

Appendix F

Self-Assessment

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Elm Creek WMC

Third Generation Plan Self-Assessment

Third Generation Plan Activities

Management Plan Amendments and Policy Revisions

The Third Generation Plan has been amended eight times since 2015 (Table 1). Most of those were to revise the Capital Improvement Program, however, there were other significant amendments. In 2022 the Commission amended the Rules and Standards to adopt revised requirements for low floor elevations adjacent to natural and artificial waters, and to conform the Rules to the most recent version of the State of Minnesota General Stormwater Permit.

Table 1. Elm Creek Third Generation Plan record of plan revisions.

Number	Date of Adoption	Summary of Revisions
	9/23/15	Plan approved by BWSR
	8/14/15	Plan adopted
1	05/11/16	Add 5 projects: revise costs
2	05/10/17	Add 2 projects
3	05/09/18	Add 8 projects
4	05/08/19	Add 3 projects
5	06/10/20	Add 3 projects
6	06/09/21	Clarify low floor standards; conform to new SW permit
7	5/11/22	Add 1 project
8	6/12/24	Add 2 projects; revise one project

The Commission also adopted or revised several policies as shown in Table 2. Notably, the Commission adopted policies to create new funds to share in the costs of various improvements and adopted policies governing the use of those monies. The Commission also adopted a revised Capital Improvements Policy that increased the Commission cost share on certain types of projects that address “internal load” from 25% of the project cost to 100% of the project cost. Those projects, such as lake alum treatments, are intended to correct problems in the receiving water itself, as opposed to reducing pollutant loading from the watershed.

Table 2. New or revised policies adopted 2015-2024.

Date of Adoption	Description
September 12, 2018	Developed and adopted the Recommended Livestock Policy for member cities to consider for local adoption.
April 11, 2012	Developed and Adopted a Cost Share Policy
October 12, 2016	Revised the Cost Share Policy to provide a formula for sharing the cost of completing subwatershed assessments (SWAs) between the Commission and cities.
October 12, 2016	Revised the Cost Share Policy to eliminate the requirement that subwatershed assessments (SWAs) must be for lands outside the MUSA.
November 14, 2018	Adopted Closed Projects Account policy to establish allowable uses for levy funds remaining after reimbursing cities for the costs of completing a capital project.
August 11, 2021	Adopted a Policy on Internal Load Funding stating the Commission may contribute up to 100% of funding to internal load projects for impaired lakes with TMDLs where internal load is more than 50% of the load.
August 11, 2021	Established a City Cost Share program to contribute 50% of the cost of smaller member city BMP projects up to \$50,000.

Date of Adoption	Description
August 11, 2021	The Commission established a Partnership Cost Share program to contribute up to 100% of the cost of small BMP projects completed voluntarily by private parties on private property, up to a total of \$50,000.
September 8, 2021	Adopted a new Policy on Cost Share for Equipment and Non-structural Practices: 25% cost share in practices that have a demonstrated benefit to impaired waters with a TMDL. The applicant must document that benefit. The cost share applies only to equipment providing a new pollutant load activity or the cost of upgrading to better equipment to obtain more load reduction.
March 9, 2022	Revised Cost Share Policy to increase Commission maximum annual levy from \$500,000 to \$750,000 as a working guideline.
May 10, 2023	Adopted Adequate Fund Reserve Policy: The Commission shall maintain an unrestricted fund balance of approximately 50 percent of operating revenues (or no but not less than five months of operating expenses in its general fund).

Regulatory Program

The Commission does not issue permits but does require development and redevelopment to meet requirements for runoff rate control, treatment, and volume management. Those requirements and others relating to wetlands, floodplains, erosion control, buffers, and stream crossings are set forth in Rules and Standards. As part of the Third Generation Plan development the Rules were reviewed and revised and reissued just prior to adoption of that Management Plan. The Commission had previously acted as the Local Government Unit (LGU) for Wetland Conservation Act (WCA) administration for some member cities, but in 2019 relinquished that authority to the member cities.

