

Small MS4 Annual Report Form

Please refer to the attached instructions as you prepare your annual report.

A. General Information

Name of MS4: City of Flagstaff. Malcolm Alter, Stormwater Manager

Contact Name: Eileen Hamlin, Stormwater Analyst

Telephone Number: 928-779-7685 X 7484 Email Address: Ehamlin@ci.flagstaff.az.us

Annual Report Period: December 19, 2002 – June 30, 2004 July 1, 2004 – June 30, 2005
 July 1, 2005 – June 30, 2006 July 1, 2006 – June 30, 2007

B. SWMP Modifications and Additional Information. Attach a brief explanation if you check “yes” to any of the following statements.

1. Changes have been made or are proposed to the SWMP since the last annual report, including changes in response to ADEQ’s review. YES NO
Changes were made to the SWMP as requested by ADEQ. These changes were accepted by written notice dated June 2, 2006.
2. The MS4 has annexed lands. YES NO
- 3a. The MS4 discharges directly to an impaired water. YES NO
- 3b. A water within 10 miles of the MS4’s jurisdiction has been identified as impaired. YES NO
Both Upper & Lower Lake Mary are identified as impaired on the 2004 Impaired Waters List
- 4a. The MS4 discharges directly to water for which a TMDL has been established. YES NO
- 4b. A TMDL has been established for a water within 10 miles of the MS4’s jurisdiction. YES NO
Upper & Lower Lake Mary
5. The MS4 has conducted analytical monitoring of stormwater quality. YES NO
6. The MS4 is relying on another government entity to satisfy some permit obligations. YES NO
ADEQ maintains enforcement authority on industrial permits

C. Stormwater Management Program Status. Provide the status of every BMP and measurable goal in your SWMP as described in the instructions.

Table 1 Public Education and Outreach on Stormwater Impacts

Table 1.1 Public Education and Outreach: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.1.a Public Education & Outreach	Collect brochures, fact sheets, and other educational materials from federal, state, and local agencies or other MS4 web sites.	City staff will contact agencies and review web page quarterly to ensure that the most current information is available.	April 2003	December 2007		In Progress. This is an on-going element of the program. Websites are reviewed quarterly and items of interest or significance are included in the program and/or outreach.
	Distribute information to the general public and to specific targeted audiences defined in <i>V.B.1. b. i.</i>	City staff will write articles for publication in <i>City Scope</i> (identified in Table 1.2) once during each permit year and place the information on the City's webpage	April 2003	December 2007		In Progress. This is an on-going element program. A City Scope article was prepared in Spring of 2006 detailing where the stormwater utility fee is spent and summarizing the scope of the stormwater program.
	Provide educational materials to the general public, specific targeted audiences and City employees on: The hazards of illegal dumping and illicit discharges to water quality and public health and safety.	City staff with input from various departments will define goals and messages for the public employees' communication strategy.	April 2003	October 2003		Completed January 2004
		The City will train public employees on illicit connections, construction site management and good housekeeping practices within existing training sessions and in targeted training sessions as needed, annually updating training.	April 2004	December 2007		In Progress. This is an on-going element of the program. Environmental Services provides annual training every January.
	The importance of construction	The City staff will print materials	Aug.	December		Completed June 2005

Table 1.1 Public Education and Outreach: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
	site management to protect water quality and reduce or eliminate sediment and erosion problems.	(brochure) on construction site management for general public and construction site operator's use. Construction site requirements adopted by Council.	2004	2004		
		City Staff will print and distribute information directly to construction managers and development community on construction site requirements adopted by City Council	July 2004	December 2007		Completed June 2005
	Pollution prevention strategies for daily operations including the impacts of improper disposal of household chemicals and provide support for the City's program for collection and disposal of such pollutants.	City staff will collect PR materials on illicit discharge programs developed by Phase I communities and EPA and select materials for use in Flagstaff; place on website as appropriate.	March 2004	June 2004		Completed June 2004
		City staff will print and distribute PR materials on illicit discharge hazards. These materials will be placed in library, City Hall and other appropriate public buildings.	October 2004	December 2007		In Progress. This is an on-going element of the program. In addition to the stated distribution, staff conducted 5 public meetings and distributed outreach and educational materials at those meetings.
		City staff will incorporate water quality messages in existing household chemical management program	July 2003	December 2007		Complete. April 2004
	Educate children on the importance of water quality and how they can help protect the environment.	City staff will create a pilot program for education of grade-school children working with local school system to finalize program and gain approval to test in local school system. Based on approval of school	July 2004	May 2005		In Progress. Staff have met with Environmental Services Education Coordinator, Water Conservation Education Trainer, Willow Bend teachers resource center and participated in a Master

