

**City of Coffeyville Stormwater Management  
Plan  
January 1, 2021 through December 31, 2022**



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## **CITY OF COFFEYVILLE STORMWATER MANAGEMENT PLAN**

### **I. BACKGROUND Regulatory History**

EPA promulgated the Final Rule of the NPDES Phase II Stormwater Regulations on December 8, 1999. The regulations required KDHE, as the NPDES permitting authority, to develop criteria for designating small Municipal Separate Storm Sewer Systems (MS4s) to be regulated under the NPDES stormwater discharge control program. There are four methods by which a small MS4 may be designated. Accordingly, KDHE developed criteria as “regulated small MS4s.” Designation method No. 2 is applicable to the City of Coffeyville.

#### **City of Coffeyville Designation Basis**

Under designation method No.2 (40 CFR 123.35 (a)(2)) KDHE considered four factors: 1.) population; 2.) location; 3.) population density; and 4) TMDL listing of adjacent stream segments or lakes. All cities with a population greater than 10,000 located outside an urban area must be considered. All cities with populations greater than the four other criteria are met. Coffeyville has a population greater than 10,000 based on the most recent census and is outside an urbanized area; it was therefore designated to be regulated under the Phase II rules. In addition, the TMDL factor applies to the City, since Sycamore Creek has been identified as impaired due to Bacteria, Nutrients & Sediment. MS4s must be designated if they are adjacent to streams or lakes identified in a TMDL as impaired and the municipality meets the location and population density criteria.

#### **Application and Permitting**

The City of Coffeyville was issued a National Pollutant Discharge Elimination System (NPDES) permit by the Kansas Department of Health and Environment, effective October 1, 2004, for discharge of stormwater from our Municipal Separate Storm Sewer System (MS4) to the waters of the United States. The permit was issued as required by the EPA Stormwater Phase 2 Rule, which applies to municipalities with a population greater than 10,000. Phase 1 applied to municipalities with 100,000 or greater population and went into effect in 1990 for those large cities. On January 27, 2014 a new permit was issued to the City of Coffeyville beginning on February 1, 2014 and going through December 31, 2019.

One of the requirements of our new MS4 NPDES permit is to prepare a Stormwater Management Program Document (SMP), submit the proposed SMP to KDHE for approval by February 28, 2015, and hold a public hearing to solicit public comment and recommendations on the proposed SMP.

## **II. STORMWATER MANAGEMENT PROGRAM DOCUMENT**

### **A. Format and Contents**

The purpose of the SWMP Document is to describe the City's Stormwater management Program. The document addresses each of the program's six minimum control measures (MCMs) as well as the Goals/BMPs which will be implemented in order to lessen the discharge of TMDL regulated parameters addressed in the City's permit (fecal coliform impairment of Cow Creek). The document includes the following information:

Purpose of the Minimum Control Measure

The Measurable Goal for each listed goal;

The Implementation Time Schedule, etc. for each listed goal;

Points that are available for each listed goal;

Years that the listed goal is available to be implemented;

### **B. Document Modification**

The SWMP Document presented herein will be modified if the City and/or KDHE determine in the future that such modifications are necessary to achieve the goals of the program. An annual evaluation will be performed and any modifications submitted with the annual report which is also required by the City's Stormwater Permit.

### III. MINIMUM CONTROL MEASURES

#### 1. Public Education and Outreach Goals

**Purpose:** Public education is key to the success of a Stormwater Management Plan. We must convey to residents an understanding of how their actions affect stormwater quality and inform them of stormwater quality issues in their community. With this understanding residents may take ownership of the problems and become part of the solution by voluntarily eliminating major sources of pollutants by making small changes to their everyday activities. **(4) Points for this BMP are required for the years 2021, 2022.**

##### **LBMP PED&0-01 – Maintain a stormwater webpage.**

**MEASURABLE GOAL** – Maintain the webpage with up to date information with all links effective and valid information. Check all links and update website as necessary on a minimum monthly basis. Document monthly checks in a log book and indicate changes with logged summaries.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The webpage must be available for a minimum of 3 months to qualify for points in the year it is established and subsequent years the webpage must be available throughout the year.

