



Woods Cross City

WOODS CROSS CITY

STORM WATER

MANAGEMENT PROGRAM

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Updated November 5, 2010
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Updated: December, 2021

New Permit Update: May 12, 2021

J-U-B ENGINEERS, Inc.

INTRODUCTION

Polluted storm water runoff is often transported to municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. EPA's Storm Water Phase II Rule establishes an MS4 storm water management program that is intended to improve the Nation's waterways by reducing the quantity of pollutants that are introduced into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, roadway salts and deicing materials, pesticides and fertilizers from lawns, sediment from construction sites, and carelessly discarded trash, such as cigarette butts, paper wrappers, and plastic bottles. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging use of the resource, contaminating water supplies, and interfering with the habitat for fish, other aquatic organisms, and wildlife.

In 1990, EPA promulgated rules establishing Phase I of the National Pollutant Discharge Elimination System (NPDES) storm water program. The Phase I program for MS4s requires operators of "medium" and "large" MS4s, that is, those that generally serve populations of 100,000 or greater, to implement a storm water management program as a means to control polluted discharges from these MS4s. The Storm Water Phase II Rule extends coverage of the NPDES storm water program to certain "small" MS4s but takes a slightly different approach to how the storm water management program is developed and implemented.

In the State of Utah, the EPA has granted primacy to the State of Utah to oversee and manage the storm water program. The State has adopted the Utah Pollutant Discharge Elimination System (UPDES) for that purpose. Woods Cross City has prepared this Storm Water Management Program (SWMP) to meet the requirements of the UPDES Storm Water Discharge Permit for Small MS4s.

Storm Water Management Program

A Storm Water Management Program should:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP);
- Protect water quality;
- Satisfy the appropriate water quality requirements of the Clean Water Act; and
- Be phased in over a five year period.

Storm water management programs must include:

- ✧ Best Management Practices (BMPs) for each of the six minimum control measures;

1. Public Education and Outreach
 2. Public Participation/Involvement
 3. Illicit Discharge Detection and Elimination
 4. Construction Site Runoff Control
 5. Post-Construction Runoff Control
 6. Pollution Prevention/Good Housekeeping
- ✧ Measurable goals for each minimum control measure (i.e., narrative or numeric standards used to gauge program effectiveness);
 - ✧ Estimated months and years in which actions to implement each measure will be undertaken, including interim milestones and frequency; and
 - ✧ The person or persons responsible for implementing or coordinating the storm water program.

Permit Application and Notice of Intent

Phase II Rule encourages the development of a storm water management program by requiring a Notice of Intent (NOI) describing the storm water management program to be submitted to the NPDES permitting authority. The Notice of Intent becomes the permit application.

Cities required to permit under Phase II are allowed to cooperate and work together with neighboring cities in the application process. The permittee may join with a Phase I city or another Phase II city in applying for a permit. The individual MS4s may share responsibility for program development with neighboring communities and/or take advantage of existing local or state programs.

Permit Requirements

The chosen measurable goals, submitted in the Notice of Intent as a permit application, become the required storm water management program; however, the NPDES permitting authority can require changes in the mix of chosen BMPs and measurable goals if all or some of them are found to be inconsistent with the provisions of the Phase II Final Rule. Likewise, the permittee can change its mix of BMPs if it determines that the program is not as effective as it could be.

Reports

The permit requires that the city review the SWMP annually, report on our activities and make any updates that might be required. The annual reports should use the

form provided by the State. Generally, the annual report should include the following information:

- ✧ The status of compliance with permit conditions, including an assessment of the appropriateness of the selected BMPs and progress toward achieving the selected measurable goals for each minimum measure;
- ✧ Results of any information collected and analyzed, including monitoring data if any;
- ✧ A summary of the storm water activities planned for the next reporting cycle;
- ✧ A change in any identified BMP or measurable goals for any minimum measure; and
- ✧ Notice of relying on another governmental entity to satisfy some of the permit obligations (if applicable).

Record Keeping

Records required by the State must be kept for at least 5 years and made accessible to the public at reasonable times during regular business hours. Records need not be submitted to the State unless the Permittee is requested to do so.

Deadlines

The following deadlines are recognized as part of the program:

Date	Description
November 8, 2021	Update of the SWMP to be submitted to the State
November 8, 2021	Implementation of the 80 th Percentile Rainfall Event Retention Standard with associated LID requirements

Penalties

The NPDES permit that the operator of a regulated small MS4 is required to obtain is federally enforceable, thus subjecting the Permittee to potential enforcement actions and penalties by the NPDES permitting authority if the permittee does not fully comply with application or permit requirements. This federal enforceability also includes the right for interested parties to sue under citizen suit provision (section 405) of CWA.

This document contains a description of the community-specific Storm Water Management Program for Woods Cross City. The Program includes the following;

- ✧ Best Management Practices (BMPs) for each of the six minimum control measures;
 1. Public Education and Outreach
 2. Public Participation/Involvement
 3. Illicit Discharge Detection and Elimination
 4. Construction Site Runoff Control
 5. Post-Construction Runoff Control
 6. Pollution Prevention/Good Housekeeping
- ✧ Measurable goals for each minimum control measure (i.e., narrative or numeric standards used to gauge program effectiveness);
- ✧ Estimated months and years in which actions to implement each measure will be undertaken, including interim milestones and frequency; and
- ✧ The person or persons responsible for implementing or coordinating the storm water program.

