Recertification Notice of Intent (NOI)

Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000

You must **complete, certify, and sign this Recertification Notice of Intent (NOI) form** and return it along with the **updated Stormwater Management Program (SWMP)** to the Department in order to continue permit coverage under the General Permit ARR040000. You must submit this form **no later than July 1, 2019.** Please keep a copy of this form for your records once completed and signed.

Permittee Name	Permit Tracking Number	AFIN
City of Mountain Home	ARR040063	88-01563

If any changes or additions need to be made to the information shown below, please update the new information in the corrections section below and/or attach documentation.

	Current Information in ADEQ's database	Corrections/Additions, If Needed
Small MS4 Physical Address	720 South Hickory	
County	Baxter	
Urbanized/Core Areas	Mountain Home	
Receiving Stream	Hicks Creek	
Ultimate Receiving Stream	White River	
Contact Person & Title	Greg Ifland, Building Department Director	Arnold Knox - Street Department Director
Telephone Number	(870) 425-4708	
Cognizant Official & Title	Hillrey D. Adams, Mayor	
Responsible Official & Title	Hillrey D. Adams, Mayor	

Are the mailing and invoice addresses the same?

(Yes) or No* *If "No," please provide invoice address: _____

_____

_____

Additional Comments: _____

_____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I certify that I have read and will comply with all the requirements of the Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000.

Responsible Official Name: Hillrey Adams
Responsible Official Title: Mayor
Responsible Official Signature: Hillrey Adams
Date: 6/5/19

Return the NOI form to the address below or send it electronically to: water.permit.application@adeq.state.ar.us or via ePortal at the following web address: https://eportal.adeq.state.ar.us/

NPDES Permits Section, Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

City of Mountain Home
Arkansas

Stormwater Management Plan

October 2016
Revised September 2018
Revised October 2018
Revised November 2018
Revised June 2019

Background and Context

The City of Mountain Home Stormwater Management Plan (Plan) has been developed to provide policy and management guidance for activities affecting stormwater throughout the City of Mountain Home. This plan is intended to assist in fulfilling State and Federal water quality requirements. Implementation of these policies and best management practices is intended to help protect the quality of stormwater that is discharged to local streams and waterways, and to develop and preserve the storm drainage infrastructure of the City of Mountain Home (City).

Purpose

The purpose of the Plan is to describe the City's stormwater drainage system, including both the open and piped systems, their connections to the streams, and the overall condition of the system. This description will provide baseline information used to develop focused stormwater management strategies. Furthermore, the plan will define the goals, policies, and best management practices necessary to achieve the City's long term objectives and to meet State and Federal regulatory requirements in a way that is understandable to the public and usable by the City's staff. The plan establishes a means for measuring, reporting, and managing the City's water resources by presenting benchmarks that will ensure meaningful progress, as well as ensuring compliance with applicable laws and permit requirements.

This document is a compilation of programs, ordinances, regulations, procedures and information that will now be used as the guidance document for the City's Stormwater Management Program (SWMP) as required under the Regulated Small MS4 General Permit. Due to the nature of assembling material such as this, redundancy and ambiguity may exist within this document. If any part of this document is unclear, please contact the City of Mountain Home for clarification at 870-425-2550. This document or portions within may be modified when necessary.

Description of Permit Area

The City currently serves a population of 12,488 people within its borders as of the 2010 Census. The geographic boundaries of the MS4 Plan are the city limits encompasses approximately 23 square miles. The City has authority and responsibility for planning, building, operating, maintaining and regulating the stormwater drainage systems within the city limits. This area includes the upper portions of Dodd Creek, Hicks Creek, and Indian Creek and their tributaries. The City's stormwater management practices will include cost-effective and efficient methods that will reduce or eliminate stormwater pollution and protect the riparian areas of these open waterways.

Overview of Mountain Home's Stormwater Drainage Systems

Stormwater in the City of Mountain Home drains towards various tributaries throughout the Dodd Creek and Indian Creek watersheds. Both Dodd Creek and Indian Creek drain into the White River. Approximately 60% of the City's neighborhoods are drained by road side ditches, with the remainder drained by curbed and guttered streets with underground drainage systems. Periodic clearing of brush and debris from the City's open storm drains is conducted by the City's Street Department Maintenance Crew.

