

City of Fort Collins

Phase II MS4 Permit Program Document - working file with revisions

Permit Cycle: March 10, 2008 through March 10, 2013

Administratively Extended in 2013, 2014, 2015, 2016

Revisions documented via annual report "Changes to Stormwater Management Program"

2010 – Municipal Code changes related to enforcement mechanisms

2011 – Revision of Stormwater Design Criteria Manual and clarification

2012- Clarification of 2011 changes

Other Documents:

2009 - One-Time Operating Procedures Report

CDPS MS4 Phase II

STORMWATER MANAGEMENT

PROGRAM DESCRIPTIONS

FOR CITIES AND COUNTIES

March 2008 – March 2013
Due to WQCD by June 10, 2008

Agency Name	City of Fort Collins Utilities
Permit Certification Number	COR - 090050
MS4 Location Description <i>(most permit certifications will cover a single city or county)</i>	City(s) Permitted: City of Fort Collins County Permitted: Non-Standard MS4(s) Permitted (including location descriptions):
Map	Attached MS4 Boundary Map Showing: <ul style="list-style-type: none"> • Jurisdictional Boundary (including all city, county and non-standard MS4s covered under your certification) • Permit Boundary (refer to Page 1 of your permit)
CDPS Program Descriptions	Attached
Program Implementation Area (Counties only)	<input type="checkbox"/> Permitted Area <input type="checkbox"/> Entire Jurisdiction
Joint Submittal	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes

Certification: The following certification must be signed by the Legally Responsible Person. The signer must be either a principal executive officer, ranking elected official or other duly authorized employee.

"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."

Name (printed): James C. Hibbard, P.E.

Title: Water Engineering and Field Operations Manager

Signature: _____

Date:

TABLE OF CONTENTS

Instructions

Overall Program Perspective

MCM 1: Public Education & Outreach

MCM 2: Public Participation/Involvement

MCM 3: Illicit Discharge Detection & Elimination

MCM 4: Construction Site Runoff Control

MCM 5: Post-Construction Stormwater Management

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

CDPS Stormwater Management Program Descriptions Instructions

A. Applicability

This template is applicable for all permittees covered under the MS4 general permits COR-080000 and COR-090000. This template is **not** applicable to non-standard MS4s permitted under the COR-070000 general permit.

B. Filling out the Template

This template is intended to be filled out electronically, with additional lines added to the sections as descriptions are entered.

C. Submitting the Program Description

A complete program description, including the original signed certification on page 2, must be submitted to the Water Quality Control Division by **June 10, 2008**.

The submittal **must** include an original signature. E-mailed or faxed copies will **not** be accepted.

D. Completeness

The form must be completed accurately and in its entirety, or it will be deemed incomplete. This template is intended to be a summary of all of the content for the CDPS Stormwater Management Program Submittal required by Part I.A.6 of the MS4 general permits, COR-080000 and COR-090000. The descriptions provided must be detailed enough for the Water Quality Control Division to determine the permittee's general strategy for complying with the required items in each of the six CDPS Stormwater Management Program Minimum Control Measures (Parts I.B.1-6 of the general permits).

E. Cited Permit Requirements

Subsection B of this template for each of the six Minimum Control Measures includes citations of the specific permit requirements. Where permit requirements have been significantly modified from the previous versions of the general permits, the new language is identified in the template as either a "Clarified" or "New" permit requirement. Refer to Part II.H of the permit rationales for additional information on these changes.

City of Fort Collins	Overall CDPS Stormwater Management Program Perspective	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
----------------------	---	---

Summary description of the overall water quality concerns, priorities, and goals specific to the permittee that were considered in the development of the CDPS Stormwater Management Program:

<p>The City of Fort Collins is situated at the base of the foothills of the Rocky Mountains in Larimer County. The jurisdictional boundaries of the City encompass approximately 52 square miles. According to a 2007 estimate, the population of Fort Collins is approximately 131,000. Stormwater runoff drains through the City's Stormwater Drainage System to various creeks, ponds, and open channels on its way to the Cache La Poudre River and Fossil Creek Reservoir.</p> <p>Pollutants of concern considered in the development of the stormwater program include commonly recognized constituents in urban runoff such as: sediment, nutrients, pathogens, road salts, hydrocarbons, heavy metals, and temperature.</p> <p>Oversight of the stormwater program is carried out by the Regulatory and Government Affairs Division (RGA) of the Water Resources and Treatment Department of Utilities. However, nearly all City Departments are key to successful program implementation. Program oversight and some maintenance activities are funded by enterprise, while some peripheral activities are funded by the general fund.</p>

City of Fort Collins	PUBLIC EDUCATION & OUTREACH	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 – 2013
----------------------	--	---

A. Program Perspective: The goal of the Public Education and Outreach Program is to increase public knowledge of local water quality problems caused by urban runoff in order to maintain public support for local stormwater quality programs. This support ranges from individuals changing their daily actions to community backing for all stormwater program elements. The program should take into account pollutants commonly associated with the urban environment.

