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III. ESTABLISHMENT OF GOALS AND POLICIES

The Gun Club Lake Watershed Management Organization (GCLWMO) has identified the following “self-assessment” to set context for the establishment of the GCLWMO Watershed Plan goals and policies as identified in this section. From this overall context, the GCLWMO has developed goals and policies, as defined below.

GCLWMO Assessment and Context

The GCLWMO has been in existence for more than 20 years, since inception of the Metropolitan Surface Water Management Act in the 1980s. The current basic composition of the GCLWMO Board includes all volunteer citizen representatives. The GCLWMO is supported by technical and administrative support from City of Eagan.

In recent years, the GCLWMO Board has discussed at length the following three interrelated issues:

- Implementing “added value” watershed management projects, given the “unique” role the GCLWMO plays in the member communities’ existing comprehensive programs.
- Developing a watershed management plan that can “fit” the local conditions in the GCLWMO and is acceptable and meeting State Rule and Statutory requirements.
- The managers’ desire to make a real positive difference in the management of the watershed.

The GCLWMO has the following unique administrative, watershed and local management characteristics:

- **Administration and Relationship with the City of Eagan.**

The City of Eagan provides most of the funding and technical and administrative support to the GCLWMO. Eagan has an active Water Resources Program and is recognized as a leader in municipal water resource management. Duplicative administrative costs will likely impact local water resource budgets.

- **Watershed Characteristics and Topography**

The original topography on the GCLWMO is essentially a gradual slope to the Minnesota River with numerous and, in many cases, isolated basins of varying sizes. These basins have historically resulted in numerous flooding problems. As Eagan developed, the City solved the flooding by incorporating the basins in a stormwater storage and conveyance network designed, in many cases, to discharge directly into lakes and wetlands. Now there are few feasible options for system disconnects or alternative onsite controls.

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- **GCLWMO Management and Local Performance**

All three member communities have a GCLWMO-adopted update to their “3rd Generation” local water plan.

- **Overall GCLMWO Management Framework**

The GCLWMO’s limited management framework presents challenges in developing a Watershed Management Plan that is appropriate for the local unique situation and meets agency expectations. The framework in development of this plan involved searching for ways to implement in a fashion that will add value in our relationship to the cities. Our management approach will guide the development of the goals, policies and implementation strategies in this plan. Generally the following framework are the types of activities which the GCLWMO can be relevant and successful:

- Conduct small projects that can be implemented using available resources or that can be supported with grant funding.
- Carry out activities by managers.
- Partner with other entities.
- Promulgate standards.
- Oversee cities’ activities.

Based on the management framework and context described above, the GCLWMO Board has developed mission, goals and policies (defined below) for purposes of meeting the Metropolitan Surface Water Management programs consistent with Minnesota Statutes Section 103B.201.

GCLWMO Mission

- A. Protect, preserve, and use natural surface water and groundwater storage and retention systems.
- B. Minimize public capital expenditures needed to correct flooding and water quality problems.
- C. Identify and plan for means to effectively protect and improve surface water and groundwater quality.
- D. Establish more uniform local policies and official controls for surface water and groundwater management.
- E. Prevent erosion of soil into surface water systems.
- F. Promote groundwater recharge.

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- G. Protect and enhance fish and wildlife habitat and water recreational facilities.
- H. Secure the other benefits associated with the proper management of surface water and groundwater.

The following goals and policies address issues related to water quantity, water quality, recreation, fish and wildlife, public participation and education, ground water quality protection, wetlands, erosion, GCLWMO administration, and cooperation. Pursuant to State Statute member communities shall update their local plans (if necessary) within two years of GCLWMO adoption of this Plan.

A. **Water Quantity**

Goal:

Coordinate intercommunity and/or interagency storm water runoff, flooding, and other water quantity issues.

