

M.L. 2018, Chp. 214, Art. 4, Sec. 02, Subd. 04k Project Abstract
For the Period Ending June 30, 2021

PROJECT TITLE: Implement Pilot Credit-Trading System for Storm Water in the Shell Rock River Watershed to Improve Water Quality

PROJECT MANAGER: Courtney Phillips

AFFILIATION: Shell Rock River Watershed District

MAILING ADDRESS: 214 West Main Street

CITY/STATE/ZIP: Albert Lea, MN 56007

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WEBSITE: www.shellrock.org

FUNDING SOURCE: Environment and Natural Resources Trust Fund

LEGAL CITATION: M.L. 2018, Chp. 214, Art. 4, Sec. 02, Subd. 04k

APPROPRIATION AMOUNT: \$300,000

AMOUNT SPENT: \$ 299,073

AMOUNT REMAINING: \$ 927

Sound bite of Project Outcomes and Results

This pilot project developed a water management framework plan along with associated appendices to submit an overlay permit for water quality credit trading to the Minnesota Pollution Control Agency. This work may provide water quality solutions to MS4 permittees bound by funding constraints.

Overall Project Outcome and Results

This project was a collaborative effort between the SRRWD, the City of Albert Lea and utilized a technical advisory committee that consisted of Minnesota Pollution Control Agency (MPCA), Board of Water and Soil Resources, and Department of Agriculture staff.

Stormwater credit trading begins when an upstream landowner, or discharger, reduces pollution or nutrients below levels that are required by law. Those nutrient reductions are then verified, and measured by third party scientists and translated into “credits” that are sold to a credit bank. Downstream towns or cities could then purchase those credits instead of spending multi-million dollars in stormwater system retrofits.

The outcome of this project is the Fountain Lake Phosphorus Stormwater Water Quality Trading Management Plan. This document includes the regulatory requirements, policies, trade ratio, credit transaction value, and program administration behind stormwater credit trading. Attached to this plan are the appendices that support the management plans reasoning and forms that could be used to establish a credit trading program. The end result is a set of documents that are ready for an MS4 entity to submit to MPCA for possible approval of stormwater credit trading to take place. Please note the MPCA would have the authority to approve, modify or deny a stormwater credit trading program in the State of Minnesota. A working credit trading program such as this can provide water quality benefits at a reduced cost, contributing to the fishable, swimmable, drinkable waters initiative.

Project Results Use and Dissemination

Documents that are available for dissemination include the Fountain Lake Phosphorus Stormwater Water Quality Trading Management Plan and the cost effectiveness for water quality trading report. These documents will be sent to the Minnesota Pollution Control Agency, The Board of Water and Soil Resources, and Department of Agriculture. Both documents can also be found on the Shell Rock River Watersheds District website [HERE](#) and submitted to LCCMR staff.



Environment and Natural Resources Trust Fund (ENRTF)

M.L. 2018 ENRTF Work Plan (Main Document)

Today's Date: August 4, 2021

Date of Next Status Update Report: N/A project is completed

Date of Work Plan Approval: 06/05/2018

Project Completion Date: June 30, 2021

Does this submission include an amendment request? No

PROJECT TITLE: Implement Pilot Credit-Trading System for Storm Water in Shell Rock River Watershed to Improve Water Quality

Project Manager: Courtney Phillips

Organization: Shell Rock River Watershed District

College/Department/Division:

Mailing Address: 214 West Main Street

City/State/Zip Code: Albert Lea, MN 56007

Telephone Number: 507-379-8782

Email Address: courtney.phillips@co.freeborn.mn.us

Web Address: www.shellrock.org

Location: Project location is in the SE geographic region of Minnesota. Specifically limited to the Shell Rock River Watershed District located entirely within Freeborn County. The City of Albert Lea is also a project partner and is located within the Watershed.

Total Project Budget: \$300,000

Amount Spent: \$299,073

Balance: \$927

Legal Citation: M.L. 2018, Chp. 214, Art. 4, Sec. 02, Subd. 04k

Appropriation Language: \$300,000 the second year is from the trust fund to the commissioner of natural resources for an agreement with the Shell Rock River Watershed District to develop and implement a pilot water-quality credit-trading program for storm water that provides voluntary and cost-effective options to reduce pollution on a watershed scale. M.L. 2020 - Sec. 2. ENVIRONMENT AND NATURAL RESOURCES TRUST FUND; EXTENSIONS. [to June 30, 2021]

I. PROJECT STATEMENT:

The Shell Rock River Watershed District (SRRWD) Stormwater Quality Trading Pilot Program (the “Program”) will develop and implement the state’s first model framework for stormwater credit trading. Water quality credit trading is a flexible, cost- effective compliance plan that can accelerate implementation and water quality improvements.

