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Restoration Implementation

5.1 Phasing of Restoration

All sites within the study area exhibit multiple impairments to the natural recovery of water and riparian resources. Despite the removal of stressors associated with industrial land use, many sites will be unable to recover ecologically without intervention due to the severity and extent of disturbance modification to natural resources. The presence of native vegetation, aquatic habitats, resilience to stress, and connectivity of riparian habitats have been altered or completely degraded by:

- Channel dredging;
- Alteration of natural channel form;
- Stream bank shaping and armoring;
- Creation of urban land or infrastructure in riparian areas; and
- Filling floodplains and wetlands.

Without the development and implementation of habitat restoration design, measurable resource recovery by natural succession is unlikely on many of the selected sites in the foreseeable future. The fundamental biological processes responsible for historic conditions, such as native vegetation layers, available seed-bank, and riparian habitat connectivity, have been significantly altered, in some cases irrevocably. The dominance of invasive plant communities and degraded urban soils combine to inhibit the natural, successional recruitment and colonization of native plants.

There are two levels of phasing habitat restoration projects. The first involves determining which of several projects should be implemented first. A brief discussion on prioritization of the projects proposed in this ERMP can be found in Section 4.3. The second phasing level involves with the sequence of actions for any particular restoration design.

A critical element of restoration construction involves the sequencing of the installment of various restoration features. Although such sequencing is site- and project-specific, general recommendations can be made based on information gained from the field assessments.

Two restoration actions that should be addressed early in project implementation are control of invasive species and stabilization of the channel and/or stream bank. Invasive plant communities represent the most significant ecological

stressor that is directly linked to stream bank and riparian upland soil instability, sediment loading, and natural recovery of native vegetation layers.

In addition to control and management of invasive species, any measures to re-shape or stabilize the stream bank, including re-establishing a riparian plant community should be implemented early on in a multi-year project. Seasonal conditions associated with invasive plant control measures and the duration of the growing season in western New York warrant strategic implementation of habitat restoration design. It is critical to develop and initiate an invasive plant treatment and restoration planting plan that incorporates multiple growing seasons to accommodate initial site work, treatments, and re-vegetation. The site should be monitored and measures taken as needed to adapt to changes in site conditions.

5.2 Monitoring and Maintenance

Monitoring

The ERMP is a plan to improve the ecological integrity and health of the lower Buffalo River watershed and to support the delisting of the Buffalo River AOC. A monitoring program would need to assess conditions on the watershed or macro scale and the individual project or micro scale. Performance-based monitoring protocols should be meaningful relative to the determination of success but that are also relatively uncomplicated and inexpensive to complete).

Restoration of stream channel, riparian habitat, and associated terrestrial resources in the lower Buffalo River watershed would require the development of performance monitoring program to assess physical, biological, and/or hydraulic changes between pre-restoration and post-restoration conditions. Development of monitoring programs for restoration projects would require coordination with regional stakeholders, including environmental agencies. The following discussion presents potential monitoring program elements. It is important that project sponsors incorporate monitoring concepts or even a detailed monitoring plan into their habitat restoration grant applications. The degree of detail and exact requirements may vary by funding organization requirements.



Photo 5.2-1 Baseline data collection on fishery and riparian resources in the upper watershed of the Lake Erie drainage basin

A monitoring program would provide critical information to enable project sponsors to assess restoration success and to determine what efforts may be needed to achieve specific habitat restoration goals. In general, monitoring approaches are to measure and record changes in various structural characteristics and functional processes within a given habitat type over time. Sometimes this is conducted in conjunction with monitoring of and comparison with a nearby undisturbed (or high-quality) reference site. In the absence of such a reference site, monitoring could be done using “before and after” types of comparisons. Typically, community and population goals are established prior to implementation and used as metrics for determining the relative success of restoration efforts. Typical metrics include measurements or observations of vegetation and and/or wildlife, but may include a variety of physical or other characteristics (e.g., channel width to depth ratio, changes in water quality parameters).

Specific functional assessment protocols may be used to establish baseline conditions and measure post-restoration changes. Examples of such protocols are the Qualitative Habitat Evaluation Index, Stream Assessment Protocol, and the Rapid Bioassessment Protocol for Use in Streams and Wadeable Rivers (to list a few) (Guilfoyle and Fischer 2006, Barbour et. al 1999, Society for Ecological Restoration 2004).