Policies:

1. Future discharge rates from new development and redevelopment will, at a minimum, not exceed the existing discharge rates for the 2-, 10-, and 100-year events. Discharges shall be consistent with the discharge rates outlined in the member communities approved Water Resources Management Plan. The scope of what constitutes a “redevelopment” project will be addressed by member communities and modifications of the definition of redevelopment will be reviewed by the GCLWMO. If necessary, the GCLWMO will recommend changes to the proposed definition consistent with GCLWMO policies.
2. The design of all major stormwater storage facilities shall accommodate a critical duration event with a 1% chance of occurrence unless otherwise accounted for in the approved Water Resources Management Plan.
3. New storm sewer systems shall be designed to accommodate discharge rates with a 10% chance of occurrence. The 10% storm event is defined as having an NRCS Type III distribution with 4.2" of rainfall over a 24-hour period.
4. Newly constructed stormwater management ponds that are constructed as part of private development shall be placed in drainage and utility easements dedicated to the member community.

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5. The GCLWMO requires member communities and involved agencies to manage the use within the 100-year flood level as designed by the National Flood Insurance Program Flood Insurance Rate Maps (FIRM).
6. If FIRM maps for a member community are not available or are inaccurate, the GCLWMO shall require the regional (100-year) flood elevations for the area to be established by the member community or the proposer of land use alterations.
7. The GCLWMO shall prohibit encroachment into floodways.
8. The member communities shall adopt, as a minimum, a floodplain ordinance that conforms to Minnesota Rules, Chapter 6120.5000.
9. Landlocked depressions that presently do not have a defined outlet and do not typically overflow may be allowed to positive outlet to protect adjacent properties. This outlet must be in conformance with an approved Local Plan, demonstrate that downstream properties are not adversely affected by the flows, and be in conformance with current wetland regulations.
10. Regional detention areas will be identified by member communities in their Local Water Management Plans.
11. New development activities require provision for the infiltration of the first one-half inch of stormwater runoff from any rainfall event. LGUs may grant exemptions or variance where the requirement can be shown to be technically unfeasible, soil conditions are not conducive, or depth to groundwater /bedrock is of a concern.
12. The GCLWMO will continue to actively work with Dakota County and local governments to identify possible funding and governance scenarios to resolve the drainage issues at Lebanon Hills Regional Park.

B. Water Quality

Goal:

Maintain or improve the quality of water in lakes, streams or rivers within or in proximity to the GCLWMO boundary.

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Policies:

1. The GCLWMO requires skimmers or other devices in the construction of new pond outlets and the addition of skimmers to existing systems whenever feasible and practical.
2. The GCLWMO shall require that each local plan identify a waterbody classification system that should be defined in their approved Local Plan. As monitoring information is collected by both the GCLWMO and member communities, the classifications will be evaluated.

Comparisons of member community's waterbody classification systems are shown below:

Name of City	Waterbody Classification System Used	Description of System
City of Mendota Heights	Approved plan identifies LMRWMO five category system	<ul style="list-style-type: none"> • Category I direct Contact • Category II Indirect recreational • Category III Wildlife habitat and aesthetics • Category IV – Nutrient traps • Category V – Sediment traps <p><i>- LeMay and Augusta Lakes are both Category II (table 4.1 in City plan)</i></p>
City of Inver Grove Heights	Classifies consistent with LMRWMO, GCLWMO and the MPCA guidance	Two unnamed waterbodies classified using City wetland assessment.
City of Eagan	4 classification system which addresses MPCA guidance	<ul style="list-style-type: none"> • Class I – Direct Contact Recreation • Class II- Indirect Contact recreation • Class III – Aesthetic /Wildlife • Class IV – Stormwater Basin <p><i>- (table 6.4 in City Plan)</i></p>

3. The GCLWMO will encourage member communities to develop spill prevention, control, and counter measure plans that are consistent with state and/or federal regulations such as Minnesota Statutes 115E and the Federal Oil Pollution Act 33USCA Sec. 2701-2761.
4. The GCLWMO requires communities within the GCLWMO adopt the revised shoreline regulations as established by the Mn/DNR to promote the proper use of shoreland areas to protect water quality.
5. As part of implementation of the GCLWMO volunteer monitoring program grant, the GCLWMO will establish a process and framework for collection/evaluation of water quality data on these

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lakes in the watershed to determine conformance with GCLWMO guidelines.