This document also contains the following information and documentation in its appendices:

- ✧ Appendix A – Supplemental Guide to Storm Water Management for Contractors and Developers
- ✧ Appendix B – Supplemental Guide to Storm Water Management for Public Works Departments
- ✧ Appendix C – Standard Operating Procedures, Documentation and Elements of the Illicit Discharge Detection and Elimination program
- ✧ Appendix D – General program documentation including inspection forms, enforcement logs, training logs, annual reports, maintenance records, observation reports, and other general documentation
- ✧ Appendix E – Copies of the most current city ordinances applicable to stormwater

- ✧ Appendix F – Copies of State permits and documents regulating the Woods Cross City storm water program
- ✧ Appendix G – System maps and inventories
- ✧ Appendix H – LID Manual

WOODS CROSS CITY CHARACTERISTICS

General Information

The Woods Cross City Storm Drain System falls under the Public Works Department for the City. The Public Works Director can be contacted at the following address and phone number:

Sam Christiansen
 1555 S 800 W
 Woods Cross, Utah 84087
 (801) 292-4421

Some general information for Woods Cross City follows:

Population: 11,500

Size: 6 sq. miles

Geographic Description: 8 miles North of Salt Lake City. Located directly west of Bountiful with elevations varying between 4220 ft. to 4380 ft.

Receiving Waters: Most of Woods Cross drains into the A-1 drain, which empties into the Great Salt Lake. Some of the western portion of the city drains directly through wetlands and into the Great Salt Lake.

Annual Precipitation: 15.83 inches per year

Type of Community: A small semi-rural city with moderate rates of residential growth that are expected to continue for many years.

Latitude: 40.87° N

Longitude: 111.90° W

The Woods Cross storm water system consists of curb and gutters, inlet boxes, piping, a few typical open channel sections, swales and canals. Most storm water facilities drain through piping into A-1 Drain. The A-1 Drain drains to the northwest into the Great Salt Lake. There are a few detention basins that exist within the system. Many of

the streets use curb and gutter to collect storm water runoff with the remaining using swales or ditches. Most of the swales and ditches are located in the western parts of the city that have not yet been fully developed. The city is served by a sanitary sewer system that is treated by the South Davis Sewer Improvement District. The city has an ordinance requiring any new development within 300 feet of the existing sanitary sewer to connect. There are some existing septic tank systems in the city, but all new developments are required to connect to the public sanitary sewer system.

History

The historical development of Woods Cross is directly linked to water. Pioneer settlers in 1848 selected the area's rich bottom lands to establish their farms -- generations of fertile silt deposits from the overflowing channels of Mill Creek created some of the best farm land in the state. The mountain watersheds east of Woods Cross retained rain and melting snows until saturation sent runoff water into the boggy meadows and sloughs of the bottoms. Here some of the water was trapped and absorbed into underground aquifers preserving fresh water along the eastern edge of the Great Salt Lake.

Among the early settlers of the area was Daniel Wood, for whom Woods Cross is named. By 1855 he was the wealthiest man in Woods Cross with land, houses, and personal possessions worth nearly \$14,000. He built a school in 1854, a church in 1863, and in 1869 gave the lower portion of his rich farm gratis for a railroad depot and crossing--called Woods Crossing, then shortened to Woods Cross.

As the watersheds in Bountiful were cleared to build homes and the sloughs along the Jordan were drained for commercial and industrial development, runoff had no place to go. Woods Cross townspeople struggled to control and utilize this water effectively. They built wooden troughs and ditches along the foothills to channel the water where they wanted it to go and they installed drains in the bottoms to carry the excess to the lake. They also built holding ponds and underground cisterns to save the runoff until the residents had a need for it. Not until a federally funded water project in the 1980s built concrete containing walls, collecting basins, and lined ditches carry the overflow to the Great Salt Lake did the city's surface water problems disappear.

By 1970, Woods Cross had become the third fastest growing city in the state of Utah, reaching a population of 3,124--up from 1,098 in 1960. The population continued to grow at a rate of more than a thousand a decade, reaching 5,384 residents in 1990. The unprecedented growth alarmed the city. With support from local residents, city officials preserved their hard won water resources by keeping town boundaries tight. Woods Cross allowed more aggressive towns like Bountiful and North Salt Lake to annex shopping centers and industrial parks and to supply them with water.

Woods Cross and its population are visibly committed to their "rural way of life." The LDS chapel, the park, and the city hall form the hub of the town. Small local businesses and limited heavy industry ring the city. Subdivision housing separates the two. Local residents prefer the rural life-style and less complicated life of Woods Cross in comparison to city life in Salt Lake City or Bountiful. Many new residents have selected

Woods Cross as a place to raise their families. High-density housing and industrial complexes have consistently been defeated when proposed as developments for the city. Recent state and federal matching grants have enabled Woods Cross to mark its boundaries and welcome newcomers with evergreens and flowers.

This carefully controlled growth keeps over-crowding, high crime rates, traffic congestion, homeless transients, and bitter inter-city squabbles to a minimum. "Let's make every effort to keep our life-style" is and has been the political focus of both city officials and local residents.

Local Water Quality Concerns

The water quality within the city of Woods Cross is relatively good. None of the streams or waterways have been identified as protected under Section 303(d) of the Clean Water Act. The hope and intent of this Storm Water Management program (SWMP) is to maintain that status and possibly even improve the current water quality.

The storm water in Woods Cross City drains into the A-1 Drain, which in turn empties into the Great Salt Lake. At present the city hasn't encountered any major problems related to the storm drain system capacity, however there has been periodic localized flooding along the A-1 Drain in major precipitation events.