Development and redevelopment projects that meet certain size and other criteria are required by city ordinances to incorporate into their developments Best Management Practices (BMPs) sufficient to meet the Commission’s Rules and Standards. Engineering plans, hydrologic calculations, wetland delineations, and other supporting material is submitted to the Commission’s Engineer, who conducts a Project Review and discusses the proposal and any necessary revisions with the developer.

In 2020 the Commission adopted a revised project review fee policy to require applicants to pay the full amount of the project review. In 2023 review fee schedule was revised to modify the amounts of the initial escrow deposited with the application and the administrative and technical services fees.

Table 3 summarizes the projects reviews that have been completed during 2015-2024. These project reviews include private development and redevelopment as well as public projects such as street and highway projects.

Table 3. Project review history 2015-2024.

Year	Project Reviews	Wetland Actions	TEP panels
2015	39	22	14
2016	52	17	17
2017	53	40	12
2018	54	66	12
2019	32	8	*
2020	42	*	*
2021	55	*	*
2022	49	*	*
2023	30	*	*
2024	33	*	*
TOTAL	439		

*Discontinued role of LGU for WCA in 2019

Monitoring Program

Lakes. The Commission contracts with Three Rivers Park District to conduct a monitoring program that tracks conditions in the lakes and major streams of the watersheds. The Third Generation Plan established four sentinel lakes – Fish, Weaver, Diamond, and Rice – which are monitored annually. Each year two other lakes are monitored on a rotating basis. Most years one additional lake is monitored by volunteers through the Met Council's Citizen-Assisted Monitoring Program (CAMP). Prior to 2020, the Commission collaborated with Hennepin County and adult volunteers to assess 3-4 wetland sites per year through the Wetland Health Evaluation Program (WHEP). That program was paused starting in 2020 due to COVID restrictions and ultimately was discontinued by the County.

Streams. The Commission collaborates with the USGS, which operates a monitoring station on Elm Creek in Elm Creek Park Preserve in Champlin. In addition to the partnership with the USGS to monitor flow and water quality on Elm Creek, the Commission currently routinely monitors flow and water quality at three sites on Elm, Rush, and Diamond Creeks. Students collect biological data at 3-4 sites per year through the Hennepin County RiverWatch program, which was paused for a few years due to COVID restrictions but resumed in 2023.

Lake and stream data is summarized annually and is available on the Commissions' website and in the Commission's annual report, along with the findings of the volunteer monitoring programs.

Education and Outreach Program

The Third Generation Plan established the goal of the Education and Outreach Program as “to educate and engage everyone in the watershed by increasing awareness of water resources and creating and supporting advocates willing to protect and preserve the resources in the watershed.” The Commission provides most of its education and outreach through the West Metro Water Alliance (WMWA), a collaborative formed by the Commission along with Shingle Creek WMO, the West Mississippi WMO and Bassett Creek WMO. While the Commissions do continue to provide local education and outreach, the four WMOs pool resources to take on larger, more visible initiatives. The most significant and far-reaching program is Watershed PREP, in which contracted educators present water resource-based classes to fourth grade students. Since the program's inception in 2013, over 22,700 students have participated in the watershed introduction lesson, and 9,700 in the water cycle lesson.

In 2023 the Commission and the other three WMOs in WMWA, the Richfield-Bloomington WMO and Hennepin County pooled grant funding to hire an education and outreach specialist for two years to develop and deliver messaging and coordinate implementation projects. This specialist is dedicated half time to the WMWA+ collaborative and half time to general County work. In 2024 the same entities are poised to renew that funding for another two years, with a long-term strategy of self-funding on an ongoing basis once the grants funds are depleted.

Other education and outreach activities include:

- In partnership with Hennepin County, student and adult volunteer monitoring of selected stream and wetland sites in the watershed.
- In partnership with the Metropolitan Council, volunteer lake water quality monitoring on one lake per year.