**POINTS** – 3 points may be claimed in the first year implemented and 2 points each successive year.

**YEARS IMPLEMENTED** – 2021 thru 2022

##### **LBMP PED&0-02 – Distribute educational materials (flyers, brochures, catalog mailings, handouts, or emails) addressing various pertinent stormwater public education topics.**

**MEASURABLE GOAL** – Number of all flyers, brochures, catalog mailing, handouts, or emails distributed in a year shall equal or exceed the most recent U.S. Census Bureau decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of flyers, brochures, or emails distributed shall also be documented. This information and copies of the flyers, brochures, catalog mailings, handouts, or emails shall be retained on file.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Either flyers, brochures, catalog mailing, handouts, or emails are to be distributed in at least two separate batches, ideally in separate seasons (either winter, spring, summer or fall). However, the required number of those distributed must be within a single calendar year for points to be claimed.

**POINTS** – 2 points may be claimed in a year in which the required number of flyers, brochures, catalog mailing, handouts, or emails are distributed.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PED&0-03 – Provide either training or educational materials to identified businesses at high risk of contributing to stormwater pollution.**

**MEASURABLE GOAL** – Provide training or educational materials to at least 3 businesses.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Track number of businesses receiving materials within the calendar year.

**POINTS** – 2 points may be claimed each year the required amount of training or distribution of educational material occurs.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PED&0-04 – Apply notification placard, covers/hatches with message, or stencil, on stormwater inlets to provide a message similar to “No Dumping – Drains to River”.**

**MEASURABLE GOAL** – Apply this notification to at least 10% of all known stormwater inlets in the MS4 the first year and at least an additional 5% each subsequent year.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Track the number of markings within the calendar year.

**POINTS** – 2 points may be claimed each year the required numbers of inlets are marked.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PED&0-05 – Post the municipality’s MS4 permit along with the SMP document on the city’s stormwater webpage.**

**MEASURABLE GOAL** – Post the documents on the webpage for at least 6 months in the calendar year.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Track number of months the documents are posted.

**POINTS** – 1 point may be claimed each year the documents are posted for at least 6 months.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PED&0-06 – Provide either, a stormwater telephone hotline, web based or text message method for public reporting of illicit discharge.**

**MEASURABLE GOAL** – Respond to all reported complaints within 10 days and if found valid, resolve or establish a schedule for resolution within 20 days. The efforts to implement the resolution must begin within 20 days of reporting.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The reporting system must be available to the public for at least six months in the year to claim the points.

**POINTS** – 2 points may be claimed each calendar year the reporting system is maintained and available. An additional point may be claimed for each illicit discharge resolved in the calendar year up to a limit of 2 additional points per calendar year.

**YEARS IMPLEMENTED** – 2021 thru 2022

## 2. Public Involvement and Participation Goals

**Purpose:** Public Involvement and Participation serves the same purposes that the public education and outreach. A better educated population will be able to make more environmentally conscious choices in their daily activities. This minimum control measure also allows the City to see the success and effectiveness of the plan through interaction with the public. **(3) Points for this BMP are required for the years 2021, 2022.**

### **LBMP PI/P-01 – Establish a citizens’ advisory committee.**

**MEASURABLE GOAL** – Host the citizens’ advisory committee meetings twice yearly and receive comments and guidance from the committee regarding the SMP. Retain on file the copies of the attendance list and minutes of the meetings.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The citizens’ advisory committee must hold at least two meetings within the year in which points are claimed.