Table 1.1 Public Education and Outreach: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		system, implement pilot program for grade school children and evaluate; expand depending on outcome.				Watershed Steward program (train the trainer). In addition staff have contributed 35 hours of staff time to Project WET where we demonstrated a watershed model to 600 elementary school students. Additionally, staff contributed 8 hours to Arizona Water Education for Teachers. Staff also presented a watershed & floodplain management paper at the NAU Watershed Research & Education Program Field School for Decision Makers.
	Establish stormwater page on City's webpage using it to provide information and to receive input and complaints in support of construction site management and post construction controls as well as to provide electronic reporting capability for Illicit Discharge Detection & Elimination notification.	City staff will coordinate internally with Information Technologies staff to draft page layout, links and email capability.	April 2004	June 2004		Completed June 2004
		City staff will create a stormwater page on the City's website and track the number of hits to evaluate use.	October 2003	December 2007		Completed: June 2004. Hits to site during the current reporting period are 109,582; visits to the site are 7,286.
		City staff will update website throughout permit period, placing current information on site at least monthly.	June 2004	December 2007		In Progress. This is an on-going element of the program.

End of Table 1.1

Table 2 Public Involvement and Participation

Table 2.1 Public Involvement & Participation: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (Steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.2 Public Involvement & Participation	Comply with public notice requirements for any newly created or revised ordinances. Conduct public meetings to discuss the permit and its renewal in year 5 as well as any significant changes to the proposed program over the remaining term of the permit.	The City will provide public notices pursuant to standard requirements and procedures regarding meetings and opportunities for participation in the development and implementation of the permit program.	March 2004	December 2007	X	In Progress. This is an on-going element of the program. In Nov. 2005, staff conducted 3 public meetings for program input & Public Education. In addition, there were multiple council presentations including public participation X Revised. Corrected process regarding public meetings.
	Stormwater Staff will organize and actively participate in a Citizens Advisory Committee to receive citizen input and to assist in dissemination of program objectives to the Community.	Stormwater staff will host monthly meetings of a Citizens advisory committee. This committee will be composed of 11 voting members. To include representation from commercial and residential property owners, retail & service business, consulting & engineering, home builders, non-profit organizations, environmental groups, NAU and Flagstaff City Council. As stated in resolution No. 2005-81.	December 2000	December 2007	X	In Progress. This is an on-going element of the program. X SWAC appointed by resolution No. 2005-81. This item was under Table 1.1 at request of ADEQ moved to Table 2.1. In addition, a revision was made to the number of voting members, changing the membership from 9 to 11 by council resolution. This allows for 2 members at large.
	Develop a volunteer-based program, similar to the "Adopt a Highway" program utilized throughout the nation for litter control on roadways, to address the clean up of local washes.	City staff will research structure and legal requirements necessary to establish a volunteer program with the assistance of the City Attorney.	October 2004	October 2004 Also May 2006		Complete. Staff researched liability concerns regarding having volunteers do stream assessment. Waivers have been developed & signed.
		City staff will create program structure & policies and then	November 2004	April 2005		In Progress. This is an on-going element of the program.

