Plumbing Board
c/o Department of Labor and Industry
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St. Paul, MN 55155
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Plumbing Board

Request for Action (RFA)

Name of submitter: MPCA, MN Dept of Health, Ryan Anderson, Mgr, Stormwater Section, MPCA

Purpose of request (check all that apply): ☐ New rule ☑ Rule amendment ☐ Repeal of an existing rule

The Minnesota Plumbing Code (MN Rules, Chapter 4714) is available at https://epubs.iapmo.org/2020/MPC/

Specify the purpose of the proposal (check all that apply):

- ☐ Appurtenance (e.g., water conditioning equipment)
- ☐ Test method
- ☑ Other (describe): Pause consideration of adding Chapter 15 of the UPC to the MN Plumbing Code

Does your submission contain a **Trade Secret**? ☐ Yes ☑ No

If "Yes", mark **"TRADE SECRET"** prominently on each page of your submission that you believe contains trade secret information. Minnesota Statutes, section 13.37, subdivision 1(b), defines "trade secret" as follows:

"Trade secret information" means government data, including a formula, pattern, compilation, program, device, method, technique or process (1) that was supplied by the affected individual or organization, (2) that is the subject of efforts by the individual or organization that are reasonable under the circumstances to maintain its secrecy, and (3) that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Note that, although "trade secret" information is generally not public, the Board and its committees may disclose "trade secret" information at a public meeting of the Board or committee if reasonably necessary for the Board or committee to conduct the business or agenda item before it (such as your request.) The record of the meeting will be public.

Describe the proposed change. The Minnesota Plumbing Code (Minnesota Rules Chapter 4714) is available here: https://epubs.iapmo.org/2020/MPC/

NOTE: Please review the Minnesota Plumbing Code and identify all parts of the Code that require revision to accomplish your purpose. The proposed change, including suggested rule language, should be *specific*. **If modifying existing rule language, underline new words and ~~strike through deleted words~~.**

Please list all areas of the Minnesota Plumbing Code that would be affected. **Important:** If your text does not fit in the field below, please attach this information at the end of this form and insert "see attachment" in the field below.

The Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Health ask the UPC Chapter 15 Ad Hoc Committee, along with the Plumbing Board at large, to pause consideration of adopting and amending Chapter 15 of the UPC until the MPCA completes work on the enhanced Stormwater Reuse Chapter of the Minnesota Stormwater Manual. After that time, MPCA and MDH would recommend revisions to Chapter 15 that align with the State's final Stormwater Reuse Guidance. Additionally, we request no amendments to Chapter 16 related to outdoor irrigation water quality be considered.

Need and Reasons For the Change. Thoroughly explain the need and why you believe it is reasonable to make this change. During a rulemaking process, the need and reasonableness of all proposed rule changes must be justified; therefore, a detailed explanation is necessary to ensure the Board thoroughly considers all aspects of the proposal.

See last page

If your product/method standard(s) are not currently listed in a national code, your Request For Action will not be considered by the Board or its committees; however, you are welcome to present at any Board meeting during the Open Forum section of the Agenda.

The MPCA's guidance provided in the Stormwater Manual is not listed in a national code, however is consistent with stormwater management practices in the state and nationwide. The updated guidance will be developed in collaboration with state and national experts, regulators, and practitioners of stormwater reuse.

The proposal must be accompanied by copies of any published standards, the results of testing, and copies of any product listings, as documentation of the health, sanitation, and safety performance of any materials, methods, fixtures, and/or appurtenances. If none are available, please explain:

This Request for Action has our draft project plan attached, which will serve as the framework of the guidance Team. This framework follows our successful approach to developing similar materials dealing with protecting human health and the environment.

Please submit the form and all supporting documents electronically. Attach scanned copies of any literature, standards, and product approvals or listings. If any of the materials you are submitting come from printed or copyrighted sources, please include written permission from the publisher allowing the materials to be distributed at meetings. Email all documents to: DLI.ccldboards@state.mn.us

Primary reason for change: (check only one)

- ☐ Protect public, health, safety, welfare, or security
- ☐ Lower construction costs
- ☐ Encourage new methods and materials
- ☐ Change made at the national level
- ☐ Mandated by the legislature
- ☐ Provide uniform application
- ☐ Clarify provisions
- ☐ Situation unique to Minnesota
- ☑ Other (describe): Delay adoption of Chap 15 until work is done by MPCA (may inform future consideration of the rule.

