitive areas:

- The City's Wellhead Protection Plan (2014)
- MPCA's Construction Stormwater General Permit and the Municipal Separate Storm Sewer System (MS4) Permit
- Minnesota Rule 7060
- Minnesota Statutes 103H.005 Subd. 13
- MPCA's Brownfield Program Response Action Plans
- Section 4.3.2 of NMCWD's rules
- Contamination-screening checklist for stormwater infiltration (available from the MPCA at:

https://stormwater.pca.state.mn.us/index.php?title=Screening_assessment_for_contamination_at_potential_stormwater_infiltration_sites

More information about infiltration at contaminated sites can be found at the MPCA's MIDs webpage.

5.4.2 Groundwater Resource Conservation

The City will continue to look for ways to conserve and reuse water.

Corrective Action:

- The City will collaborate with the City's Utilities department to find opportunities for water conservation and reuse.

5.5 Wetlands

In addition to the actions described in Sections 5.1 and 5.2, it is important for the City to maintain its wetlands and stormwater ponds to maintain their natural functions.

The City modified its wetland inventory in 2010 using a slightly modified version of the Minnesota Routine Assessment Methodology for evaluating wetland functions. Assessment areas included floral diversity, wildlife habitat, fish habitat, and shoreline protection and the wetlands were rated as functioning at low, medium, or high levels.

Corrective Actions:

- The City will continue inspecting outlets as required per the MS4 permit (20% per year).
- The City will implement programs, studies, and capital improvements outlined in the implementation section of this LSWMP that target the protection of wetlands.

5.6 Recreation, Habitat, and Natural Areas

5.6.1 Floatables and Invasive Aquatic Vegetation

Floatables and invasive aquatic vegetation may interfere with recreational opportunities. Invasive terrestrial vegetation is managed by the Bloomington Park Maintenance Division.

Corrective Actions:

- The City will implement the capital improvements program and studies outlined within this LSWMP to address specific problems in the water bodies
- The City will develop a Rapid Response Plan for managing specific aquatic invasive species in Bush Lake.

5.6.2 Nuisance Bird Populations

Increased populations of geese and gulls in City water bodies can be a nuisance and have likely caused closures of Bush Lake Beach within the City. Birds are suspected to be the source of high E. coli levels at Bush Lake Beach.

Corrective Actions:

- The City will continue efforts to manage geese and waterfowl:
 - Posting public signage discouraging waterfowl feeding and outlining impacts
 - Publishing public-education information on the City's website and in the City newsletter and local paper discussing the connection between water quality and waterfowl feeding
 - Promotion of shore area management/native buffer establishment techniques
 - Egg addling for geese
- The City will continue implementing and monitoring additional BMPs and maintenance procedures specific to Bush Lake Beach in an effort to eliminate future closures due to waterfowl.

5.7 Enhance Public Participation, Information, and Education

5.7.1 Leaf Litter Management

Citizens are often confused about how to manage leaves on their property, and how (and when) the city manages leaf litter in streets.

Corrective Actions:

- The City will continue to distribute information to residents regarding proper management of yard waste through the *Bloomington Briefing* (City newsletter) and on the web site. Additionally, the City responds to reports of poor yard maintenance techniques with a form letter to help educate residents and commercial property owners on why it is important to properly manage yard waste. The City's trash haulers also provide yard waste pick-up service which can be included as part of residents' weekly garbage service.
- The City will continue to sweep the streets twice annually (sometimes more in high priority areas). The fall sweep is timed to pick up as much leaf litter as possible, but

also needs to be completed by the end of October, before an early season snowfall. However, leaves have been falling from trees later in the year and, more recently, the bulk of the leaves are not coming down until the end of October or into November. The City's sweeping program is not designed to pick up residents' leaves. Residents are responsible for picking up their own leaves; those who rake leaves into the street or dump them into a nearby wetland, stream, or other water body may be subject to enforcement action.

- The City will continue the program the [Adopt-a-Storm Drain](https://www.bloomingtonmn.gov/pw/news/adopt-storm-drain-2017-10-03) Pilot program started in 2017 (<https://www.bloomingtonmn.gov/pw/news/adopt-storm-drain-2017-10-03>) focused on two neighborhoods that drain to Normandale Lake. This is a partnership between the NMCWD and the Center for Global and Environmental Education at Hamline University.