- In coordination with Hennepin County, helped promote outreach to and field days focused on aspects of land and animal management for water quality.
- Reference material and news posted on the Commission's website.
- In partnership with WMWA, workshops on rain gardens and sustainable turf management.
- Education and outreach materials highlighting proper use of road salt for snow and ice control.
- Outreach to local print and cable television for news coverage of commission and city projects.

Special Studies

Subwatershed Assessments. Subwatershed assessments are intensive studies of small areas of land to identify the best locations for small Best Management Practices (BMPs) such as rain gardens, tree trenches, and bioinfiltration basins. They are usually completed in areas that are already developed and have little or no stormwater treatment or where additional load reductions are sought. Each of the studies below identifies the highest priority, most cost-effective practices that could be considered. The Commission has dedicated grant and levy funds to supplement other city and county funds for implementation and has completed several BMPs in these study areas.

in 2019 the Commission, Hennepin County and City of Cocoran hosted an open house for the Rush Creek Headwaters SWA project for over 200 households, which generated 22 site visits. Two property owners took on projects themselves, while four were considered for Hennepin County funding and/or technical assistance.

- Rush Creek Headwaters: the area draining to the North Fork of Rush Creek from its headwaters to CR 116/Fletcher Lane, including the Jubert Lake and Henry Lake drainage areas.
- Diamond Creek: the area draining to Diamond Creek, including the drainage areas to Diamond, French, and Hayden Lakes.
- South Fork Rush Creek: the area draining to the South Fork of Rush Creek, from its headwaters to its confluence with the North Fork in Maple Grove.
- Weaver Lake: The City of Maple Grove evaluated the Weaver Lake direct drainage area.
- Rice Lake: the City of Maple Grove evaluated the Rice Lake direct drainage area.

HUC8 Special Hazard Areas Study. Elm Creek received a grant from the DNR to update hydrologic and hydraulic modeling for the watershed using the most recent Atlas 14 rainfall depths and distributions. This modeling has been completed and is usable but is still under agency review. When approved and adopted it will be used by the DNR and FEMA to update the Flood Insurance Study Special Hazard Area (Floodplain) maps.

Progress Toward TMDLs

Several of the lakes and the major streams in the watershed do not meet state water quality standards and have been designated by the State of Minnesota as Impaired Waters. The Elm Creek Watershed Total Maximum Daily Load (TMDL) process to evaluate and address these impairments was completed in phases over several years, starting with additional monitoring and data gathering in 2009-2010, analysis and development of the TMDL in 2012-2014, and then final completion of the TMDL document and accompanying Watershed Restoration and Protection Strategies (WRAPS) document in 2015. The final reports were approved by the MPCA and EPA in 2016.

The Elm Creek TMDL study addresses:

- Seven lake *nutrient* impairments (Cowley, Sylvan, Henry, Rice, Fish, Diamond, Goose)
- Four stream *E. coli* impairments.
- Three stream *DO* impairments.
- Four stream *fish and macroinvertebrate* impairments, with primary stressors *total phosphorus (TP)* and *total suspended solids (TSS)*.

Since completion of the Watershed TMDL, there are new impairments:

- Elm Creek and the lower reach of S Fork Rush Creek for excess *chloride*. These were included in the Metro Chloride TMDL.
- *Total Suspended Solids (TSS)* in Elm Creek. Since this was a primary stressor in the TMDL, the Commission is already assigned and making progress toward required load reductions.
- *Fish biotic integrity (F-IBI)* in CD #16, a tributary to S Fork Rush Creek. No TMDL has been established.
- *Fish biotic integrity (F-IBI)* in Fish Lake. NO TMDL has been established.

The Fish Lake nutrient impairment has now been “delisted,” or removed from the Impaired Waters list as the lake now meets state standards.