Like most communities along the Wasatch Front, some of the biggest concerns involve sediment loads (coming primarily from disturbed sites), fertilizers and pesticides coming from lawns and farmlands, and oils and grease coming from the roadways, salts and deicing materials coming from the roadways, and improper disposal of household chemicals and waste materials. Unlike some other communities Woods Cross has the additional concern of storm water runoff coming from industrial businesses within the community. There are also a number of car dealerships, the Auto Auction, and schools that have large impervious areas that can generate a lot of runoff and larger than normal amounts of oil and/or grease. The downtown area in Woods Cross has been well established for many years and contains large number of mature trees. Leaves coming from the trees create a minor problem during the Fall of the year. Woods Cross's SWMP has been geared toward small city applications, targeting the pollutants mentioned.

Steering Committee

A steering committee was formed in the fall of 2002 for the purpose of addressing the above mentioned water quality items and consider options to develop a storm water management program. The steering committee included several members from the community including City Staff, Contractors, and representatives from Commercial, Industrial and Institutional uses. This early committee was instrumental in the creation and establishment of the original 2002 SWMP. Currently, the Committee consists of Public Works Staff, City Administration and City Council (who represent the community at large). All drafts and changes will be presented at City Council meetings where these individuals may respond.

Mission Statement

One of the first functions of the Steering Committee was to develop a mission statement that can be utilized in directing and shaping the Storm Water Management Program. The committee suggested the following Mission Statement:

“Our mission is to improve the quality of life in Woods Cross City and within applicable affected areas by enhancing the water quality of storm water discharges.”

As discussion was held trying to understand the nature of the problems and how to accomplish the mission statement, it was determined that the first thing that needs to be done is educate the people. This program has been developed with a heavy emphasis on education and public involvement. It is anticipated that the effectiveness and participation levels in various programs will be greatly enhanced if the public is first made aware of the problems we face.

Ongoing Documentation Process

Much of the documentation is or will be included in Appendix D. As part of this update, the existing BMPs and measurable goals have been reviewed and assessed for their effectiveness and contribution in helping us achieve our desired results. We have completed evaluation worksheets to document our review and our assessment of our current program. These evaluation sheets are found in Appendix D. This evaluation combined with new permit requirements provided the foundation for this update. We have tried to build off of the positive things that have been accomplished and renewed our commitment to improve in areas where our program has been lacking. We feel the revised program is more focused.

Our plan is to document our activities and to keep better track of what is happening within our community. We will continue to use the forms, logs, evaluation forms and backup information from the last major update. In the coming months we will focus attention on updating city standards to meet the new retention requirements.

PUBLIC EDUCATION AND OUTREACH

Permit Requirements

The permit requirements for Public Education and Outreach on Storm Water Impacts can be found in Section 4.2.1 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. The MS4 shall promote behavior change by the public to reduce water quality impacts associated with pollutants in storm water runoff and illicit discharges. This is a multimedia approach targeted to specific audiences. The four audiences

are: (1) residents, (2) institutions, industrial and commercial facilities, (3) developers and contractors (construction), and (4) MS4 owned and operated facilities.

2. The MS4 shall identify target pollutants and pollutant sources and their potential impacts relating to storm water quality.
3. The MS4 shall provide and document information given to the four focus audiences.
4. The MS4 shall provide documentation or rationale as to why particular BMPs were chosen for its public education and outreach program.

Summary of Existing Efforts

Educational Materials

The city publishes a newsletter monthly.

City used Media

Woods Cross City has a website that is located at www.woodscross.com

Message Board

The city currently owns and maintains a message board in City Hall. The purpose of the board is to post announcements and items of general interest to the community.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs. Each BMP is cross referenced alphabetically by code in the indicated appendix to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness. Only those BMPs listed below will be utilized by Woods Cross City as part of their SWMP at the present time.

BMP	Code	Appendix
Classroom Education On Storm Water	CESW	B
Educational Materials	EM	B
Employee Training	ET	B
Public Education/ Participation	PEP	B
+Using Media	UM	B

Goals

In order to more fully realize the benefits of the BMPs the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Education and Outreach.

The following table includes the goals for MCM 1.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)					
1	Selected pollutants	Residents and Businesses	4.2.1.1 To educate audiences about impacts from storm water discharge	Media developed by by Davis County Storm Water Coalition	Ongoing	PEP and UM	Ads continue to run
1	Selected pollutants	Residents (4th graders)	4.2.1.1 To educate audiences on ways to avoid, minimize, and reduce impacts of storm water discharge	Continue Davis County water fair annually	Annually	PEP and CESW	Fair occurs annually
1	Selected pollutants	Residents and Businesses	4.2.1.1 To educate audiences on actions individuals can take to improve water quality	Media developed by by Davis County Storm Water Coalition	Ongoing	PEP and UM	Ads continue to run
1	See list in "desired result" column	General Public	4.2.1.2 Information is provided to target audience on prohibitions against illicit discharges and improper disposal of waste including: maintenance of septic systems; effects of outdoor activities, such as lawn care; benefits of on-site infiltration of storm water; effects of automotive work and car washing on water quality; proper disposal of swimming pool water; and propert management of pet wastes.	Include information on the website and include information in utility bills or city newsletter.	Ongoing	PEP and UM	Information is current on website and included in utility bills or city newsletter.