Anticipated benefits: (check all that apply)

- ☐ Save lives/reduce injuries
- ☑ Improve uniform application
- ☐ Improve the health of the indoor environment
- ☑ Provide more construction alternatives
- ☑ Reduce regulation
- ☑ Provide more affordable construction
- ☐ Provide building property
- ☐ Drinking water quality protection
- ☑ Decrease cost of enforcement
- ☑ Other (describe): see below

We hope the work of the MPCA will provide numerous benefits to storrmwater practitioners by providing a range of methods that may be implemented to reduce risk associated with stormwater reuse

The Following information is optional. This information can assist in evaluating a Request for Action and in rulemaking and should be provided if known.

Economic impact: (explain all answers marked "yes")

1. Does the proposed change increase or decrease the cost of enforcement? ☐ Yes ☐ No. **If yes,** explain

2. Does the proposed change increase or decrease the cost of compliance? ☑ Yes ☐ No. **If yes,** explain. Include the estimated cost increase or decrease, and who will bear the cost increase or experience the cost decrease:

   By allowing the MPCA to complete this work related to stormwater reuse practices, we are likely to provide options to practitioners that are suitable for a wide range of projects. Each reuse application has unique characteristics; as such and consistent with stormwater regulation, we seek to provide options that are successful and efficient in managing risk. There is no one-size-fits-all regulation that is cost effective or appropriate for all instances. Should the proposed language include a prohibition of stormwater as an alternate source of water, costs of projects and development that had planned on that technology will dramatically increase. In fact, this proposed rule will likely render some projects infeasible.

3. Are there less costly or intrusive methods to achieve the proposed change? ☐ Yes ☐ No**. If yes,** explain.

4. Were alternative methods considered? ☐ Yes ☐ No. **If no,** why not? **If yes,** explain what alternative methods were considered and why they were rejected.

5. If there is a fiscal impact, try to explain any benefit that will offset the cost of the change. If there is no impact, mark "N/A."

6. Describe the classes of persons affected by a proposed change, who will bear the cost, and who will benefit.

7. Does the proposed rule affect farming operations? (Agricultural buildings are exempt from the Minnesota Building Code under Minnesota Statutes, Section 326B.121.) ☐ Yes ☐ No. **If yes, explain below**.

8. Are there any existing Federal Standards? ☐ Yes ☐ No. **If yes, list below.**

9. Are there any differences between the proposed change and existing federal regulations? ☐ Yes ☐ No ☐ Not applicable ☐ Unknown. **If yes,** describe each difference and explain why each difference is needed and reasonable.

10. Minnesota Statutes, section 14.127, requires the Board to determine if the cost of complying with proposed rule changes in the first year after the changes take effect will exceed $25,000 for any small business or small city. A small business is defined as a business (either for profit or nonprofit) with fewer than 50 full-time employees, and a small city is defined as a city with fewer than ten full-time employees. During the first year after the proposed changes go into effect, will it cost more than $25,000 for any small business or small city to comply with the change? ☐ Yes ☐ No. **If yes,** identify by name the small business(es) or small city(ies).

11. Will this proposed plumbing code amendment require any local government to adopt or amend an ordinance or other regulation to comply with the proposed plumbing code amendment? ☑ Yes ☐ No. **If yes,** identify by name the government(s) and ordinances(s) that will need to be amended to comply with the proposed plumbing code amendment.

If the Board continues with adopting Chapter 15 with Minnesota amendments that ban stormwater as an alternate source of water, state regulators and hundreds of municipalities will need to update their ordinances, permits, rules or other regulatory mechanisms to comply with this new ban. This RFA is requesting the Board pause adoption of these proposed rules to allow MPCA's work to inform potential consideration of the rules in the future.