6. The GCLWMO will conduct water quantity and quality studies when financial resources are made available to understand baseline conditions. The member communities shall utilize studies conducted by outside agencies or will partner with outside agencies to offset acquiring original data whenever possible.
7. In the design and construction of all new or modification of existing storm water conveyance systems, pretreatment of storm water runoff to NURP recommendations should be provided prior to discharge where feasible and appropriate.
8. The GCLWMO will establish a member community oversight and annual reporting to the WMO through integrating the GCLWMO into the NPDES MS4 review and approval process.
9. The GCLWMO requires that member communities eliminate illegal connections to each community's stormwater conveyance system.

C. **Recreation, Fish and Wildlife**

Goal:

Protect and enhance water-based recreational facilities and fish and wildlife habitat.

Policies:

1. The GCLWMO requires wetlands to be protected in conformance with the goals and policies outlined in **Section F**.
2. The GCLWMO will explore opportunities to work with member communities to establish buffer strips along wetland/waterbodies in City and public areas.
3. All member communities shall adopt a shoreland ordinance in compliance with Minnesota Rules, Chapter 6120.2500 through 6120.3900.
4. All member communities should consider the Minnesota Natural Heritage Information identified in **Appendix H** in update of their local plans and in coordinating surface water management activities.

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D. Public Participation and Education

Goal:

Educate the public on pertinent water resource management issues and increase public participation in water management activities.

Policies:

1. The GCLWMO will require local communities to implement public education as part of the Minnesota Pollution Control Agency NPDES Phase II program.
2. Distribute educational material aimed at fostering responsible water quality management practices. Topics are anticipated to include:
 - Shoreland restoration and low impact development related workshops.
 - Wetland buffers.
 - Water quality monitoring.
 - Activities of the GCLWMO.
3. The GCLWMO will work with DSWCD to maintain their website for water resource management information; include possible sample articles for local communities and adding the updated watershed management plan on the site.
4. In 2007-2009 coordinate and implement volunteer water quality monitoring on seven lakes in the WMO in cooperation with School of Environmental Studies consistent with terms recent acquired Clean Water Legacy Act Grant.
5. Require member communities to develop a public education program as part of local plan development. Possible educational programs include but should not be limited to newsletters, door hangers, catch basin stenciling, cable television, etc.
6. Work with residents in watershed to develop and implement an educational program, including building awareness of lawn and garden chemical use, and water resource management. Host landscape workshops for lakeshore owners and low impact development.

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7. The GCLWMO will coordinate and cooperate with the Dakota County Water Education and Communication Coordinator within the Water Resources Office.

E. Groundwater Quality

Goal:

Protect and conserve the ground water resource and encourage the infiltration of properly treated surface water to recharge groundwater.

Policies:

1. The GCLWMO will work to improve the extent, quality and availability of ground water quality data.
2. The GCLWMO will coordinate with other agencies and local units of government to identify sources or potential sources of ground water pollution. Clean-up of any pollutant identified will be the responsibility of the LGU and the property owners, and clean-up will be completed in conformance with State law.
3. The GCLWMO requires local communities to develop and implement well head protection plans as required by the Minnesota Department of Health.
4. The GCLWMO will support efforts to gather further information on the hydrogeology of the region. When such information becomes available, including information on the location of ground water recharge areas, the GCLWMO will take into consideration these areas for the purpose of maintaining their recharge capabilities in protecting ground water quality.
5. The GCLWMO supports the efforts of Dakota County and member communities in their current effort to develop a ground water flow model for the Prairie du Chien/Jordan aquifer.

F. Wetlands

Goal:

Work with local government units to manage existing wetlands and, where possible, restore diminished or drained wetlands.