Table 2.1 Public Involvement & Participation: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (Steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		publicize using Public Education and Outreach communication tools.				Environmental Services conducts a volunteer program within both the Adopt-a-Highway program as well as an Adopt-a-Wash Program. Adopt-a-Highway does litter removal on 77 miles of highway per year. Volunteers include Civic groups & Environmentally concerned organizations. Groups adopt sections that have particular significance to them. Performing an average of 1 event per quarter. Removing more than 70 tons of trash, litter and recyclables. See specific detail in attached Weekly report compilation.
		City will establish up to 10 wash adoptions each year, providing training materials and advice to the volunteer groups as well as receiving input on any concerns identified by the volunteers.	July 2005	Dec. 2007		In Progress. This is an on-going element of the Environmental Services program. The Adopt-a-wash program includes 49 organizations who inspect, investigate and remove litter from waterways in the City. We also have a Stream Team which does wash assessments.
	Provide public input into the SWMP throughout the permit period and during renewal of the permit in year 5.	City staff will publish the SWMP, the NOI & the annual report on the website and accept public comment or suggestions for improvement.	Sept. 2004	Sept. 2007		In Progress. This is an on-going element of the program. The current version of each of the 3 documents are available on the website and a contact person is listed.
		City staff will hold public	September	Dec. 2007		Not Started. No activity due

Table 2.1 Public Involvement & Participation: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (Steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		meetings during renewal of permit in the fall of 2007 and City Council will hold a hearing on the renewal application.	2007			during this reporting period.

End of Table 2.1

Table 3 Illicit Discharge Detection & Elimination

Table 3.1 Illicit Discharge Detection & Elimination: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.3. Illicit Discharge Detection & Elimination	The City staff researches, defines, and drafts a City ordinance prohibiting illicit discharges and illegal dumping to the City of Flagstaff stormwater system.	City staff will research other communities' existing ordinances as well as model ordinances available through ADEQ and professional organizations to identify structure, content, enforcement procedures, etc. for the ordinance.	June 2003	Sept. 2003	X	Completed. September 2003 X Revised BMP to read "draft ordinance"
		City staff will seek public input from the general public as well as the Citizens Stormwater Advisory Committee (SWAC) into the draft ordinance. The general public will be able to comment and provide input at the first reading of the ordinance.	June 2006	November 2006	X	Not Started. Revised start date to June 2006. As of June 2006 draft ordinance is with the legal office for review and will be taken to SWAC for input & comment as well as through the council process at either opportunity public input is welcome. X - Revised start date from 10/03 to 6/06. Pending Council approval of rate increase, determination of enforcement authority and hiring of additional staff to perform job functions. In the interim period city staff who are mapping outfalls as well as citizen volunteers as part of the Stream Team are observing and reporting IDD concerns.
		Staff will finalize ordinance language. City Council will adopt and City staff will	Oct. 2006	November 2006	X	Not Started. No activity due during this reporting period.

Table 3.1 Illicit Discharge Detection & Elimination: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		implement the ordinance.				X - Revised start date from 10/03 to 10/06. Pending determination of enforcement authority and hiring of additional staff to perform job functions.
	Complete an inventory of the City of Flagstaff storm sewer system, identifying all outfalls and names and locations of Waters of the United States as defined by ADEQ creating a map of the MS4.	The City will inventory and map the MS4 within 65% of the jurisdictional boundary.	March 2006	December 2006	X	In Progress. Performed concurrently with inventory & mapping project; includes photo & GIS layer 40% complete; anticipate 65% completion by December 2006. X Revised start date from October 2003 to March 2006 in order to be able to utilize the deliverable due date for an existing project.
		The City will inventory and map the MS4 within 35% of the jurisdictional boundary in the final year of the permit.	Dec. 2006	July 2007	X	Not Started. No activity due during this reporting period.. X - Revised start date from 7/05 to 12/06.
	Receive and investigate complaints concerning illicit discharges and dumping, providing public access to staff and reports on the resolution of complaints and concerns.	The City staff will establish a direct phone line to the Stormwater Services Division for receipt of input from the public, 24 hours a day.	April 2004	December 2007		Complete. Phone line established August 2003. Receiving & investigating as well as general comments. This is an on-going element of the program.
		The City staff will put an email contact on the webpage to receive information directly.	June 2004	December 2007		Complete. August 2003. This is an on-going element of the program.
	The City will train employees in the detection, collection, and identification of illicit discharges.	The City will train public employees on illicit connections, and good housekeeping practices within existing training sessions and in targeted training	April 2004	December 2007		In Progress. Environmental Services provides annual training every January.