12. **Additional supporting documentation may also be attached to this form.** Are there any additional comments you feel the Committee/Board may need to consider? **If so,** please state them here:

Attached to this request are the Draft work plan for the guidance Tech Team and the 7-Agency Letter of Acknowledgment describing the current plans for managing reuse in the State.

Information regarding submitting this form:

1. Submissions are reviewed in the order they are received. Missing documentation will delay processing, and your proposal will not be considered "Complete" until all required materials are received.
2. Submit all supporting documentation (manufacturer literature, approvals from other states, engineering data, etc.) electronically to DLI.CCLDBOARDS@state.mn.us
3. After your Request for Action (RFA) form is received, you will be assigned a file number. Use this file number on all correspondence and supplemental materials.
4. For copyrighted materials that must be purchased from publishers (such as published standards, product approvals or testing data, or listings by agencies like IAPMO, ASSE, ASTM, etc.), submit these electronically, with written permission from the publisher to distribute them at meetings, to DLI.CCLDBOARDS@state.mn.us

Information for presentation to the Committee or Plumbing Board:

5. You will be notified of the date of the Committee or Plumbing Board meeting in which your Request For Action will be heard.
6. Limit presentations to 5 minutes or less. You are not required to provide a formal presentation or additional handouts. However, if you choose to do so, please submit them to lyndy.logan@state.mn.us at least 3 days before the meeting.
7. Be prepared to answer questions regarding the proposal and any documentation.

I understand that any action is a recommendation to the Plumbing Board and is not to be considered final action.

SUBMITTED BY

Name: Ryan Anderson, MPCA, Tom Hogan, MDH Date: 8/25/2026

Company name/representing: Minnesota Pollution Control Agency, Minnesota Department of Health

Mailing address (Street, City, State, Zip): 520 Lafayette Road St. Paul, MN 55155

Email address: ryan.anderson@state.mn.us Phone: 651-757-2222

For assistance or questions on completing this form, contact Mike Westemeier, Department of Labor and Industry at michael.westemeier@state.mn.us or by phone 651-284-5898.

OFFICE USE ONLY

RFA File Number: PB0235 Date received by DLI: 8/28/2026

Date of Committee/Board meeting: Initial review on 9/1/2026 for scheduling full discussion - 10/1/2026

Title of RFA: PB0235.RFA.Ryan Anderson.MPCA.Chapter 15.Rec'd 8.28.2026

Please remember to attach all necessary explanations and supporting documentation.

Need and reasonableness for change:

The MPCA has delegated authority to regulate the discharge of stormwater in Minnesota. As part of MPCA's standard business practices, we develop guidance materials to assist practitioners in managing stormwater to protect the environment and human health. We have previously developed guidance in the MN Stormwater Manual to successfully manage risks to human health from similar stormwater practices, such as methods for higher engineering review for infiltration and assessment of contaminated sites. The MPCA is presently convening a team to develop and deliver this reuse guidance. We are currently extending Team invitations to a wide range of stormwater practitioners, fellow regulatory agencies including the Department of Labor ad Industry and Department of Health, experts from the U.S. Environmental Protection Agency, plumbing professionals, and others. This new and updated guidance will include information on advanced methods such as those contemplated in the Board's draft rules as well as a wide range of additional methods that will also reduce risk. Providing multiple options for stormwater managers is consistent with how stormwater is regulated in Minnesota and nationwide. Work is expected to formally begin this late summer. The MPCA's current draft charter and work plan for this project is attached to this request.

This guidance approach is also consistent with the 2025 Letter of Acknowledgment, signed by 7 State agencies and departments including MPCA, Health Department, and Department of Labor and Industry which outlines the responsibilities and current strategy for managing stormwater reuse. You will note the Letter indicates the MPCA will be responsible for "...coordinating the overall development of the State's SCU (stormwater capture and use) guidance and implementation strategies..." This project will achieve that goal. The Letter of Acknowledgment is included as a reference with this RFA and also located on MDH's website: https://www.health.state.mn.us/communities/environment/water/docs/cwf/scuackowledge.pdf.