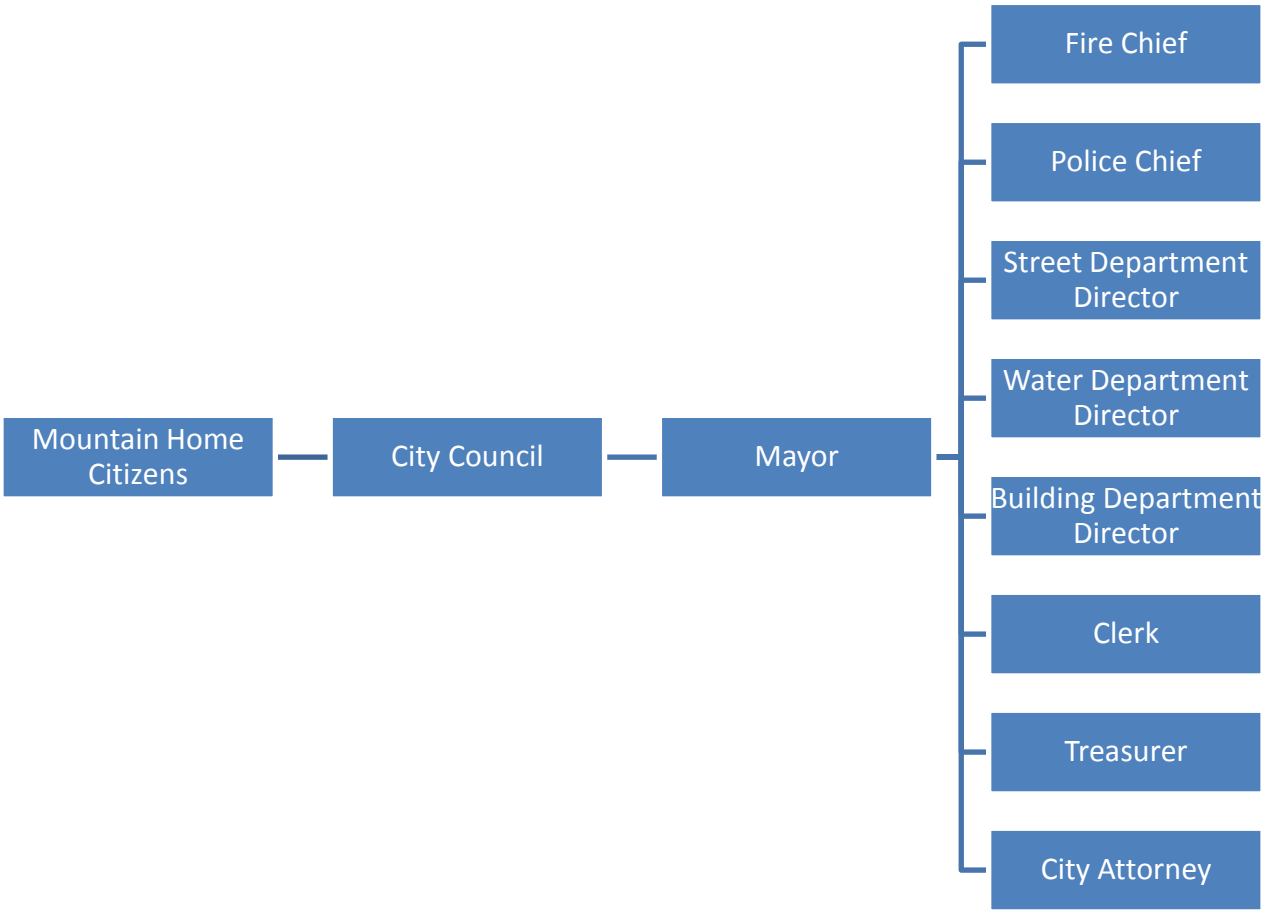
Area of Focus

The Stormwater Plan addresses stormwater quality management policies and management practices that are, and/or will be implemented in the City. The scope of the Plan is determined primarily by the Federal MS4 Permit requirements, but addresses local water resource issues as well. These areas of focus in the Stormwater Plan include:

- *Pollution incidents and unlawful (illicit) discharges to the City's stormwater drainage system.* These discharges can be recurring or occasional discharges, and include pollutant runoff from parking lots, discharges from industrial outfalls, accidental spills, poor construction site management, and incorrect dumping practices into street gutters or catch basins by City residents.
- *On-Site management of stormwater to reduce the quantity of stormwater and pollution entering the drainage system.* Similar to illicit discharges, events that cause flooding, system surcharges, or ongoing pollutant loading can originate from a variety of causes. These include inadequacies in the type and design of infrastructure, inadequate maintenance, insufficient erosion and/or sediment control practices, and increases in impervious area without provision for on-site retention and infiltration of stormwater into the ground. The City regulates these issues through implementation of various Codes and Ordinances including, but not limited to, the Municipal Code, Subdivision Regulations, and the Flood Damage Prevention Code within the City's jurisdictional boundaries.
- *Reduction and prevention of pollution at City facilities and resulting from City activities and business practices.* The City provides services with a potential for creating water pollution, erosion, and sedimentation. These include activities such as road construction, sewer and water line repair and replacement, ditch cleaning and maintenance activities, as well as activities at City facilities, such as vehicle washing and maintenance. The Federal NPDES Stormwater Program requires the City to implement pollution prevention practices that reduce or eliminate stormwater pollution from City activities and regulate the activities of businesses and residents to the extent allowable by law. As the regulatory entity, it is imperative that the City lead by example in areas where similar practices and behaviors from residents and businesses are required.

- *Public education geared toward broad community stewardship of water resources.* The Federal NPDES Stormwater Program places significant emphasis on public education as part of the long-term solution to stormwater pollution. As such, public outreach and education are required elements of the Stormwater Plan. The long-term success of the City's efforts will hinge on increased awareness and stewardship throughout the community. The Stormwater Plan will result in formal educational outreach efforts that are targeted at a broad audience throughout the area.
- *Public awareness and involvement in the City's Stormwater Management Program.* Broad awareness and participation in the development and implementation of the Plan by residents and local area businesses is a key component to ensure effectiveness of the Plan. The Plan includes a public involvement component in its development that meets the Federal NPDES program.
- *ADEQ-required Municipal Separate Storm Sewer System (MS4) Plan elements.* The NPDES Stormwater Program requires that the City submit a MS4 Plan in order to acquire a MS4 permit to legally discharge stormwater to the water of the U.S.

City of Mountain Home Organizational Chart



The Street Department is responsible for the management and implementation of the City's SWMP Plan and MS4 Permit programs. The Street Department will have the assistance of the Police and Fire Departments in enforcement of the BMP's designated in the Plan. The Street Department will implement and maintain the BMP's designated in the Plan.

The current Street Department Director is:

Arnold Knox
2903 Highway 201 North
Mountain Home, AR 72653
870-428-4708

Implementation of the Six Minimum Control Measures

1. Public Education and Outreach on Stormwater Impacts

Permit Requirements:

Regulation 40 CFR 122.34(b)(1): "The permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff."

Applicable BMPs:

A. Stormwater Information Distribution to the General Public: The City of Mountain Home will provide and/or distribute brochures and/or fact sheets from ADEQ or USEPA to developers, builders, realtors, the Chamber of Commerce, and residents of the City of Mountain Home. The City will also provide this information to educators and special interest groups for use at Earth Day events and similar educational programs.

   Themes or Messages: General Stormwater Awareness, Property Management Awareness, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness, Illicit Discharge and Illegal Disposal of Waste

   Time to Implementation: One year to design and review documentation. Two to five years for distribution.

   Measurable: The City will develop and print 3,000 brochures/flyers. The City will measure this BMP by the total number of flyers distributed per year and the variety of the audiences they are delivered to. In addition to those listed above, the City will also distribute the material each fall at the county fair and at the Van Matte Senior Center.

The brochure will be included in the welcome material given to new residents by the Water Department and/or the Chamber of Commerce.

B. Storm Drain Marking: The City of Mountain Home will purchase storm drain inlet markers to be placed on storm inlets within the City's downtown business district and other high traffic commercial and/or industrial areas. The City will contact local Boy and Girl Scout Troops, or other appropriate organizations, to assist with the installation of the markers to further emphasize the City's stormwater protection programs, as the media would also be invited to the event. Examples of these markers are included in the supporting documentation.

   The City of Mountain Home will also support and encourage a Storm Drain Art Project, as sponsored by the Friends of the River. The project will consist of storm drains being painted to remind residents of the drain's receiving waters. This project will utilize the local talent of students and residents and bring much needed attention to the location and use of storm drains, as well as beautify City streets and neighborhoods. Please see the attached examples of Storm Drain Art in other cities.

   Themes or Messages: Stormwater Control Awareness, Stream Corridor Awareness, Stream and Watershed Issues

   Time to Implementation: Five years to implement as time and budget allows.

