

Municipality/Organization: City of Everett

EPA NPDES Permit Number: MAR041078

MaDEP Transmittal Number: W- 035930

Annual Report Number Year 15
& Reporting Period: April 1, 2017 to March 31, 2018

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2018)

Part I. General Information

Contact Person: Gregory M. St. Louis, PE Title: Executive Director of DPW & Engineering

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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 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.

Signature: 

Printed Name: Gregory M. St. Louis, P.E.

Title: Executive Director of DPW & Engineering

Date: 4-25-18

Part II. Self-Assessment

The City of Everett continue to fully engaged with the service of a consulting engineering firm in self-assessment and implementation of the Small MS4 General Permit on several number of new programs, conducting construction projects, improving staff education and organization, and extensive public outreach and education campaigns.

The City of Everett continues to develop and update the storm water master plan using prioritized sub-basin and integrated plan developed by the City consultant. During the 2016-2017 permit year, the City of Everett continued to plan for and implement the recommendations from the initial phases of storm water plan for replacement or rehabilitation of catch basin structures and follow a good housekeeping and pollution prevention procedures with street sweeping, catch basin cleaning and other municipal operations.

The City of Everett written document herein below is intended to fulfil this annual year 2017 reporting requirement:

- From August 28, 2017 to September 29, 2017 a total of 478 catch basins were cleaned and a total of 373.32 cubic yards sediment removal was recorded, removed and disposed of. All catch basins were reviewed and cleaned this fall under an annual outside contract.
- This year, the City of Everett awarded a catch basin redirection contract to a contractor.
- In year 2017, the City of Everett initiated a repair to a collapse headwall on a drainage culvert on a private property discharging to an outfall on the Mystic River.
- The City of Everett continues to follow up on potential illicit connections identified in its drainage systems while working on a more target and efficient illicit Discharge Detection and Elimination (IDDE) program.
- The City Engineering Division reviews on the average 30 construction and post- construction submittals monthly for compliance with Everett City Ordinance and MassDep storm water management standards.
- The City of Everett Department of Public Works completed 80 stormwater related work orders to maintain our water quality BMPs, catch basins and drainage lines.
- The City of Everett Department of Public Works has continued to implement the street sweeping on all roads at least once a year.
- In 2017, the City of Everett inspects construction sites for conformance with City policies for erosion control and site storm water management. Private development projects are reviewed by city departments for adherence to Massachusetts Storm Water Regulations. Inspections are periodically conducted on private development sites to insure that their BMPs are operable and maintained.
- The City with Consultant support has continued to perform an I/I investigation in accordance with MassDEP Guidelines to address the lower Broadway Casino development on inflow and tidal investigation. To perform infiltration/inflow analyses and sewer system evaluation survey, implementation of smoke testing program, tidally infiltration investigation, CCTV inspection on catchment areas.
- The City conducted a robust public education program and outreach to reduce pollution in storm drain by placing 80 medallion with a symbol “Do not dump flows to the river”. In addition, painting involvement of Everett Public School Art Director and students to paint sea creature mirrors on storm drain. Public outreach was conducted with friends of Malden River and Mystic

watershed Associations which drafted a Malden River plan to increase recreation opportunity and access to the Malden River.