The Program is a collaborative effort between the SRRWD, the City of Albert Lea, and the Minnesota Pollution Control Agency (MPCA). Stormwater credit trading begins when an upstream landowner, or discharger, reduces pollution or nutrients below levels that are required by law. Those nutrient reductions are then verified, and measured by third party scientists and translated into “credits” that are sold to a credit bank. Downstream towns or cities, in this case the City of Albert Lea, would then purchase those credits instead of spending multi-million dollars in stormwater system retrofits. The Program will establish a transferrable approach that could be used across Minnesota for sediment and nutrient credit trading for stormwater.

While the MPCA has done nutrient trading in a single permit/single point source setting, it has not been translated into the multi-point stormwater context. This program will deploy a multi-disciplinary working group to develop the heavy science and infrastructure necessary for success. The Shell Rock River Watershed District has conducted 15 years of projects and research that will be used to develop and test the necessary science and ratios for project success.

There are 3 overall goals of the pilot Program:

1. Create a transferable trading framework that incorporates eligibility and transaction protocols when working with a credit trading program.
2. Test numerous factors involved in water quality trading to verify and adjust the Program to provide equal or greater reductions in pollution than conventional methods.
3. Provide voluntary opportunities for accelerated implementation for both point and non-point loading reductions.

This program builds on an existing system of natural resource data and information. It would also produce a foundational document for water quality trading in Minnesota. In addition, the watershed district would improve the water resources of the communities within the watershed by reducing pollution and nutrients. Finally, this Program uses innovative, scientific methods to protect and restore our water through a well-established coalition of the city, watershed district, and landowners.

II. OVERALL PROJECT STATUS UPDATES:

Project Status as of January 31, 2019:

Once the grant agreement was signed, the District put together and released a Request for Bid for engineering/consulting services in September of 2018. The District received 2 bids and in November 2018, the Board awarded the lowest bidder, RESPEC consulting as the engineer/consultant. After awarding the consultant, the team has completed a schedule, discussed meeting check in times, timelines, and communication operations. In early January, the project team met with project partners including the MPCA, Department of Ag, the City of Albert Lea, and the consultants to discuss timelines, outcomes, communication plans and operation of how the pilot project will run. Next steps involve identifying and establishing baselines for the credit trading pilot project.

Project Status as of June 30, 2019:

After the kick-off meeting in late January, the consultants quickly hit the ground running and started to identify and establish baseline conditions for the pilot project. The consultants identified key project partners and structured the pilot program into teams including a core, project, technical, and advisory teams. The project team is set up to have monthly meetings to keep the project on track and to stay up-to date on topics. Currently the project is meeting its timeline, and might actually be a little ahead of schedule. The timeline will be discussed more in detail in the activity items. So far the District has been impressed with the collaborative efforts between the City of Albert Lea, MPCA Staff and the District itself. The pilot project is moving along nicely in all aspects and is in line with the budget.

Project Status as of January 31, 2020

This status update includes the heart of the project. Once the initial data gathering was completed, the group started to conduct monthly check-in meetings to keep the project on schedule and discuss project needs. The constants have created the Baseline Analysis document that determines what the City’s will need to complete before credit trading can take place. Another document that has been created is the Credit Definitions and Credit Supporting Policies project manual. This document combines all of the science, modeling, and defensible reasoning to the credit trading project and why certain analyses were selected. The location factor has also been modeled as part of this process and next steps include doing a mock trade. This mock trade will take into account current projects and prices and implement them into a trade scenario for the City of Albert Lea to see if it is economically feasible for both the credit buyer and credit seller.

During this time we have had a check-in meeting with the Technical Advisory group and we soon plan to take it to the Advisory Group in March 2020.

Amendment Request May 28, 2020

We are requesting that funds be shifted from personnel costs to professional services costs.