In 2024 the Commission is completing a ten-year review of progress that is comprised of the following:

- Completing additional lake and stream monitoring to better assess current conditions and evaluate any future trends.
- Evaluating load reductions achieved through the conversion of lands with little or no stormwater management to development incorporating stringent runoff volume and pollutant load reduction practices.
- Evaluating load reductions achieved through BMPs in the watershed, including stream restoration, lake management, structural and nonstructural practices such as enhanced street sweeping.
- Completing a trend analysis on current water quality data.
- Evaluating implementation strategies and recommending any revisions.

This analysis is expected to be complete by the end of 2024, although water quality monitoring will also be completed in 2025. Initial results will be available to incorporate into the Fourth Generation Plan.

Cost Share Projects

The Commission operates two programs to share in the cost of small BMP installations. The City Cost Share Program provides matching funding for City voluntary BMPs. The Partnership Cost Share Program provides up to 100% of the cost of voluntary BMPs on private property. Cost share guidelines specify project eligibility, and participation is granted on a first come first served basis as funds are available. Two projects have been funded, one City and one Partnership project.

Table 4. Cost Share projects 2013-2024.

Year	Project	Description	Program	Amount
2023	Dayton River Road Channel Stabilization	Repair of an eroding channel from Dayton River Rd to the Mississippi	City	\$50,000
2024	Fish Lake Carp Management	Cost share in Fish Lake carp removal	Partner	\$11,856
TOTAL				\$61,856

Grants

The member cities have been actively taking actions to manage and improve the water resources in the watershed. The Commission has been fortunate to have been successful at receiving grants to undertake projects and special studies. As detailed in Table 6, this has provided nearly \$1.2 million to supplement local funding.

Table 6. Grant funding received 2015-2024.

PROJECT	AMOUNT	SOURCE	YEAR
Rush Creek Headwaters SWA	\$50,280	BWSR CWLA AIG	2016
Fish Lake Alum	\$200,000	BWSR CWLA	2017
Elm Creek Phase IV	\$134,486	BWSR WBIF	2018
Elm Creek Phase V	\$200,000	BWSR WBIF	2020
S Fork Rush Cr Restoration	\$314,153	BWSR WBIF	2020
Headwaters Ag BMP Implementation	\$175,000	BWSR WBIF	2022
Education and outreach specialist	\$30,000	BWSR WBIF	2022
High priority studies	\$92,274	BWSR WBIF	2022
TOTAL	\$1,196,193		

WBIF = Watershed Based Implementation Funding; CWLA = Clean Water Legacy Act; AIG = Advanced Implementation Grants

Capital Projects

The Commission shares in the cost of qualifying capital projects in accordance with a CIP Cost Share Policy. The Commission share is funded using the authority under Minn. Stat. 103B.251, which allows the Commission to request Hennepin County to levy an ad valorem tax on its behalf across all the property in the watershed. Any excess levy funds after project close outs are segregated in a Closed Projects Account and may be used only for additional capital projects. Cities serve as contracting agencies and are then reimbursed from Commission funds. Table 7 shows the Third Generation capital projects.

Table 7. Elm Creek capital projects and levies, 2015-2024.