Table 3.1 Illicit Discharge Detection & Elimination: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		sessions as needed, annually updating training.				
	Notify City employees, of the hazards and costs of illicit discharges and improper disposal of waste through seminars and/or published and distributed information.	The City will train public employees on illicit connections, and good housekeeping practices within existing training sessions and in targeted training sessions as needed, annually updating training.	April 2004	December 2007		In Progress. Environmental Services provides annual training every January.
	The City staff will inspect stormwater outfalls during dry weather to identify illicit discharges and locate illegal dumping with follow up investigation to identify sources and eliminate problems.	The City staff will develop and test inspection procedures, including creation of a database to track and maintain activity and results of inspections.	June 2006	August 2007	X	Not Started. No activity due during this reporting period. Anticipate hiring & enforcement authority in Fall of 2006. X - Revised start date this activity is dependent upon the completion, and approval of the Illicit Discharge Ordinance and pending hiring of additional staff. We anticipate approval in October 2006. Inspector hired effective 9/5/06. Further note this activity will be performed concurrently with outfall mapping.
		The City staff will inspect all outfalls within 65 percent of Flagstaff corporate boundary and initiate investigation of potential discharge problems based on adopted ordinance.	June 2006	August 2007	X	In Progress. City Stormwater and GIS staff are working on a comprehensive inventory of the City's surface and sub-surface stormwater drainage systems. The GIS database and maps that will be developed from this project will be used for stormwater planning, operation,

Table 3.1 Illicit Discharge Detection & Elimination: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
						<p>maintenance, emergency response and NPDES Phase II compliance. The inventory is complete in University Heights, Ponderosa Trails, Airport, Bow and Arrow, Equestrian Estates and Cheshire areas. Data collection is ongoing in the Pine Canyon, Northern Arizona University and Downtown areas. The inventory is approximately 40% complete at this time. It is anticipated to be 65% complete by December 31, 2006 and 100% complete by August 31, 2007. The inventory will be updated continuously as changes or additions are made to the stormwater system. The task includes the inventory of 290 stream reaches on 21 major wash corridors within the city limits.</p> <p>X - Revised start date this activity is dependent upon the completion, and approval of the Illicit Discharge Ordinance and pending hiring of additional staff. We anticipate approval in November 2006. This function will be performed concurrently with outfall mapping.</p>
		The City staff will inspect all outfalls within remaining 35	Dec. 2006	July 2007	X	Not Started. No activity due during this reporting period.

Table 3.1 Illicit Discharge Detection & Elimination: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		percent of Flagstaff corporate boundary and initiate investigation of potential discharge problems based on adopted ordinance.				Field inspector position has been approved & filled start date is Sept. 5, 2006. X - Revised start date this activity is dependent upon the completion, and approval of the Illicit Discharge Ordinance and pending hiring of additional staff. We anticipate approval in October 2006. This function will be performed concurrently with outfall mapping.