B. Permit Requirements

*The permittee must implement a public education program in an effort to promote behavior change by the public to reduce water quality impacts associated with pollutants in stormwater runoff and illicit discharges that includes: (**Clarified permit requirement**)*

- 1) targeting specific pollutants and pollutant sources determined by the permittee to be impacting, or to have the potential to impact, the beneficial uses of receiving waters;*
- 2) conducting outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff; and (**Clarified permit requirement**)*
- 3) informing businesses and the general public of the municipality's prohibitions against, and/or the water quality impacts associated with, illegal discharges and improper disposal of waste.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

1. Forming Partnerships

	Public Education Program Element - Partnerships <i>List each program element, briefly describe. Provide the year(s) for implementation or state "ongoing" for currently implemented programs.</i>	Implementation Year or "Ongoing"
1.a	<i>Poudre School District (PSD) – The City works closely with PSD's science coordinator in the implementation of the WaterSHED (Stormwater Habitat and Education Development) program.</i>	Ongoing
1.b	<i>Larimer County – The County is instrumental in promoting hazardous waste disposal and recycling programs for households and small businesses.</i>	Ongoing
1.c	<i>Colorado State University (CSU) – The City provides guest lectures for several CSU departments. The WaterSHED program supports the CSU Environmental Learning Center's programs.</i>	Ongoing
1.d	<i>Colorado Division of Wildlife (DOW) – The City coordinates with DOW on Project Aquatic Wild when requested.</i>	Ongoing

1.e	<i>Discovery Science Center Museum</i> – The City provides instruction on the museum’s watershed model at open houses when requested.	Ongoing
1.f	<i>Northern Colorado Alliance of Stormwater Coordinators (NCASC) member</i> –NCASC is a regionally defined group of MS4 Phase II permittees.	Ongoing
1.g	<i>Colorado Stormwater Council (CSC) member</i> - The CSC acts as a forum for MS4 permit holders to aid in the development and implementation of stormwater programs at a local level.	Ongoing
Discontinued/changed elements implemented during first permit term		
Reference	Summary of element and reason for discontinuing in second term.	
1.1.e. (from 1 st permit term program description)	<i>Trees, Water, and People</i> - This local organization was instrumental in the development of one of the outdoor classrooms; however, the organization is no longer active in the maintenance of outdoor classrooms. The outdoor classrooms are maintained as needed by the City.	

2. Using Educational Materials and Strategies

	Public Education Program Element – Educational Materials and Strategies <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	<i>Educational Programs for School-age Children</i> – Activities from the WaterSHED (Stormwater Habitat and Education Development) program are used each year in PSD elementary and middle schools. Each activity is correlated to a particular grade level using State of Colorado and PSD standards. Each activity focuses on one aspect of non-point source pollution and the resulting effects on stormwater quality. Program offerings include classroom water activities and field trips to outdoor classrooms and local streams. WaterSHED staff commit to 3500 contact hours with PSD students and adults annually.	Ongoing
2.b	<i>Event Participation</i> - WaterSHED staff participate in at least three annual local events to disseminate information on citizens’ roles in stormwater pollution prevention. Past participation has included events such as CSU Ram Serve, CSUnity, Earth Day, Sustainability Fair, Thursday Night Music & More, and Make a Difference Day.	Ongoing
2.c	<i>Volunteer Citizen Educators</i> – Each year citizen volunteers called Master Naturalists participate in a Master Naturalist training that includes WaterSHED training and field activities. Master Naturalists may complete additional training in order to conduct these activities in the field with students.	Ongoing
2.d	<i>Library of Educational Materials</i> – WaterSHED activities are compiled in a notebook, and materials are distributed to schools and citizens upon request. Reference materials for the WaterSHED program are kept in the Customer Connections Division at Utilities.	Ongoing
2.e	<i>Water Festivals</i> – Each year WaterSHED activities are included in the Fort Collins Children’s Water Festival. Topics include watershed protection and using biotic indices to indicate water quality.	Ongoing

2.f	<i>Promotional Material, Brochures or Fact Sheets</i> – Promotional material, such as our “Runoff to the Poudre River” bookmark will be displayed and distributed at a variety of locations and events. Articles promoting stormwater pollution prevention are displayed periodically on the City’s web site.	Ongoing
2.g	<i>Alternative Information Sources</i> – the WaterSHED program is currently promoted on the City’s web site at: www.fcgov.com/utilities/edu-kd-watershed.php .	Ongoing
Discontinued/changed elements implemented during first permit term		
Reference	Summary of element and reason for discontinuing in second term.	
1.2.1.2.	The previous permit specified events in which the City’s WaterSHED staff participated, including Poudre River Festival, Science Olympiad, and Enrichment in the Fort. WaterSHED staff strives to participate in as many relevant events as possible, but have found it is unlikely that any one event will continue to occur over the next five years; therefore, no specific commitment to participate in particular events is described here.	