PR#	City	Project Name	Commission Share	Local Share	Est Total Cost	Amount Levied
2015-01	Plymouth	Elm Cr Reach E	\$250,000	\$836,000	\$1,086,000	\$250,000
2016-01	Rogers	CIP-2016-RO-01 Fox Cr, Creekview	80,312	240,938	321,250	80,312
2016-02	Champlin	Mississippi Point Park Riverbank Repair	75,000	225,000	300,000	75,000
2016-03	Champlin	Elm Creek Dam	187,500	6,813,720	7,001,220	187,500
2016-05	Maple Grove	Fish Lake Alum Treatment-Phase 1	75,000	225,000	300,000	75,000
2016-04	Maple Gove	Rush Creek Main Stem	75,000	0	0	75,000
2017-01	Rogers	Fox Cr, Hyacinth	112,500	337,500	450,000	112,500
2017-03	Champlin	Mill Pond Fishery and Habitat Restoration	250,000	4,750,000	5,000,000	250,000
2017-04	Champlin	Rain Garden at Independence Avenue	75,000	225,000	300,000	75,000
2018-01	Maple Grove	Rush Creek Main Stem	75,000	0	0	75,000
2018-02	Plymouth	CIP-2017- EC Stream Restoration Reach D	212,500	637,500	850,000	212,500
2018-03	Champlin	Elm Creek Stream Restoration Phase III	100,000	300,000	400,000	100,000
2018-04	Champlin	Downs Road Trail Raingarden	75,000	225,000	300,000	75,000
2019-01	Maple Gove	Rush Creek Main Stem	25,000	1,775,000	1,650,000	26,513
2019-04	Medina	Hickory Drive Stormwater Improvement	76,823	231,097	307,920	81,471
2019-05	Corcoran	Downtown Regional Stormwater Pond	26,477	79,433	105,910	28,709

PR#	City	Project Name	Commission Share	Local Share	Est Total Cost	Amount Levied
2019-06	Champlin	Elm Creek Stream Restoration Phase IV	150,000	450,000	600,000	159,075
2020-01	Various	Livestock Excluss, Buffer & Stabilized Access	50,000	0	50,000	53,025
2020-02	Various	Agricultural BMPs Cost Share	50,000	0	50,000	53,025
2020-03	Plymouth	Enhanced Street Sweeper	25,000	50,000	75,000	31,512
2021-01	Maple Grove	Elm Rd/Everest Ln Stream Resto	125,000	375,000	500,000	132,536
2021-02	Champlin	Elm Creek Stream Restoration Phase V	150,000	750,000	900,000	159,075
2022-01	Various	City Cost Share	100,000	100,000	200,000	106,500
2022-02	Various	Partnership Cost Share	50,000	0	50,000	53,250
2022-03	Maple Grove	South Fork Rush Creek Restoration 1	406,252	2,843,748	3,250,000	430,828
2023.01	Maple Grove	South Fork Rush Creek Restoration 2	406,250	0	00	430,830
2023.02	Dayton	CSAH 12/Dayton River Rd Stabilization	110,000	1,219,410	1,329,410	116,655
2023.03	Rogers	Downtown Pond Expansion and Reuse	101,500	304,500	406,000	107,640
2023.04	Various	City Cost Share Program	100,000	100,000	100,000	106,050
2023.05	Various	Partnership Cost Share Program	50,000	0	50,000	53,025
			\$3,645,114	\$23,093,846	\$25,932,710	\$3,772,531

Evaluation of Goals and Strategies

Third Generation Priorities

The Third Generation Watershed Management Plan established five priorities to be addressed in the 2015-2024 planning period. The Plan also established goals in six areas and priority actions. The following is an overview of progress through mid-2024.

Priority 1: Begin implementing priority projects and actions in 2015, providing cost-share to member cities to undertake projects to help achieve WRAPS lake and stream goals.

The member cities, other agencies, and private property owners have implemented a variety of actions to improve lakes and streams, from large capital projects to individual property maintenance choices. Some examples include:

- Several significant stream restoration projects totaling 30,600 linear feet on Elm Creek and Rush Creek, and projects on smaller streams such as Fox Creek.
- Lake improvement actions including alum treatments, and carp and invasive vegetation management.
- Partnering with Hennepin County Board Conservationists to promote and undertake improvements on agricultural and other lands. These include actions such as nutrient management plans, buffers, swales, manure bunkers, runoff storage and treatment, and wetland restorations.
- Routinely incorporating Best Management Practices into public infrastructure projects.

Priority 2: Use the results of the WRAPS study to establish priority areas, and complete subwatershed assessments to identify specific Best Management Practices that feasibly and cost-effectively reduce nutrient and sediment loading to impaired water resources.