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Policies:

1. The GCLWMO will require the member municipalities to accept the local governmental unit responsibility for wetland management to manage and protect wetlands in conformance with the rules developed by the Board of Water and Soil Resources.
2. The GCLWMO will actively seek partners to assist in implementation of the Nichols Fen Groundwater Study. As opportunities arise, the WMO will seek partners and resources for the restoration of degraded wetlands.
3. The local governments shall develop wetland management plans. Plans should address the issue of pretreatment of stormwater prior to discharge to wetlands. The GCLWMO supports wetland banking so that high value wetlands in appropriate areas may be created in lieu of requiring replacement of low value wetlands in unsuitable or inappropriate areas within the GCLWMO.
4. Wetland assessments shall be in accordance with MnRam 3.0 or the most recent version of MnRam. It should be noted that the entire area of the GCLWMO is covered by approved wetland management plans as incorporated into the approved local plans. Furthermore wetlands within the WMO have been inventoried and classified or have a process in place to be inventoried and classified upon submittal of applications.
5. The GCLWMO requires that any review of a proposed wetland encroachment will initially address the issue of avoidance. It will be the municipalities' responsibility that prior to allowing any wetland encroachment, all reasonable attempts to avoid such alteration must be demonstrated. This avoidance review must also consider the reasonableness of the no-build alternative.

G. Erosion

Goal:

Prevent and minimize the effects of sedimentation from erosion-prone areas.

Policies:

1. The GCLWMO shall require, in conformance with the MPCA NPDES rules, the submission and implementation of erosion and sediment control plans to the member community for review. The GCLWMO will require, at a minimum, the adoption prevention of

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erosion and sedimentation from land disturbance activities of one acre or more in size. These plan shall conform to the general criteria set outlined in the Minnesota Pollution Control Agency “Protecting Water Quality in Urban Areas,” Erosion Control Ordinance, and the NPDES Construction Site permit.

2. The GCLWMO requires member communities to adopt an erosion and sediment control ordinance. The ordinance should require measures similar to those of the MPCA Best Management Practices (BMPs). A model erosion and sediment control ordinance available on the MPCA’s website at www.pca.state.mn.us/publications/wq-strm2-16b.pdf.
3. The GCLWMO requires member municipalities to identify a permit program or document the modification of an existing program to increase the awareness of erosion issues and ensure compliance.
4. The GCLWMO requires member municipalities to be responsible for establishing standards as approved by the GCLWMO in enforcing erosion and sedimentation control programs for all development and redevelopment sites for lands within the watershed. Erosion and sedimentation control measures must be identified in the local water management plans and must address all developments that have potential to impact surface water quality. The local plan must require the owner of the land to be developed or redeveloped to complete a sediment/erosion control plan for construction activities in which existing vegetative cover is removed or disturbed pursuant to NPDES requirements. The approval of said plan by the municipality must be obtained prior to construction activity.
5. The GCLWMO recommends that municipalities give consideration to obtaining surety to provide adequate safeguards to ensure the plan is carried out by the developer.

H. GCLWMO ADMINISTRATION AND OPERATION

Goal:

Conduct GCLWMO business in accordance with the Joint-Powers Agreement and the Watershed Management Plan.

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Policies:

1. The GCLWMO shall maintain five (5) active managers with three (3) managers appointed by the City of Eagan, one (1) manager appointed by the City of Mendota Heights and one (1) manager appointed by the City of Inver Grove Heights.
2. The GCLWMO shall notify the Minnesota Board of Water and Soil Resources of all manager appointments and vacancies.
3. Vacancies on the GCLWMO Board shall be filled by the local government within ninety (90) days.
4. At the first meeting of the GCLWMO Board in January, the managers shall elect a chairperson, vice chairperson, secretary, treasurer, and other officers as deemed necessary.
5. The GCLWMO shall prepare and distribute annually a newsletter that meets the requirements of Minn. Statutes 103B.277 and Minnesota Rule 8410.0100.
6. The GCLWMO shall solicit proposals for all legal, auditing, engineering, and other technical services at least every two (2) years.
7. The Board shall coordinate its planning activities with contiguous watershed management organizations and counties conducting water planning and implementation under Chapter 110B.
8. On or before April 1, the Board shall file with the Board of Water and Soil Resources and the clerk of each member governmental unit a financial activity and audit report of the previous fiscal year meeting the requirements of Minn. Stat. 103B.231 and Minnesota Rule 8410.0150.
9. In cases where surface water impacts or the source of impacts transcend municipal boundaries, or the community is found to not be in compliance, the GCLWMO shall review such problems and issue directives to the appropriate local government unit(s) for resolution. The GCLWMO will act as mediator if appropriate to resolve any issues to attempt to expedite resolution.

