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# Level II Performance Review

**Black Dog Watershed Management Organization**

**Local Government Unit Review**

**Final Report**

July 31, 2017

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**Minnesota Board of Water and Soil Resources**

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This report has been prepared for the **Black Dog Watershed Management Organization** by the Minnesota Board of Water and Soil Resources (BWSR) in partial fulfillment of the requirements of Minnesota Statutes, Chapter 103B.102, Subd.3.

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## Report Summary

PRAP Level II Report Summary	Black Dog WMO
<p>What is a PRAP Performance Review?</p> <p><b>The Board of Water and Soil Resources supports Minnesota’s counties, watershed districts and soil and water conservation districts that deliver water and related land resource management projects and programs. In 2007 the Board set up a program (PRAP) to systematically review the performance of these local units of government to ensure their effective operation. Each year BWSR staff conduct routine reviews of several of these local conservation delivery entities. This document reports the results of one of those reviews.</b></p>	<p><b>Key Findings and Conclusions</b></p> <p>The Black Dog WMO has a good record of accomplishment in implementation of their current water management plan which covers the years 2012-2022.</p> <p>The WMO’s compliance with BWSR performance standards is very good in meeting the essential, administrative, planning and communication practices that lead to an effective, efficient organization.</p> <p>The WMO’s partners reinforce these conclusions in their high marks` for communication, quality of work, relations with customers and follow-through.</p> <p><b>Resource Outcomes</b></p> <p>The Black Dog WMO watershed management plan contains specific, measureable resource outcomes goals for water quality. The WMO annual water quality report contains information about the water quality results achieved in area surface waters. The Black Dog WMO has completed 3 of 28 action items in the current plan with another 16 activities ongoing.</p> <p><b>Action Item:</b></p> <p><b>Work with the cities of Lakeville and Eagan to come into compliance with requirement for water plan approval by BDWMO.</b></p> <p><b>Commendations</b></p> <p>The Black Dog WMO is commended for meeting 5 out of 9 High Performance Standards (applicable to WMOs).</p> <p><b>Recommendations</b></p> <p><b>Recommendation 1:</b> Develop and implement training plan for each board member.</p> <p><b>Recommendation 2:</b> Make water quality data and trends easily accessible to the public.</p> <p><b>Recommendation 3:</b> Conduct a strategic planning initiative and workload analysis to assess the WMO’s ability to comply with the 8410.0105 Subpart 1, and 8410.0140 Subpart 1. C. requirements that the WMO shall evaluate progress for the implementation of plan actions at a minimum of every two years.</p> <p><b>Recommendation 4:</b> Address the action item by working with the cities of Lakeville and Eagan to come into compliance with requirement for water plan approval by BDWMO.</p>

## Introduction

This is an information document prepared by the staff of the Board of Water and Soil Resources (BWSR) for the Black Dog Water Management Organization (WMO). It reports the results of a routine performance review of that organization's water resource management plan implementation and overall organizational effectiveness in delivery of land and water conservation projects and programs.

BWSR has reviewed the Black Dog WMO's reported accomplishments of their management plan action items, determined the organization's compliance with BWSR's Level I and II performance standards, and surveyed members of the Black Dog WMO and their partner organizations.

This review is neither a financial audit nor investigation and it does not replace or supersede other types of governmental review of local government unit operations.

While the performance review reported herein has been conducted under the authority granted to BWSR by Minnesota Statutes Chapter 103B.102, this is a staff report and has not been reviewed or approved by the BWSR board members.

### What is PRAP?

PRAP is an acronym for BWSR's Performance Review and Assistance Program. Authorized by the 2007 Minnesota legislature, the PRAP purpose is to support local delivery of land conservation and water management by periodically reviewing and assessing the performance of local units of government that deliver those services. These include soil and water conservation districts, watershed districts, watershed management organizations, and the local water management functions of counties.

BWSR has developed four levels of review, from routine to specialized, depending on the program mandates and the needs of the local governmental unit. A Level I review annually tabulates all local governmental units' compliance with basic planning and reporting requirements. In Level II, conducted by BWSR once every ten years for each local government unit, the focus is on the degree to which the organization is accomplishing its water resource management plan. A Level II review includes determination of compliance with BWSR's Level I and II statewide performance standards, a tabulation of progress on planned goals and objectives, a survey of board or water plan task force members and staff of the factors affecting plan implementation, a survey of LGU partners about their impressions of working with the LGU, and a BWSR staff report to the organization with findings, conclusions and recommendations. BWSR's actions in Levels III and IV include elements of Levels I and II and then emphasize assistance to address the local governmental unit's specific needs.

## Black Dog WMO Background

### History

The following information was taken from the Black Dog WMO 2012-2022 Watershed Management Plan.

“The BDWMO is located in northwestern Dakota County. The majority of the BDWMO discharges through the Lower Minnesota River Watershed District (LMRWD) before reaching the Minnesota River. However, the Murphy Hanrehan, Kingsley Lake and Orchard Lake subwatersheds are tributary to the Credit River. Water management activities in these subwatersheds are of particular interest to Scott County (Scott WMO) and the City of Savage.

The original joint powers agreement (JPA) between the member cities of the BDWMO went into effect in 1985. At the time of its formation, the BDWMO covered 12,900 acres (20.2 square miles) covering parts of the cities of Apple Valley, Burnsville, Egan, Lakeville and Savage. In 1999, the JPA was revised and restated along with a new memorandum of understanding with Scott County, when the portion of the former Credit River WMO in Dakota County was incorporated into the BDWMO, increasing the BDWMO area to 16,600 acres (25.9 square miles). In 2010, a new JPA went into effect as did an additional memorandum of understanding between the BDWMO and Scott County when the City of Savage was removed from the BDWMO and incorporated into the Scott WMO.

Currently, the BDWMO boundary covers an area of approximately 16,600 acres (25.9 square miles). The JPA will continue to be revised as necessitated by the policies of this Plan, future amendments, or other actions taken by the Commission (e.g., jurisdictional changes, membership, funding formulas).

### Management Structure

The BDWMO Board of Commissioners consists of five commissioners and three alternates appointed by the member cities to a three-year term. The City of Burnsville appoints three commissioners, the cities of Apple Valley and Egan appoint the fourth commissioner, and the City of Lakeville appoints the fifth commissioner. Member city staff attend board meetings on a regular basis as informal technical advisors. Regular meetings are held on the 3<sup>rd</sup> Wednesday of the month at the City of Burnsville

offices. The public is invited to attend the BDWMO Commission meetings.