- The City revitalized and planted two rain gardens with posted educational signs on the Malden River.
- The City of Everett Planning Department is providing educational leaflets encouraging residents to harvest and save rainwater by offering 40% off rain barrel purchased. <http://www.ci.everett.ma.us/documentcenter/view/2734>
- The City of Everett is rewriting its ordinance on sanitary sewers and storm drains submitted and updated a Draft Stormwater/Sewer Integrated Plan in June 2016 to EPA and DEP. The purpose of this report was to present the results of the integrated planning effort, including a capital improvements plan, to act as a roadmap for the City's Department of Public Works and Engineering Department moving forward. The plan includes an evaluation of the citywide stormwater and wastewater collection infrastructure in Everett. This will provide a long-term plan outlining an approach for efficiently operating and maintaining these systems as well as addressing MassDEP's short term and long term Clean Water Act goals. DEP provided comments on the plan in a letter dated February 16, 2017. DEP's December comments were resolved with a January 2018 response from the City. The City anticipates reaching a resolution in the near term.
- Continuing efforts towards raising awareness about the importance of the Malden and the Mystic Rivers water quality and in collaboration with the Mystic River Watershed Association (MyRWA), a nonprofit organization, on projects to address water quality, promote green infrastructure and provide stormwater education. MyRWA and the Friends of the Malden River continue posting Everett press releases on their websites and social media.
- To improve and expand outreach, the City of Everett continued provided stormwater management information on Facebook page and Twitter posts in an effort to keep residents and other interested persons informed about programs, events, projects, and general updates.
- The City of Everett supports connecting communities via cycling and walking thru the abandoned Saugus branch railroad corridor through City programs (Earth Day Cleanup, MAPC Art Project) and leaflets providing information on commuter benefits and workshops.
- Continuation of in-house employee education
- The City of Everett is working with Horsley Witten Group and Mystic River Water Shed to implement Coastal Zone Management grant to identify BMPs to stormwater runoff discharge into the Malden River.
- The City of Everett is working with BSC Group on a CZM Municipal Vulnerability Program (MVP) assessment and initial resiliency project.
- The City of Everett is working with a coalition of cities, agencies, nonprofits (including MyRWA), developers and residents on the Malden River Greenway project for improvements to the Malden River and its waterfront. The first step is a robust community engagement process in June 2017 leading to a Malden River Greenway Vision Plan. <https://mysticriver.org/news/2017/10/23/malden-river-greenway-vision>
- The City of Everett worked diligently this year to move forward with advertisement, social media, educational video with Mystic River Water Shed to educate the public on storm water; similar to Main Rubber Docking Video. <https://drive.google.com/file/d/1xdUrCvkXaFDWx4UrLpdF5TgeXyhxatsN/view?ts=5ae0faf6>
<https://drive.google.com/file/d/1oOB486C91KRVa-K0gPji8XaPCNcxGuoq/view?ts=5ae0fae2>
<http://www.everettindependent.com/2018/01/06/demaria-calls-for-new-stadium-on-malden-river-new-transportation-network-in-inaugural-address/>

<http://www.everettindependent.com/2017/12/13/friends-of-malden-river-expect-test-results-in-march/>

<http://www.everettindependent.com/2017/11/03/master-plan-for-malden-river-greenway-completed-ready/>

<http://www.everettindependent.com/2017/08/05/future-of-everetts-side-of-the-malden-river-looks-to-succeed/>

<http://www.everettindependent.com/2017/06/30/re-imaginingmalden-river-greenway-kickoff-draws-large-crowd-from-three-communities/>

<http://www.everettindependent.com/2017/06/30/malden-river-a-calm-getaway-among-cool-breezes-and-scenic-banks/>

<http://www.everettindependent.com/2017/06/23/greenwayenvisioning-the-malden-river-of-the-future/>

<http://www.everettindependent.com/2017/06/09/national-grid-response-deadline-coming-next-week-on-malden-river/>

<http://www.everettindependent.com/2017/05/05/access-to-beautycitymyrwa-build-partners-to-study-expansive-malden-river-greenway/>

<http://www.everettindependent.com/2017/06/03/city-to-plant-100-trees-for-this-season/>

<http://www.everettindependent.com/2017/10/27/city-continues-tree-planting/>

<http://www.everettindependent.com/2017/04/29/earth-day-clean-up/>

<http://www.everettindependent.com/2017/10/06/ge-site-riverwalk-work-to-be-featured-in-everett-greenway-meeting/>

<http://www.everettindependent.com/2018/04/06/trash-talk-removing-litter-from-the-mystic-river/>

<http://www.everettindependent.com/2017/09/08/wynn-receives-draft-chapter-91-license-for-dredging-mystic-river/>