1	See list in "desired result" column	Business and Institutions	4.2.1.3 Information is provided to target audience on prohibitions against illicit discharges and improper disposal of waste including: Proper lawn maintenance Benefits of appropriate on-site infiltration of storm water Building and equipment maintenance Use of salt or other deicing materials Proper storage of materials Proper management of waste materials and dumpsters Proper management of parking lot surfaces.	Include information on the website and produce and distribute a brochure that is targeted to specific types of businesses.	Ongoing	PEP and UM	Information is current on website and included and brochures are distributed.
1	Illicit discharge and waste	Contractors, Developers, and plan review staff	4.2.1.4 Reduce adverse impacts from development sites	Assemble packets of information on SWPPP and BMPs that the contractor must read and sign.	Update by Jan. 2023	EM	Information packets are signed for every new development.
1	Illicit discharge and waste	Employees	4.2.1.5 Information is provided to target audience on prohibitions against illicit discharges and improper disposal of waste including: Equipment inspection to ensure timely maintenance Benefits of appropriate on-site infiltration of storm water Minimization of use of salt or other deicing materials Proper storage of industrial materials Proper management of waste materials and dumpsters Proper management of parking lot surfaces.	Have annual training on illicit discharges.	Ongoing	ET	Trainings continue ongoing

1	All pollutants	Permittee engineers, development and plan review staff, land use planners	4.2.1.6 Training on LID, Green Infrastructure, and post construction BMPs	Require an annual meeting with all engineers, development and plan review staff, and land use planners to review the city's LID goals. Discuss what has been done in the past year to meet the goals, and define the upcoming year's goals.	Annually - Ongoing		Annual meeting occurs
1	All pollutants	All Audiences	4.2.1.7 Evaluate the effectiveness of the public education program by a defined method.	Research evaluation methods and select the best one (Annually January). Implement the selected evaluation method (Annually Jan)	Annually-Ongoing		Evaluation method chosen (2011) and implemented (2012)
1	All pollutants	All Audiences	4.2.1.8 Document why certain BMPs were chosen for public education program (over others)	Include an explanation in the SWMP.	December 31, 2022		Documented rationale included in the SWMP.

PUBLIC PARTICIPATION / INVOLVEMENT

Permit Requirements

The permit requirements for Public Participation and Involvement on Storm Water Impacts can be found in Section 4.2.2 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Comply with applicable State, and local public notice requirements to involve interest groups and stakeholders for their input on the SWMP.
2. Make available to the public a current version of the SWMP document for review and input for the life of the permit. This should be posted on the City's website. A specific contact person and phone number or email address shall be identified for those wishing to comment.

Summary of Existing Efforts

Steering Committee

A "Storm Water Steering Committee" consisting of city members was formed in October of 2002 and has taken an active role in selecting the BMPs and developing the initial SWMP for the city.

Storm Drain Labeling Program

The city has labeled all storm water basins utilizing volunteer groups to place the stencils. To date approximately 1/2 of the community has been labeled. Information flyers were also distributed in the neighborhoods where labeling was completed.

Used Oil Recycling

There are several locations within the city boundaries where used oils can be brought for recycling. City website will be updated with these locations.

Waste Collection

Twice a year in the spring and fall the city conducts a general cleanup and a green waste cleanup. Residents can bring their waste to the City Shops for the city to dispose of.

Service Groups

There are local scout and church groups that have participated in street cleanup and litter reduction.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Public Education/ Participation	PEP	B

Goals

In order to more fully realize the benefits of the BMPs the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Public Involvement and Participation.

The following table summarizes the goals for MCM 2.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)					
2	All pollutants	General public	4.2.2.1 Have a program or policy in place that allows for the public to provide input	Notify the public at least a week in advance of the city council meeting when the SWMP update will be reviewed.	By December 15 2021	PEP	The program or policy is in place
2	All pollutants	General public	4.2.2.2 Have SWMP document available for public review before it's submitted to the state	Have a hard copy of the draft of the permit available at the city offices within a week of the public hearing	By Dec 15, 2021	PEP	SWMP document is available for public review a week before public hearing
2	All pollutants	General public	4.2.2.3 Have SWMP document available to the public at all times	Post the SWMP on the website	Ongoing	PEP	SWMP is updated and posted on the website
2	All pollutants	General public	4.2.2.3 Make updated SWMP document available to the public annually	Post updated SWMP annually	Ongoing	PEP	SWMP is updated and posted on the website annually
2	All pollutants	General public	Continue current public involvement practices	Have spring and fall clean up days, Annual day of service	Ongoing	PEP	The public participates in the programs

ILLICIT DISCHARGE DETECTION AND ELIMINATION

Permit Requirements

The permit requirements for Illicit Discharge Detection and Elimination on Storm Water Impacts can be found in Section 4.2.3 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Maintain a storm sewer system map of the MS4, showing the location of all outfalls and the names and location of all State waters that receive discharges from those outfalls.
2. Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, or local law) on non-storm water discharges into the MS4, and appropriate enforcement procedures and actions.
3. Develop and implement a plan to detect and address non-storm water discharges, including spills, illicit connections, and illegal dumping to the MS4. The plan should include:
 - a. Procedures for locating and listing priority areas likely to have illicit discharges
 - b. Annual field inspections of priority areas
 - c. Dry weather screening
 - d. Reporting of businesses that may require a separate industrial permit.
4. Develop and implement standard operating procedures (SOPs) for:
 - a. tracing the source of an illicit discharge.
 - b. characterizing the nature of, and the potential public or environmental threat posed by, any illicit discharges found or reported.
 - c. ceasing the illicit discharge, including notification of appropriate authorities, property owners, and technical assistance for removing the source and follow-up inspections.
5. Inform public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste.
6. Promote or provide services for the collection of household hazardous waste.
7. Publicly list and publicize a hotline or other local number for public reporting of spills and other illicit discharges.
8. Develop a written spill/dumping response procedure, and a flowchart for internal use, including various responsible agencies and their contacts.
9. Adopt and implement procedures for program evaluation and assessment.

10. Train employees, at a minimum, annually on the IDDE program.

Summary of Existing Efforts

Ordinances

Woods Cross City has an ordinance designed to specifically prohibit illicit discharges to the storm sewer system.

Illicit Spills

Currently, reports of spills are responded to by Woods Cross City and enforced by the Davis County Health Department.