- Personnel would be reduced by \$9,292.50
- Professional/Technical/Service Contracts would increase by \$9,292.50

The reasoning for this budget shift is largely related to the Covid-19 situation at hand. The last portion of our project was set aside for outreach and stakeholder review. These meetings were intended to be in person, but have had to transition to online platforms, creating online surveys, and more time spent into developing materials so that meetings could still be conducted. As a result, this is increasing the original budget and impacting the timeline. If the personnel costs are still needed, the SRRWD will contribute them as in-kind. This will have no other impacts to the grant or activity items.

Amendment Approved by LCCMR 6/19/2020

Project extended to June 30, 2021 by LCCMR 6/18/20 as a result of M.L. 2020, First Special Session, Chp. 4, Sec. 2, legislative extension criteria being met.

Project Status as of July 1, 2020:

After the last status update was submitted, our consultants quickly got to work on completing the mock trade scenarios with monitoring and modeling data that the SRRWD had previously completed as well as using projects that have been completed with known bid prices. The project team was guided by the advisory team to create a simpler, single value trade ratio to be used and transferred across the state. By having a single trade ratio, it simplifies the program while incorporating assurances that nutrient reductions are being met. The consultants got to work on coming up with the science based reasoning to justify the single value trade ratio.

The next steps included completing the credit trading forms and documents to be set up for the applicant, broker, and administrator. Those forms will be included in the manual, and the manual is in the final

steps of being completed. Unfortunately the group wanted to see more advisory and stakeholder meetings that were planned for the end of the grant timeline, but it was very hard to set meetings up given the COVID situation that was presented.

Project Status as of January 31, 2021:

Right after the project amendment for the timeline was approved, we found out that our lead consultant who was working on the project left to take a different position. The company quickly filled with a replacement but there was a slight learning curve to bring them up to speed. Once fully involved, they completed the forms that were in draft stage and began working on the overlay manual for the program.

As part of this project, the group created and presented to the local advisory committee that included local soil and water conservation staff, local farmers, chamber members, corn and soybean association board members, and farm insurance staff. The presentation took place virtually on December 16th 2020 and provided great comments back regarding this pilot project. The planning group then took the comments and will incorporate them into the final manual. Currently the manual is getting wrapped up and this should be a completed project shortly. One limiting factor is the new MS4 (Municipal, Separate Stormwater System) permit does not include an end date to when compliance needs to be reached. This means that entities that have an MS4 are allowed to set their own compliance schedule and some can drag their feet instead of being proactive to credit trading.

Project Status as of June 30, 2021: Over the last few months all documents and reports have been staff reviewed and received final edits to create the Fountain Lake Phosphorus Stormwater Water Quality Trading Management Plan. This document includes the regulatory requirements, policies, trade ratio, credit transaction value, and program administration behind stormwater credit trading. Attached are the appendices that support the management plans reasoning and forms that could be used to establish a credit trading program. The end result is a set of documents that are ready for an MS4 entity to submit to MPCA for possible approval of stormwater credit trading to take place. Please note the MPCA would have the authority to approve, modify or deny a stormwater credit trading program in the State of Minnesota.

III. PROJECT ACTIVITIES AND OUTCOMES:

ACTIVITY 1: Identify and Establish Baselines

Description: To become a seller, an upstream discharger/landowner must control its pollution discharge beyond its current obligations. The Program would identify credit generation, or seller, opportunities and baselines from landowners, in-lake and stream management programs and other opportunities for best management practices by inventorying existing drainage infrastructure.

The primary transferable outcome of this step will be to create a voluntary working template that can be used on a case by case basis in other Minnesota communities.

ENRTF BUDGET: \$74,000; Amount Spent \$74,000 Amount Balance \$0

Outcome	Completion Date
1. Identify and Catalogue Municipal Pollutant Loading	March 1, 2019
2. Establish Eligibility Conditions for Credit Generators	July 1, 2019
3. Establish Baseline Conditions for Credit Buyers	August 1, 2019

Activity 1 Status as of January 31, 2019:

RESPEC consultants and the District entered into a contract in November of 2018. During the short two months that they have been working on the project, they are currently in the process of collecting all the stormwater modeling data, and stormwater infrastructure data that will be used to create the pilot program. So far they are on Outcome 1: Identify and Catalogue Municipal Pollutant Loading. They will move to Outcome 2 in March of 2019.