### BDWMO Vision and Mission

Within the context of the statutory authority granted to WMOs and contained in the JPA, the BDWMO Board has established the following vision to provide strategic direction to its work. The following vision helps to focus the organization’s efforts and is a reminder of what the BDWMO is working to achieve:

***Water resources and related ecosystems are managed to sustain their long-term health and aesthetic beauty in order to contribute to the well-being of the citizens within the watershed.***

In addition to the statutory authority and functions identified in the JPA, the BDWMO has further clarified its mission in relationship to its members. The following guiding principles of the BDWMO helped the organization establish its Goals and Policies:

- Keep regulation at the local level—the BDWMO will not administer a permit program.
- Assist member communities with intercommunity floodplain and runoff planning and with mediation of water management disputes between communities.
- Monitor, classify and manage strategic water resources to meet their intended use. Strategic resources are waterbodies that have broad watershed significance.
- Monitor, evaluate and/or model stormwater runoff quality.
- Improve the quality of the stormwater runoff reaching the Minnesota River.
- Manage intercommunity stormwater runoff, flooding and other water quantity issues.
- Develop policies to be implemented by the cities to protect the BDWMO’s water resources.
- Assess performance of the BDWMO and the member cities toward achieving the goals stated in this plan.
- Provide member cities with useful information about the BDWMO, its activities, and water resource management.
- Educate all watershed citizens and member cities in water resource issues and BDWMO activities.
- Assist member cities with funding water quality projects through grants and other

funding available directly to watershed organizations.

## Findings

This section describes what BWSR learned about the performance of the Black Dog WMO. **Source: Black Dog WMO 2012-2022 Watershed Management Plan.**

### Findings Part 1: Planning

The current water resources management plan was adopted in December, 2012 and will expire in 2022. The plan identifies 7 goals and 28 implementation tasks to addressing problems for the Black Dog WMO each with goals and policies.

#### WATER QUALITY GOALS

- Maintain or restore the water quality of the BDWMO water resources to meet state water quality standards and allow for the continuation or enhancement of existing intended uses.
- Improve the quality of stormwater runoff reaching the Minnesota River by reducing nonpoint source pollution (including sediment) carried with stormwater runoff.
- Maintain or improve the quality of stormwater runoff reaching the calcareous fen (Black Dog fen) and the nearby trout streams.

#### WATER QUANTITY AND FLOODING GOALS

- Manage intercommunity stormwater flows.
- Minimize flood damage to private and public property, and protect against increased flooding caused by development and redevelopment activities.

#### EROSION/SEDIMENTATION GOALS

- Limit and/or decrease erosion and sedimentation through controls to protect water quality, habitat, and infrastructure.

#### WETLAND AND HABITAT MANAGEMENT GOALS

- Preserve the ecological quality of wetlands for water retention, recharge, soil conservation, habitat, aesthetics, and natural enhancement of water quality.
- Achieve no net loss of wetlands in the BDWMO, while conforming to the Minnesota Wetland Conservation Act (WCA) and associated rules (Minnesota Rules 8420).

#### SHORELAND, HABITAT AND OPEN SPACE MANAGEMENT GOALS

- Protect and enhance fish and wildlife habitat within the BDWMO.
- Maintain or improve shoreland integrity, preserve and enhance the ecological quality of shoreland areas as it relates to wildlife habitat, aesthetics, soil conservation, and natural improvement of water quality.
- Preserve and enhance the quality of open spaces.
- Protect and increase recreation opportunities within the BDWMO.

#### GROUNDWATER GOALS

- Protect the quality and quantity of groundwater resources.

#### ADMINISTRATION GOALS

- Promote local regulation of water resources by delegating day-to-day management of the BDWMO's water resources to the member cities.
- Provide administrative guidance to member cities through this plan and the review and approval of local water management plans.
- Provide periodic review of projects proposed to meet policies/goals for strategic waterbodies established in this plan.
- Minimize duplication of federal and state rules and standards.
- Supplement existing federal and state regulations with specific design standards and criteria that address unique needs of BDWMO resources described in this plan.

There are 28 different implementation tasks assessed in this report. Black Dog WMO staff have provided a description of the goals, actions and accomplishments to date. An analysis of this information shows that the Black Dog WMO has made progress on about two thirds of the action items in the plan. Based on this assessment, the WMO has made progress on 15 items (54%), has completed 4 items (14%), and has not started 9 items (32%).

A full description of the goals, implementation actions and progress is contained in Appendix A, pages 9-15.

## Findings Part 2: Performance Standards

BWSR tracks all 18 watershed management organizations' compliance with three basic standards each year in a Level I review. This is reported in a publically accessible database on the BWSR website.

For the Level II reviews, BWSR has developed a set of performance standards that describe both basic and high performance best management practices related to overall operation of the organization. The standards address four areas of operation: administration, planning, execution, and communication/coordination. The **basic practice** standards describe practices that are either legally required or fundamental to WMO operations. The **high performance** standards describe practices that reflect a high level of performance. While all watershed management organizations should be meeting the basic standards, only the more ambitious ones will meet many high performance standards. The results for the Black Dog WMO are listed in Appendix B, page 16.

For this Level II review, Black Dog WMO reports compliance with 8 of the 9 basic performance standards that are applicable to WMOs and 5 of 9 high performance standards.

## Findings Part 3: LGU Self-Assessment

The information for this part and the next is based on responses to surveys developed by BWSR to get the opinions of both board members and staff and from the WMO's partner organizations about performance. Black Dog WMO staff identified, at BWSR's request, their current WMO Board members, city technical advisors and staff, and those partner organizations with which they have an on-going working relationship. BWSR invited those people to take the on-line survey and their responses were received and analyzed by BWSR staff. The identity of survey respondents is unknown to both BWSR and the Black Dog WMO.

Part 3 summarizes the results from the survey of WMO Board members and staff regarding the accomplishments of the organization over the past several years. A total of 10 Board Managers, Alternates, or Advisory members and staff were invited to take the survey and 8 (80%) responded. It is suggested that staff, Board members and Advisory Committee members consider these responses as a starting point for follow up discussion. The full

### Resource Outcomes

The Black Dog WMO watershed management plan contains specific, measureable resource outcomes goals for water quality. The plan goals include evaluating and tracking water quality trends within the WMO, to improve intergovernmental coordination regarding water quality management within the WMO, and to improve water quality within the WMO.

responses are reported in Appendix C, pages 17-21, and briefly summarized here.