Illicit Connections

The City has not generally experienced problems with individuals or businesses illicitly connecting their sanitary waste water piping to storm drains. More-common types of illicit discharges include natural runoff from sites where former industrial businesses once stood, spills from highway accidents, concrete truck wash out water, residential yard waste and debris being washed into the gutters, and carpet cleaner waste. There are several refineries and other industrial businesses in town that are regulated directly by the state. These businesses are a concern.

Mapping

The city has a fairly comprehensive, GPS based, storm drain map showing the storm drain system and its points of discharge. A copy of this map is included in Appendix G.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Community Hotline	CH	B,C
Employee Training	ET	B,C
Hazardous Waste Management	HWM	B,C
Illegal Dumping Control	IDC	B,C
Identify Illicit Connections	IIC	B,C
Illegal Solids Dumping Controls	ISDC	B,C
Map Storm Water Drains	MSWD	B,C
Non-Storm Water Discharge to Drains	NSWD	B,C
Ordinance Development	OD	B,C
Public Education/ Participation	PEP	B,C
Used Oil Recycling	UOR	B,C

Goals

In order to more fully realize the benefits of the BMPs the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Illicit Discharge Detection and Elimination.

The following table includes the goals for MCM 3.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone Date	Associate BMPs	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)					
3	All Pollutants	Contractors, Developers, City Council	4.2.3 Enforcement ability for storm water rules	Review and update the ordinance to conform with new permit	Jan-22		If ordinance is in place and meets the permit requirements
3	N/A	Public Works	4.2.3.1 Maintain Storm Water Map	Update map with every development	Ongoing		If policy is in place and meets the permit requirements
3	All Pollutants	All Audiences	4.2.3.2 Effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges to the MS4.	Keep ordinance current	Ongoing		
3	All Pollutants	All Audiences	4.2.3.3 Implement a written plan to detect and address non-storm water discharges to the MS4	Develop IDDE priority area	Mar-22		
3	All Pollutants	All Audiences	4.3.3.3.2 Field inspections of areas which are considered a priority area	Conduct annual inspections of priority areas	Jun-22		Successful if inspections are completed
3	All Pollutants	All Audiences	4.2.3.3.3 Dry weather screening activities for the purpose of verifying outfall locations and detecting illicit discharges	Do Dry weather screening 20% of all outfalls each year	1 July of each year		Successful if all screenings are done
3	All Pollutants	All Audiences	4.2.3.4 Implement standard operating procedures for tracing the source of illicit discharges	Refresh employees on incident response procedures and flow chart	Ongoing		Successful if training is completed annually for all staff involved in incident reporting.
3	"	"	4.2.3.5 Implement SOPs for characterizing the nature of illicit discharges and the potential public or environmental threat posed by them	Review flow chart and SOP with staff and provide training annually.	Ongoing		Successful if training is completed annually for all staff involved in incident reporting.
3	All Pollutants	All Audiences	4.2.3.6 Develop and implement standard operating procedures for ceasing the illicit discharge	Respond to all illicit discharges in accordance with flow chart and SOP	Ongoing		

1	All Pollutants	Public Employees, Businesses and Residents	4.2.3.7 Inform public employees, businesses, and general public of hazards associated with illicit discharges and improper disposal of waste	See MCM 1			See MCM 1
3	Household Hazardous Waste	Residents	4.2.3.8 Promote or provide services for the collection of household hazardous waste	Put the HHW Address and Phone number on City Web Site	Ongoing		Successful if complete by that date
3	Household Hazardous Waste	Residents	4.2.3.9 Publicly list and publicize a hotline or other telephone number for public reporting of spills and other illicit discharges	Put the HHW Address and Phone number on City Web Site	Ongoing		Successful if complete by that date
3	All Pollutants	All Audiences	4.2.3.10 Adopt and implement procedures for program evaluation and assessment. Include a database for mapping, tracking of the spills or illicit discharges identified and inspections conducted	Keep database current	Ongoing		Successful if complete by that date

CONSTRUCTION SITE RUNOFF CONTROL

Permit Requirements

The permit requirements for Construction Site Runoff Control on Storm Water Impacts can be found in Section 4.2.4 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements

1. Have an ordinance or other regulatory mechanism requiring the implementation of proper erosion and sediment control practices on construction sites. This will include a requirement for a Storm Water Pollution Prevention Plan (SWPPP) and enforcement provisions.
 - a. Ensure construction operators obtain and maintain UPDES Construction Permit coverage for the duration of the project.
2. Develop a written enforcement strategy including
 - a. Standard Operating Procedures (SOPs) for enforcing processes and sanctions on construction sites with escalating enforcement.
 - b. Document and track all enforcement actions
3. Develop and implement SOPs for preconstruction SWPPP review. Include the following:
 - a. A preconstruction conference to review plans and requirements
 - b. Procedures for consideration of potential water quality impacts using a checklist
 - c. Identifying priority construction sites
4. Develop and implement SOPs for construction site inspections and enforcement including:
 - a. Inspecting sites monthly
 - b. Inspecting all phases of construction
 - c. Procedures for Notice of Termination and final inspections
 - d. Inspecting priority areas every two weeks
 - e. Follow up on inspection action items
5. Train staff to implement the construction storm water program, including permitting, plan review, construction site inspections, and enforcement.
6. Establish procedures to maintain records of all projects disturbing greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development.

Summary of Existing Efforts

City Ordinances

The City currently has an ordinance that requires a storm water construction activity permit for construction activities. The application for this permit requires a completed Storm Water Pollution Prevention Plan (SWPPP).

Site Plan Review Process

The City currently has a procedure requiring the submittal of construction drawings prior to approving a new development. This process does not specifically require water quality impacts to be considered.