   Measurable: The City plans to install storm drain inlet markers on the inlets surrounding the Downtown Square and the mid-town commercial district – approximately 12 markers downtown and at least 20 in mid-town. With the support of the Friends of the River Group, the City hopes that a minimum of 10 inlets located near the Junior and Senior High Schools will be included in the Storm Drain Art Project, with the desire that the project will expand to other parts of the city.

Rationale and Decision Process:

The City's strategy for developing and distributing the public education materials is to start with information such as the most typical sources of pollutants in stormwater runoff and the impacts associated with those pollutants. The information will include simple ways residents can prevent pollutants from entering the stormwater runoff. This information will be available in the brochures and fact sheets that will be distributed in the city. The storm drain markings and paintings will be placed in order to remind citizens of the ultimate destinations of the pollutants that enter the drains.

2. Public Involvement/Participation

Permit Requirements:

The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program.

Applicable BMPs:

A. Create a Stormwater Hotline: The City will create a storm water hotline for residents to call and report stormwater pollution.

   Time to Implementation: One year. The City already has a Code Enforcement contact number that all members of the public are free to call to report concerns. This phone number will be listed in the printed materials to be distributed as per Measure 1.

   Measurable: Records will be kept of each call, as well as the notification from the Code Enforcement Officer to the City agency responsible for investigating the complaint and the outcome of the investigation.

B. Conduct Public Meetings to Obtain Community Input: The City will hold public meetings to discuss the adoption and implementation of the Stormwater Management Program and associated Plan, to inform citizens about storm water management and gain support for and input into the proposed water management priorities and programs.

   Themes or Messages: General Storm Water Awareness, Property management Awareness, Development Site Control Issues, Stream and Watershed Issues, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness
   Time to Implementation: Permit term.

   Measurable: Conduct one meeting per year to discuss the Stormwater Management Program.

C. Conduct Presentations at Local Organizations: The City will, if allowed, perform presentations at local civic organization meetings and gatherings.

   Themes or Messages: General Storm Water Awareness, Property management Awareness, Development Site Control Issues, Stream and Watershed Issues, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness, Illicit Discharge and Illegal Disposal of Waste

   Time to Implementation: Two years to create presentation documents and media for use at the local meetings and gatherings. Ongoing.

Measurable: The City plans to attend at least one meeting per year. This could be with the Chamber of Commerce, political organizations, fraternal organizations, builders group, etc…

D. Storm Drain Inlet Tagging: As discussed in BMP "B" in the previous section, the City will engage local Boy and Girl Scout Troops, or other appropriate organizations, to assist in the tagging program. The Friends of the River will solicit additional sponsors for the Storm Drain Art Project and will engage local artists, to include students and other residents. Local media will be contacted so they can cover the events to generate more interest.

Themes or Messages: General Storm Water Awareness, Property management Awareness, Development Site Control Issues, Stream and Watershed Issues, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness

Time to Implementation: Five years to implement as time and budget allow.

Measurable: Record the number of storm drain inlets tagged or painted each year.

Rationale and Decision Process:

The City will work to inform citizens that the Code Enforcement Officer number can be used to inform the City of any sources of pollution or pollution events that are witnessed. The public meetings and the tagging and painting projects, as well as flyers and mailers, will be used to generate public involvement in the process and increase community outreach concerning the actions that affect water quality in the City.

3. Illicit Discharge Detection and Elimination

Permit Requirements:

1. The City stormwater discharge enters Hicks Creek, which has 303(d) listings for Nitrates and pathogens, with a current TMDL for Nitrate. Therefore, in accordance with ARR040000 1.3.4 consistent review of the SWPPP and development of a water quality testing program as determined by Part 3.4.5 and 3.5 will be necessary to determine if changes to the SWPPP are required to protect the listed stream.

2. Develop, implement and enforce a program to detect and eliminate illicit discharges [as defined in 40 CFR §122.26(b)(2)] into the permittee's small MS4;

3. Develop a stormwater system map; showing the location of all outfalls and the names and location of all waters that receive discharges from those outfalls;

4. To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit water discharges into the permittee's stormwater system and implement appropriate enforcement procedures and actions

5. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the permittee's system;

6. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

7. Address the following categories of non-stormwater discharges or flows (illicit discharges) only if the permittee identifies them as significant contributors of pollutants to the permittee's small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, de-chlorinated swimming pool discharges, and street wash water.