Macro Level Monitoring Across the ERMP Focus Area and Lower Buffalo River Watershed

This level would involve an overall monitoring framework that would include the entire ERMP Focus Area (and maybe beyond). Performance monitoring at this scale would provide resource managers with data to measure response to restoration projects at the watershed level. This “higher level” system could be used to:

- Track implementation of all habitat restoration projects within the Focus Area (and perhaps within the entire lower Buffalo River watershed).
- Develop Focus Area-wide performance/monitoring metrics. For example: number of projects constructed, percentage of stream bank stabilized and restored, number of acres where invasive species control and management has been implemented, etc.
- Monitor and quantify overall lower watershed changes or gains experienced as a result of implementation of an increasing number of restoration projects. Measure changes related to BUIs, water quality, changes in availability of aquatic and emergent habitat (in-channel/nearshore and shoreline), and overall biological community responses (changes in benthos and fish communities).
- Macro-level observations on successes, failures, and methods of adaptive management.

In brief, the monitoring program would help to evaluate the effectiveness and rate progress of the ERMP and Buffalo River AOC RAP efforts, and support macro level tracking of the monitoring and maintenance of specific projects.

Micro Level Monitoring of Site-Specific Projects

This level involves tracking the changes observed as the result of habitat restoration projects at the individual project scale. It requires development of site-specific performance/monitoring metrics, which are likely to vary from project to project based upon the goals and objectives of each.

Each project site would require a monitoring protocol that is reflective of site-specific conditions and proposed aquatic and terrestrial restoration features. Performance measures would be identified that allow project managers to measure the degree of success in restoring structure that is designed to support hydraulic form and function. Physical and biological variables would be measured to assess the functional uplift (i.e., restoration success) generated by the combination of structural features and vegetative community establishment. Variables to measure include:

- Structural integrity;
- Sediment transport and capture;

- Soil and stream bank stability;
- Plant community establishment; and
- Wildlife usage, available forage and cover, travel and migration within the riparian corridor.



Photo 5.2-2 Data collection of hydraulic shear stress, stream bank stability and fishery baseline conditions for monitoring

A variety of tested approaches for developing and implementing monitoring plans are described in the literature. Specificity of project goals and objectives would support the selection of the most appropriate assessment tools. Guilfoyle and Fischer (2006) provide guidelines for developing monitoring programs for assessing riparian restoration. Although the methods were developed for arid and semi-arid regions, they provide a straightforward example of the general components of monitoring plan development and implementation. Using their approach as an example, the primary components of restoration and monitoring plans would include:

- Establishing clearly defined restoration goals and objectives;
- Developing a monitoring protocol:
 - Detail of overall approach,
 - Conduct baseline surveys,
 - Develop list of metrics (physical, chemical, biological – vertebrates, invertebrates, fish, plant communities) and then consider best approaches,

methods, and techniques for measuring, and related time, frequency, effort, and expense requirements;

- Implementing a monitoring design
 - Detail and quantify sampling design specific to the restoration location, for example (for vegetation data collection) number of plots, the layout of sampling plots across the site, sampling protocol, sample size, etc.;
- Analyzing and interpret results from monitoring; and
- Assessing the degree of success.

Monitoring plans should indicate what maintenance activities may be needed and require documentation of the activities completed. The plans should identify the means to ensure that proper maintenance is funded and performed over a stated time period. An adaptive management methodology can be applied to project-specific monitoring plans. Adaptive management would provide project managers the flexibility to react to change or uncertainty in the implementation of final restoration design (or after restoration has been completed), and take corrective action as needed.

Monitoring should continue until there is reasonable proof that a project is exhibiting the processes and functions of the desired conditions, as established by the goals and objectives, and that there is evidence that only maintenance activities would be required in the future.

Maintenance

The ecological restoration plans proposed in this document would be implemented in very dynamic environments. Variables such as stream flow volumes and velocities, the impacts of ice formation and movement, changes in vegetation over time from stage of maturity to weather and other stresses would cause changes over time. Absent unforeseen impacts such as extreme weather or fires, well planned and implemented restoration projects should be resilient to the normal year to year forces and stresses. In practice, however, projects need to be periodically inspected for problems. Some measures may need periodic attention until they become fully established, such as controlling re-establishment of invasive species. Other problems could occur more at random and warrant periodic inspections to ensure no repairs are needed. Detailed project implementation plans should have maintenance plans to ensure the long-term integrity of all project components.