Inspectors

The City has two RSI registered inspectors who conduct monthly/Bi-weekly SWPPP inspections.

Standard Drawings and Specifications

The city has a set of standard drawings and specifications for subdivision site development.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix .

BMP	Code	Appendix
Certification and Inspector Training	CCIT	A,B
Erosion Control Plan	ECP	A,B
Landscape and Irrigation Plan	LIP	A,B
Ordinance Development	OD	A,B
Zoning	ZO	A,B

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Construction Site Runoff Control.

The following table includes the goals for MCM 4.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.1.1 Ordinance shall require construction operators to prepare a SWPPP and apply sediment and erosion control BMPs as necessary	Require a SWPPP for every construction site over one acre	Ongoing	OD	Successful if 95% of all active construction sites have a working SWPPP
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.2 Develop a written enforcement strategy and implement the enforcement provisions of the ordinance or other regulatory mechanism	Maintain ordinance and keep it current	Ongoing	OD	
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.3 Develop and implement SOP's for pre-construction SWPPP review for construction sites	Use checklist to do preconstruction reviews of SWPPP	Ongoing	ECP	Successful if we are conducting SWPPP reviews
4	"	"	4.2.4.3.1 Conduct a pre-construction meeting	Hold Pre-con meetings on all sites greater than 1 acre or as part of common plan of development	Immediately		Successful if we are conducting Pre-con meetings
4	"	"	4.2.4.3.2 Identify priority construction sites considering important factors	Have a list of priority construction sites	Ongoing	ZO	Successful if priority list exists
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.4.1 Inspections of all new construction sites ... at least monthly by qualified personnel	Conduct monthly inspections of all construction sites	Ongoing	CCIT	Successful if 90% of all active construction sites are inspected monthly

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.4.2 The Permittee must inspect all phases of construction	Conduct inspections before construction begins, during construction and as construction is completed	Ongoing		
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.4.3 Inspection by the MS4 of priority construction sites must be conducted at least biweekly	Inspect priority areas twice a month	Ongoing		Successful if 90% of all priority construction sites are inspected twice a month
4	Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers	4.2.4.4.5 Based on site inspection findings, the Permittee must take all necessary follow-up actions	Follow-up on all deficiencies reported in the inspections	Ongoing		
4	"	Contractors, developers and MS4 staff	4.2.4.5 The Permittee must ensure that all staff whose primary job duties are related to implementing the construction storm water program, including permitting, plan review, construction site inspections, and enforcement, are annually trained	Have all staff conduction reviews and inspections qualified and trained	Ongoing	CCIT	
4	"	Contractors, developers and MS4 staff	4.2.4.6 All Permittees shall maintain records of all project disturbing greater than or equal to one acre for five years	Keep records of all reviews, inspections and enforcement actions for at least five years	Ongoing		

POST CONSTRUCTION RUNOFF CONTROL

Permit Requirements

The permit requirements for Post-Construction Runoff Control on Storm Water Impacts can be found in Section 4.2.5 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements

1. Have an ordinance or other regulatory mechanism requiring the implementation of long-term post-construction storm water controls at new and redevelopment sites.
2. Develop an enforcement strategy and implement enforcement provisions of the ordinance including escalating enforcement for recalcitrant violators.
3. Develop requirements or standards for new development and redevelopment projects to include storm water controls or management practices that will prevent or minimize impacts to water quality, including:
 - a. Non-structural BMPs
 - b. Structural BMPs that focus on Low Impact Development which encourages infiltration, evapotranspiration or harvesting.
 - c. If LID is not feasible document why and provide the rationale for alternative controls to be used
 - d. Develop a retrofit plan for existing developed sites that are adversely impacting water quality.
4. Define specific hydrologic method for calculating runoff and flow rates to be used to size structural BMPs and facilitate plan review. These methods shall include:
 - a. Requirements to prevent the off-site discharge of the precipitation from all rainfall events less than or equal to the 80th percentile rainfall event.
 - b. If retaining this event is infeasible, document why and provide alternative design criteria.
5. Adopt and implement procedures for site plan review which incorporate consideration of water quality impacts These procedures shall include:
 - a. Reviewing plans to ensure that they include long-term storm water management measures that meet the requirements
 - b. Providing developers and contractors with preferred design specifications to more effectively treat storm water
6. Develop, adopt and implement Standard Operating Procedures (SOPs) for site inspection and enforcement of post-construction storm water control measures. These procedures must ensure adequate ongoing long-term operation and maintenance by including:
 - a. A requirement for annual inspections of all long-term BMPs

- b. Maintenance agreements addressing maintenance requirements for any control measures
 - c. Allowing the MS4 to conduct oversight inspections
 - d. Inspection of long-term BMPs during construction to ensure they get constructed properly
7. Provide adequate training for staff concerning post-construction storm water management, plan review, inspections and enforcement.
 8. Maintain an inventory of all post-construction structural storm water control measures. This includes public and private facilities.

Summary of Existing Efforts

Ordinances

The City has an ordinance allowing a maximum storm water discharge rate for new development. No other ordinances currently address runoff from construction sites or new development.

Landscaping Plans

Developers are required to present a plan outlining landscaping plans to the city.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
BMP Inspection and Maintenance	BMPIM	A,B
Educational Materials	EM	A,B
Infrastructure Planning	IPL	A,B
Landscape and Irrigation Plan	LIP	A,B
Ordinance Development	OD	A,B
Additional LID BMPs will be added based on LID Handbook development.		

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Post Construction Runoff Control.