The Commission has completed Subwatershed Assessments in three priority upper watershed areas with predominately agricultural/rural residential land uses: The Rush Creek Headwaters, South Fork Rush Creek, and Diamond Creek subwatersheds were identified in the WRAPS as potentially contributing higher pollutant loads to impaired streams and lakes. In addition, the Commission supported the city of Maple Grove in its completion of SWAs for the Weaver Lake and Rice Lake drainage areas.

Priority 3: Develop a model manure management ordinance to regulate the placement of new small non-food animal operations using the City of Medina ordinance as a guide, and require member cities to adopt that ordinance or other ordinances and practices to accomplish its objectives.

A model ordinance was developed in 2018 and cities were encouraged to consider using it as the basis for their own official controls. Each city in the watershed has adopted the model or a modified version.

Priority 4: Partner with other organizations to complete a pilot project for targeted fertilizer application and to increase and focus outreach to agricultural operators.

While there was initial support, the Commission opted instead to work with Hennepin County to encourage a broad range of agricultural BMPs.

Priority 5: Continue participating in joint education and outreach activities with WMWA and other partners.

The Commission has actively participated in WMWA to develop and deliver coordinated messaging and outreach focused on protecting waters and good practices, from elementary students to lake associations to tabling at city festivals and events. The Commission also dedicated some of its Watershed-Based Implementation Funding (WBIF) to a pool with four other WMOs and Hennepin County to hire a shared outreach coordinator to develop and deliver a broader range of focused messaging and outreach.

Progress Toward Third Generation Goals and Actions

Water Quantity. The Third Generation Plan goals for water quantity are focused on reducing, or at minimum achieving no increase in, the volume and rate of runoff discharging to the streams in the watershed, to reduce potential for downstream flooding, erosive velocities and minimize further streambank erosion and mass wasting. An additional management goal is to maintain the current flood profile of Elm Creek and tributaries.

Goal Area A: Water Quantity

Third Generation Goals	Progress Toward Goals	Status
A.1. Maintain the post-development 2-year, 10-year, and 100-year peak rate of runoff at pre-development level for the critical duration precipitation event.	Commission rules for new development and redevelopment require no increase in the rate of runoff post development. Small projects less than 1 acre are encouraged to add voluntary BMPs.	Complete and ongoing
A.2. Maintain the post-development annual runoff volume at pre-development volume.	Commission rules for new development and redevelopment require abstraction of new volumes, but allow filtration where infiltration is not feasible, which is common. New volumes are tracked.	Needs work
A.3. Prevent the loss of floodplain storage below the established 100-year elevation.	Commission rules require compensating storage where this occurs.	Complete and ongoing
A.4. Reduce peak flow rates in Elm, Diamond, and Rush Creeks and tributary streams to the Crow and Mississippi and preserve conveyance capacity.	Theoretically if all projects meet the infiltration requirement. Not all do because of poor soils. Not tracked.	Needs work

Water Quality. The goals for water quality are focused on making progress to improve the lakes and streams in the watershed as well as protect those that are not impaired waters.

Goal Area B: Water Quality

Third Generation Goals	Progress Toward Goals	Status
B.1. Improve Total Phosphorus concentration in the impaired lakes by 10% over the 2004-2013 average by 2024	Progress is being assessed in the 10-year TMDL Review currently underway. Fish Lake has been delisted due to improved water quality	In process
B.2. Maintain or improve water quality in the lakes and streams with no identified impairments.	Progress is being assessed in the 10-year TMDL Review currently underway	In process
B.3. Conduct a TMDL/WRAPS progress review every five years following approval of the TMDLs and WRAPS study.	Progress is being assessed in the 10-year TMDL Review currently underway	In process
B.4. Identify high priority areas where the Commission will partner with cities and other agencies to provide technical and financial assistance.	Subwatershed assessments have been completed for catchments where modeling for the TMDL indicated a higher-than-average pollutant load contribution. Partnering with the County on BMPs in those areas.	Complete

Groundwater. The Commission has undertaken limited groundwater management activities in the past, primarily by requiring projects meeting project review thresholds to infiltrate a portion of runoff. The Rules also limit the use of infiltration in sensitive recharge areas and Wellhead Protection Emergency Response Areas.