LETTER OF ACKNOWLEDGMENT

Between Minnesota State Agencies Regarding Stormwater Capture and Use (SCU)

1. Parties

This letter acknowledges the relationship of the following state agencies (or entities) to Stormwater Capture and Reuse: the Minnesota Pollution Control Agency (MPCA), the Minnesota Department of Health (MDH), the Minnesota Department of Natural Resources (DNR), the Minnesota Board of Water and Soil Resources (BWSR), the Minnesota Department of Labor and Industry (DLI), the Minnesota Department of Agriculture (MDA), and the Metropolitan Council. Collectively they are referred to as Agencies in this letter.

2. Purpose

The purpose of this letter is to establish a common understanding and clarify primary roles and responsibilities among the Agencies for advancing the development and implementation of safe and sustainable Stormwater Capture and Use (SCU) practices in Minnesota, based on the findings and recommendations of the January 30, 2025 report titled "Update on Developing a Clear Process for Implementing Stormwater Capture and Use in Minnesota" prepared by EOR for the Minnesota Department of Health (hereinafter referred to as "the Report").

3. Background

Minnesota has seen increasing interest in SCU as a water management strategy to conserve water resources and manage stormwater volumes. Legislative directives in 2015 and 2021 called for study, recommendations, and a road map for water reuse implementation. The Report summarizes the collaborative efforts undertaken by the Agencies and interested parties through the Interagency Work Group and Engagement Core, identifies progress made, highlights remaining challenges (including role clarity and consensus on risk management), and provides recommendations for next steps. Advancing SCU requires continued interagency collaboration and clear leadership.

4. Understandings and Agreements

The Agencies agree to this shared understanding:

- **Acceptance of Report:** The Agencies acknowledge receipt of the Report and accept its contents, findings, and recommendations as a foundational basis for guiding future collaborative efforts to develop and implement a clear process for SCU in Minnesota.

- **MPCA as Lead Agency for Guidance Development:** The MPCA shall serve in its existing capacity as the agency responsible for coordinating the overall development of the state's SCU guidance development and implementation strategies. MPCA will leverage its existing role as steward of the Minnesota Stormwater Manual to serve as the primary collaboration hub and repository for SCU information, guidance, training resources, and best practices. MPCA will continue to engage appropriate partner agencies and interested parties when content or policy needs to be developed.
- **MDH Role in Public Health Risk:** The MDH holds the primary responsibility for assessing public health risks associated with SCU, developing health-based water quality criteria for various source waters and end uses, providing related technical guidance, and evaluating potential exposure pathways. MDH will continue to participate actively in the Interagency Work Group to ensure public health considerations are integrated.
- **Roles of Other Agencies:** The Agencies recognize the essential roles of DNR (water appropriations, quantity impacts), BWSR (watershed management planning, grants), DLI (plumbing code enforcement, cross-connection prevention), MDA (agricultural perspectives), and the Metropolitan Council (regional planning, research, data and metro area grants) within their respective statutory authorities and areas of expertise related to SCU. The Agencies commit to continued collaboration to ensure these perspectives are integrated.
- **Future role of the SCU Interagency Workgroup:** Realizing that the science, risk management, and breadth of interested parties relevant to SCU spans across the roles, authorities, and responsibilities in the Executive Branch, the agencies named in this letter commit to meaningful participation in the Interagency Workgroup as essential to the promotion of safe water reuse in Minnesota. Each of the agencies has the ability to call a meeting of this group as new information or needs arise.
- **Need for External Engagement and Third-Party Facilitation:** The Agencies acknowledge the Report identifies areas requiring further clarity and the value of continued engagement of interested parties. The Agencies are committed to ensuring meaningful engagement continues and intend on using established methods of outreach and team structure. The Agencies will work to ensure products are trusted by the diverse interested parties and the process fosters consensus-building on outstanding technical and policy issues (e.g., risk benchmarks, restricted access definitions, cost-benefit analysis), and support the development of broadly accepted guidance. In the event additional facilitation is required, and contingent on availability of funding, third party facilitation may be considered.

5. Collaboration

The Agencies commit to continued active participation in the Interagency Work Group and support for the interested parties process to ensure a coordinated, collaborative, and transparent approach to developing and implementing SCU guidance and policy in Minnesota.

