

Action Category III.C. Improve the effectiveness and efficiency of state and local stormwater compliance and enforcement entities to better meet stormwater management and water quality goals.

Priority within Category	Action Item	Readiness			Approach & Sequencing	Responsible Parties		Obstacles	Solutions	Currently Funded? If so, source of funding?		Resource Amount/Type	Additional resources needed?	Range of needed increase	Action Completed by:
		Organizational Commitment	Existing Supporting Products	Level of Understanding		Primary	Secondary			Source of funds	Recipient				
	III.C.a. Test compliance and enforcement protocols for transparency, accountability, consistency, and flexibility.	MPCA: Low (minimal benefit perceived of self evaluation – high understanding, long history, and court tested approaches). Also Action Item missing env. benefit; High to evaluate LGUs LGUs: Low now due to evolving programs	MPCA: Enforcement Response Plan, training curriculums, & legislation	MPCA: High for self; low for LGUs LGUs: Low-varied	3	MPCA	Regulated MS4s and other non-regulated LGUs	<ul style="list-style-type: none"><li>Regulated MS4 programs will evolve with successive permit cycles</li><li>New JPA contracts summer 2009 (chasing moving targets)</li></ul>	Start this work after 2011 MS4 permit so as to not become outdated	MPCA: Stormwater program funding sources (EPA, Env. Fund, Permit fees, etc.)	MPCA	MPCA: program development staffing and local program audits: ~0.1 FTE	Yes (short term)	MPCA: 0.25-3 FTE (scope dependant)	
	III.C.b. Vest authority for compliance with adequate enforcement capacity.	MPCA: High (JPA local partners and MS4 iterative permitting process) LGUs: Low (given limited MS4 audit data – but consistent with national trends)	MPCA: yrs. of inspection & permit data	Low	2	MPCA	Regulated MS4s and other non-regulated LGUs	<ul style="list-style-type: none"><li>MPCA: Capacity</li><li>LGUs: Self regulating</li><li>Larger entities</li><li>Conflicting local priorities/ Interests</li><li>Which LGUs? (watershed vs. political boundaries)</li></ul>	Smaller sites addressed at local level with state oversight and assistance with larger enforcement cases. Wait for watershed-approach aspects of roadmap addressed	MPCA/LGUs: taxes, utility/ permit fees	LGUs/ MPCA	<ul style="list-style-type: none"><li>MPCA: 2.5 FTEs, \$500,000 JPA</li><li>LGU; unknown various C/E budgets</li></ul>	Yes (long term)	<ul style="list-style-type: none"><li>MPCA: 2-12 FTE;</li><li>LGU: unknown</li></ul>	
	III.C.c. Evaluate how different compliance and enforcement entities fit together relative to stormwater goals, and identify overlaps and gaps.	MPCA: Medium due to many competing priorities and NPDES obligations; LGUs: High	Construction Stormwater NPDES Compliance Work Group Report	Medium	1	MPCA	Regulated MS4s and other non-regulated LGUs	<ul style="list-style-type: none"><li>Differing state and local environmental goals</li><li>State-wide consistency vs. local experimentation and needs</li></ul>	Develop statewide minimum standards to meet water quality, not degrade waters, and address TMDLs with consideration for additional local requirements.	MPCA	MPCA/ contractor	MPCA: program development staffing and local program audits: ~0.1 FTE	Yes (short term)	MPCA: 0.5-1 FTE	
	III.C.d. Evaluate effectiveness of compliance and enforcement strategies.	MPCA: Medium	Construction Stormwater NPDES Compliance Work Group Report	Medium	4	MPCA	Regulated MS4s and other non-regulated LGUs	No central data location for inspections or enforcement actions	MPCA JPA program has coordinated data sharing that could be expanded.	MPCA	MPCA/ contractor	MPCA: program development staffing and local program audits: ~0.1 FTE	Yes (long term)	MPCA: 0.25-1.5 FTE; LGU: unknown to report data	