Goal Area C: Groundwater

Third Generation Goals	Progress Toward Goals	Status
C.1 Promote groundwater recharge by requiring abstraction/infiltration of runoff from new development and redevelopment.	Commission rules for new development and redevelopment require abstraction of new volumes, but allow filtration where infiltration is not feasible, which is common. New volumes are tracked.	Needs work
C.2. Protect groundwater quality by incorporating wellhead protection study results into development and redevelopment Rules and Standards.	Infiltration is not allowed in certain high-risk areas.	Complete

Wetlands. The Commission’s primary tool for managing wetlands is the Wetland Conservation Act (WCA). The Commission no longer serves as the Local Government Unit (LGU) for WCA administration in any of the member cities.

Goal Area D: Wetlands

Third Generation Goals	Progress Toward Goals	Status
D.1 Preserve the existing functions and values of wetlands within the watershed.	Cities are now responsible for enforcing the WCA. Impacts are as allowable under WCA. Commission does not track cumulative impacts.	Work needed
D.2 Promote the enhancement or restoration of wetlands in the watershed.	SWAs have identified some potential wetland restorations. The Commission has partnered with the County on a few restorations.	Work needed

Drainage Systems. Hennepin County retains ditch authority over several jurisdictional ditches in the watershed. The primary Third Generation activity related to drainage systems is to periodically review the advantages and disadvantages of ditch authority and if requested to reconsider jurisdiction.

Goal Area E: Drainage Systems

Third Generation Goals	Progress Toward Goals	Status
E.1 Continue current Hennepin County jurisdiction over county ditches in the watershed.	Continuing current jurisdiction.	Complete

Operations and Programing. The following goals guide the routine programs and operations of the Commission, and include the education and outreach program; maintenance of rules and standards; the annual monitoring program; and programs and activities to stay abreast of changing standards and requirements, search for grant and other funds to supplement the regular budget, and operate a capital improvement program and share in the cost of projects.

Goal Area F: Operations and Programming

Third Generation Goals	Progress Toward Goals	Status
F.1 Identify and operate within a sustainable funding level that is reasonable to member cities.	The member dues have increase 19% since 2015, from \$209,000 to \$250,000, or less than 2% per year. The inflation rate increased 31% in that period.	Complete
F.2 Foster implementation of TMDL and other implementation projects by sharing in their cost and proactively seeking grant funds.	The Commission has provided \$3.6 million in CIP cost share, \$62,000 in small project cost share, and obtained \$1.2 million in grants funds.	Complete
F.3 Operate a public education and outreach program to supplement the NPDES Phase II education requirements for the member cities.	Primarily participation in the West Metro Water Alliance. Limited independent education and outreach. Maintains a website.	Complete, but needs work
F.4 Operate a monitoring program sufficient to characterize water quantity, water quality, and biotic integrity in the watersheds and to evaluate progress toward meeting TMDL goals.	The Commission contracts with Three Rivers Park District to administer the monitoring program set forth in the Plan. Results are presented annually to the Commission.	Complete
F.5 Maintain rules and standards for development and redevelopment that are consistent with local and regional TMDLs, federal guidelines, source water and well head protection requirements, sustainable water yields, nondegradation, and ecosystem management goals.	The Commission maintains Rules and Standards and periodically revises them as necessary for clarification or to incorporate the latest standards or regulatory requirements.	Complete
F.6 Serve as a technical resource for member cities.	The Technical Advisory Committee is comprised of representatives from the member cities and staff from Hennepin County, Three Rivers Park District, and consulting staff. The TAC meets periodically throughout the year to review and advise on topics referred by the Commission and to learn about new technologies and topics and share information.	Complete