The long-term cost to maintain the restoration project(s) could be significant. Project sponsors will need to include long-term cost estimates at the start of the planning process based on the experiences of agencies and organizations in the region. Those agencies and organizations, including the USACE, Buffalo Niagara RiverKeeper, and NYSDEC, can assist project sponsors in estimating long-term maintenance costs. Some restoration measures would be subjected to

forces that could damage or reduce the habitat value of a site to the point where the restored habitat could be destabilized and permanently damaged. The long-term cost could be significant, but an estimate can be developed as project sponsors decide to go forward with a restoration project on a given site, based on the experiences of agencies and organizations in the region.

5.3 Potential Threats or Issues

Both physical and institutional factors could slow the pace of ecological restoration or threaten the biological integrity of projects after implementation. Physical factors include extreme weather and stream flow events, including damages from ice jams and flows. Vegetative components of restoration projects are particularly vulnerable in the first few years after establishment. Until plants (especially the root systems) mature and become well established they are more easily damaged by high stream flows, ice flows, and drought. Properly designed and installed structural practices, such as rock vanes, hydraulic cover stones, and toe of stream bank protection should withstand all but the most extreme events. Nonetheless, there are risks that such events could occur.



Photo 5.3-1 Cazenovia Creek ice jam near confluence with Buffalo River

Biological threats, especially from invasive plant species, will be a continuing concern for the health of the Buffalo River, its tributaries, and riparian areas throughout the project area. The proposed projects, if implemented and properly managed, would do a great deal to reduce the impacts of invasive species in the

ERMP area. Even so, invasive plants are likely to propagate and gain ground beyond the project areas without concerted efforts to limit their spread.



Photo 5.3-2 Japanese knotweed understory monoculture in riparian floodplain with imminent stream bank tree failure on Cayuga Creek

These factors influence the design and construction phase (design, selection, and physical siting of restoration features), and the post construction phase. As discussed above, projects would need to be monitored after implementation to assess the effectiveness of the project in bringing about the intended ecological benefits. The effects of the river/creek system on specific restoration features would also be monitored.

Threats to in-stream restoration could come from extreme water and ice flow events, but the majority of factors that could negatively affect ecological restoration are related to management of the water and the watershed, including the kinds of infrastructure present.

Recent water quality studies indicate that ammonia, dissolved oxygen, water temperature, and iron are water quality parameters of concern in the Buffalo River AOC. Sources and factors currently contributing to water quality problems in the AOC include:

- CSOs and SSOs;
- Urban runoff;
- Storm sewers;
- Industrial discharges;
- Hazardous waste sites;
- Sediment and other pollutants from the upper watershed;
- Habitat modification, including land development in and near the riparian zone; and
- Hydrologic modification.



Photo 5.3-3 Cayuga Creek stream bank failure and sediment loading

None of the factors above are easy or quick to address. Reducing infrastructure-related threats will take years due to the extent of the infrastructure and the cost of improvements. Reducing urban runoff impacts will also take a long time. The threats from hazardous waste have been significantly reduced in the recent past, but continued attention needs to be given to this factor. Managing the risks to ecological restoration from land management and land uses is complex and requires community decisions on how to plan and control certain land uses in areas that have the greatest impacts on stream ecosystems.

5.4 Permitting Requirements

Ecological restoration projects that impact the natural resources of an area may be subject to regulatory requirements of various governmental agencies. Each governmental agency has a standardize procedure in determining whether a project requires one or more permits. These procedures may include submitting an application form, supporting documentation with project design, and any supplemental information required by the agency (see Table 5-1).

To avoid delays in the planning, design, and implementation of the project, an applicant should first contact/meet the appropriate agency staff to obtain advice on completing the required forms and on any other requirements. This meeting would allow for the clarification of requirements and a discussion of the preliminary plan/design and possible alternatives that would be agreeable to the agency.