Activity 1 Status as of June 30, 2019:

Starting from January first, the consultants worked until April on credit definitions that would be used for this pilot process. Running parallel to determining the definitions, the consultants also worked on modeling data to identify and catalogue municipal pollution loading and establishing the baseline conditions for credit buyers. Documents that have been produced as a result of activity one include a living Credit Definitions and Credit Supporting Policies document, and a draft SRRW Stormwater Credit Water Quality Trading Program – Baseline Analysis technical report. These documents will be included in the final report to the legislature as addendums.

From May to June the team started working on establishing baseline conditions for credit generators incorporating best management practices and the new Minnesota Buffer Law. After documents were drafted, a meeting was held on May 23rd with MPCA staff and City of Albert Lea staff to go over the findings, all went well.

Activity 1 Status as of January 31, 2020

Most of the topics of this section were completed by August of 2019 leaving little to be reported for the January 31, 2020 update. Nothing is being charged for this time period for this section as a result. The consultants have developed and cataloged the municipal loading and established eligibility for credit buyers. The establishing credit generators is still in draft form with minor changes that may result based on what the Advisory Committee recommends.

Activity 1 Status as of July 1, 2020

This activity was completed and nothing is being charged for this time period for this section as a result.

Activity 1 Status as of January 31, 2021:

This activity was completed and nothing is being charged for this time period for this section.

Activity 1 Status as of June 30, 2021:

This activity was completed and nothing is being charged for this time period for this section.

ACTIVITY 2: Establish Trade Ratios and Trade Mechanics

Description: The primary outcome of this step will be to select appropriate scientific models to estimate load reductions from Best Management Practices (BMP’s). A trading ratio is the mechanism to place value on pollution reductions. For non-point sources, measuring pollution reduction for BMP’s is site-specific. The Program will focus primarily on phosphorus reduction, although such a program can provide many ancillary benefits by reducing other pollutant parameters.

ENRTF BUDGET: \$160,000; Amount Spent \$160,000

Outcome	Completion Date
1. Develop Trade Ratios	January 1, 2020
2. Establish Trade Mechanics	February 1, 2020

Activity 2 Status as of January 31, 2019:

This activity will not begin until October of 2019.

Activity 2 Status as of June 30, 2019:

Although this activity was not slated to begin until October of 2019, the consultant has been working to develop trade ratios using the definitions and policies that are created.

Activity 2 Status as of January 31, 2020

Starting a little before October of 2019, the consultants were working on the trade ratio. The trade ratio is comprised of many factors including the retirement factor, environmental enhancement factor, equivalency and uncertainty factors. Most of these are established and completed but will be finalized in the end of February or early March. The manual and appendix containing these documents are currently in draft form until those details are worked out and input is sought from the Advisory Committee.

Activity 2 Status as of July 1, 2020

After meeting with the Advisory Committee that includes MPCA, BWSR, and Department of Ag staff, the group received a recommendation to create a single-value trade ratio. This ratio eliminates the need to find individual factors like the retirement, environmental enhancement, equivalency and uncertainty factor. Instead, this single value trade ratio looks as science based, and already approved ratios, that have been vetting and approved from other agencies and statewide trading programs. Now the value will be a single trade ratio but the location factor will be added to the seller’s portion of the credit. This portion of the project is nearing completion and plans to be wrapped up by June 2020.

Activity 2 Status as of January 31, 2021:

This activity was completed and nothing is being charged for this time period for this section.

Activity 2 Status as of June 30, 2021:

This activity was completed and nothing is being charged for this time period for this section.

ACTIVITY 3: Stakeholder Review and Final Report

Description: Identified stakeholders will be included to perform review and input on the Program. A final report will be prepared for possible state-wide implementation.

ENRTF BUDGET: \$66,000; Amount Spent \$65,073

Outcome	Completion Date
1. Stakeholder Review	May 1, 2020
2. Final Report	June 30, 2021

Activity 3 Status as of January 31, 2019:

This Activity will not start until February of 2020.

Activity 3 Status as of June 30, 2019:

This Activity will not start until February of 2020.

Activity 3 Status as of January 31, 2020:

This Activity will not start until February of 2020.

Activity 3 Status as of July 1, 2020:

This activity was started in February of 2020, unfortunately the COVID pandemic came in early March and it was very difficult to get meetings set up to receive comments because it is such a technical topic. One advisory committee meeting was scheduled over a Zoom conference but there was local stakeholder meetings planned as well for this grant activity.