<http://www.everettindependent.com/2017/03/24/wynn-hopes-to-bring-new-clean-up-technique-to-mystic-river-dredging/>

Overall, the City of Everett has improved tremendously over the last 14 years and will continue this work under the new NPDES permit. The City will prepare and submit a Notice of Intent for compliance with the 2016 new General Permit.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
1-1.1	Develop and distribute educational material to residential property owners; and post on City web site for municipal employees. Include information on the hazards associated with illicit discharges and improper disposal of waste and steps the public can take to minimize pollution from stormwater runoff	CONCOMM	Year 1: Procure, develop or adapt one brochure/fact sheet on stormwater issues; post stormwater information on City web site Years 2 through 5: Distribute information quarterly, utility customers, both residential and commercial, and distribute at City Hall, the library and Waterfront Fairs. Also during Years 2 through 5, post information on the City web site and update the web site semi-annually, and air information on cable television annually.	<ul style="list-style-type: none"> - The City continues its efforts towards raising awareness about the importance of the Malden and the Mystic Rivers water quality and is collaborating with the Mystic River Watershed Association, on projects to address water quality, promote green infrastructure and provide storm water education. - MyRWA and the Friends of the Malden River continue posting Everett articles on their websites and social media. - The City continues to host information about stormwater including “FAQs” and “Quick Links” on the Department of Public Works Water Division page. - The City has a stormwater public education video on local public access television which has expanded to include a number of topics. - In January 2017, the City committed to support MyWRA's application entitled Malden River Public Health Risk Assessment. Everett will provide \$5,000 of financial support and \$2,500 of in-kind efforts to help broadcast the outcomes of the study through translation services, cable TV access and social media. - Friends of Malden River & Mystic River have both performed surveys and handed out flyers, conducted 3 public meetings, and met with over 300 people on the Malden River Vision Project; including members of the MassDEP (Martin Suuberg) 	<ul style="list-style-type: none"> - Raise awareness and promote positive acceptance for the Integrated Plan by posting it on the City website. Links will be provided for education and outreach materials including slideshows and pamphlets. - Pamphlets, mailers and door hangers will be developed and distributed to provide general education of stormwater and sewer issues. They will be tailored to address specific issues in particular neighborhoods. -Continue programs outlined in Year 1. - Met measurable goals as outlined.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
1-1.2	Revise dog licensing materials to include information on stormwater issues related to pet waste management, and use revised materials. Conduct limited visual survey of City-owned parklands to determine where additional signs, pooper scooper stations or repairs to same may be needed. Install/repair signage and pooper scooper stations in selected locations.	CONCOMM	Year 1: Revise dog licensing materials. Years 2 through 5: Use revised materials. Years 2 and 4: Conduct limited visual survey of City-owned parklands. Years 3 and 5: Install/repair signage and pooper scooper stations based on survey results.	-Dog licensing materials include pet waste educational materials and are available at the office counter. -Animal Control Officer conducts visual survey. - Continue to maintain signage and pooper-scooper stations through all public park spaces.	- Continue to install and maintain signage and pooper-scooper stations through all public park spaces and provide educational materials. - Met measurable goals as outlined.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
1-1.3	Develop and distribute educational material to business property owners; and post on City web site for municipal employees. Include information on the hazards associated with illicit discharges and improper disposal of waste.	CONCOMM	Year 1: Procure, develop or adapt one brochure/fact sheet on stormwater issues; post stormwater information on City web site. Years 2 through 5: Distribute information quarterly, via either mailing a brochure/ fact sheet to business property owners based on tax assessor records; airing information on the City’s community television station; distributing a brochure/fact sheet at a community event; or making a brochure/ fact sheet available at City Hall, libraries or other municipal facilities open to the public. Update the web site semi-annually.	<ul style="list-style-type: none"> - Posted stormwater information on City web site - Posted information on the City’s community television station -Actively educating business property owners and enforcing illicit discharges through IDDE work. -The City has in-house employee education regarding the hazards associated with illicit discharges and the improper disposal of waste at the DPW, Planning Department, GIS Department, Finance Department, Police Department and the Engineering Department. 	-Met measurable goals as outlined.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
1-1.4	Develop and distribute educational material to owners of properties on which land uses with higher potential pollutant loads have been identified; and post on City web site for municipal employees. Include information on the hazards associated with illicit discharges and improper disposal of waste	CONCOMM	Year 2: Procure, develop or adapt one brochure/fact sheet on stormwater issues; post stormwater information on City web site. Years 3 through 5: Distribute information bi-annually, via either mailing a brochure/ fact sheet to property owners based on tax assessor or DEP RCRA generator or other records; airing information on the City's community television station; distributing a brochure/fact sheet at a community event. Update the web site semi-annually.	- Posted stormwater information on City web site - Posted information on the City's community television station -Actively educating and enforcing developers and potential developers of pollutant reduction requirements.	-Continue education to targeted parcels via meetings. - Met measurable goals as outlined.
1-1.5	Conduct Waterfront Fairs to provide outreach to residents and businesses.	LACOMUNIDAD ZUMMER	Conduct one Waterfront FESTIVAL in 2012 and two Waterfront Fairs per year during Years 2 through 5.	-Waterfront Festivals are held consistently every year and in conjunction Friends of Malden River & Mystic River have both performed surveys and handed out flyers.	-Continue to support the Waterfront Festivals - Met measurable goals as outlined.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
2-1	Establish Stormwater Task Force.	PDP	Identify individuals to serve on the Task Force within the first eight months of the permit period. The task force will hold at least four meetings per year. It will prepare and submit the required annual reports.	- The City has a taskforce including Director of Public Works, Director of Planning, Director of Engineering and Environmental Planner that meets as needed.	- Met measurable goals as outlined.
2-2	Implement Catch Basin Stenciling Program.	PDP	Year 1: Contact Mystic River Watershed Association and/or other organization and develop phased stenciling plan. Years 2 through 9: Implement phased plan. Stencil 30% of all City-owned catch basins over five year permit term.	-Program in place for volunteer catch basin stenciling implementation (via MyRWA).	-Continue support of catch basin stenciling program (ongoing via MyRWA). - Met measurable goals as outlined.
2-3	Conduct River Clean-up Day	PDP	Year 1: Develop program and invite participation of other organizations. Years 2 through 9: Conduct one clean-up day annually.	- Everett supports the MyRWA annual riverfront cleanup day each year on Earth Day.	- Continue to assist MyRWA with annual riverfront cleanup day. -Promote cleanup of waterfront at Wynn property and along the Malden River in conjunction with the Malden River Vision Plan.