Assessment of Third Generation Plan Performance

In preparation for the Fourth Generation Management Plan, the Commission conducted a self-assessment to identify achievements and areas for improvement. The Commissions have completed or will have completed by 2024 nearly all the work plan activities and strategies identified in the Third Generation Plan. The most successful achievements of the Third Generation Plan were:

Water Quality

- Provided cost share assistance to member cities to undertake significant pollutant loading projects, including several stream restoration and lake management projects to reduce sediment and nutrient loading and improve habitat.
- Partnered with the City of Maple Grove, the Three Rivers Park District, the Fish Lake Improvement Association, and other stakeholders to undertake various actions to restore water quality in Fish Lake and achieve delisting from the Impaired Waters list.
- Created the new City and Partnership Cost Share programs to provide financial assistance for smaller projects, and amending the Cost Share Policy to provide costs share of capital equipment such as high efficiency sweepers. This increases the range of type of BMPs being implemented in the watershed.
- Expanded the partnership with Hennepin County to provide outreach and technical and financial assistance to rural and agricultural land owners to achieve voluntary management practices. The Commission also dedicated both levy and grant funding to expand these efforts in key subwatersheds.
- Completed three subwatershed assessment in areas where modeling for the TMDL/WRAPS indicated had higher potential for pollutant loading (Rush Creek Headwaters, Diamond Creek, and South Form Rush Creek). Provided financial assistance to Maple Grove to complete subwatershed assessments in high priority urban areas (Rice Lake and Weaver Lake areas).

Education and Outreach

- Expanded education and outreach efforts through the West Metro Water Alliance (WMWA) partnership watershed PREP program to provide classroom offerings. Over 22,000 students served in the last 10 years in schools across the four participating watersheds, including several in Elm Creek.
- Dedicated grant funding in partnership with four other WMOs and Hennepin County to employ a half time education and outreach coordinator dedicated to increasing information delivery and engagement and BMP implementation in the five watersheds.
- Partnered with Hennepin County conservationists to deliver targeted education and outreach opportunities to agricultural and rural landowners and operators.

Operations

- Updated the Rules and Standards to be consistent with latest NPDES permitting, including rules specifically for linear projects.
- Worked to make financial reporting more accessible and adopted an Adequate Fund Balance Policy.
- Revised the project review fee policy so that applicants pay the actual cost to complete the review.

Areas that fell short of Third Generation expectations or which could be improved include:

Water Quality

- TMDL Implementation has focused on TP and TSS and to a much smaller extent on biotic impairments except for some incidental habitat improvement with stream stabilization projects.
- The Commission has relied on citizen volunteers to supplement the monitoring program, and it is becoming more difficult to find volunteers willing to commit the time.
- Just getting started and need to do more to foster “nonstructural” agricultural practices such as soil health, cover crops.
- Need to provide more incentives for thinking “outside the box” on BMPs such as reuse and newer technologies.

Education and Outreach

- Need to do more general education and outreach, as well as targeted E &O to lake association, HOAs, large lot rural homeowners, et.
- Need a more focused approach on chloride management.
- Need more formal Commissioner education to get up to speed on technical issues.

Operations

- The runoff volume management requirements in the Rules and Standards assumed that most development and redevelopment would be able to provide infiltration of 1.1” of runoff. However, due to less permeable soils than expected many large developments have only been able to provide filtration. The 1.1” abstraction requirement was intended to mimic pre-development conditions; instead, new runoff volumes are being created and are discharging to surface waters.
- These new volumes are being tracked but need to assess potential impacts and develop mitigation strategies if necessary. May need to look for regional storage or infiltration opportunities.
- Worked with the DNR to update the Commission’s Special Flood Hazard model to incorporate Atlas 14. It is a usable model but has stalled in its formal review and is not yet enforceable nor have the official flood maps been updated.