8. The permittee will develop a process to respond to and document complaints relating to illicit discharges.

Applicable BMPs:

A. Testing and Monitoring Program: The City stormwater discharge enters Hicks Creek which is listed on the 303(d) list for Nitrates and pathogens and has a current TMDL for Nitrates. The Hicks Creek TMDL for Nitrates does not ascribe a Waste Load Allocation (WLA) for the City's stormwater discharge. In addition, the TMDL is modeled on a 0 cfs upstream flow condition and states that "upstream contributions of nonpoint sources could be considered relatively small and under all conditions of flow would only serve to dilute the effluent concentrations" of the sewage treatment plant (STP). However, the City feels it is important to support stream health by assisting the STP in meeting the TMDL requirements. Therefore, testing of these contaminants will be conducted to determine if changes to the SWPPP are warranted in the future.

   Time to Implementation Concerning Nitrates: As per ARR 040000 3.4.5.2.1.1, the City will work to identify potential significant sources within 1 year of date of permit issuance.

Time to Implementation Concerning Bacteria: The City will work to identify potential significant sources of bacteria entering the MS4 within 1 year of permit issuance, as per ARR 040000 3.4.5.2.2.1 .

Additional BMPs and the implementation of them will be conducted in accordance with ARR 040000 3.4.5.2.2

Time to Implement Concerning the Monitoring Program: A Monitoring Program will be submitted to ADEQ within two years of permit approval.

Measurable: As per ARR040000 3.5.1 quarterly grab samples, performed with the appropriate analytical methods, will be conducted for nitrates and pathogens. In addition, a monitoring program will be designed to "help identify those outfalls responsible for the discharge of nitrates and/or pathogens. The initial outfalls to be sampled will be representative of the varying land uses of the city."

Furthermore, the monitoring program will be used to address illicit discharges as described in ARR040000, to determine if they are significant contributors of pollutants to the MS4. The testing will be conducted in such a manner as to attempt to identify potential locations of sanitary sewer overflows, which have been identified as a potential contributor to the pathogen listing.

As per 3.5.1, based upon initial results of sampling, the City reserves the right to revise its sampling plan as appropriate. The initial sampling plan will be submitted to ADEQ for review. All sampling results will be submitted with the City's annual MS4 report.

B. Ordinance: The City has adopted ordinances that establish stormwater pollution prevention and erosion control standards, as well as penalties for illicit discharges.

Time to Implementation: Complete – The Municipal Code Sections: 5.08.02 Septic Tank Overflows Unlawful, 5.12.01 – Littering Illegal, 10.04.02 Sewer Regulations; Required and Prohibited Connections, 10.04.08 Enforcement and Penalties , 7.24.12 Drainage System, 9.16.01 Drainage; Obligations of Citizens (ORD. No. 844 & ORD. No. 93-021 Sec. 1(1)), 9.16.04 Drainage; Erosion Control (ORD. No. 93-022 Sec. 1 & Sec. 2) all provide for stormwater pollution prevention and/or erosion control, as well as providing the City a mechanism to penalize landowners for illicit discharges and require remediation.

Measurable: Record the number of phone calls reporting suspected illicit discharges. Record the number of enforcement penalties charged and collected. Record the remediation of source of illicit discharge.

C. Outfall Inventory and Mapping: The City has developed and maintains a map of all stormwater inlets, controls, outlets and locations of receiving waters. The map was created using aerial photography and GPS. Approved construction drawings for new development designs showing streets, inlets and development tie-ins to existing storm drains or outfalls from the development are transferred from the development drawings to the stormwater map. All road reconstruction projects that convert open ditch to curb and guttered streets with underground drainage systems are added to the map as well. See Measure 6.C for additional illicit discharge identification technics.

   Time to Implementation: One year. The map needs to be edited.

   Measurable: Add priority areas to the map that may be more likely to have illicit connections, i.e. areas with older sanitary sewer lines. Identify sources of illicit discharges. Ensure the map is updated with each new subdivision drainage system or commercial retention pond added.

D. Assess Illicit Discharge Priorities: The City Street Department will collect and review data concerning enforcement activities to determine the types of complaints received and the amount of effort to enforce versus probable water quality benefits and assess the relative benefit of each type of enforcement activity to create a list of enforcement priorities.

   Time to Implementation: Five years. Two years will be needed for data collection and evaluation. Years three through five will be used to evaluate if new enforcements rules are necessary and to make any necessary adjustments to the Municipal Code and other regulations if new enforcement rules are required.

   Measurable: Record the number of phone calls reporting suspected illicit discharges. Record the number of enforcement penalties charged and collected.