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2-4	Establish Stormwater Hotline	CONCOMM	Year 1: Create database of stormwater related issues, including operation and maintenance concerns, possible illicit connections and unusual outfall discharges. During Years 1 through 9, publicize hotline number, update database regularly, undertake follow-up action on 80% of the items. Share data with Engineering Department, DPW, Planning Department, and Board of Health.	<p>-The City has implemented an online program called Everett 311 that allows residents to instantly alert the city to issues including those related to stormwater operations and maintenance concerns. The Everett 311 app allows residents and visitors to report and track non-emergency issues and get answers to your questions about Everett. This serves as the City’s Stormwater Hotline and will be promoted.</p> <p>-The City has an Alert Center on their website that allows anyone to view alerts or emergencies in their area. Residents can be instantly notified of alerts and emergencies by subscribing online.</p>	<p>-Encourage the public to report drainage and pollution issues to the City via the webpage and 311 app.</p> <p>-Met measureable goal as outlined.</p>
2-5	Seek easement to waterfront	PDP	Year 1: Propose easement to property owner by Year 2.	<p>-The City is working with a coalition of cities, agencies, nonprofits (including MyRWA), developers and residents on the Malden River Greenway project for improvements to the Malden River and its waterfront. The vision plan proposes new waterfront paths, parks, bridges, and boating facilities for the Malden River to allow for and encourage access to the waterfront.</p>	<p>-Continue to support the Malden River Greenway Vision Plan for access to the waterfront and raise awareness to obtain access to all of Everett’s waterfront.</p>