6. Implementation and Duration

This letter confirms the existing authorities, responsibilities and intentions of the Agencies to continue working together for safe, affordable and responsible stormwater capture and use in Minnesota. Signature by the authorized representatives of all participating Agencies demonstrates a shared understanding of the importance of this practice to water sustainability and signals the state's intention to continue making progress in this practice.

7. Signatures

Thomas P. Hogan, Director
Environmental Health Division
Minnesota Department of Health

Joshua Stamper, Director
Pesticide & Fertilizer Management Division
Minnesota Department of Agriculture

Nicole Blasing, Director
Municipal Division
Minnesota Pollution Control Agency

Todd Green, Director
Construction Codes and Licensing
Minnesota Department of Labor and Industry

John Jaschke, Executive Director
Minnesota Board of Water and Soil Resources

Katie Smith, Director
Ecological and Water Resources Division
Minnesota Department of Natural Resources

Sam Paske, Assistant General Manager
Water Planning Services
Metropolitan Council Environmental Services

DRAFT Work Plan and Tech Team Engagement Framework for Developing MPCA Stormwater Capture and Use Guidance

Background

Minnesota agencies and stakeholders have been discussing stormwater (re)use systems, benefits, needs, public risk, and potential regulatory and guidance frameworks for over a decade. Through this time, a number of reports with valuable information, insight, and proposed directions have been created, including:

- *Update on Developing a Clear Process for Implementing Stormwater Capture and Use in Minnesota* EOR & MDH, January 30, 2025 (hereafter referred to as "the 2025 report")
- *Reuse of Stormwater and Rainwater in Minnesota, A Public Health Perspective*, MDH, 2022
- *Advancing Safe and Sustainable Water Reuse in Minnesota*, U of M Water Resources Center & MDH, 2018

Goal

The goal of this project is to develop guidance for stormwater capture, treatment, and (re)use, addressing the highest need recommendations from the 2025 Minnesota Department of Health report in areas where MPCA could potentially serve as a suitable lead. This guidance will be integrated into the Minnesota Stormwater Manual, augmenting or replacing the existing Manual content on the harvest and (re)use of stormwater and rainwater (hereafter referred to as "Manual").

Scope

The process will be led by MPCA Stormwater staff, involve a technical team, and may contract technical components of the work plan based on identified needs and available resources. The project will develop guidance and recommendations for treatment and (re)use of stormwater (including roof water) for intended uses of 1) outside irrigation (subsurface, surface, drip, aerial) and 2) indoor, non-potable uses (toilet flushing, laundry, irrigation, etc.) The guidance is expected to include:

- Acceptable risk and pathogen log reduction targets (LRTs), where Minnesota Department of Health (MDH) has technical expertise
- Guidance on treatment systems, including
    - Technical components and treatment systems to meet risk benchmarks
    - Backflow and system separation, where DLI has regulatory oversight
    - Exclusionary recommendations, template signage, and public notice language
- Operation and maintenance guidance and inspection protocol templates

The MPCA envisions that guidance will be developed for two "levels" of treatment:

- Systems meeting the MDH recommended pathogen LRTs. Note that this method is considered the best scientific studied method for protection of human health and substantially reduces risk to vulnerable members of the public.
- Systems that minimize human risk through a combination of pathogen reduction and management practices that reduce exposure (i.e. exclusion). The intent of the second level of treatment is to provide a more cost-effective treatment option to facilitate reuse while still reducing public risk to an acceptable level.

DRAFT Tech Team Charter

Purpose and Goal

The purpose of the tech team is to advise the MPCA on the development of guidance for the (re)use of stormwater and rainwater in the State of Minnesota.

Roles

The role of the tech team is to provide feedback and potentially technical support on requested components of the project, within the project scope and as identified in the work plan, which the MPCA will use to develop the direction and content of this work.

Members

Tech team members will be selected by the MPCA in consultation with partner agencies so that a wide spectrum of stakeholder interests can be covered (e.g. MDH, DLI and/or Plumbing Board, Met Council, MCSC, Freshwater, city practitioners, watershed districts). MPCA will solicit recommendations from partner agencies prior to inviting prospective team members. The MPCA is targeting a tech team of approximately 20 members. Representatives from stakeholder groups are strongly encouraged to serve as a point of contact for others within their interest group to ensure other voices from that sector are represented.