E. Perform Field Reviews and Site Inspections: The City includes erosion control elements in the building permit procedures and the subdivision review and inspection procedures, as per Municipal Code 9.16.01 Drainage; Erosion Control, as well as the Subdivision Regulations and Commercial Building Permit.

   Time to Implementation: One year. This BMP is directly tied to the creation of this Stormwater Pollution Prevention Program and Plan.

   Measurable: Ensure appropriate tracking and recording of site inspections, i.e. a spreadsheet listing dates of inspections, findings and required actions, if any.

E. Educate Businesses: The City will develop and distribute an educational brochure for direct distribution to business that sell, store or use potentially harmful chemicals. The brochure will include a definition of “illicit discharge”, the importance of protecting the

storm drain system from receiving such discharges, City ordinances and penalties, and the City Hotline phone number to call in the case that a spill does occur.

Time to Implementation: Two years. One year to develop the business specific brochure and one year to distribute and have individual conversations with business owners.

Measurable: Create a running list of each business that is contacted. These businesses should include, but are not limited to, auto parts stores, gas stations, mechanics, pharmacies, lawn and garden stores, restaurants and grocery stores.

Rationale and Decision Process:

The city will create an ordinance or ordinances to establish the City's regulations and enforcement of the Stormwater Management Plan and MS4 Permit.

4. Construction Site Stormwater Runoff Control

Permit Requirements:

The permittee must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the permittee's small MS4 from construction activities that result in a land disturbance greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. For stormwater discharges associated with small construction activity in accordance with 40 CFR §122.26(b)(15)(i), the permittee will develop, implement, and enforce a program to reduce pollutant discharges from such sites. The permittee's program must include the development and implementation of, at a minimum:

1. An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law;

2. Requirements for construction site operators to implement appropriate erosion and sediment control Best Management Practices;

3. Procedures for site plan review and land division that incorporate measures to prevent or control potential water quality impacts;

4. Procedures for receipt and consideration of information submitted by the public; and

5. Procedures for site inspection and enforcement of control measures.

Applicable BMPs:

A. Erosion Control Ordinance: The City ORD. 93-022 establishes Stormwater Pollution Prevention and Erosion Control Standards, is written into the Municipal Code Section 9.16.04 and includes penalties. This BMP was chosen because it has already been developed and is being practiced.

   Time to Implementation: Complete.

   Measurable: Ensure the Building Department reminds developers about ORD. 93-022. Add ORD. 93-022 to the information checklist for building permit information, requirements and paperwork.

B. Flood Damage Prevention Ordinance: The City has written ORD. 2010-30 that establishes a Flood Damage Prevention Code and Floodplain Development Permit. The Floodplain Development Permit will be reviewed to ensure it includes measures to protect water quality during and after any development activities in the floodplain. This BMP was chosen because it has already been developed and is being practiced.

   Time to Implementation: One year to review and edit the Flood Damage Prevention Code and Floodplain Development Permit to ensure compliance.

   Measurable: Finalize review. Continue to record and track each project that requires submittal and approval of the Floodplain Development Permit.

C. Staff Training: The City will offer at least one orientation and training session annually to involve City employees, specifically those employed at the water and wastewater treatment plants, so that they can understand and perform their role in the program adequately. This measure was chosen because it is a good way to promote stormwater protection.

   Themes or Messages: General Storm Water Awareness, Property Management Awareness, Development Site Control Issues, Stream and Watershed Issues, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness

   Time to Implementation: Two years to create the training program and initiate training sessions.

   Measurable: Provide City employees with a minimum of one training session annually.

D. Field Inspection: Field inspections are performed to ensure compliance with the City's ordinances and other applicable rules and regulations. This BMP was chosen because it has already been developed and is being practiced.

Time to Implementation: Ongoing. Field inspection schedules are built into the City's Subdivision Regulations (ORD. 97-026, Sec. 1) and the Commercial Building Permit.

Measurable: Record each field inspection done for each project.

E. Site Plan Review: The City Subdivision Regulations (ORD. 97-026, Sec. 1), including the Parking Lot Regulations (ORD. 97-30), and the Commercial Building Permit provide procedures for site plan and land division reviews that incorporate measures to prevent or control potential detriments to water quality and provide for stormwater retention. The regulations restrict post construction site runoff to pre-development runoff conditions. Stormwater retention ponds can be deeded to the City, but are generally kept as a responsibility of Homeowner Associations. This BMP was chosen because it has already been developed and is being practiced. It is an efficient way to physically constrain runoff to pre-development levels.