**POINTS** – 3 points may be claimed each year this BMP is implemented in compliance with the specified requirements.

**YEARS IMPLEMENTED** – 2021 thru 2022

### **LBMP PI/P-03 – Hold park or stream bank clean-up events for public volunteers to aid municipal staff in removing trash, debris, pollutant sources from the selected clean-up area.**

**MEASURABLE GOAL** – Clean an area which must be equal to or greater than one acre or alternately at least 200 yards of streambank.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – At least one such clean up activity must occur in the year for which the points are claimed.

**POINTS** – 3 points may be claimed each year this BMP is implemented in compliance with the specified requirements.

**YEARS IMPLEMENTED** – 2021 thru 2022

### 3. **Illicit Discharge Detection and Elimination Goals**

**Purpose:** To eliminate illicit discharges into the public storm sewer system and our waterways. An illicit discharge is defined as any discharge into the storm sewer system that is not composed entirely of clean water or stormwater. Most flow during dry weather can be considered an illicit discharge. **(5) Points for this BMP are required for the years 2021, 2022.**

**LBMP IDD&E-04 – Implement a program to evaluate MS4 outfalls to identify illicit discharges. Inspect at least 5% of the known MS4 outfalls during the calendar year and evaluate the ones which have dry weather discharges. Evaluate the water quality of the dry weather discharges to recognize non-stormwater contributions and trace and eliminate the source of the illicit discharge, and document the outfalls inspected.**

**MEASURABLE GOAL** – Inspect at least 5% of the city’s known MS4 outfalls and identify any illicit discharges, trace and eliminate the source of the discharge

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Inspecting and evaluating at least 5% of the city’s known outfalls in a calendar year or may occur in up to two consecutive years and documenting the inspections.

**POINTS** – 1 point may be claimed in the year when a total of at least 5% of the city’s known outfalls are finally inspected, and 2 additional points may be claimed in which an illicit discharge associated with this group of evaluated/inspected outfalls is eliminated.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP IDD&E-07 – Implement a Household Hazardous Waste Collection Program (HHWCP) or document others have implemented such a program to provide such service to all property owners or residents located within the permit area.**

**MEASURABLE GOAL** – Document that the property owners within the MS4 permit area were able to dispose of such wastes at the HHWCP during a calendar year. Retain this documentation on file.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The property owners or residents located within the permit area must be able to dispose of waste accepted by the HHWCP throughout the calendar year.

**POINTS** – 3 points may be claimed for any year in which this BMP was implemented in compliance with the requirements.

**YEARS IMPLEMENTED** – 2021 thru 2022



**LBMP IDD&E-10 – Inspect, 5% of the MS4 systems stormwater inlets and/or outfalls within the permit area all conducted within a 12-month period to aid in identifying illicit discharges. If in a 12-month period 15% of the MS4 system inlets and/or outfalls are inspected a higher point value may be claimed in the year the required percentage of inspections are completed.**

**MEASURABLE GOAL** – Generate a summary report of the inspection including the number of inlets and/or outfalls visually inspected, condition comments, illicit discharges identified and the results of efforts to eliminate illicit discharges, e.g., discharge line disconnected and redirected to the sanitary sewer or discharge practice terminated.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The inspection process can occur in a single calendar year or may be conducted over a period extending from one year into the succeeding year. Points may be claimed in the year when these inspections are completed. (5% or 15%)

**POINTS** – 3 points may be claimed for inspection of 5% of the MS4 system in the year the required percentage of inlets and/or outfalls are finally inspected, alternately if 15% of MS4 system is inspected 5 points may be claimed.

**YEARS IMPLEMENTED** – 2021 thru 2022

#### 4. Construction Site Stormwater Runoff Control Goals

**Purpose:** During construction activity, vegetation and topsoil can be stripped away, making the area especially vulnerable to erosion and sediment reaching our waterways. Construction sites also generate large amounts of other wastes that may find their way to our waterways. **(4) Points for this BMP are required for the years 2021, 2022.**

**LBMP CSSRC-01 – Implement a requirement for a Soil Erosion and Sediment Control (SESC) Plan for any land disturbance sites which are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.**

**MEASURABLE GOAL** – Enact a regulatory ordinance, or other enforceable measure that requires an SESC Plan for all developments disturbing sites which are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Points may be claimed in the year the ordinance/enforceable requirement first becomes effective, and for each full calendar year thereafter for which the ordinance/enforceable requirement remains effective.