Board members, Advisory Committee members and staff were asked how often the organization uses some sort of master plan to guide decisions. 83% said Always, and 17% indicated usually.

In listing the organization's most successful accomplishments over the past 3-5 years, respondents mentioned *Habitat Monitoring Program Partnering with the Dakota County SWCD for Landscaping for Clean Water, rain gardens etc., and support for shoreline restoration projects, construction of the Whitney Pond performed by Apple Valley and construction of the Crystal Lake Pond by Burnsville.*

Another survey participant mentioned *the storm sewer diversion pond that routes storm drainage from the southwest corner of Apple Valley and routes it through a pond designed to catch nutrients heavy enough to sink before routing the water into Keller Lake where all of the original drainage was going prior to creation of the pond.*

Respondents attributed the success of these projects to *continuity of BDWMO oversight. Forecasting and appropriation of necessary funding streams.*

One survey participant mentioned *the Habitat Monitoring was re-done several years ago and now provides a more in depth look at a water body every 5 years. It also provides ideas of projects that could be done on those lakes to make improvements. Partnering with the SWCD has provided a lot of public education to residents in the watershed and has led to a lot of smaller water quality improvement project being completed in the watershed.*

Another participant stated *the Board acknowledges the importance of the plan and follows it, there is a*



*good working relationship with the cities and their staff, and we work with high quality consultants.*

Another person commented that the WMO provided for *good analysis of water quality in Keller Lake by Barr Engineering along with transparent planning that was shared with local residents and good cooperation between the cities of Apple Valley and Burnsville.*

Survey participants were also asked to list programs or projects which have not shown as much progress or success. Responses included the *Keller Lake Alum treatment and the Ferric chloride system on Crystal Lake.*

Reasons cited include *funding was an issue and we needed member cities to implement some projects before the alum treatment could be done and cost of plan.*

Partnerships are an important part of organizational success. Respondents were asked which organizations they feel they can partner with. Respondents listed *Burnsville, Lakeville, Apple Valley, MPCA, BWSR, Dakota County SWCD, Dakota County, Barr Engineering and DNR* as organizations the Black Dog WMO currently has strong working relationships with.

The *City of Lakeville* was listed as an organization with which better collaboration would benefit the Black Dog WMO.

**Findings Part 4: Partners’ Assessment**

Black Dog WMO staff identified 10 individuals who have or potentially could partner with the organization in the implementation of its plan. These people were invited to take an on-line survey of their opinions regarding their working relationship with and assessment of the WMO. Seven individuals responded, a good (70%) response rate. The partners were asked questions that focused on their working relationship with the WMO and their rating of the work done by the WMO. These responses are reported in Appendix C, pages 17-21, and summarized here.

Most partner organization respondents expressed familiarity with the Black Dog WMO as indicated by reporting interactions from a few times (28.6%), several times a year (28.6%), to monthly (28.6%) and 14.3% said not at all. Seventy one per cent of the partners expressed that the amount of work they do with the Black Dog WMO is about right and 29% indicated there was potential for more collaboration (see appendix C).

Overall, the partners gave good marks to the Black Dog WMO’s performance in five key areas of partnership

Performance Area	Partner Ratings				
	Strong	Good	Acceptable	Poor	Don’t Know
Communication	57.1%	28.6%	14.3%	0%	0%
Quality of Work	28.6%	42.9%	14.3%	14.3%	0%
Relations with Customers	28.6%	28.6%	14.3%	0%	28.6%
Initiative	28.6%	14.3%	28.6%	14.3%	14.3%
Timelines/ Follow through	14.3%	42.9%	28.6%	0%	14.3%

(see table below).

Finally, about 57% of the partner organizations believe they have a strong or good working relationship with Black Dog WMO, and 29% rated the relationship as good, but could be better and 14% said non-existent, we don’t work with this organization (see appendix C).

When asked for additional comments about the Black Dog WMO, or how they could be more effective, no comments were provided.

A full summary of the survey responses is in Appendix C, pages 17-21.

## General Conclusions

The Black Dog WMO has a good record of accomplishment in implementation of their water management plan. The organization has demonstrated how a systematic approach to water management can be delivered.

The WMO's compliance with the BWSR performance standards applicable to WMOs means they are, for the most part, meeting the essential administrative, planning and communication practices.

The WMO's partners reinforce these conclusions in their good marks for communication, quality of work, and relations with customers.

### Action Items

Action Items are based on those Part 2 Basic Practice performance standards for which the WMO is not currently meeting. There is one Action Item for the Black Dog WMO at this time:

- Work with the cities of Lakeville and Eagan to come into compliance with requirement for plan approval by BDWMO spelled out in M.R. 8410.0105, subpart 9 and 8410.0160, subpart 6, Local Water Plans. The rule requires that local water plans must be prepared by metropolitan cities and towns (*municipalities*) and the local water plan must become part of the local comprehensive plan for a municipality. Prior to adoption, a municipality must prepare their local water plan, distribute it for comment, and have it approved by the organization with jurisdiction in the municipality. The next local comprehensive plans are due December 31, 2018, thus all cities and towns in the seven-county metropolitan area must complete and adopt their local water plan between January 1, 2017 and December 31, 2018. Cities that are not in compliance with this rule requirement will not be eligible for Clean Water Funds. The Board should direct staff to consult with BWSR staff, both the Board Conservationist and Regional Manager, regarding how to address the need and timing for cities to update their local water management plans.

## Commendations

Commendations are issued based on compliance with BWSR's High Performance Standards, as reported in the Findings, Part 2 above. The Black Dog WMO is commended for meeting the following High Performance Standards, reflecting practices that indicate organizational strength:

- Operational guidelines exist and current.
- Biennial Budget Request submitted on time
- Water quality trends tracked for priority water bodies.
- Coordination with County Board, SWCD Board and city/township officials
- Partnerships: cooperative projects/tasks done with neighboring districts and organizations, counties, cities, non-governmental organizations.

## Recommendations

This section contains recommendations offered by BWSR to the **Black Dog WMO** and staff to enhance the organization's service and its delivery of effective water and related land resource management. BWSR financial assistance may be available to support the **Black Dog WMO's** implementation of some of these recommendations.

### **Recommendation 1: Develop and implement training plan for each board member.**

New programs and increasing water management expectations for local governments require a commitment to continued training. This recommendation suggests that new board members are provided with orientation training and all board members have an individual training plan for continuing education in leadership, organizational management and water resource management. The individualized training plan would provide a means of ensuring that staff and board members can continue to build knowledge and skills necessary to carry out duties and responsibilities.