End of Table 3.1

Table 4 Construction Site Stormwater Run-off Control

Table 4.1 Construction Site Stormwater Run-off Control						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.4.a & b Construction site run-off control	The City requires grading permits for land disturbing activities to meet the requirements of the AZPDES General Permit. The City will adopt an ordinance to address construction activities as defined in Part V. Section 4. It will establish the process; plan review, inspection procedures and enforcement strategies for construction site management.	City staff will research the policies and strategies that will be included in program processes, enforcement strategies and inspection procedures, involving key stakeholders as appropriate.	August 2003	March 2004		Complete. July 2005 See Addendum to Annual Report
		City Council will hold public hearing on program and ordinance.	April 2004	June 2004		Complete. June 2005.
		City Council will adopt ordinance and City staff will implement plan review, site inspection and enforcement procedures	June 2004	July 2005		Complete. July 2005 See revision to International Building Code and Addendum to Annual Report.
	The City will develop and implement policies and procedures for plan review regarding construction site management in compliance with local ordinance, incorporating them into current plan review practices for new construction	City staff and stakeholders will define plan review procedures in conjunction with ordinance development in BMP 1, above.	March 2004	June 2004		Complete. July 2005 See attached Revision to International Building Code and Addendum to Annual Report.
		City staff will be trained on procedural changes.	June 2004	June 2004		Complete. July 2005 See attached Revision to International Building Code and Addendum to Annual Report.

Table 4.1 Construction Site Stormwater Run-off Control

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		City staff will implement plan review process and adjust as needed to provide an effective review	July 2004	Dec 2007		Complete. July 2005 See attached Revision to International Building Code and Addendum to Annual Report.
	Develop and adopt technical guidance materials for the design and maintenance of erosion and sediment control measures as well as other strategies to address construction site wastes.	City staff will research technical guidance materials from other communities in semi-arid climates as part of the program development.	August 2003	March 2004		Complete. June 2004.
		City staff will develop materials specific to Flagstaff construction environment.	April 2004	April 2004		Complete. July 2005 See attached Revision to International Building Code and Addendum to Annual Report as well as Stormwater Mgmt. Design Manual.
		City of Flagstaff staff will develop technical guidance materials in conjunction with new ordinance and distribute to development community and staff.	June 2004	June 2004		Complete. July 2005 See Attached reference to ADOT manual as well as attached Revision to International Building Code and Addendum to Annual Report as well as Stormwater Mgmt. Design Manual.
	The City will review current practices for inspection of construction sites as carried out by building inspectors and grading inspectors as well as research practices utilized in other communities. Working with the City Attorney, the City will determine the most effective enforcement of the ordinance; train inspectors on these	City staff will research current practices internal and external to the City and identify potential practices for Flagstaff.	March 2004	March 2004		Complete. July 2005

Table 4.1 Construction Site Stormwater Run-off Control						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
	procedures and implement with adoption of the ordinance.					
		Working with City Attorney, City staff will identify enforcement strategies for construction site management practices.	April 2004	May 2004		Complete. July 2005
		City of Flagstaff staff will develop inspection practices in conjunction with ordinance development that are compatible with ordinance language.	June 2004	June 2004		Complete. July 2005.
		City will implement and update inspection and enforcement practices as needed. Track inspections and enforcement actions taken, maintaining annual records of activity.	July 2004	December 2007		Complete. July 2005.
	The City will notify the public on how to interact with staff to provide input on construction site management issues. The staff will respond to public inquiry and complaints concerning construction site runoff issues with follow up on the action taken.	City staff will write procedures and provide education materials to the general public on overall construction site management program, explaining how the public can assist in providing input on concerns.	April 2004	August 2004		Complete. August 2003 and July 2005
		City staff will track input and resolution of issues, maintaining annual records of activity and analyze complaints over the permit period to improve the process and oversight.	July 2004	December 2007		Complete. August 2003 and July 2005.

End of Table 4.1

Table 5 Post Construction Stormwater Management in New Development and Redevelopment

Table 5.1 Post Construction Stormwater Management in New Development & Redevelopment: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.5.a Post Construction Management	In conjunction with the BMPs listed below, the City will create and implement an on-going post-construction BMP inspection program as part of the overall strategy to ensure long-term performance of controls for new development and redevelopment activities as defined in Part V. Section B 5	The City staff writes procedures for inspection and compare with other inspection procedures in the organization, coordinating where appropriate.	October 2005	January 2006		Complete. March 2004 See attached Addendum to Annual Report. In particular the Land Development Code which covers comprehensive inspection & enforcement procedures.
		The inspection procedures are adopted in conjunction with ordinance development and implementation.	January 2006	December 2007		Complete. March 2004 See attached Addendum to Annual Report.
	Create and adopt a City of Flagstaff ordinance that addresses post-construction stormwater quality for new development and redevelopment projects that are greater than or equal to one acre, including requirements for plan review and enforcement of long-term maintenance strategies for structural controls. The City will have enforcement authority to ensure compliance by owners /developers if post development controls are not constructed as design or fail to protect or minimize run-off impacts to water quality.	The City will review all existing designs authorized in the City's Design Manual and in ordinance language and establish performance goals for programs in Flagstaff.	October 2004	December 2007		Complete. October 2004. Also June 2006 for completion of SWMP assessment See attached Addendum to Annual Report.
		The City will update designs and	March	June 2005		Complete. October 2004.