**POINTS** – 3 points may be claimed in the year the ordinance initially becomes effective, and 2 points may be claimed for each successive year thereafter for which the ordinance remains effective.

**YEARS IMPLEMENTED – 2021 thru 2022**

**LBMP CSSRC-06 – Develop written procedures for inspection of construction sites. Develop a Stormwater Construction Site Inspection Guide for use by municipal inspectors.**

**MEASURABLE GOAL** – Develop written procedures for inspection of construction sites that addresses the administrative aspects associated with required inspections of construction sites, the issuance of inspection reports, notices of violations, and enforcement actions. The Inspection Guide must provide inspectors guidance on how to conduct a construction site stormwater inspection, the required procedures, and guidance on acceptable conditions of various BMPs employed on such sites, enforcement actions and/or reference of cases for enforcement by other municipal staff, guidance on photo log of the inspection and inspection checklists for use by the inspector.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Development of the written procedures and the Inspection Guide can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.

**POINTS** – 3 points may be claimed in the year of initial development, 2 points may be claimed for each successive year the written procedures and inspection guide continue to be utilized.

**YEARS IMPLEMENTED – 2021 thru 2022**

## **5. Post-Construction Stormwater Management Goals**

**Purpose:** Development has a significant effect on water quality, during the course of development, natural landscapes are often replaced by impermeable roads, parking lots, sidewalks, roofs and other impervious surfaces that lead to increases in the volume and flow rate of stormwater runoff. This increase leads to flooding and erosion that carries sediments and pollution to our waterways. This minimum control measure is to prevent or minimize water quality impacts. **(5) Points for this BMP are required for the years 2021, 2022.**

**LBMP P-CSM-01 – Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs which are required for new development and re-development construction sites which are greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs 1 acre or more. Alternately, adopt and implement the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP manual.**

**MEASURABLE GOAL** – The design manual will impose requirements to achieve at least one of the following standards:

1. Capture at least, the first 0.5 inches of precipitation on the site and utilize methods to prevent discharge off-site, including but not limited to:
  - Retain on-site
  - Infiltrate
  - Transpire or
  - Beneficially reuse
2. Through implementation of appropriate BMPs, reduce the peak stormwater flow rate to a value equal to or less than the rate which would be experienced on the site prior to the development/re-development project based upon modeling a standard storm event, e.g. 1.0 inch – 6 hour event assuming saturated soil conditions.
3. Other sizing or detention standards generally accept by design engineers as adequate for the permittee’s local.

As an alternative to a custom design manual the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP manual may be adopted and implemented.

Measures will be included to enforce the installation of the various structural BMPs required.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Development of the design manual can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.

**POINTS** – 4 points may be claimed in the year of initial implementation of a custom design manual – alternately 6 points may be claimed in the year of initial implementation if the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP manual. 3 points may be claimed for each successive year compliance with the custom design manual is required/implemented or 5 points for the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP manual.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP P-CSM-02 – Develop a list of post-construction structural or non-structural BMPs which are required to be incorporated in any development/re-development project. The list must include guidance regarding the BMPs which must be incorporated in various projects as determined appropriate by the permittee. The list is to be provided to entities involved with the design of projects prior to site plan review by the permittee.**

**MEASURABLE GOAL** – Develop a list of post-construction structural or non-structural BMPs (enforceable through ordinance or other means) which are required to be incorporated in any development/re-development project. The list must include guidance regarding the BMPs which must be incorporated in various projects as determined appropriate by the permittee. The list is to be provided to entities involved with the design of projects prior to site plan review by the permittee.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Development of the list and guidance can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.