### **Recommendation 2: Make water quality data and trends easily accessible to the public.**

The WMO and its partners are currently doing a comprehensive job of monitoring area lakes and streams, and specific water quality goals have been identified for many of the water bodies. While the WMO does produce an annual Water Quality Report, and the LGU has recently updated their website to report lake water quality data in a GIS based format, it is still very difficult to locate information about water quality trends, particularly lake trends, from the WMO website. The website should be updated to make information about water quality trends in area lakes available in easy to understand and access formats. Annual reports posted on the website should also contain information on water quality trends.

### **Recommendation 3: Conduct a strategic planning initiative and workload analysis to assess the WMO's ability to comply with the 8410.0105 Subpart 1, and 8410.0140 Subpart 1. C. requirements that the WMO shall evaluate progress for the implementation of plan actions at a minimum of every two years.**

The goals in the current water management plan are related to resource outcomes. However, efforts to measure the effects of projects on those resources are not apparent. The organization should evaluate

progress at a minimum every two years as required in rule, and make sure to measure outcomes, not just outputs, and report on progress toward achieving resource improvement. BWSR PRAP Assistance Grant funds may be available to partially fund such an assessment.

**Recommendation 4: Address the action item** by working with the cities of Lakeville and Eagan to come into compliance with requirement for water plan approval by BDWMO spelled out in M.R. 8410.0105, subpart 9 and 8410.0160, subpart 6, Local Water Plans.

## LGU Comments and BWSR Responses

The Black Dog WMO was invited to comment on the findings, conclusions and joint recommendations in the draft version of this report. The letter was summarized and responded to in this section and reproduced in its entirety in Appendix D, page 23.

**Black Dog WMO Comment #1:** Action Item: Work with the cities of Lakeville and Eagan to come into compliance with requirement for water plan approval by BDWMO. – *The Black Dog WMO will work with the cities listed above in completing and adopting their local water plans before December 31, 2018.*

**BWSR Response:** BWSR appreciates the Black Dog WMO's focus on dealing with this action item and commitment to resolving it by December 31, 2018.

**Black Dog WMO Comment #2:** *The Black Dog WMO will look into creating an orientation packet for new board members. The Black Dog WMO will also look to incorporate up to two educational presentations to the board annually and will look at offering conference attendance options to board members.*

**BWSR Response:** - BWSR appreciates the Black Dog WMO's commitment to addressing board member training needs.

**Black Dog WMO Comment #3:** *The Black Dog WMO does include this information (recommendation 2) in annual reports and newsletters but will also look at creating a specific water quality section on the website so water quality data and trends can be easily found by the public.*

**BWSR Response:** BWSR recognizes the Black Dog WMO's consideration to implement this recommendation to expand and improve communication with the public.

**Black Dog WMO Comment #4:** *The Black Dog WMO performs an annual assessment of its implementation program by updating the implementation table to show the status of each implementation item. This table is included in the Black Dog WMO's annual activity report (submitted to BWSR). The Black Dog WMO will consider revising their annual assessment table so it is in the form of the table in the draft PRAP*

*Report. The biggest change would be the addition of the "Next Steps" column, which could help the Black Dog WMO better understand if its priorities or implementation actions need to be revised.*

**BWSR Response:** BWSR appreciates the Black Dog WMO's consideration of this recommendation.

## Appendix A. Plan Accomplishments

**LGU Name: Black Dog Watershed Management Organization**

**Date of This Assessment: April, 2017**

**Type of Management Plan: Metro-area JPA WMO Plan**

**Date of Last Plan Revision: September 26, 2012 BWSR approval**

**Planned Actions or Activities taken from Table 5-1: Implementation Tasks in the 2012 Black Dog WMO management plan**

**Progress Rating:**  =not started/dropped  =on-going progress  =completed/target met

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Administrative and Operational – Watershed-wide</b>					
1. General WMO administration, including reviewing and responding to issues and opportunities (not otherwise described in this table) as they arise. This may include services provided by: <ul style="list-style-type: none"> <li>Administrator (City of Burnsville)</li> <li>BDWMO consulting engineer</li> <li>BDWMO Attorney</li> </ul>	Ongoing	Ongoing	BDWMO continues to perform these actions as needed/requested.	<input type="radio"/>	Continue to perform as needed/requested.
2. Revise joint powers agreement (JPA) to allow cost allocation apportionment specified in Section 4.7.4 – Policy 8 of the 2012 BDWMO Plan (funding of internal load reduction projects)	2013	Not implemented (not required)	Revision of the JPA not required to develop and implement plan to accrue funds in a Capital Improvement Fund.	<input type="checkbox"/>	None.
3. Review Burnsville local watershed management plan	2014	2014	BDWMO approval of updated plan in 2014.	<input type="radio"/>	Major plan update began in 2016; review of updated plan expected in 2017.
4. Review Lakeville local watershed management plan	2014	2018 (anticipated)	BDWMO approval of last plan in 2008.	<input checked="" type="checkbox"/>	Review of updated plan anticipated in 2018

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
5. Review Apple Valley local watershed management plan	2014	2016	BDWMO approval of 2007 plan and associated ordinances in 2016, finding them in conformance with 2012 BDWMO Plan.	<input type="radio"/>	Major plan update began in 2017; review of updated plan expected in 2018.
6. Review Eagan local watershed management plans	2014	2018 (anticipated)	BDWMO approval of last plan in 2007.	<input type="radio"/>	Review of updated plan anticipated in 2018
7. Miscellaneous reviews including, but not limited to: <ul style="list-style-type: none"> <li>Review city comprehensive plan changes that require review by the Metropolitan Council</li> <li>Review projects for consistency with the BDWMO plan, as requested by member cities or other governmental agencies</li> <li>Review and approve any proposed changes to the intercommunity stormwater system that are inconsistent with an approved local plan</li> <li>Review and approve changes to an approved local plan that would cause the local plan to be inconsistent with the BDWMO plan</li> </ul>	Ongoing	Ongoing	BDWMO continues to perform these reviews as needed/requested.	<input type="radio"/>	Continue to perform as needed/requested
8. City technical staff (technical advisor) attendance at BDWMO meetings	Ongoing	Ongoing	City technical staff regularly attend BDWMO meetings	<input type="radio"/>	City staff continue to attend BDWMO meetings.
9. Facilitate intercommunity flood control, stormwater runoff, erosion, and sediment control projects	As needed	No facilitation needed yet	No facilitation of intercommunity projects currently planned	<input type="checkbox"/>	Provide facilitation, if needed.

