

PRWD Rule Revision Board Workshop #3

Permitting Rule Review & Gap Analysis

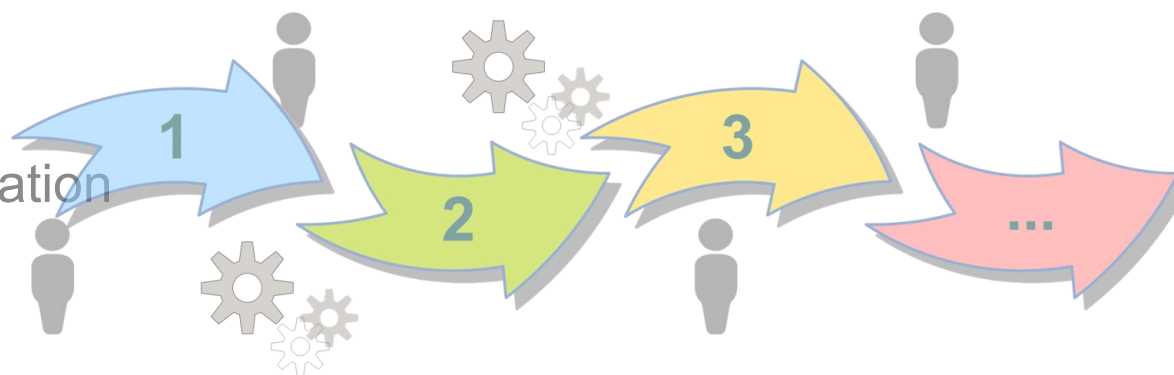


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Rule Making is a Process

- When we work the process we
 - Stay focused
 - Systemically address each item
 - Provide important background information
 - Make informed decisions
 - Work towards consensus
- We're not starting from scratch
 - This will be a refinement and clarification process
 - We will revisit and either edit or reaffirm as needed





What is the Process?

BWSR Rule Making Handbook

Statutory Requirements

Facilitated by following a Roadmap

1. ~~Review District Goals & Purpose~~
2. ~~Establish Baseline Knowledge~~
3. Clarify/Update Rule Language and Criteria
4. Coordination With Other Agencies
5. Establish Procedures/Workflows
6. Stakeholder Review of Proposed Updates
7. Complete Review and Comment Period



Rule Review



- Form
 - What do the Rules look like
 - How do applicants interact with them
 - What is inside of them
- Function
 - What are the specific requirements
 - How do submittals compare
 - How do thresholds compare

Form

Exercise in perspective

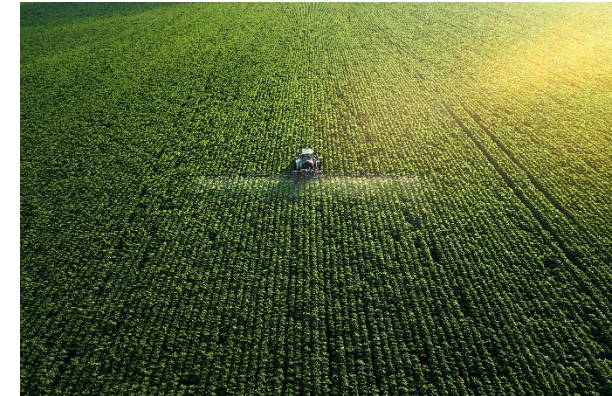
- Gardener - hobby

- Inputs – seed, water, fertilizer(?), pesticide(?)
- Outputs – produce (food)

- Farmer – agribusiness

- Inputs – tillage, pre-emerge, seed, fertilizer, herbicide/pesticide (cultivation), equipment (fuel, improvements), other
- Outputs – crop (commodity) which they then have to sell to make their profit

Both are growing plants, but have very different needs, skills, and perspectives



Rule Review



- PRWD Permit Page - [Permits – Pelican River Watershed District \(prwd.org\)](https://prwd.org/permits)
- PRWD Rules - [RULES OUTLINE \(prwd.org\)](https://prwd.org/rules)
- PRWD Resources - [Permit Information and Guidance Documents – Pelican River Watershed District \(prwd.org\)](https://prwd.org/permit-information-and-guidance)
- Rule Review & Gap Analysis Matrix - [24041_PRWD_Permit_Matrix.xlsx](#)

One Example



- RCWD Permit Page - [Permitting Information | Rice Creek Watershed District](#)

- RCWD Rules - [RICE CREEK WATERSHED DISTRICT](#)

Moving Forward



- Prepare Draft Revised Rule
- Seeking concurrence on the following
 - Comprehensive Rule
 - Match partner submittal requirements as feasible
 - Break Rule into action-based sections with related requirements
 - Remove scope as feasible where state regulates to an equal or more restrictive standard
 - Incorporate existing guidance as applicable
 - Move to an instant volume standard (MIDS) instead of event based volume for water quality requirements



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