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
3-1	Conduct hydraulic study of drainage system.	City Engineer/DPW	Complete hydraulic modeling by the end of Year 2.	-Not Completed. As part of the draft Stormwater and Sewer Infrastructure Integrated Plan data collection phase, review of record plans and field investigations, identified a number of discrepancies in pipe connectivity as well as missing pipes and structures in the existing stormwater geodatabase. This updated information was added to the GIS geodatabase to ensure the most complete and comprehensive plan to be used for future hydraulic modeling.	-The Stormwater and Sewer Infrastructure Integrated Plan will address schedule for hydraulic modeling completion and will be included as part of the Capital Improvements Plan.
3-2	Conduct dry weather outfall screening.	City Engineer/DPW	Year 1: Conduct dry weather screening of up to 25 outfalls. Evaluate those that are observed to have dry weather flow with field screening procedures. Sample outfalls for fecal coliform on two separate occasions. If warranted based upon field screening, conduct additional screening and analysis for some or all of the pollutants in the proposed 2002 “Massachusetts Integrated List of Waters” on up to five outfalls over the permit term beginning in Year 3. Year 5: Conduct dry weather screening of all City-owned outfalls.	Dry weather screening of outfalls was completed in 2006. From sampling events during this program, 10 outfalls were identified as having stormwater contamination as noted in the “City-wide Illicit Discharge Detection and Elimination (IDDE) Program 2009/2010”. E. coli samples were taken at all outfalls, except where signs of upstream pollution were present to confirm contamination. Many recommendations from the June 2009 IDDE Investigation were followed up during the “2014 Illicit Discharge Detection and Elimination (IDDE) Investigation”, and an additional investigation was conducted in the Kelvin Street outfall area in 2015. MyRWA and EPA have also been conducting sampling of outfalls of concern within the City.	<ul style="list-style-type: none"> - Future dry weather outfall screening to be performed in compliance with new MS4 Permit. - Met measurable goals as outlined.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any) (2016)	Planned Activities – Permit Year 16
3-3	Develop and implement a plan to identify and remove non-stormwater discharges to the MS4.	City Engineer/DPW	Year 1: Prioritize outfalls, evaluate funding sources for identifying and removing illicit connections, and develop a system for maintaining electronic records of the program. Conduct field investigations of prioritized area to locate and remove illicit connections within two years of dry weather field screening subject to funding constraints.	IDDE Investigation work commenced in June 2009 with the “City-wide Illicit Discharge Detection and Elimination (IDDE) Program 2009/2010”. Recommendations from the June 2009 IDDE Investigation were followed up during the “2014 Illicit Discharge Detection and Elimination (IDDE) Investigation”, and additional investigation was conducted in the Kelvin Street outfall area in 2015. Five (5) illicit connections were confirmed and removed this year.	-Continue to follow-up on IDDE program results and recommendations. - Future IDDE work to be performed in compliance with new MS4 Permit.
3-4	Develop an ordinance to make it illegal to improperly connect a sanitary sewer to the storm drain system or to dump pollutants into the system (i.e. Non-Stormwater Discharge Prohibition).	City Engineer/DPW	Year 1: Draft ordinance and present to the Mayor/Common Council/Board of Aldermen. If ordinance is adopted, develop and adopt regulations. If not, repeat in Years 2 through 9.	- Completed	- Met measurable goals as outlined.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
4-1	Revise Site Plan Review Ordinance/Regulations/ Procedures.	PDP	Year 1: Develop draft changes to the ordinance. Year 2: Present proposed changes to Mayor/Common Council/Board of Aldermen. If not approved, revise if necessary and present in Years 3 through 9 until approved. Develop and present to Planning Board revised Site Plan Review regulations and/or procedures within six months of adoption of ordinance.	- Completed	- Met measurable goals as outlined - Continue to review and enforce ordinance on proposed site developments.
4-2	Develop site inspection and enforcement of construction control measures program.	CONCOMM	Year 2: Develop program. Years 3 through 5: implement program.	-Ordinance completed. -City is enforcing ordinance for stormwater runoff control on developments	- Met measurable goals as outlined
4-3	Identify Preferred Standard Construction Site Runoff Controls	CONCOMM	Year 1: Identify preferred best management practices. Year 3: Complete a draft “Preferred Standard Construction Site Runoff Controls” document. Year 4: Distribute to contractors.	-Ordinance completed -Ensured that soil erosion and sedimentation control measures and storm water runoff control practices are incorporated into the site planning and design process and are implemented and maintained. - Controls informally identified and working on documentation and distribution	- Formal implementation and distribution - Confirm with regular site inspection and documentation.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
4-4	Develop procedures to receive and consider information submitted by the public regarding stormwater issues on construction sites.	CONCOMM	Year 1: Create database and advertise hotline telephone number (see BMP 2-4). Years 2 through 5: Accept and document inquiries, convey information to appropriate department for follow-up, review database monthly.	-The City has implemented an online program called Everett 311 that allows residents to instantly alert the city to issues including those related to stormwater operations and maintenance concerns. The Everett 311 app allows residents and visitors to report and track non-emergency issues and get answers to your questions about Everett. This serves as the City’s Stormwater Hotline and will be promoted.	-Encourage the public to report drainage and pollution issues to the City via the webpage and 311 app. -Met measurable goals as outlined
4-5	Develop site inspection and enforcement of control measures program.	City Engineer/DPW	Year 2: Develop program. Years 3 through 5: Implement program.	- Ordinance completed -Enforced site inspection: 1) Initial Site Inspection: prior to approval of any plan. 2) Erosion Control Inspection 3) Bury Inspection: prior to backfilling of any underground drainage or storm water conveyance structures. 4) Final Inspection. After the storm water management system has been constructed and before the surety has been released,	- Continue to enforce site inspection - Met measurable goals as outlined