The following table includes the goals for MCM 5.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5	All Pollutants	All Audiences	4.2.5.1.1 The Permittee's new development/redevelopment program should include non-structural BMPs.	Adopt LID Manual that includes non-structural BMPs	Jan-22		
5	"	"	4.2.5.1.2 – New development projects must manage rainfall on-site, and prevent the off-site discharge of the precipitation from all rainfall events less than or equal to the 80th percentile rainfall event.	Draft new storm water LID handbook that includes requirements to retain the 80th percentile storm or approved alternative design criteria	Jan-22		If new handbook is in place
5	"	"	4.2.5.1.2 - Redevelopment projects must provide a site-specific and project specific plan aimed at net gain to onsite retention or a reduction in impervious surface to provide similar water quality benefits	Implement a policy of no net gain to runoff from redevelopment projects	Jan-22		If policy has been adopted

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5	"	"	4.2.5.1.3 The program shall include a process which requires the evaluation of a Low Impact Development approach for all new development projects. Permittees must allow for use of a minimum of five LID practices from the list in Appendix C of the State's "A Guide to Low Impact Development Within Utah"	Adopt at least 5 of the LID practices in the State's manual			If there are standard details for at least 5 practices in the city's standards
5	"	"	4.2.5.1.4 Feasibility. If meeting the retention standards described in Part 4.2.5.1.2 is infeasible, a rationale shall be provided for the use of alternative design criteria. Th new or redevelopment project must document and quantify that infiltration, evapotranspiration, and reaiwater harvesting have been used to the maximum extent feasible and that full employment of these controls are infeasible due to constraints.	Adopt the use of a Water Quality Report providing the justification for the methods being employed and explaining how the Water Quality Volume is being handled.			If a Water Quality Report is required

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5	All Pollutants	All Audiences	4.2.5.2. Develop and adopt an ordinance or other regulatory mechanism that requires long-term post-construction storm water controls at new development and redevelopment sites.	Review existing ordinance to determine if it meets requirements of new permit, record them with county, and add them to GIS database	Ongoing - Annually	OD	If review is complete
5	"	"	"	Draft ordinance revisions	Jan-22	OD	If draft is complete and ready for others to review
5	"	"	"	Adopt updated ordinance	Feb-22	OD	If ordinance has been passed
5	"	"	4.2.5.2.2 Documentation on how the requirements of the ordinance or other regulatory mechanism will protect water quality and reduce the discharge of pollutants to the MS4.	Adopt a Water Quality Report to document: how long-term BMPs were selected, pollutant removal expected from the BMP and technical basis supporting performance claims	Dec-22	IPL	If draft is completed by the milestone date
5	"	"	4.2.5.2.3 Require private property owner/operators or qualified third parties to conduct maintenance and provide annual certification that adequate maintenance has been performed on long term water quality facilities	Require maintenance agreements on all privately owned water quality facilities	Dec-21		

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5	"	"	4.2.5.2.4 - Permanent structural BMPs shall be inspected at least once during installation by qualified personnel.	Inspect all permanent facilities at least once during construction			Include a column on the inventory of long term BMPs for construction inspections. Track inspections using the inventory
5	"	"	4.2.5.2.5 Inspections and any necessary maintenance must be conducted at least every other year or as necessary to maintain functionality of the control by the Permittee, or, if applicable, the property owner/operator.	Provide a column on the permanent BMP inventory to track the last inspection.			
5	"	"	"	Set up a schedule for inspections every other year			
5	"	MS4 Staff, Contractors and Developers	4.2.5.3.1 Adopt and implement procedures for site plan review which evaluate water quality impacts. The procedures shall apply through the life of the project from conceptual design to project closeout.	Discuss water quality requirements at all meetings with Developers. Add water quality requirements to all Developer handout materials			

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5	"	MS4 Staff, Contractors and Developers	4.2.5.3.2 Review post-construction plans for, at a minimum, all new development and redevelopment sites to ensure that the plans include long-term storm water management measures that meet the requirements of this minimum control measure.	Add long-term storm water management measures to all review checklists			
5	"	MS4 Staff	4.2.5.4 The Permittee must maintain an inventory of all post-construction structural storm water control measures installed and implemented at new development and redevelopment sites. This inventory must include both public and private sector sites that were developed since the Permittee obtained coverage by this permit or the date that post construction requirements came into effect.	Inventory log updated annually	Ongoing		If log is updated
5	"	MS4 staff	4.2.5.5. Permittees shall provide adequate training for all staff involved in post-construction storm water management, planning and review, and inspections and enforcement.	Schedule and conduct training for appropriate personnel	Annually	BMPIM	If all appropriate personnel are trained

POLLUTION PREVENTION / GOOD HOUSEKEEPING

Permit Requirements

The permit requirements for Pollution Prevention and Good Housekeeping on Storm Water Impacts can be found in Section 4.2.6 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements

1. Develop and implement an operation and maintenance program for city-owned or operated facilities.
2. Maintain an inventory of city-owned or operated facilities and storm water controls. Assess said list for their potential to discharge typical urban pollutants to the storm water system.
3. Identify 'high-priority' facilities or operations that have a high potential to generate storm water pollutants. Included with Standard Operating Procedures (SOPs) specific to municipal operations. The SOPs shall include appropriate pollution prevention and good housekeeping procedures for all of the following types of facilities and/or activities listed below:
 - a. Buildings and facilities
 - b. Material storage areas, heavy equipment storage areas and maintenance areas
 - c. Parks and open spaces
 - d. Vehicle and equipment
 - e. Roads, highways, and parking lots
 - f. Storm water collection and conveyance system
 - g. Other facilities and operations (those not listed, but would reasonably be expected to discharge contaminated runoff)
4. Develop and implement a SWPPP for all "high priority" facilities
5. Conduct inspections of "high priority" facilities
 - a. Weekly visual inspections
 - b. Quarterly comprehensive inspections
 - c. Quarterly visual observation of storm water discharges
6. Develop and implement SOPs for the following types of facilities and/or activities
 - a. Buildings and facilities
 - b. Material and equipment storage areas
 - c. Parks and open space
 - d. Vehicles and equipment
 - e. Roads, highways and parking lots
 - f. Storm water collection and conveyance systems
 - g. Other facilities and operations