Now that there is a COVID approved extension, the group will have more time to complete all documents with the local stakeholder comments and final advisory committee comments. We will have time to host, and incorporate final comments into the documents/manual to make for successful project. There can also be refinements made to the single value trade ratio and manual as well to incorporate the comments.

Activity 3 Status as of January 31, 2021:

The planning group presented to the local advisory committee on December 16th 2020. That group included local multiple soil and water conservation staff, local farmers, chamber members, corn and soybean association board members, and farm insurance staff. The presentation took place virtually and provided great comments back regarding this pilot project. The planning group then took the comments and will incorporate them into the final manual. The goal is to have one more technical review group meeting on the last draft of the manual and forms to provide comment and review. Currently the manual is getting wrapped up and this should be a completed project shortly. Once completed, the City of Albert Lea would have everything set up to apply for a Stormwater permit if they so wished to apply for one. Once submitted to the MPCA, the MPCA would review the permit for possible approval.

Activity 3 Status as of June 30, 2021:

As mentioned in the previous update, the group supplied documents to the technical advisory committee in May 2021 for their review. The technical advisory committee consists of MPCA, BWSR, and Dept. of Ag staff. Building on from the last update, a large majority of the document had been completed. Final work included minor revisions from the technical advisory team meeting and formatting the plan to look cohesive. The Fountain Lake Phosphorus Stormwater Water Quality Trading Management Plan is now a completed document that includes the regulatory requirements, policies, trade ratio, credit transaction value, and program administration behind stormwater credit trading.

IV. DISSEMINATION:

Description: Project plans for dissemination, presentation, documentation, or sharing of data results will be found on the Shell Rock River Watershed District website page. The web page is located at: www.shellrock.org and will be listed under the projects tab located on the left hand side of the webpage. Social media including Facebook and Twitter will sometimes contain reference to the Program. Links to those sites can be found on the SRRWD website page.

Project personnel will ~~also be prepared to~~ share the final report with the MPCA, stakeholders, interested organizations and key policy makers.

First Update January 31, 2019:

After the contract agreement with RESPEC was approved by the District Board, the local reporter for the Albert Lea Tribune asked for more information about the pilot program. Although an interview was done, the paper is waiting to publish a story until more work has been done on the program.

Second Update June 30, 2019:

The SRRWD was asked to provide a PowerPoint on this topic to a Minnesota Rural Water Association sponsored event that targeted about 50 wastewater professionals. The City of Albert Lea staff also spoke on June 6th at the Minnesota Environmental Science and Economic Review Board event that targeted about 75 water professionals. Other dissemination includes staff providing updates at public board meetings and questions with other local professionals as asked.

Third Update January 31, 2020

The SRRWD and RESPEC consultants were asked to speak at the Minnesota Association of Watershed Districts (MAWD) Conference and Trade show regarding this project. The event targeted about 25 water professionals and the PowerPoint was placed on the MAWD website to be seen by others. Other disseminations include staff providing updates at public board meetings and occasional questions asked by the public.

Fourth Update July 1, 2020

Due to the COVID situation, no meetings or presentations were called out to speak at in person. Other disseminations include staff providing updates at public board meetings and occasional questions asked by the public. The District also included updates on their email mailer called "Watershed Weekly" that is distributed to roughly 100 followers.

Fifth Update January 31, 2021:

Due to COVID, public presentations are reduced. Disseminations include updated in the SRRWD "Watershed Weekly," updates at SRRWD Board Meetings, and the December 18th 2020 local Advisory meeting.

Final Update June 30, 2021:

Due to COVID, public presentations have been reduced. Disseminations include updated Watershed Weekly publications, updates at Shell Rock River Watershed District Board Meetings and on the Shell Rock Facebook page. Additional publication includes dissemination of final report document to LCCMR, MPCA, and on our website for viewing.