Boundaries & Authority

Tech team members agree to work within the scope of the project, per the work plan, and within the agreements of the tech team charter, including ground rules for effective meetings. Generally, the MPCA will be engaging the tech team at the "involve" IAP2 spectrum level of engagement. The specific influence at any particular decision point may vary, and the MPCA strives to provide transparency. While the MPCA retains ultimate decision-making for what information is reflected in the MN Stormwater Manual, tech team feedback is critical to this process and for the content development.

Responsibilities

The MPCA will oversee the process, conduct components of the work, and will contract work plan components as needed. MPCA will communicate schedules and work to find dates that work for the majority of the tech team members by using date polls. The MPCA will engage the tech team on specific components of work as described in the work plan to ensure progress on this project, with the overall goal of working with this tech team to make guidance available in a timely manner.

The tech team engagement process is not yet fully detailed, as we are looking for tech team feedback at the onset as well as allowing adaptation based on feedback and the pace of work. The *estimated* timeline for the project is at least one year, and potentially up to two years depending on the process agreed upon by the team. The estimated commitment during that time is approximately 3-6 half-day workshops to be hosted in the Metro area (location TBD, perhaps the St. Paul MPCA office, 10a-3p with a lunch break, remote inclusion possible but not preferred) and 4-8 online/remote meetings (~2 hours each). When accepting a spot on the tech team, members are asked to commit to attending the majority of the workshops and remote meetings.

The tech team will fulfill specific roles and responsibilities as identified in the work plan. Tech team members will respond to emails and polls, review provided materials, and prepare for meetings - all within a reasonable time commitment as agreed upon by the team members. Tech team members will follow general best practice meeting ground rules, which shall be detailed in this charter.

Tech team members will discuss their representation with their agency or organizational leadership to ensure the best representative is participating. Furthermore, tech team members may be asked to bring items to their leadership and/or colleagues for review, feedback, or approval to ensure organizational alignment.

High-level Work Plan

Task 1. Form tech team, Project kick-off including review of work plan, scope, and charter

Goal: Establish a collaborative, multidisciplinary technical team of approximately 20 participants that cover the range of vested stakeholders and agencies. Provide relevant background information and ensure tech team is caught up on history, issues, and background. Solicit feedback on the project scope, work plan, and tech team charter. Revise documents accordingly.

Proposed format: Email invites and discussion items to tech team invitees. In-person workshop with full tech team, approximately 4 hours in length. Follow-up with remote meeting or emails, as appropriate.

Tech team role and responsibility: Tech team members will attend the workshop and provide feedback on the project scope, tech team charter, and work plan.

MPCA role and responsibility: MPCA Stormwater staff will execute Task 1. MPCA will consult with partner agencies to ensure their expertise and authority are appropriately represented in the process, and invite tech team members based on feedback. MPCA will make final revisions to the project scope, work plan, and tech team charter based on tech team feedback. MPCA may develop a contract with an engineering firm for identified technical needs.

Task 2. Review risk framework, risk tolerance, and associated treatment and risk mitigation measures for stormwater reuse systems

Goal: Discuss risk tolerance and risk assessment work completed to-date. Review MDH LRT treatment targets and identify guidance needs for systems meeting these targets. Develop O&M guidance and other technical information needs for treatment systems. Discuss what would be needed to allow for alternative LRT targets (e.g. restricted access to reuse practices, site-specific sampling and characterization of stormwater, etc…).

Proposed format: Remote meeting with task introduction and some provided information/presentations (i.e. MDH risk assessment review). Then 1 or 2 in-person workshops, approximately 4 hours each. Follow-up emails or remote meetings with any refinements and final high-level direction for Manual needs.

Tech team role and responsibility: Tech team will attend remote meeting(s) and in-person workshop(s). Tech team members may be asked to present information on their specific areas of expertise. Tech team may provide technical review and assistance in developing system needs, O&M guidance needs, and other technical information needs.