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
10. Apply for and/or assist member cities with grant applications	Ongoing	Ongoing – in 2015 assisted Burnsville with CWF application	The BDWMO continues to pursue these opportunities as they arise; in 2015 the BDWMO assisted the City of Burnsville in preparing a Clean Water Fund grant application for the city's Crystal Beach Park project (the city received the grant).	<input type="radio"/>	Continue to apply for grants or assist member cities in their grant applications, as appropriate/requested.
11. Complete and submit annual audit to BWSR	Ongoing	Performed annually	Submitted annually; per revised statute, the BDWMO is required to perform an audit every 5 years, rather than annually. In the other years, the BDWMO will prepare an annual finance statement. The last audit was prepared for year 2014; the next audit will need to be prepared for year 2019.	<input checked="" type="checkbox"/>	Prepare next audit in 2019; prepare annual finance statements in intervening years.
12. Update BDWMO Watershed Management Plan	2020	To be completed	BDWMO adopted its latest Watershed Management Plan in 2012.	<input type="checkbox"/>	Planning for an updated Plan will begin in 2020.
13. Development of TMDL Studies and Implementation Plans	Ongoing	None completed/started	BDWMO will perform these tasks as necessary; there are no TMDL studies or implementation plans currently planned by the BDWMO	<input type="checkbox"/>	BDWMO will perform these tasks as necessary; do not anticipate studies in the near future.
14. Complete and publish watershed annual report (newsletter) and post on website	Ongoing	Completed annually	Published annually.	<input checked="" type="checkbox"/>	Complete annually.
15. Complete and submit annual activity report to BWSR and post on website	Ongoing	Completed annually	Completed, published, and submitted annually	<input checked="" type="checkbox"/>	Complete annually

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
16. Create, maintain and update web site—put plan, data, meeting agenda and minutes, watershed annual reports, water quality monitoring reports, educational materials, project updates, etc. on the site	Ongoing	Ongoing	Website is hosted by Dakota SWCD and regularly updated as new material is available.	○	Continue to maintain and update website.
17. Educational outreach including, but not limited to: exploring social media and email list serves to expand communication with the public, sponsoring workshops in partnership with the Blue Thumb program, the promotion of awareness of groundwater resource issues, and seeking volunteers to participate in water quality and water quantity programs	Ongoing	Annually, including partnership with Dakota SWCD since 2009	Provided watershed annual report to member cities and posted to BDWMO website; maintained website (see above); since 2009, BDWMO has partnered with the Dakota SWCD to fund Landscaping for Clean Water (formerly Blue Thumb) Program workshops in the BDWMO area. BDWMO funded 4 workshops in 2016 (2 Landscaping for Clean Water Intro Workshops and 2 Landscaping for Clean Water Design Workshops).	○	Continue providing watershed annual report to member cities and partnering with Dakota SWCD to fund workshops.
18. Implementation of small-scale best management practices on private property to improve water quality	Ongoing	Annually, since 2009, in partnership with Dakota SWCD	Since 2009, BDWMO has partnered with the Dakota County SWCD by providing funding and support to install water quality improvement projects through the Landscaping for Clean Water Program (formerly Blue Thumb and Community Conservation Cost Share Programs) for Black Dog WMO residents. Projects included rainwater gardens, native gardens, shoreline improvements, and a bioretention site.	○	Continue partnering with Dakota SWCD to fund water quality improvement projects.



Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
19. Implement recommended internal phosphorus load reduction projects identified in UAA and/or TMDL for non-strategic waterbodies or strategic waterbodies without inter-community shoreline	As needed	Not yet implemented.	BDWMO will implement these projects when watershed load reduction projects have been implemented and further water quality improvements are needed.	<input type="checkbox"/>	Implement when needed (see Keller Lake actions below).
<b>Monitoring and Studies – Strategic Waterbodies</b>					
1. Annual CAMP water quality monitoring, performing trend analysis, and establishing action levels for the following strategic waterbodies: <ul style="list-style-type: none"> <li>• Crystal Lake</li> <li>• Keller Lake</li> <li>• Orchard Lake</li> <li>• Kingsley Lake</li> <li>• Lac Lavon</li> </ul>	Ongoing	Performed annually	CAMP monitoring completed annually; trend analysis completed annually.	<input type="radio"/>	Continue annual CAMP monitoring and trend analyses of monitoring data.
2. Lake water quality monitoring	Ongoing	Ongoing/ annually	Performed for one lake annually; most recent monitoring includes Orchard Lake in 2014, Crystal Lake in 2015, and Lac Lavon in 2016	<input type="radio"/>	Continue cycle of monitoring: Orchard Lake in 2017, Crystal Lake in 2018, and Lac Lavon in 2019
3. Habitat monitoring at 5-year intervals for the following strategic waterbodies: <ul style="list-style-type: none"> <li>• Crystal Lake</li> <li>• Keller Lake</li> <li>• Orchard Lake</li> <li>• Kingsley Lake</li> <li>• Lac Lavon</li> </ul>	Ongoing	Ongoing/ annually	Implementation of the redesigned program began in 2011 (Kingsley Lake); habitat monitoring of Orchard Lake was performed in 2012, Crystal Lake in 2013, Lac Lavon in 2014, Keller Lake in 2015, and Kingsley Lake in 2016	<input type="radio"/>	Continue cycle of monitoring: Orchard Lake in 2017, Crystal Lake in 2018, Lac Lavon in 2019, Keller Lake in 2020, and Kingsley Lake in 2021.

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
4. Implement lake water quality management actions recommended in Table 4-1 of the 2012 BDWMO Plan, depending on water quality trends and comparison of recent water quality to action level, for the following strategic waterbodies: <ul style="list-style-type: none"> <li>• Orchard Lake</li> <li>• Kingsley Lake</li> <li>• Lac Lavon</li> </ul>	As needed	Not yet needed	BDWMO will implement these actions as necessary; there are no actions currently planned	<input type="checkbox"/>	Continue tracking water quality trends and action levels and take actions as/when necessary.
<b>Capital Projects – Crystal Lake</b>					
1. Implement recommended watershed projects to reduce runoff-borne phosphorus loads, as identified in the TMDL, that may include: <ul style="list-style-type: none"> <li>• Street sweeping</li> <li>• Native shoreline buffers</li> <li>• Public outreach and education</li> </ul>	Ongoing	Ongoing	Projects to be performed by member cities (Lakeville, Burnsville) with possible grant funding from BDMWO. Burnsville performs street sweeping in the watershed twice a year and performs ongoing outreach and education. Beyond website articles and city newsletter information, city staff meet with the Crystal Lake association twice a year. BDWMO also performs ongoing public education.	<input type="radio"/>	Cities perform projects as needed; continue to perform public education.
2. Implement recommended internal phosphorus load reduction projects identified in the TMDL, that may include: <ul style="list-style-type: none"> <li>• In-lake alum treatment</li> <li>• Aquatic macrophyte management</li> <li>• Internal load reduction in upstream Keller Lake</li> </ul>	As needed	Not yet implemented/ needed	Potential future projects are listed in Table 5-3 of the 2012 BDWMO Plan; no projects are currently planned	<input type="checkbox"/>	Implement when recommended.