Table 5-1 Potential Permit Requirements for Ecological Restoration Projects

Potential Requirements	Jurisdictional Activities	Comments/Contacts
1. USACE CWA Section 404 Nationwide Permit 13, 27– Joint application for Permit	13. <u>Bank Stabilization</u> . Bank stabilization activities below mean high water necessary for erosion prevention, 27. <u>Aquatic Habitat Restoration, Establishment, and Enhancement Activities</u> . Activities below mean high waters of the United States associated with the restoration, enhancement, and establishment of non-tidal wetlands and riparian areas and the restoration and enhancement of non-tidal streams and other non-tidal open waters, provided those activities result in net increases in aquatic resource functions and services.	The permittee must submit a joint application, a pre-construction notification, wetland delineation report (if applicable), project plans with location map and photos to the district engineer prior to commencing the activity if the bank stabilization activity: (1) involves discharges into special aquatic sites; (2) is in excess of 500 feet in length; or (3) will involve the discharge of greater than an average of one cubic yard per running foot along the bank below the plane of the ordinary high water mark. (Sections 10 and 404) http://www.lrb.usace.army.mil/regulatory/nwp/ NYNWP2007/NY%20NWP13.doc 716-879-4330
2. 401 Water Quality Certification	Water Quality Certification is required for: bank stabilization greater than 200 feet, work in coastal erosion hazard areas, conversion of one wetland type to another, projects larger than 1 acre where for example, a permit is required from the USACE under Section 404 of the Clean Water Act.	Joint application submitted to NYSDEC – 270 Michigan Ave Buffalo, NY 716-851-7165

Table 5-1 Potential Permit Requirements for Ecological Restoration Projects

Potential Requirements	Jurisdictional Activities	Comments/Contacts
3. NYS Protection of Waters Permit 6NYCRR Part 608 Article 15	Disturbance of the bed or banks of a PROTECTED STREAM or other watercourse; Construction, Reconstruction or Repair of dams and other impoundment structures; Excavation or placement of fill in NAVIGABLEWATERS and their adjacent and contiguous wetlands.	Joint application submitted to NYSDEC – 270 Michigan Ave Buffalo, NY 716-851-7165 http://www.dec.ny.gov/permits/6340.html
4. NYS Freshwater Wetlands Permit 6NYCRR Part 663 Article 24	Disturbance to a state regulated wetland and the 100 foot adjacent area. Some activities requiring a permit include: Construction of buildings, roadways, septic systems, bulkheads, dikes, or dams; Placement of fill, excavation, or grading; Modification, expansion, or extensive restoration of existing structures; Drainage, except for agriculture; Application of pesticides in wetlands.	Joint application submitted to NYSDEC – 270 Michigan Ave Buffalo, NY 716-851-7165 www.dec.ny.us/permits/6277.html
5. Floodplain Management Permit 6NYCRR Part 500	All communities that participate in the National Flood Insurance Program have a local law or ordinance that regulates development within mapped floodplains. However, anybody who wishes to develop any area within a floodplain should consult with their local floodplain manager, often a building inspector or zoning officer, for specific requirements.	Floodplain construction requirements: http://www.dec.ny.gov/lands/40576.html
6. SPDES General Permit for Stormwater Discharges from Construction Activity 6NYCRR Part 750 Article 17	Construction activities involving soil disturbances of one (1) or more acres	Develop a Stormwater Pollution Prevention Plan (SWPPP) and Notice of Intent to: NOTICE OF INTENT NYS DEC, Bureau of Water Permits 625 Broadway, 4th Floor Albany, New York 12233-3505 http://www.dec.ny.gov/chemical/43133.html
7. Solid Waste Disposal 6NYCRR Part 360	Waste such as tires, scrap metal, paint, furniture, garbage, appliances, vehicles, construction and demolition debris intended to be removed from the site may require disposal at an approved facility.	Contact NYS DEC – Buffalo office 716-851-7220
8. Local Building Permit	Potential for Building Permit, Site Development Permit, Site Plan Approval	Contact local Town Building Inspector

5.5 Potential Funding and Technical Assistance Sources for Stream Habitat Restoration and Improvement Projects

This subsection provides a brief overview of some potential sources of funds to implement recommended actions. It is not an exhaustive list and project sponsors may need to research other potential funding sources.

Regardless of the funding source, any application for funding should make reference to this ERMP to show how the project supports the overall goals established for the Buffalo River. Applications for projects that would contribute to meeting the goals of established plans such as this could have advantages in the funding process over those that are not included in such plans.