MPCA role and responsibility: MPCA solely or in collaboration with a potential contractor will design and lead the meetings. MPCA will coordinate with technical experts to bring information and resources to the technical team. MPCA will lead, contribute, and/or contract technical review needs, including working closely with any contractor, if one is deemed necessary. MPCA will refine final high-level direction for Manual needs.

Task 3. Review Manual and identify guidance needs based on determined allowable risk, treatment needs, and associated O&M

Goal: Compare existing Manual content against identified needs for content related to risk assessment, treatment system components, O&M information, and other technical information and guidance needs.

Proposed Format: Depending on who does the actual work, the format could vary substantially. If PCA and/or contractors do this work, the format can likely be one remote meeting to provide feedback on recommended work. If tech team would like to be involved with this work, this could be several hours of review pre-work and an in-person workshop.

Tech team role and responsibility: Tech team will review materials and provide feedback, either attending remote meeting(s) and in-person workshop(s). Tech team may provide technical review and assistance in reviewing Manual Content and developing recommendations to guide work to actually develop content on risk assessment, system needs, O&M guidance needs, and other technical information needs.

MPCA role and responsibility: MPCA solely or in collaboration with a potential contractor will design and lead engagement work with the tech team to solicit feedback or assistance on this task. MPCA or their contractor may do the work to identify specific revision and additions to the Manual which ensure technical information needs are met.

Task 4. Draft content for the MN Stormwater Manual

Goal: Develop technical information within the project scope and with details as identified in the previous tasks for the MN Stormwater Manual.

Proposed Format: Using feedback from the previous task, some parties will draft the guidance/new Manual content. This draft content, either all at once or iteratively, will be provided to the Tech Team for feedback and updated accordingly. This work may be done by consultants, MPCA staff, tech team members, or a combination, based on interest.

Tech team role and responsibility: Depending on how the tech team would like to participate in this task, the tech team may participate in drafting content for the Manual. Tech team will review draft content and provide comments.

MPCA role and responsibility: Depending on the final work plan, MPCA may draft the guidance, or if contractors or tech team members participate, MPCA will oversee work, ensuring consistency through the process and with the products. MPCA will engage the tech team for feedback on the draft products.

Task 5. Broad public and stakeholder review and outreach

Goal: Vet draft content with broader stakeholder community and solicit feedback.

Proposed Format: The format for outreach could include outreach webinars to solicit feedback, emails to a broader stakeholder audience, and targeted interviews with system operators and local governments for practical feedback.

Tech team role and responsibility: The tech team will help spread the message that MPCA is looking for public and stakeholder review of the draft guidance.

MPCA role and responsibility: MPCA Stormwater staff would lead outreach efforts with the assistance of communications staff and potentially contractors.

Task 6. Guidance revisions and final publication

Goal: Amend draft guidance based on public feedback. Conduct additional outreach if necessary. Make final guidance available in the Manual.

Proposed Format: The format will be dependent on the nature of feedback received. MPCA, with assistance from contractor if needed, will revise the draft guidance based on feedback received. MPCA will engage with the tech team on specific issues if necessary. This may require email correspondence or online meetings to discuss needed changes. Additional outreach may be needed for substantial revisions.

Tech team role and responsibility: Respond to MPCA requests for input, and engage in correspondence and/or meetings as necessary based on involvement needs.

MPCA role and responsibility: MPCA or contractors would revise draft guidance accordingly based on received feedback and input from the tech team. MPCA will publish final guidance in the Manual, and advertise that the new guidance is available through email lists, newsletters, and potentially webinars.

Task 7. Long-term communication and updates

Goal: Maintain feedback loop with local implementers, partner agencies, and other stakeholders for continued refinement of guidance, collection of system information, sharing of research, and other related work.

Proposed Format: Annual (or as needed) meetings of tech team. The tech team membership may evolve through time.

Tech team role and responsibility: Attend meetings and share about projects, guidance needs, research, or other related reuse system information.

MPCA role and responsibility: MPCA will convene tech team annually or as needed.