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

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
5-1	Develop post-construction runoff control ordinance, regulations, procedures and guidance.	Planning Board	Year 2: Draft the post-construction runoff ordinance and hold a public meeting. Year 3: present the final ordinance to the Mayor / Common Council / Board of Aldermen. Present in Years 4 and 5 if necessary. Present the regulations, procedures and guidance to the appropriate board and conduct a public hearing thereon within six months of ordinance adoption.	- Ordinance completed -City is enforcing ordinance for stormwater post-construction runoff control on developments	- Met measurable goals as outlined.
5-2.1	Require DPW review of selected structural BMPs.	City Engineer/DPW	Year 1: Develop draft procedures for evaluation of BMPs for operation and maintenance issues. Year 2: Develop final procedure. Years 3-5 implement procedure	- Required BMP Operation and Maintenance plan is established through ordinance.	- Met measurable goals as outlined.

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5-2.2	Establish a mechanism to fund operation and maintenance of structural BMPs	City Engineer/DPW	Year 1: Investigate potential funding mechanisms, develop a draft funding mechanism, and hold a public meeting to solicit input from the community. Year 2: revise draft and present to Mayor / Common Council / Board of Aldermen. If not adopted, revise and present in Years 3 through 5.	-Currently funding has been allocated through the General Fund. The City is continuing to explore additional funding mechanisms.	- Ongoing

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (2016) (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 16
6-1	Develop and Implement a Plan to Prevent and Reduce Pollutant Runoff from Municipal Operations.	City Engineer/DPW	By the end of Year 2, develop and adopt a plan. Implement plan beginning in Year 3.	-Plan in place and being implemented. -The DPW facility salt piles are stored in a covered shed, construction materials and debris are stored within designated areas in dumpsters or bins, oil/water separators exist where appropriate.	-Continue to improve efforts and ensure compliance with new MS4 Permit.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

TMDLs will be addressed as part of the new permit. The existing permit was established without this requirement as it was not applicable.