Table 5.1 Post Construction Stormwater Management in New Development & Redevelopment: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		create a draft ordinance to meet the regulatory objectives.	2005			
		The City staff will provide opportunity for public input for ordinance and design criteria through public meetings with appropriate stakeholders.	April 2005	August 2005		Complete. October 2004.
		The City staff will finalize ordinance and design criteria; the City Council will adopt with staff implementing over life of permit.	Sept. 2005 and January 2006	January 2006 & December 2007		Complete. October 2004.
	The ordinance addressing post construction controls will require long-term operation and maintenance BMPs. At change of ownership, the new owner must execute a formal agreement that the new owner is aware of the long-term operation and maintenance BMPs as required by the ordinance adopted to address this requirement and will continue to institute them.	The City will educate developers about the long-term maintenance requirements during pre-construction meetings.	January 2006	December 2007		Complete. October 2004.
		When the City issues final occupancy permits, the owner/operator is required under the City Land Development code to maintain BMPs at the site.	January 2006	December 2007	X	Complete. October 2004. X Revised. Up-dated reference to letter writing process. This is covered under land development code.

Table 6 Pollution Prevention/Good Housekeeping for Municipal Operations

Table 6.1 Pollution Prevention Good Housekeeping for Municipal Operations: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
V.B.1.a Pollution Prevention Good House keeping	The City will revise City policies and documents to address pollution prevention that includes municipal maintenance activities, schedules and inspection procedures for structural and non-structural controls to reduce floatable and other pollutants dumped into washes etc. Pollution prevention plans will address storage of materials, proper materials handling, drainage and structural controls maintenance procedures and in-house environmental inspections.	The staff will meet to discuss current applicable documents and procedures as well as establishing the priorities for facilities assessment.	July 2003	December 2003		Complete. December 2003
		The City will utilize knowledgeable staff in the Environmental Services Division, Public Works Department as a trainer for public employees.	July 2004	December 2007		In progress. Environmental Services provides a comprehensive annual training each January as well as maintains an industrial permit for city sites that fall within the supervisory control of Public Works and Environmental Services.
		An initial training will be scheduled upon completion of site pollution prevention plan for facilities. Refresher training will occur on an annual basis. New employees will be trained along with training on safety and other aspects of the applicable Pollution Prevention Plan.	July 2004	December 2007		In progress. Environmental Services provides comprehensive annual training each January

Table 6.1 Pollution Prevention Good Housekeeping for Municipal Operations: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		The City will evaluate the 4 existing pollution prevention plans each year of the permit.	January 2005	December 2007	X	<p>In Progress. Public Works, Environmental Services, performs a comprehensive audit as well as maintains an industrial permit for city sites that fall within the supervisory control of Public Works and Environmental Services.</p> <p>X Revised. Changed misleading reference</p>
	Evaluate City operations and maintenance activities to determine if the risk of polluting stormwater is being reduced to the maximum extent practicable.	The City staff will establish priorities for evaluation of operations with particular attention to street and drainage system maintenance, street sweeping and parks maintenance. Other operations will be evaluated in later years of the permit based on priorities.	January 2005	April 2005		<p>In Progress. Public Works, Environmental Services, performs a comprehensive audit as well as maintains an industrial permit for city sites that fall within the supervisory control of Public Works and Environmental Services. This is an on-going element of Public Works that will continue for the life of the permit</p>
		Evaluation of two operational activities will occur in each year of the permit.	Sept. 2005	December 2007		<p>In Progress. Public Works, Environmental Services, performs a comprehensive audit as well as maintains an industrial permit for city sites that fall within the supervisory control of Public Works and Environmental Services. This is an on-going element of Public Works.</p>
		The City will implement changes in operations to improve water quality and stormwater runoff, programming budgetary impacts in the year following the	July 2005	December 2007		<p>In Progress. Public Works, Environmental Services, performs a comprehensive annual training as well as addressing plan, procedure</p>