**POINTS** – 3 points may be claimed in the year of initial implementation and 2 points may be claimed for each successive year the list is maintained and implemented.

**YEARS IMPLEMENTED** – 2021 thru 2022

## **6. Pollution Prevention/Good Housekeeping for Municipal Operations Goals**

**Purpose:** Many opportunities exist in our own City operations to prevent stormwater pollution. Altering daily activities that have the potential to contribute pollutants to stormwater can have positive effects on water quality. **(4) Points for this BMP are required for the years 2021, 2022.**

### **LBMP PP/GH-05 – Implement a program for street sweeping in which the street sweepings are collected and disposed of properly or recycled/reused if possible.**

**MEASURABLE GOAL** – All paved streets which can be swept shall be listed in the schedule for street sweeping. A log shall be maintained listing the street segments which are swept and dates of sweeping and where the street sweepings are disposed or material was sent to be recycled and/or reused.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – At least 10% of the streets which are listed in the street sweeping schedule must be swept at least once in a year to claim points for the year. In years when street sweeping equipment is purchased for use by the permittee, additional points may be claimed.

**POINTS** – 3 points may be claimed in the year at least 10% of the listed streets are swept and street sweeping equipment is purchased, 2 points may be claimed for each year at least 10% of the listed streets are swept.

**YEARS IMPLEMENTED** – 2021 thru 2022

### **LBMP PP/GH-06 – Develop an employee training program to ensure permittee’s staff understands what actions they can take in the workplace to minimize stormwater pollution.**

**MEASURABLE GOAL** – Provide guidance documents in the form of either, fact sheets, flyers, or emails to staff to coach them in appropriate actions they can take while working to minimize stormwater pollution.

Alternately, provide in-person training or videos with sign-in sheets for signature documentation of personal or video training.

Retain copies of the guidance documents and/or sign-in sheets, a log of when the guidance was distributed, or training was provided to staff should be maintained.

Provide appropriate guidance and/or training to staff a minimum of twice per year.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – For each year in which staff receive guidance documents, in-person training, or video training on two separate dates, points may be claimed for the year.

**POINTS** – 1 point may be claimed in years when guidance document, in-person training, or video training are provided on two separate dates.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PP/GH-07 – Implement a program to inspect stormwater inlets to identify illicit discharges and clean drop inlets of accumulated debris.**

**MEASURABLE GOAL** – Inspect at least 5% of all inlets annually. Additionally, if 10% of all inlets are inspected in a year, an additional point may be claimed.

For any inlets which have evidence of dumped paint, oil or other substances which are considered illicit discharges, follow up with efforts to educate individuals near the impacted inlet about illicit discharges.

For inlets which have any accumulation of debris, remove the debris for proper disposal.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – For each year in which staff inspect at least 5% of all stormwater inlets at least one point may be claimed.

**POINTS** – 1 point may be claimed in years when staff inspects at least 5% of all stormwater inlets and 2 points may be claimed in years when staff inspects at least 10% of all stormwater inlets

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP PP/GH-08 – Develop, implement and keep updated an online storm sewer map accessible to the public.**

**MEASURABLE GOAL** – Map shall cover the entire MS4 within the permit area and include all the MS4 lines, both pipe and open drainage (i.e. ditches), and shall also illustrate all impaired waterways (i.e. Sycamore Creek) with an indication of the listed impairment.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – For each year in which the map is posted online, points may be claimed. In the first year the map is posted it must be posted for at least six months for points to be claimed.

**POINTS** – 3 points may be claimed in the first year and 2 points may be claimed for each year thereafter for which the map remains posted.