7. If a third-party is to conduct municipal maintenance or private developments conduct their own maintenance, the contractor shall be held to the same standard as the City. This should be outlined and defined in contracts.
8. Develop and implement a process to assess the water quality impacts in the design of all new flood management structural controls that are associated with the MS4.
9. City construction projects shall comply with the requirements applied to private projects.
10. Include annual employee training on how to incorporate pollution prevention and good housekeeping techniques into municipal operations, including SOPs.

Summary of Existing Efforts

Existing Maintenance Program

The City currently maintains inlet boxes and other MS4 improvements on an as-needed basis. Streets are also swept as-needed.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Woods Cross City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Employee Training	ET	A,B
Housekeeping Practices	HP	A,B
Infrastructure Planning	IPL	A,B

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Pollution Prevention/Good Housekeeping.

The following table includes the goals for MCM 6.

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6	All Pollutants	MS4 Staff	4.2.6.1. Permittees shall develop and keep current a written inventory of Permittee-owned or operated facilities	Complete listing of MS4 owned/operated facilities	Ongoing	HP	If list is current at the time of the annual report
6	"	"	4.2.6.2 All permittees shall assess the written inventory of Permittee-owned or operated facilities, operations and storm water controls for their potential to discharge to storm water typical urban pollutants	Complete assessments and identify "high priority" facilities	Ongoing	HP	If assessments are completed and documentation recorded in SWMP
6	"	"	4.2.6.4 The permittee shall update the SWMP to include a list of "high priority" facilities and prepare a SWPPP for each facility.	After re-evaluation create a "high priority" list		HP	If list is prepared
6	"	"	4.2.6.4 ... prepare a Storm Water Pollution Prevention Plan (SWPPP) for each "high priority" facility	Prepare a SWPPP for each "high priority" facility	Dec. 31, 2022		If SWPPPs are prepared
6	"	"	4.2.6.5.1 Monthly visual inspections: The Permittee must perform weekly visual inspections of "high priority" facilities in accordance with the developed SOPs to minimize the potential for pollutant discharge.	6.2 Conduct monthly inspections	Ongoing	HP	If at annual review all weekly inspections are logged and reports completed

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6	"	"	4.2.6.5.2 Semi-Annual comprehensive inspections: At least once per quarter, a comprehensive inspection of "high priority" facilities, including all storm water controls, must be performed	6.3 Conduct semi-annual comprehensive inspections	Ongoing	HP	If at annual review all quarterly inspections are logged and reports completed
6	"	"	4.2.6.5.3 Annual visual observation of storm water discharges: At least once per quarter, the Permittee must visually observe the quality of the storm water discharges from the "high priority" facilities	6.4 Conduct annual visual observations of storm water discharges at high priority facilities	Ongoing	HP	If at annual review all quarterly visual monitoring is completed and logged and reports completed
6	"	"	"	Conduct quarterly comprehensive inspections	Ongoing	HP	If at annual review all quarterly inspections are logged and reports completed
6	"	"	4.2.6.6.3 Quarterly visual observation of storm water discharges: At least once per quarter, the Permittee must visually observe the quality of the storm water discharges from the "high priority" facilities	Conduct quarterly visual observations of storm water discharges at high priority facilities	Ongoing	HP	If at annual review all quarterly visual monitoring is completed and logged and reports completed

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6	"	"	4.2.6.6. Permittees shall develop and implement SOPs to protect water quality at each of the facilities owned or operated by the Permittee and/or activities conducted by the permittee	Review and/or update appropriate SOPs for facilities	January 1 Annually	HP	If SOPs are updated and current by milestone date
6	"	"	4.2.6.6.5 The Permittee shall develop a spill prevention plan in coordination with the local fire department	Prepare a spill prevention plan		HP	If spill prevention plan is in writing
6	"	"	4.2.6.6.6 All Permittees must maintain an inventory of all floor drains inside all Permittee-owned or operated buildings.	Inventory floor drains		HP	If there is a written inventory
6	"	"	4.2.6.7 The Permittee shall be responsible for ensuring, through contractually-required documentation and/or periodic site visits that contractors performing Operation and Maintenance activities for the Permittee are using appropriate storm water controls	Review standard contractor/vendor contract language to include water quality concerns			

**General Permit for Discharges from Small Municipal
Separate Storm Sewer Systems (MS4s)
Measurable Goals**

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6	"	MS4 Staff, Contractors and Developers	4.2.6.8. The Permittee must develop and implement a process to assess the water quality impacts in the design of all new flood management structural controls that are associated with the Permittee or that discharge to the MS4.	Draft a policy/process to assess water quality impacts on all new flood control projects	Jan. 2022	IPL	To be included in LID Handbook
6	"	"	"	Enforce policy	Ongoing	IPL	If policy is approved and adopted by milestone date
6	"	MS4 staff	4.2.6.8.1 Existing flood management structural controls must be assessed to determine whether changes or additions should be made to improve water quality.	Identify places where existing infrastructure needs to be modified to improve water quality			
6	"	"	4.2.6.9 The Permittee must develop a plan to retrofit existing developed sites that the Permittee owns or operates that are adversely impacting water quality.	Develop and implement a plan to retrofit those existing locations that need to be improved			Provide column on City-owned or operated facilities inventory to mark those adversely impacting water quality