Time to Implementation: Complete.

Measurable: Ensure submitted plans provide temporary construction SWPPP BMPs.

F. Structural BMPs: The City Subdivision Regulations and Parking Lot Ordinance require retention ponds and landscaped areas to manage and protect post construction stormwater. In addition to the retention ponds required for development and post construction flow limited to pre-development levels, the City also requires a portion of each parking lot to be pervious landscaping. This BMP was chosen because it has already been developed and is being practiced.

Time to Implementation: Complete.

Measurable: Ensure submitted plans provide permanent SWPPP BMPs.

G. Provide Sample Site BMPs: Sample BMP specifications, details, and inspection reports will be provided to contractors, builders or other interested parties on request.

Time to Implementation: Two years. Samples of inspection reports and details will be obtained from the ADEQ General Permit ARR150000 and related documents. The City will develop BMP sample documents.

Measurable: Field inspections will be conducted regularly, stop work orders will be distributed, and penalties will be levied to any and all construction sites that do not meet the standards described by City ordinances.

Rationale and Decision Process:

Construction plans that are submitted to the City for approval are reviewed for compliance with the City's Municipal Code, Ordinances and relevant Regulations. City personnel conduct regular site inspections to ensure compliance. Projects are required to have BMPs that help eliminate sediment erosion in stormwater runoff. Large individual developments may be subject to ADEQ construction permitting, but a unified program to reduce runoff pollution in the city is a necessity in order to perform inspections and enforce the existing codes, ordinances and this Stormwater Management Plan.

5. Post-Construction Stormwater Management in New Development and Redevelopment

Permit Requirements:

1. Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb one acre or more, including projects less than one acre if they are part of a larger common plan of development or sale, and discharge into the permittee's small MS4. The permittee's program must ensure that controls are in place that would prevent or minimize water quality impacts;

2. Develop and implement strategies that include a combination of structural or non-structural BMPs appropriate for the permittee's community;

3. Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and

4. Ensure adequate long-term operation and maintenance of BMPs; and ensure adequate enforcement of ordinances and regulations.

Applicable BMPs:

A. Revise Development Review Process: The City review process will be revised and modified to streamline the process in order to provide for a more efficient work environment and provide the public with a better end result of the implementation of all applicable rules and regulations. This BMP will increase City efficiency and consistency.

   Time to Implementation: Complete.

   Measurable: A revised permit checklist will be developed so that each project is reviewed consistently.

B. Perform Field Evaluations: Each subdivision and individual site will receive a post construction review. This BMP will increase City efficiency and consistency.

   Time to Implementation: Complete.

   Measurable: A revised permit checklist will be developed so that each project is reviewed consistently.

C. Require Detention Ponds for New Development: The City Subdivision Regulations (ORD. 97-026, Sec. 1), as well as the Parking Lot Regulations (ORD. 97-30), require measures to prevent or control potential detriments to water quality and provide for stormwater retention. The regulations restrict post construction site runoff to pre-development runoff conditions. This BMP was chosen because it has already been developed and is being practiced. It is an efficient way to physically constrain runoff to pre-development levels. This BMP is a necessity to reduce flooding issues for landowners neighboring new development and to protect the City, as well as the natural downstream environment.

   Time to Implementation: Complete.

   Measurable: Ensure development plans allow for permanent retention ponds.

D. Non-Structural BMPs: As stated in Section 4.B, the City has written ORD. 2010-30 that establishes a Flood Damage Prevention Code and Floodplain Development Permit. The Floodplain Development Permit protects sensitive areas such as wetlands and riparian areas along the creeks. To further protect the riparian areas in town, provide buffers along water bodies and maintain open space, the City requires storm water easements along all watercourses, channels and streams. Developers are encouraged to infill previously developed areas by being required to build all new development facilities to City specifications and pay tapping fees to attach to existing infrastructure. These permitting activities are required by FEMA and serve to protect the natural environment in town and downstream.

   Time to Implementation: Complete.

   Measurable: Continue to track each project that applies for a Floodplain Development Permit and ensure the development, if approved, is built according to City Code.

E. Encourage Various Structural BMPs: As stated above, the City Subdivision Regulations (ORD 97-026 Sec. 1), including the Parking Lot Regulations (ORD. 97-30), require measures to prevent or control potential detriments to water quality and provide for stormwater retention. A number of developers have installed bio-retention cells as the required retention pond. The City will describe alternate BMPs such as extended-detention outlet structures, grassed swales, bio-retention cells, filter strips, etc… in the

BMP literature developed for Measure 4.G, as discussed above. A number of developers have built alternate retention facilities and they can be used to help beautify the City, in addition to the environmental benefits they provide.

