

Action Category III.A. Reduce conflicts and duplication in regulatory requirements and standards consistent with consensus goals, objectives, and implementation priorities.

Priority	Action Item	Readiness			Approach & Sequencing	Responsible Parties		Obstacles	Solutions	Currently Funded? If so, source of funding?		Resource Amounts	Additional resources needed?	Range of needed increase	Action Completed by:
		Organizational Commitment	Existing Supporting Products	Level of Understanding		Primary	Secondary			Source	Recipient				Month, Year
#1	III.A.a. Conduct review of programs to identify conflicts, duplication, robustness, and effectiveness.	Medium to low.	MN Stormwater Manual Chp. 5, BWSR Watershed Report, EQB's report on programs	Medium. Entities understand their own regulations	Accomplish Items III.A.a and .c first. Ideally, the review would have been conducted during the rulemaking that is currently in progress. The review should start at the state agency level and work down.	MPCA, BWSR, DNR, MDH, LGUs, WMOs/WDs, SSC	Representatives of all key LGU's and regulated parties.	<ul style="list-style-type: none"><li>100's-1000's LGU local ordinances/ programs for wide variety of stormwater management issues (construction, wetlands, buffers, etc.)</li><li>A lot of work, concern for limited return on investment from a comprehensive analysis</li><li>Seen as a challenge to regulatory control</li><li>Commitment and priority of agencies.</li></ul>	<ul style="list-style-type: none"><li>Select a representative sample of local programs to review. A consultant could be hired to do this.</li><li>Have a consultant perform pilot projects on items perceived as most troublesome</li><li>Work through SSC consensus-based approach as with past projects</li><li>Make this a priority task.</li><li>Researchers at the University of Minnesota may be interested in carrying-out this research.</li><li>It may be easier for an outsider (consultant/researcher) to do this Item than having the agencies perform the research themselves.</li></ul>	No			Yes	0.5-1 FTE for 6 months (consultant)	
#2	III.A.b. Identify opportunities for integrating process or standards between programs.	Medium to low. MPCA needs to commit more fully to integrating TMDL, stormwater and MS4 programs.	MN SW Manual, MPCA Impaired waters documents and training materials. Storm-water and Wetlands '97	Low. Need science-based policy/ standards. Some important concepts not well understood.	Sequenced with other impaired waters implementation process.	MPCA, BWSR, DNR, MDH, LGUs, WMOs/WDs, SSC		<ul style="list-style-type: none"><li>Comprehensive, state-wide stormwater standards would be a long, monumental project for many agencies</li><li>LGUs resent loss of local control of water regulations for their specific concerns.</li><li>Seen as a challenge to regulatory control</li></ul>	<ul style="list-style-type: none"><li>Work with SSC, start small with turbidity after EPA's construction stormwater effluent guidelines are published (2008-2009)</li><li>Develop state-wide minimum and a limited slate of higher standards to choose from at a local level along with options for trading, credits, exemptions, etc.</li><li>Work with SSC consensus-based approach as with past projects</li></ul>	Yes (for MPCA JPA pilot)	LGUs, WMOs/WDs	Approx. 12 FTEs	Yes	1-2 state FTEs, more LGU FTEs	

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#3	<b>III.A.c.</b> Link goals to regulatory requirements or standards to clarify the reason for what might be perceived as a conflict and make the reason for regulation more easily understood.	<b>Medium.</b> Time and resources constrain actions. Complexity is unavoidable. High aspirations but low follow through.	Clean Water Act, State laws/permits, local ordinances	<b>Low.</b> Standards are poorly defined/identified	Goals should be developed first, and then programs should be aligned. But other items will not wait due to stakeholders immediate needs. We should start and do simultaneously.	MPCA, BWSR, DNR, MDH, LGUs, WMOs/WDs, SSC		<ul style="list-style-type: none"><li>• Goals for may not align between programs/regulators</li><li>• Standards don't have numbers assigned, but BMPs assigned – each regulating entity has differing lists/priorities.</li><li>• Overall goals are ill defined for some programs as “Best Available Technology” or “Maximum Extent Practical”</li><li>• Comprehensive, state-wide stormwater standards would be a long, monumental project for many agencies.</li></ul>	<ul style="list-style-type: none"><li>• Use SSC to test/ validate goals through literature searches/ research/ monitoring</li><li>• Advance state-wide stormwater standards</li><li>• Advance state-wide stormwater standards</li><li>• Work through SSC, start small with turbidity after EPA's construction stormwater effluent guidelines are published (2008-9)</li></ul>	Yes MPCA nondeg rule, BWSR wetland rule, DNR Shoreland rule. MDH Wellhead Protection rulemaking. This funding is only for the rulemaking - already allocated.		Several FTEs	Yes	2-4 FTEs for 3 years	
#4	<b>III.A.d.</b> Test perceived conflicts to see if they are goal-or implementation-based ; identify standards that cannot be combined.	<b>Medium to low</b>	Compliance Workgroup's final report, BWSR Watershed Report,	<b>Low</b>	Accomplish Items III.A.a and .c first. III.A.c is closely related to III.A.a.	MPCA, BWSR, DNR, MDH, LGUs, WMOs/WDs, SSC		<ul style="list-style-type: none"><li>• Question validity/ importance of perceived conflicts</li><li>• Seen as a challenge to regulatory control</li><li>• Level of complexity is high and difficult to simplify</li></ul>	<ul style="list-style-type: none"><li>• ID specific resulting conflicts and degree of impacts to regulated parties in order to help prioritize</li><li>• Work through SSC consensus-based approach as with past projects</li></ul>	No			Yes	0.5-1 FTEs for 6 months	
#5	<b>III.A.e.</b> Evaluate regulatory management issues; identify issues that can be addressed within the framework.	<b>Low</b>	None	<b>Low.</b> Entities only understand own regulations	This item seems to be a part of III.A.a	MPCA, BWSR, DNR, MDH, LGUs, WMOs/WDs, SSC		<ul style="list-style-type: none"><li>• Comprehensive internal review of various agency programs related to stormwater is impractical</li><li>• Conflicting regulations between 103B and 103D</li></ul>	Brainstorming session with stakeholders to help ID priority issues for agencies to evaluate internal processes to propose to the SSC	No			Yes	Aprox. 2 FTEs/ agency with stakeholders for 6 mo.	