5.7.2 Water Quality and Aquatic Plant Expectations in Wetlands, Ponds and Shallow Lakes

Residents have high expectations for water quality and management of aquatic vegetation in wetlands, ponds and shallow lakes.

Corrective Actions:

- The City will communicate the City's role in aquatic plant management and citizens' options in pursuing efforts to manage aquatic plants in response to aesthetic concerns.
- The City will communicate basic information about the dual states of shallow lakes, ponds, and wetlands (clear water with more aquatic plants or turbid water with few aquatic plants) and how aquatic plants are important for wildlife habitat.

5.7.3 Promote Safe use of the Lower Minnesota River

Information about the safe navigation of the Lower Minnesota River should be shared.

Corrective Action:

- The City will refer interested parties to the Lower Minnesota River Watershed District safety education programs for the safe use, including commercial and recreational navigation, of the Lower Minnesota River.

5.8 Operations

5.8.1 Capital Improvement Programs to Address Water Resource Related Concerns

The capital improvement projects outlined within this plan, the Stormwater Pollution Prevention Program, and the general operating procedures of the City are sufficient to address water resource related concerns including water quantity, water quality management, fish and wildlife habitat, public waters and wetland management, and recreational opportunities. However, the Storm Water Utility Fund may not be an adequate funding source to allow for the aggressive implementation of the capital improvement projects and programs needed to address flooding areas and water quality impairments.

Corrective action:

The City will actively seek additional funding sources, such as grants, bonds, strategic partnerships and cost-share programs to fund capital improvement projects and programs and keep the City in compliance with its MS4 permit.

5.8.2 Identification of Problems Potentially Occurring within the Next 20 Years

Climate change has the potential to be a significant threat to the City's operations through increased flooding, intense storm events, and warmer winters (and resultant increased frequency of freeze/thaw cycles). These pressures will stress operations budgets for both time and resources. Also, the additional water quality impairments within the City have the potential to cost the City more time and money as the City maintains compliance with its MS4 permit. Lastly, as the City's population grows, maintaining and improving natural resources will be a challenge that will require innovative strategies.

Corrective Actions:

- The City will implement the LSWMP to address water quantity, quality, and maintenance issues associated with stormwater retention areas.
- The City will leverage its water quality models (Program for Predicting Polluting Particle Passage through Pits, Puddles, and Ponds [P8]) to determine compliance with the South Metro Mississippi TMDL.
- The City will actively seek additional funding sources and assistance (when available and practical) to improve the quality and appearance of stormwater retention areas.

5.8.3 Management of City Water Resource Management Systems

It is important that the City maintain and update its water resource management system.

Corrective Actions:

- The City will acquire additional technical and background information to efficiently and effectively manage water resources.
- The City will continue to implement a long-range water quantity and quality monitoring plan for the City.
- The City will continue to keep current with technological advances and pursue innovative technologies to manage water resources.
- The City will continue hydrologic and hydraulic modeling and water quality modeling of subwatersheds within the City including major drainage districts that have not been modeled: Hopkins Road, 3rd Avenue, 10th Avenue, and 11th Avenue.
- The City will improve the transfer of surface water resource information to the public through the education program.
- The City will post the water resources library online.
- The City will update the City's XPSWMM and P8 models as needed.

5.8.4 Maintenance of Stormwater BMPs in accordance with the MS4 Permit

The City must maintain the performance of its stormwater BMPs.

Corrective Actions:

- The City will implement MS4 SWPPP requirements.
- The City will utilize the LSWMP and other guidance documents such as the Wetland Protection and Management Plan to implement and meet the MS4 Permit.
- The City will continue to meet the obligations of existing and future agreements with WMOs for maintenance of BMPs and buffer areas required to comply with WMO permits.

5.8.5 Coordination of Regulatory Controls

Numerous regulatory controls exist within the City, as well as at the WMO and state level. Coordination of these programs is critical to achieving water quality goals.

Corrective Actions:

- The City will continue membership in the Minnesota Cities Stormwater Coalition (MCSC). Participation in this group will help achieve consistency among other cities, when appropriate, and foster coordination with the state on stormwater regulatory issues.
- The City will continue serving as a steering committee member for the MCSC.
- The City will continue to actively work with WMOs to cooperate on rule and plan revisions and implementation