Time to Implementation: One year. The map needs to be edited and the permit record revised to include identification of alternative BMPs used.

Measurable: The permit record will indicate how many developers are choosing alternate forms of BMPs, as described in the City's informational brochure.

F. Mechanisms to Address Post-Construction Run-Off: The City Subdivision Regulations (ORD. 97-026) and the Parking Lot Regulations (ORD. 97-30) both address post-construction run-off and restrict it to pre-construction flow levels. This BMP is necessary to protect adjoining landowners and protect the downstream environment.

Time to Implementation: Complete

Measurable: Site inspections are conducted at each new construction site to ensure the retention facilities are built as designed. The site inspections are recorded with the permit documentation and on the running permit record. The retention facilities are added to the stormwater map. Please see the attached ordinances.

G. Long-Term Operation and Maintenance of BMPs: All retention facilities that are transferred to the City are required to meet certain design constraints, as detailed in the Subdivision Regulations, Section 8.5.d. This BMP ensures the facilities are easily maintained within the City's maintenance budget.

Time to Implementation: Complete

Measurable: Site inspections are conducted prior to the City accepting the facility.

Rationale and Decision Process:

Related rationale to Minimum Control Measure #4; in that while the individual developments are still subject to ADEQ construction permitting, a unified program to reduce runoff pollution in the City is a necessity in order to perform inspections and enforcement of the codes and ordinances that will be established.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

Permit Requirements:

1. Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and

2. Using training materials that are available from the ADEQ, EPA, other organizations, or developed in-house, the permittee's program must include employee training to prevent and reduce stormwater pollution from activities including, but not limited to, park and open space maintenance, fleet and building maintenance, new municipal facility construction and related land disturbances, design and construction of street and storm drain systems, and stormwater system maintenance.

3. The only industrial facility owned and operated by the MS4 is the City's Sewer Treatment Plant (STP), AR0021211. The STP effluent is released to Hicks Creek below the City's stormwater effluent therefore it does not discharge into the MS4. As noted in Section 3 above, the City's monitoring plan will take into consideration the TMDL that the STP is required to meet and will conduct monitoring to ensure the stormwater discharge is not affecting the STP's ability to do so.

Applicable BMPs:

A. Development of a City Stormwater Management Plan: This manual and the BMPs listed will be used by all city municipal operations.

   Time to Implementation: Two years to provide for the review and completion of this document and creation of example BMPs.

   Measurable: The City's Stormwater Management Plan approved.

B. Annual Training: The City will offer at least one orientation and training session annually to involve City employees so that they can understand and perform their role in the program adequately. This training will specifically target employees of the Parks and Recreation Department and the Street Department, as they maintain the City owned property and streets, as well as the mechanical fleets, which include numerous vehicles and heavy equipment.

   Themes or Messages: General Storm Water Awareness, Property Management Awareness, Development Site Control Issues, Stream and Watershed Issues, Development Regulations, Stream Corridor Awareness, Vehicle Maintenance Awareness

   Time to Implementation: On-going.

Measurable: Annual records of meeting participants.

C. Perform Stream/Ditch Channel Maintenance/Cleaning: The City performs maintenance on selected streams and ditches including removal of debris and trash annually as the budget allows. The City will also conduct dry-weather screening to ensure no illicit discharges are being made.

   Time to Implementation: On-going.

   Measurable: Ditches and creeks free of litter and debris.

D. Available BMPs: The City operates a street sweeping machine that vacuums debris from City streets before it is allowed to be washed into the stormwater system. The City will make BMPs, such as sand bags, straw bales and or coir logs, available to all City Departments for use at their maintenance facilities and storage yards to reduce or eliminate the discharge of pollutants.

   Time to Implement: Two years. This will allow time for the BMPs to be included in the annual budget, approved, and distributed to the various departments. The use of the BMPs will be included in the annual employee training.

   Measurable: Continuation of the street sweeping program. BMPs being employed around City shops and construction sites.

Rationale and Decision Process:

The City will need to evaluate the operation and maintenance of all the departments that participate in ground disturbance activities. Regular education and training sessions on different requirements and proper techniques on the protection of the waterways and stormwater system in the City are necessary.

SUPPORTING DOCUMENTATION