Planned Actions or Activities	Proposed Timeframe	Actual Timeframe	Accomplishments to Date	Progress Rating	Next Steps
<b>Capital Projects – Keller Lake</b>					
<b>Progress Rating:</b> <input type="checkbox"/> =not started/dropped <input type="radio"/> =on-going progress <input checked="" type="checkbox"/> =completed/target met					
1. Implement recommended watershed projects to reduce runoff-borne phosphorus loads, as identified in the TMDL, that may include: <ul style="list-style-type: none"> <li>• Construction of a water quality treatment pond in Crystal Beach Park</li> <li>• Construction of a water quality treatment pond on southwest side of Keller Lake</li> <li>• Street sweeping</li> <li>• Native shoreline buffers</li> <li>• Public outreach and education</li> </ul>	Ongoing  2013 – 2015 (Crystal Beach Park project)  2018 (SW Keller Lake project)	Crystal Beach Park Project 2016 – 2017;  No date set: SW Keller Lake project	Projects performed by member cities (Burnsville) with possible grant funding obtained by BDMWO; BDWMO performs ongoing public education. Crystal Beach Park project: Burnsville expects to complete the project in 2017. SW Keller Lake project: Burnsville will construct this if additional total phosphorus load reductions are required in the watershed. However, if the Crystal Beach Park project meets the city’s TMDL load reduction goals for Keller Lake, the city will not construct the SW Keller Lake project.	<input type="radio"/>	Burnsville completes Crystal Beach Park project in 2017; Burnsville will construct SW Keller Lake project if additional load reductions required.
2. Implement recommended internal phosphorus load reduction projects identified in the TMDL, that may include: <ul style="list-style-type: none"> <li>• In-lake alum treatment</li> <li>• Aquatic macrophyte management</li> </ul>	As needed	Planned for 2019	Potential future projects are listed in Table 5-3 of the 2012 BDWMO Plan; Keller Lake in-lake alum treatment planned for 2019; no other projects are currently planned.	<input type="checkbox"/>	Perform Keller Lake alum treatment in 2019.
<b>Capital Projects – Orchard Lake, Kingsley Lake, and Lac Lavon</b>					
1. Implement water quality improvement measures in Orchard Lake, Kingsley Lake, and Lac Lavon as identified in future diagnostic feasibility studies, that may include: <ul style="list-style-type: none"> <li>• Watershed projects (e.g., stormwater treatment ponds, rainwater gardens, infiltration basins)</li> <li>• Internal load reduction projects (e.g., in-lake alum treatment, aquatic macrophyte management)</li> </ul>	As needed	None implemented	BDWMO will implement projects as necessary; no projects are currently planned	<input type="checkbox"/>	Implement projects as necessary; no projects planned.

## Appendix B. Performance Standards

### METRO WATERSHED DISTRICT and WMO PERFORMANCE STANDARDS

**LGU Name:**      **Black Dog WMO**

Performance Area	Performance Standard	Level of Review	Rating	
	<ul style="list-style-type: none"> <li>★ High Performance standard</li> <li>■ Basic practice or statutory requirement (see instructions)</li> </ul>	<ul style="list-style-type: none"> <li>I Annual Compliance</li> <li>II BWSR Staff Review &amp; Assessment (1/10 yrs)</li> </ul>	Yes, No, or Value	
			YES	NO
<b>Administration</b>	■ Activity report: annual, on-time	I	X	
	■ Financial report & audit completed on time	I	X	
	■ Drainage authority buffer strip report submitted on time	I	N/A	
	■ eLink Grant Report(s): submitted on time	I	N/A	
	■ Rules: date of last revision or review	II	N/A	
	■ Personnel policy: exists and reviewed/updated within last 5 yrs	II	N/A	
	■ Data practices policy: exists & reviewed/updated within last 5 yrs	II	X	
	■ Manager appointments: current and reported	II	N/A	
	■ Consultant RFP: within 2 yrs for professional services	II	X	
	■ WD/WMO has resolution assuming WCA responsibilities and appropriate delegation resolutions as warranted(N/A if not LGU)	II	N/A	
	■ WD/WMO has knowledgeable & trained staff that manages WCA program or has secured a qualified delegate. (N/A if not WCA LGU)	II	N/A	
	★ Administrator on staff	II	N/A	
	★ Board training: orient.& cont. ed. Plan, record for each board member	II		X
	★ Staff training: orient. & cont. ed. plan and record for each staff person	II	N/A	
★ Operational guidelines for fiscal procedures and conflicts of interest exist and current	II	X		
★ Public drainage records: meet modernization guidelines	II	N/A		
<b>Planning</b>	■ Watershed management plan: up-to-date	I	X	
	■ City/twp. local water plans not yet approved	II		X
	■ Capital Improvement Program: reviewed every 2 yrs	II	X	
	★ Biennial Budget Request submitted on time	II	X	
	★ Strategic plan identifies short-term priorities	II		X
<b>Execution</b>	■ Engineer Reports: submitted for DNR & BWSR review	II	N/A	
	■ WCA decisions and determinations are made in conformance with all WCA requirements. (if delegated WCA LGU)	II	N/A	
	■ WCA TEP reviews & recommendations appropriately coordinated.	II	N/A	
	■ Total expenditures per year (past 10 yrs)	II	see below	
	★ Water quality trends tracked for key water bodies	II	X	
	★ Watershed hydrologic trends monitored / reported	II		X
<b>Communication &amp; Coordination</b>	■ Website: contains information as required by MR 8410.0150 Subp. 3a, i.e. as board meeting, contact information, water plan, etc.	II	X	
	■ Functioning advisory committee(s): recommendations on projects, reports, 2-way communication with Board	II	X	
	■ Communication piece: sent within last 12 months	II	X	
	Communication Target Audience: Watershed Residents			
	★ Track progress for I & E objectives in Plan	II		X
	★ Coordination with County Board, SWCD Board and City/Twp officials	II	X	
	★ Partnerships: cooperative projects/tasks with neighboring organizations, such as counties, soil and water districts, watershed districts and NGOs	II	X	