Appendix

IAP2 Spectrum

IAP2 Spectrum of Public Participation

IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Table 3 From 2025 EOR/MDH Report

Table 3. Potential Responsibilities/Roles for Reuse Implementation Program

POTENTIAL RESPONSIBLE PARTY(IES)	COMMENTS
a. Design Considerations & How-To Guidance	
Lead: TBD Support: TBD	MN SW Manual (MPCA) is a primary resource. Identify essential tools for effective stormwater management, including O&M manuals and design guidelines, and institutional controls to mitigate exposure risks. Other entities should address local context issues & outreach: BWSR, WDs, Counties, MDA (rural/agriculture).
a1. Determine Appropriate LRTs for situation	
Lead: TBD Support: TBD	Develop framework for applying LRTs in various settings. • Determine appropriate risk benchmark – 1:10,000, 1:100, or other. • Develop criteria for restricted access to mitigate risk and potentially lower recommended LRTs • Develop Risk-Based, Tiered Management Framework
a2. Typical System Components	
Lead: TBD Support: TBD	SW Manual update with input from Technical Advisory Committee or Engagement Core including industry experts, agencies currently overseeing reuse project. • On MPCA's list of priority topics for SW Manual Update. • Includes Storage, pumping, pipe, nozzles, valves, meter, treatment, backup connection, controls, etc. • End uses: How to lower risk by restricting use and creating awareness to lower chance of exposure and reduce complexity and cost of construction and O&M.
a3. Backflow Preventer Valve / System Separation Guidance	
Lead: TBD	DLI with input from industry experts (irrigation, water harvesting industries, water suppliers).
a4. Vet other Source Waters (greywater/WW) and End Uses (beyond irrigation) for Management Framework	
Lead: TBD Support: TBD	As part of regional water supply conservation, consider other sources of reuse and extend SCU to broader end use applications.
b. Owner/ Operator Requirements	
Guidelines Lead: Interagency Work Group Enforcement Lead: TBD	Guidelines - training/certification for operation of components/ contexts typical in MN. Partnership agreements/contacts for 3rd parties including HOAs or maintenance contractors. Enforcement - when requirements adopted through local ordinance, local authority could be enforcement lead.
c. Submittal Standardization	
Lead: Engagement Core (Task Force) Support: TBD	Within Agencies, use Site Plan Review & Permit Staff to develop – Task Force. Incorporate into the MPCA SW Manual. Example Dual-Objectives Framework: Objective / Submittal Considerations 2-yr Volume Control / TBD Reduced dependence on other water sources, etc. / TBD Context dependent – customize. Submittal recommendations vary based on project objectives/drivers: i.e., stormwater-driven or water supply source.
d. Tracking Program	
Lead: TBD	Need to address: Is it realistic to track all reuse systems? MPCA does not have the capability to track all BMPs.
e. Operation & Maintenance (O&M)	
Lead: TBD - Develop Guidelines/Templates Support: Local permitting authority – Require Submittals, Enforcement	Stormwater manual update, with input from the practitioners including industry experts and agencies currently overseeing reuse projects.
	Reuse is on a list of priority topics for the MPCA stormwater manual update. Include decommissioning contingency and how stormwater requirements are met.
e1. Inspection / Reporting	
Lead: Local permitting authority	Local permitting authority could determine submittal requirements consistent with state input/guidelines.
e2. Monitoring	
Lead: TBD – Develop guidelines	Guidelines - What level of system monitoring is robust enough given context? Local permitting authority could require submittals, need to determine tie-in to enforcement.
e3. Operator Training / Certification Requirements	
Lead: TBD in the future.	Future need once there is demand through local rules or ordinances or state statute.
f. Public Notice & Signage	
Guidance Lead: TBD Requirement Lead: TBD	MPCA or MDH could develop a signage template or standard graphic to be incorporated on signs for the purpose of consistency /public awareness. System Owner – Implement (per local rule/ordinance) MN SW Manual provides guidance to ensure consistency across the state.
g. Leadership support and organizational structures to sustain Interagency Work Group and Engagement Core	
Lead: TBD	Could incorporate Agencies/Engagement Core into the MN SW Manual Reuse/SCU Chapter Update process and establish an on-going committee.