**YEARS IMPLEMENTED** – 2021 thru 2022

## **Implementation of BMPs to attenuate the discharge of TMDL regulated parameters Goals**

**Purpose:** Total Maximum Daily Load or TMDL, is the maximum allowable quantity of a pollutant that can be discharged to a stream system while not exceeding water quality criteria set by KDHE and the EPA. Coffeyville's Sycamore Creek is listed by KDHE as impaired water for high numbers of Bacteria, Nutrients, & Sediment. **(4) Points for this BMP are required for the years 2021, 2022.**

**LBMP TMDL.01 – Install pet waste stations which include a glove/bag dispenser with signage and waste cans to encourage pet waste disposal at either, parks, trails, rest areas, or other public lands owned by the city.**

**MEASURABLE GOAL** – At least one pet waste station shall be installed at the selected park, trail, rest area, or other public land. The station(s) shall include signage which encourages proper pet waste disposal/cleanup and a waste can.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – In the year the Measurable Goal requirement is implemented the point may be claimed and for each year thereafter that the pet waste stations remain in use.

**POINTS** – 1 point may be claimed for the year in which the Measurable Goal requirements are enacted, and 1 point may be claimed for each subsequent year the Measurable Goal requirements remain in effect.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP TMDL.05 – Develop a pet waste brochure or flyer document to educate the public about animal waste contamination of stormwater. The document encourages pet owners to pick up their pet's waste. Alternately, post the document on social media or the city's website.**

**MEASURABLE GOAL** – The brochures or flyers are to be posted in various public buildings and distributed to the public throughout the year. In the year the number of documents shall equal or exceed the most recent U.S. Census decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of documents distributed shall also be documented. This information and copies of the documents shall be retained on file.

Documents posted to social media or the website shall have the page copied and printed to retain on file.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The documents may be distributed in any fashion and at any time throughout the year.

Documents posted on the city's website shall be posted for at least six months in the year. Documents posted on social media shall be posted six times within the year points are claimed.

**POINTS** – 1 point may be claimed in a year in which the required number of brochures and/or flyers are distributed, documents on social media or the website must meet the requirements as listed previously.

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP TMDL.07 – Inspect 10% of all known MS4 outfalls for dry weather discharges either annually or twice per year to identify potential illicit discharges.**

**MEASURABLE GOAL** – Complete inspections of all known MS4 outfalls either annually or twice per year during dry weather periods. If any dry weather discharge is found, follow-up with an investigation to determine if a portion or all of the discharge is illicit. Document the findings and initiate efforts to eliminate and identified illicit discharges.

**IMPLEMENTATION TIME SCHEDULE, ETC.** – The inspections must be conducted either annually or if twice per year they must be seasonal within the same calendar year (winter, summer, spring, and fall). If an illicit discharge is detected and eliminated in association with this inspection program, additional points may be claimed in the year the discharge detected or in the year it is eliminated.

**POINTS** – 3 points may be claimed for annual inspections as required by this BMP, 5 points may be claimed for these inspections completed twice in a year. If an illicit discharge is detected and eliminated, 2 additional points may be claimed only once (either in the year detected or in the year the illicit discharge is eliminated).

**YEARS IMPLEMENTED** – 2021 thru 2022

**LBMP TMDL.13 – Develop and implement a water sampling program at the furthest upstream & downstream points along Sycamore Creek. Samples must be taken in compliance with the current Stormwater Permit and reported through the eDMR system/**

**MEASURABLE GOAL** – Implement program to pull samples from Sycamore creek where it enters the city limits at the bridge located on Overlook drive just north of 1st street and samples from the creek where it exits the city limits at the railroad trestle south of 11th street and send the samples off to Pace Analytical for analysis. (Minimum of 2 sample sites)

**IMPLEMENTATION TIME SCHEDULE, ETC.** – Immediate implementation of this goal is required with 2 sets of samples pulled and tested in compliance with the parameters set forth in the city's Stormwater Permit between March 1<sup>st</sup> and June 30<sup>th</sup> , and 2 sets of samples between July 1<sup>st</sup> and October 1<sup>st</sup> of each year. **(Required)**