Table 6.1 Pollution Prevention Good Housekeeping for Municipal Operations: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		evaluation, on a priority basis.				and process up-dates as needed.
	The City will train staff on pollution prevention and revised policies and procedures for operations and maintenance activities as changes are made or new procedures are put into action. The Environmental Services Division of the Public Works Department will provide trainers and the City will obtain training materials from other communities and professional organizations, as appropriate.	Following site evaluations and changes in operations or practices each year, the City will train appropriate staff as well as new staff on practices as they are implemented.	July 2005	December 2007		In Progress. Public Works, Environmental Services, performs a comprehensive audit as well as plan, procedure and process up-dates as needed to maintain quality standards.
		City trainers will research appropriate materials needed to address changes and to meet needs of industrial NPDES permits for SWPPP implementation.	July 2004	December 2007		In Progress. Public Works, Environmental Services, performs a comprehensive audit as well as plan, procedure and process up-dates as needed to maintain quality standards.
	The City will evaluate practices in managing roadways, streets, bridges, highways and parking lots owned or operated by the City to identify impacts on water quality and to prioritize any changes in practices of maintenance or design necessary to reduce or eliminate discharge of pollutants.	The City staff will establish performance goals for the identified services/operations.	October 2004	January 2005		In Progress. This is an on-going work program element of the Public Works department that will continue for the life of the permit.
		The City staff will establish a team to assess current practices to determine if goals are met or if changes are needed.	Nov. 2006	December 2006	X	Not started. No activity due during this reporting period. X – Revised start date to give

Table 6.1 Pollution Prevention Good Housekeeping for Municipal Operations: BMP's and Measurable Goals

Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
						stormwater staff the opportunity to review program with Public works department
		The City will complete assessments of current operational procedures and make recommendations for changes needed to address runoff issues.	July 2006	December 2006	X	Not started. No activity due during this reporting period. X – Revised start date to give stormwater staff the opportunity to review program with Public works department.
		Based on assessment, implement changes to current services to meet goals in managing roadway and parking systems owned by the City.	Nov. 2006	December 2006		Not Started. No activity due during this reporting period.
	The City will evaluate and make appropriate changes if needed in practices of disposal of wastes removed from the drainage system, with particular emphasis on dredge spoil, accumulated sediments, floatables and other debris.	City staff will establish a review process for evaluating current strategies for waste disposal.	Sept. 2004	December 2007		In Process. Public Works, Environmental Services, performs a comprehensive audit as well as plan, procedure and process updates as needed to maintain quality standards.
		Staff will assess the current standard operating procedures and recommend changes	July 2005	December 2006		In Process. Public Works, Environmental Services, performs a comprehensive audit as well as plan, procedure and process updates as needed to maintain quality standards. This is an on-going element of the Public Works program that will continue for the life of the permit. The evaluation team will continue to evaluate the process during the Nov. & Dec. '06 process review.

Table 6.1 Pollution Prevention Good Housekeeping for Municipal Operations: BMP's and Measurable Goals						
Minimum Control Measures	BMP	Measurable Goal (steps to measure progress)	Start Date	Target Completion Date	New or Revised	Implementation Status/ Frequency/ Achievement Date (completed, in progress, not started)
		City staff will Implement recommendations through the budget process and re-evaluate.	January 2007	December 2007		Not started. No activity due during this reporting period.

End of Table 6.1

D. Certification

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 gathered and evaluated 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.

Signature

Date

Name (printed)

Title