**Black Dog WMO Total Expenditures for last 10 years:**

2016	\$121,237
2015	\$ 92,337
2014	\$110,540
2013	\$ 99,484
2012	\$130,613
2011	\$188,823
2010	\$173,729
2009	\$188,259
2008	\$166,653
2007	\$134,719
Total Expenditures (2007-2016) =	\$1,406,394

## Appendix C. Summary of Survey Results

### Survey Overview:

The survey was developed by BWSR staff for the purpose of identifying information about the local government units’ performance from both board members and staff and from the units’ partner organizations. The Black Dog Watershed Management Organization (BDWMO) staff identified, at BWSR’s request, their current board members, staff and the partner organizations with whom they have an on-going working relationship. BWSR staff invited those people to take the on-line survey and their responses were received and analyzed by BWSR staff. Board members and staff answered a different set of survey questions than the partners. The identity of the survey respondents is unknown to both BWSR and the LGUs.

In this case, 10 board members and staff, and 10 partner organization representatives, were invited to take the survey for BDWMO. 8 board members/staff responded, a response rate of 80% and 7 partners responded (70%), a very good response rate from partners and from staff and board.

Both sets of responses are summarized below. Some responses were edited for clarity or brevity.

### The Black Dog Watershed Management Organization Board and Staff Questions and Responses

How often does your organization use your current management plan to guide decisions about what you do?	(response percent)
<b>Always</b>	83.30%
<b>Usually</b>	16.7%
<b>Seldom</b>	0.0%
<b>Never</b>	0.0%

#### Additional Comments:

- *We make constant reference to our management plan as we consider WMO actions.*
- *As far as I know.*

List your organization’s most successful programs and projects during the past 3-5 years.
<i>Habitat Monitoring Program Partnering with the Dakota County SWCD for Landscaping for Clean Water.</i>
<i>1. Support of landscaping for water quality improvements - rain gardens etc., 2. Support for shoreline restoration projects 3. Construction of the Whitney Pond performed by Apple Valley 4. Start of construction of the Crystal Lake Pond by Burnsville 5. Water Quality and Habitat Monitoring programs</i>
<i>Improving the water quality test results for Crystal Lake in Burnsville and Lakeville to make it eligible for removal from the impaired waters list.</i>
<i>Probably the storm sewer diversion pond that routes storm drainage from the southwest corner of Apple Valley and routes it through a pond designed to catch nutrients heavy enough to sink before routing the water into Keller Lake where all of the original drainage was going prior to creation of the pond.</i>
<i>Our continued water quality and habitat monitoring program for our strategic water bodies and continued support of CAMP and Landscaping for Clean Water (previously Blue Thumb).</i>

### What helped make these projects and programs successful?

*The Habitat Monitoring was re-done several years ago and now provides a more in depth look at a water body every 5 years. It also provides ideas of projects that could be done on those lakes to make improvements. Partnering with the SWCD has provided a lot of public education to residents in the watershed and has led to a lot of smaller water quality improvement project being completed in the watershed.*

*Continuity of BDWMO oversight. Forecasting and appropriation of necessary funding streams.*

*Doing the TMDL study in 2009, then following the plan that was based on the results of that study.*

*Good analysis of water quality in Keller Lake by Barr Engineering along with transparent planning that was shared with local residents and good cooperation between the cities of Apple Valley and Burnsville, MN.*

*The Board acknowledges the importance of the plan and follows it, there is a good working relationship with the cities and their staff, and we work with high quality consultants.*

### During the past 3-5 years, which of your organization's programs or projects have shown little progress or been on hold?

*Keller Lake Alum treatment. Although the project has not be implemented, several years ago the WMO set up a way to raise the necessary funds for the treatment and now the treatment is scheduled for 2019.*

*The only project that has been put on permanent hold in recent years was the Ferric chloride system on Crystal Lake.*

*I don't think we have anything on hold right now.*

*Plan to treat Crystal Lake with Alum to reduce phosphate levels.*

*None that I am aware of.*

### List the reasons why the organization has had difficulty with these projects and programs.

*Funding was an issue of that project. Also we needed member cities to implement some projects before the alum treatment could be done.*

*The major issue for this project is that it was a disappointing experiment. Although it appeared at its onset to have technical feasibility, its benefits were marginal and not able to be correlated effectively to the continued operation of the system. Black Dog decided to cut losses and permanently halt the project.*

*Cost of plan.*

### Regarding the various organizations and agencies with which you could cooperate on projects or programs...

#### List the ones with which you work well already

*Burnsville, Lakeville, Apple Valley, MPCA, BWSR, Dakota County SWCD*

*BWSR, MN PCA, Dakota County SWCD*

*Dakota County, City of Burnsville, City of Apple Valley*

*Barr Engineering*

*The cities, the DCSWCD, BWSR, DNR*

<b>List the ones with which better collaboration would benefit your organization</b>
N/A
City of Lakeville
I don't know
<b>If you don't know much about your organization's working relationships with partners, enter "I don't know"</b>

<b>What steps could your organization take to increase your effectiveness in accomplishing your plan goals and objectives?</b>
<i>Funding can be a challenge sometimes so I think it is important for the WMO to position themselves to be as competitive as possible for grant opportunities.</i>
<i>Funding is always a major issue. As we look forward to funding future high dollar value projects, a top priority should be for us to become more competitive in securing financial grant assistance.</i>
<i>Right now, I think we're able to effectively accomplish our goals.</i>
<i>I think we are doing as well as we can with the resources available and considering the board members are all volunteers and meet monthly to discuss and plan strategies to reach are ultimate goals, which are for the water quality standards for fresh water lakes.</i>

<b>How long have you been with the organization?</b>	<b>(response percent)</b>
Less than 5 years	0.0%
5 to 10 years	83.3%
More than 15 years	16.7%

### Black Dog Watershed Management Organization Partner Organization Questions and Responses

<b>Question: How often have you interacted with this organization during the past two to three years? Select the response closest to your experience.</b>	
	<b>(response percent)</b>
Not at all	14.2%
A few times	28.6%
Several times a year	28.6%
Monthly	28.6%
Almost every week	0.0%
Daily	0.0%

If you chose not all, when was the last time you interacted with the organization? N/A