V. PROJECT BUDGET SUMMARY:

A. Preliminary ENRTF Budget Overview: See attached budget spreadsheet

Explanation of Capital Expenditures Greater Than \$5,000: N/A

Explanation of Use of Classified Staff: N/A

Total Number of Full-time Equivalents (FTE) Directly Funded with this ENRTF Appropriation:

- Courtney Phillips, Project Manager: \$17,208 (67% wage, 33% benefits) 0.17 FTE per year for 2 years

Total Number of Full-time Equivalents (FTE) Estimated to Be Funded through Contracts with this ENRTF Appropriation:

- Trading Consultant(s): 0.48 FTE over 2 years
- Engineering/Ground Support Consultant(s): 0.29 FTE over 2 years
- Agency/Stakeholder Outreach: 0.08 FTE over 2 years

B. Other Funds:

SOURCE OF AND USE OF OTHER FUNDS	Amount Proposed	Amount Spent	Status and Timeframe
Other Non-State \$ To Be Applied To Project During Project Period:	\$ N/A		
Other State \$ To Be Applied To Project During Project Period:	\$ N/A		
In-kind Services To Be Applied To Project During Project Period: The Minnesota Pollution Control Agency has secured funding for staff that will provide the in-	\$11,300	\$10,433.75	Secured, Over 2 years

kind services for Mike Trogan and Marco Graziani.			
Past and Current ENRTF Appropriation:	\$ N/A		
Other Funding History:	\$ N/A		

VI. PROJECT PARTNERS:

A. Partners receiving ENRTF funding

Name	Title	Affiliation	Role
N/A			

B. Partners NOT receiving ENRTF funding

Name	Title	Affiliation	Role
Mike Trogan	PhD. Hydrologist	Minnesota Pollution Control Agency	Stormwater Municipal Division
Bruce Henningsgaard	Principle Engineer	Minnesota Pollution Control Agency	Water Assessment/Environmental Outcomes
Marco Graziani	TMDL Coordinator	Minnesota Pollution Control Agency	Wastewater Municipal Division
Steven Jahnke	Director of Public Works, City Engineer	City of Albert Lea	Storm Water Division

VII. LONG-TERM- IMPLEMENTATION AND FUNDING:

The long-term impact of this pilot Program is to develop and implement a model stormwater quality credit trading framework to provide voluntary, cost effective way to reduce pollution in watersheds across the state of Minnesota. This is a self-contained project and will take up to 2 years to complete.

VIII. REPORTING REQUIREMENTS:

- The project is for 2 years, will begin on 7/1/2018, and end on June 30, 2021.
- Periodic project status update reports will be submitted January 31 and June 30 of each year.
- A final report and associated products will be submitted between June 30 and August 15, 2021.

IX. SEE ADDITIONAL WORK PLAN COMPONENTS:

- A. Budget Spreadsheet - Attached
- B. Visual Component or Map
- C. Parcel List Spreadsheet N/A
- D. Acquisition, Easements, and Restoration Requirements N/A
- E. Research Addendum N/A

Attachment A:
 Environment and Natural Resources Trust Fund
 M.L. 2018 Budget Spreadsheet

Project Title: Implement Pilot Credit-Trading System for Storm Water in Shell Rock River Watershed to Improve Water Quality
 Legal Citation: M.L. 2018, Chp. 214, Art. 4, Sec. 02, Subd. 04k
 Project Manager: Courtney Phillips
 Organization: Shell Rock River Watershed District
 College/Department/Division: N/A
 M.L. 2018 ENRTF Appropriation: \$300,000
 Project Length and Completion Date: 3 years; June 30, 2021
 Date of Report: August 5, 2021



ENVIRONMENT AND NATURAL RESOURCES TRUST FUND BUDGET	Budget 6/19/2020	Amount Spent	Balance
BUDGET ITEM			
Personnel (Wages and Benefits)			
<i>Courtney Christensen, Project Manager: \$26,500 (67% wage, 33% benefits) 0.17 FTE per year for 2 years</i>	\$17,208	\$17,208	\$0
Professional/Technical/Service Contracts			
<i>Credit Trading Consultant(s). RFP's will be distributed and vendor contracts will be awarded on a competitive and performance basis.</i>	\$155,000	\$155,000	\$0
<i>Engineering/Ground Support Consultant(s). RFP's will be distributed and vendor contracts will be awarded on a competitive and performance basis.</i>	\$92,000	\$92,000	\$0
<i>Agency/Stakeholder Outreach. RFP's will be distributed and vendor contracts will be awarded on a competitive and performance basis.</i>	\$31,293	\$30,366	\$927
<i>Collection of City of Albert Lea Storm Water Inventory</i>	\$4,500	\$4,500	\$0
COLUMN TOTAL	\$300,000	\$299,073	\$927