Great Lakes Restoration Initiative

To accelerate the restoration of the Great Lakes, in 2010 Congress authorized a \$475 million inter-agency initiative to address issues that affect the Great Lakes, such as invasive species, non-point source pollution, and toxics and contaminated sediment. The most recent Request for Applications made up to \$40 million available for restoration projects in four focus areas:

- Toxic Substances and Areas of Concern;
- Invasive Species;
- Nearshore Health and Nonpoint Source Pollution; and
- Accountability, Monitoring, Evaluation, Communication, and Partnerships.

The EPA will be the lead for the program but will be assisted by 15 other federal agencies.

<http://epa.gov/greatlakes/fund/glef.html>

Aquatic Ecosystem Restoration Section 206, USACE

Under Section 206 (WRDA), the USACE is authorized to study, design, construct projects to restore or protect the aquatic ecosystem for the purpose of improving environmental quality when in the public interest, when the project is cost effective, and when the project does not involve more than \$5,000,000 in federal contribution.

<http://www.lrb.usace.army.mil/>

<http://www.nae.usace.army.mil/pservices/206.htm>

Stream Bank and Shoreline Restoration Section 14, USACE

Section 14 of the 1946 Flood Control Act, as amended, authorizes the USACE to develop and construct stream bank and shoreline protection projects to protect endangered highways, highway bridge approaches, and public works facilities (e.g., water and sewer lines, churches, public and private nonprofit public facilities). Each project is limited to a federal cost of \$1,500,000, and must be eco-

nomically justified, environmentally sound, and feasible from an engineering point of view.

<http://www.nae.usace.army.mil/pservices/shore14.htm>

Ecosystem Restoration in Connection with Dredging, Section 204, USACE

Section 204 of the Water Resources Development Act of 1992 provides the USACE with the authority to plan, design, and build projects to protect, restore, and create aquatic and ecologically related habitats in connection with dredging of authorized federal navigation projects. Typically, these projects involve the beneficial use of dredged material from navigation channels to improve or create wetlands or waterbird nesting habitats.

<http://www.nae.usace.army.mil/pservices/dredg204.htm>

Remedial Action Plans Section 401(a), USACE

Section 401(a) of the Water Resources Development Act of 1990 authorizes the USACE to support the development and implementation of Remedial Action Plans (RAPs) at U.S. AOCs on the Great Lakes. This authority enables the USACE to provide technical support to state and local governments.

RAP support may include a variety of technical services, including:

- Physical and environmental monitoring;
- Remedial planning and design;
- Construction management;
- Development of geographic information systems (GIS);
- Computer modeling and analysis;
- Cost estimating; and
- Real estate and public outreach support.

<http://www.lrd.usace.army.mil/navigation/glnavigation/remedialsection401/>

Aquatic Ecosystem Restoration Section 506, USACE

Section 506 of the Water Resources Development Act of 1996 authorizes the USACE to participate in planning, engineering, design, and construction of projects to restore degraded ecosystem structure, function, and dynamic processes to a more natural condition. Such projects include the removal of low-head dams as a way to improve water quality and fish and wildlife habitat. Projects require partnering with a non-federal sponsor that may be a public agency, state or local government, private interest, or non-profit environmental organization.

http://www.lre.usace.army.mil/_kd/go.cfm?destination=Page&Pge_ID=2284

Environmental Restoration – Planning Services Section 1135, USACE

Section 1135 is a continuing authority of the Water Resources Development Act of 1996 to modify the structures and operations of USACE projects to improve the quality of the environment and restore ecosystem functions impaired by projects built by the USACE or jointly by the USACE and other federal agencies, or at any site that has been affected by a USACE project, if such measures do not

conflict with authorized project purposes. The primary goal of these projects is ecosystem restoration with an emphasis on projects that benefit fish and wildlife.
<http://www.nae.usace.army.mil/pservices/rest1135.htm>

Partners for Fish and Wildlife, USFWS

The Partnerships for Wildlife Act authorized the establishment of the Wildlife Conservation and Appreciation Fund to receive appropriated funds and donations from the National Fish and Wildlife Foundation and other private sources. The fund may be used to provide grants to states to benefit a broad array of diverse fish and wildlife species and to provide non-consumptive fish and wildlife recreation opportunities. Appropriate state agencies are the only entities eligible to receive grant funds.