Is the amount of work you do in partnership with this organization...	(percent)
<b>Not enough</b> , there is potential for us to do more together	28.6%
<b>About right</b>	71.4%
<b>Too much, they depend on us</b> for work they should be doing themselves	0.0%
<b>Too much, we depend on them</b> for work we should be doing ourselves or with others	0.0%

**Other (Please explain):**

Based on your experience, please rate the efforts of the subject organization in the following areas:					
Performance Characteristic	Rating (percent of responses)				
	Strong	Good	Acceptable	Poor	I don't know
<b>Communication</b> ( <i>they keep us informed; we know their activities; they seek our input</i> )	57.1%	28.6%	14.3%	0%	0%
<b>Quality of work</b> ( <i>they have good projects and programs; good service delivery</i> )	28.6%	42.9%	14.3%	14.3%	0%
<b>Relationships with Customers</b> ( <i>they work well with landowners and clients</i> )	28.6%	28.6%	14.3%	0%	28.6%
<b>Initiative</b> ( <i>they are willing to take on new projects, try new ideas</i> )	28.6%	14.3%	28.6%	14.3%	14.3%
<b>Timelines/Follow-through</b> ( <i>they are reliable and meet deadlines</i> )	14.3%	42.9%	28.6%	0%	14.3%

How is your working relationship with this organization?	(percent)
<b>Powerful, we are more effective working together</b>	14.3%
<b>Strong, we work well together most of the time</b>	42.9%
<b>Good, but it could be better</b>	28.6%
<b>Acceptable, but a struggle at times</b>	0.0%
<b>Poor, there are almost always difficulties</b>	0.0%
<b>Non-existent, we don't work with this organization</b>	14.3%

**Comments from Partners about their working relationship with the Black Dog Watershed Management Organization.**

- None

Do you have additional thoughts about how the "subject" organization could be more effective?
None

<b>How long have you been with your current organization?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
<b>Less than 5 years</b>	14.3%	1
<b>5 to 15 years</b>	42.9%	3
<b>more than 15 years</b>	42.9%	3

## Appendix D. LGU Comment Letter

**BLACK DOG WATERSHED MANAGEMENT ORGANIZATION  
100 CIVIC CENTER PARKWAY  
BURNSVILLE, MN 55337**

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July 19, 2017

Dale Krystosek  
Board of Soil and Water Resources  
520 Lafayette Road N.  
St. Paul, MN 55155

RE: Performance Review and Assistance Program – Level II Performance Review

Dear Mr. Krystosek,

Thank you for meeting with the Black Dog WMO Commissioners and staff this Spring to discuss the Black Dog WMO Performance Review and Assistance Program (PRAP) Level II Performance Review.

The Review outlined one action item and four recommendations, which we will respond to in this letter.

**Action Item: Work with the cities of Lakeville and Eagan to come into compliance with the requirement for water plan approval by Black Dog WMO.**

**Response:** The Black Dog WMO will work with the cities listed above in completing and adopting their local water plans before December 31, 2018. This will follow the timeline necessary for incorporation of their local water plan into their comprehensive plan.

**Recommendation 1: Develop and implement training plan for each board member.**

**Response:** The Black Dog WMO will look into creating an orientation packet for new board members. The Black Dog WMO will also look to incorporate up to two educational presentations to the board annually and will look at offering conference attendance options to board members.

**Recommendation 2: Make water quality data and trends easily accessible to the public.**

**Response:** The Black Dog WMO does include this information in annual reports and newsletters but will also look at creating a specific water quality section on the website so water quality data and trends can be easily found by the public.

**Recommendation 3: Conduct a strategic planning initiative and workload analysis to assess the WMO's ability to comply with 8410.0105 subpart 1 and 8410.0140 subpart 1. C. requirements that the WMO shall evaluate progress for the implementation of plan actions at a minimum of every two years.**

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Page 2

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**Response:** On page 7 of the May 5, 2017 draft PRAP Level II report, following additional information is provided:

The goals in the current water management plan are related to resource outcomes. However, efforts to measure the effects of projects on those resources are not apparent. The organization should evaluate progress at a minimum every two years as required in rule, and make sure to measure outcomes, not just outputs, and report on progress toward achieving resource improvement. BWSR PRAP Assistance Grant funds may be available to partially fund such an assessment.

This additional information appears to suggest that the Black Dog WMO should perform pre- and post-project stormwater monitoring of each project to measure the effects of each project. However, during the Black Dog WMO's discussion of this item with you and Mary Peterson at the May 17<sup>th</sup> Commission meeting, BWSR staff commented that this recommendation was not intended to require pre- and post-project monitoring. Rather, the intention was for the Black Dog WMO to determine if priorities need to be adjusted or the implementation plan needs amending, based on the (minimum) every-two-year plan assessment noted in the recommendation.

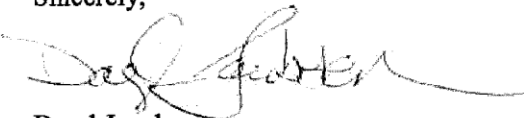
The Black Dog WMO performs an annual assessment of its implementation program by updating the plan implementation table to show the status of each implementation item. This table is included in the Black Dog WMO's annual activity report (submitted to BWSR). The Black Dog WMO will consider revising their annual assessment table so it is in the form of the table included in the draft PRAP report. The biggest change would be the addition of the "Next Steps" column, which could help the Black Dog WMO better understand if its priorities or implementation actions need to be revised.

**Recommendation 4: Address the action item by working with the cities of Lakeville and Eagan to come into compliance with requirement for water plan approval by Black Dog WMO.**

**Response:** See the response the action item listed at the top of this letter.

Please contact the Black Dog WMO Administrator, Daryl Jacobson at 952-895-4574 with any questions regarding this letter.

Sincerely,



Daryl Jacobson  
Black Dog WMO Administrator

## Appendix E. Program Data

### Time required to complete this review

Black Dog WMO Staff: 16 Hours

BWSR Staff: 42 Hours

### BWSR PRAP Performance Review Key Dates

- March 15, 2017: Initial Meeting with Staff and Board
- March 24, 2017: Survey of Board/Committee, staff and partners
- May 17, 2017: Presentation of Draft Report to Board/Committee and staff
- July 31, 2017: Transmittal of Final Report to LGU

NOTE: BWSR uses review time as a surrogate for tracking total program costs. Time required for PRAP performance reviews is aggregated and included in BWSR's annual PRAP report to the Minnesota Legislature.