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10. In cases where the local community refuses to implement a project per the directives of the GCLWMO, or requests the GCLWMO to facilitate resolution of the problem, the GCLWMO shall perform in conformance with the terms of the GCLWMO Joint Powers Agreement.
11. Each member community is responsible for establishing and implementing all local stormwater maintenance programs for water resource management.
12. The GCLWMO requires sweeping of urban section streets with curb and gutter twice annually in all areas. The GCLWMO strongly recommends member communities perform monthly sweeping of high priority subwatershed including but not limited to those subwatershed upstream of impaired waterbodies.
13. The GCLWMO will require that member communities inspect stormwater treatment basins at least every five years and sump catch basins/manholes every year. Maintenance should be conducted as necessary.
14. The GCLWMO shall review local water management plans and evaluate their consistency with the Watershed Plan. All local water management plans shall be consistent with the GCLWMO Watershed Management Plan. Member communities shall have two years from the date of the Board of Water and Soil Resources' approval of this Plan to adopt their local water management plans.
15. The GCLWMO shall provide an annual review of past activities from the implementation plan and budgeting for upcoming activities.
16. In late 2008 /2009, member communities shall prepare and submit an annual status report, similar to the annual NPDES report, to the GCLWMO for review.
17. The GCLWMO will keep regulation at the local level and will not administer a permit program unless local communities fail to develop and implement their local Water Resource Management Plans.

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I. GCLWMO COOPERATION

Goal:

Develop GCLWMO policies in conformance with agency rules applicable to water quality and natural resource protection.

Policies:

1. Apply the rules and guidelines associates with the following organizations to government and development related activities within the GCLWMO:
 - Minnesota Department of Health:
www.health.state.mn.us
 - Minnesota Pollution Control Agency:
www.pca.state.mn.us
 - Board of Water and Soil Resources:
www.bwsr.state.mn.us
 - Wetland Conservation Act:
www.bwsr.state.mn.us/wetlands/wca/index.html
 - Minnesota Department of Natural Resources:
www.dnr.state.mn.us
 - US Army Corps of Engineers: www.mvp.usace.army.mi
 - Minnesota Department of Agriculture:
www.mda.state.mn.us
 - Metropolitan Council: www.metrocouncil.org
 - Dakota Soil and Water Conservation District – including but not limited to utilizing SWCD cost-share programs for construction of rain gardens and shoreland restoration
2. The Minnesota Storm Water Manual, which is a document intended to be frequently updated, is incorporated by reference into this Plan and can be found at:
www.pca.state.mn.us/water/stormwater/stormwater-manual.html.
3. The member communities are required by this Plan and Minnesota Rules to develop and implement a local surface water management plan.

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4. The member communities have two years from the date that the Board of Water and Soil Resources approves the GCLWMO Plan to adopt a local plan that is in conformance with the requirements of the GCLWMO plan. If the member communities do not either develop their own plan by state rules, the GCLWMO will assume regulatory authority over development in the watershed area that might affect water resources.
5. In late 2008 /2009, the GCLWMO will be initiating a member community evaluation program. This annual activity report will be similar to the MS4 reports that member communities are required to submit to the MPCA. The GCLWMO will review the annual activity report from the member communities and provide areas within the local program that will need to be addressed to keep in compliance with the WMO Plan.