<http://www.fws.gov/northeast/nyfo/partners/pfwdesc.htm>
<http://www.fws.gov/grants/>

National Fish and Wildlife Foundation – Five-Star Restoration Grant Program

Provides \$10,000 to \$40,000 grants on a competitive basis to support community-based wetland, riparian, and coastal habitat restoration projects that build diverse partnerships and foster local natural resource stewardship through education, outreach, and training activities. Project sites may be public land - parks, streams, school campuses - or private land, such as corporate facilities. Because public participation is paramount in community-based restoration, these sites should be accessible to the community. The application process is entirely online through the National Fish and Wildlife Foundation Web site. Applications are generally open in late fall, with award notification in late spring.

<http://www.nfwf.org/AM/Template.cfm?Section=GrantPrograms>

The Coastal and Estuarine Land Conservation Program (CELCP), NOAA

Grants are made to eligible state agencies and local governments to purchase significant property or conservation easements from willing sellers within a state's coastal zone. Preference is given to projects that protect important coastal and estuarine areas that have significant conservation, ecological, historical, aesthetic, or recreation values, or that are threatened by conversion from their natural or recreational state to other uses. The CELCP guidelines outline the criteria and process for states to nominate land conservation projects to a national competitive process. The program is coordinated at the state level through each state's CELCP lead within the state's lead coastal management agency.

<http://coastalmanagement.noaa.gov/land/>

United States Environmental Protection Agency

The Catalog of Federal Funding Sources for Watershed Protection Web site is a searchable database of financial assistance sources (grants, loans, cost-sharing) available to fund a variety of watershed protection projects.

<http://cfpub.epa.gov/fedfund/>

Great Lakes Protection Fund

For projects designed to improve the ecological health of Great Lakes aquatic resources by restoring the physical hydrology of the environment.

www.glpf.org

Sustain Our Great Lakes

The *Sustain Our Great Lakes* program is a public–private partnership among ArcelorMittal, the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the National Fish and Wildlife Foundation, and the National Oceanic and Atmospheric Administration. The program is designed to support the implementation of the [GLRI](#), an outcomes-focused initiative designed to protect, maintain, and restore the chemical, biological, and physical integrity of the Great Lakes ecosystem.

The program supports conservation work throughout the Great Lakes basin through a bi-national grants program administered by the National Fish and Wildlife Foundation and funded by ArcelorMittal and the federal agency partners. It provides grants to nonprofit organizations, state and local governments, tribes, and educational institutions working to improve watershed health in the Great Lakes basin. The program supports habitat restoration, protection and enhancement projects, invasive species control, water quality improvements, and watershed planning and management.

<http://www.sustainourgreatlakes.org/>

5.6 Becoming a Project Sponsor – General Considerations**Pre-Planning**

Before developing an application for financial assistance to implement habitat restoration, potential project sponsors should carefully examine the site(s) and restoration measure(s) they wish to implement and determine how to best gain support from the appropriate units of government and from the owners of the properties that would be affected. Local governments are likely to be more interested in projects that assist them in meeting other needs, such as stormwater and floodplain management. While the proposed projects are not specifically designed to address stormwater management, project sponsors should investigate the potential to incorporate green infrastructure measures adjacent to but outside the areas of habitat restoration. Wherever possible, potential sponsors should quantify stormwater management benefits.

Projects can be implemented only on properties of willing landowners. Individual landowners are more likely to support a project when they see how a project might benefit them, such as stopping loss of their riparian lands to stream bank erosion, improving the aesthetics of the site, and providing wildlife viewing opportunities. Landowners should be contacted early in the process in order to accommodate their needs in the restoration plan.

Organizational Resources

Local governments do not typically have access to the resources required to independently implement more than small habitat restoration projects. Limited numbers of personnel and the multiple responsibilities of the personnel available make it difficult to apply the needed resources to the task of applying for financial assistance for projects. Project sponsors should consult with the funding agencies for suggested ways of meeting the requirements for applications. Sponsors should also confer with non-governmental groups and other potential project sponsors to pool resources.

Collaboration across Municipal Boundaries

Given the scarcity of resources at the local level and the trans-boundary nature of water resources and habitat management needs, municipalities should consider collaborating with neighboring municipalities. Sharing both funds and personnel would achieve common objectives. Although such multiple municipality collaboration may not have strong precedent, collaboration has the potential to made the unattainable possible.