3. Signage and Stenciling

	Public Education Program Element – Signage and Stenciling <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
3.a	<i>Tributary Signage</i> – Interpretive signage is displayed at select outdoor classrooms in Fort Collins, including the watershed display at the Spring Creek Bicycle Trail. Signs are maintained by the City as needed.	Ongoing
3.b	<i>Storm Drain Stenciling</i> – Fort Collins storm drains are stenciled through outreach projects typically involving CSU student groups, but may also be used to educate other community groups or City staff . These stenciling projects are accompanied by discussion of the importance of protecting water quality and reasons for the stencils. A minimum of 200 storm drains are stenciled annually.	Ongoing

4. Reaching Diverse Audiences

The City reaches diverse audiences through participation in public events that are well advertised, free, and open to the public. Information and materials distributed by the City are free and available to anyone who inquires about related topics. WaterSHED activities are taught in public, private, and home schools, including bilingual and English as second language schools. Outdoor classrooms located throughout the City are free, open to the public, and are used by organizations such as local scout troops.	

5. Illicit Discharge Education to Businesses and the Public

5.a	<i>Business Outreach Plan</i> - The City's Business Outreach Plan for stormwater includes an annual process to evaluate current challenges and plan for outreach and education. Business sectors are targeted based on spill complaints received throughout the year, and annual education and outreach on business practices and illicit discharges are aimed at these business sectors. Fifty business contacts will be made annually.	Ongoing
5.b	<i>Stormwater Outreach Campaign</i> - In conjunction with the Business Outreach Plan, these messages convey to the general public their role in the connection between land and water quality. Material is presented to the general public in a variety of methods, in addition to the components listed in items 1, 2, and 3 above.	Ongoing

6. Additional Requirements - Cherry Creek Reservoir Basin discharges (COR-080000 only)

Not applicable

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

City of Fort Collins	PUBLIC PARTICIPATION / INVOLVMENT	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
----------------------	--	---

II. PUBLIC PARTICIPATION/INVOLVMENT

A. Program Perspective

Public participation/involvement is often discussed in the context of the public education measure because they share a common goal – reaching out to citizens to improve awareness and achieve program compliance. The distinction between the two programs is that public participation/involvement provides a conduit for citizens to participate in the development and implementation of the publicly funded stormwater program.

B. Permit Requirements

Public involvement/participation. The permittee must implement a public involvement program as follows:

- 1) The permittee must comply with the State and local public notice requirements when implementing the CDPS Stormwater Management Programs required under this permit. Notice of all public hearings should be published in a community publication or newspaper of general circulation, to provide opportunities for public involvement that reach a majority of citizens through the notification process.*
- 2) The permittee must provide a mechanism and process to allow the public to review and provide input on the CDPS Stormwater Management Program.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

1. Public Notices

The City follows all applicable state and local Public Notice requirements in implementing its stormwater program. Public Notice of presentations to City boards will be published in a paper of general circulation (the Fort Collins Coloradoan) and posted on the City's web site.

2. Mechanism and Processes for Public Involvement/Feedback

	Public Involvement/Participation Program Element – Public Feedback <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	Public Meetings - Annual updates on implementation of the stormwater permit programs are given to the City’s Water Board and the Natural Resources Advisory Board.	Ongoing
2.b	Stormwater Master Planning Public Outreach Process – Stream stability and habitat enhancement assessments are incorporated into the City’s Stormwater Master Plans. As the plans are updated or new plans are adopted, the City conducts public outreach through open houses, mailings, and presentations to Boards and City Council.	Ongoing
2.e	Stormwater MS4 Permit Web Site – The City’s web page for stormwater quality is in place to explain the importance of water quality. Fort Collins Utilities web site will be expanded to list the City’s MS4 permit program descriptions and related information. The public will be able to comment on the program by clicking the “Contact Us” link.	2009
Discontinued/changed elements implemented during first permit term		
Reference	Summary of element and reason for discontinuing in second term.	
2.2.1	The previous permit stated that City Council will also receive a copy of the annual report. The Water Board is advisory to City Council, and items of importance are conveyed to the Council through this channel. Therefore, it is not necessary to send Council a separate copy of the annual report unless requested.	
2.2.3	<p>The previous permit specified citizen groups that were contacted for presentations and comment including the Poudre River Trust, Sierra Club, and Friends of the Poudre. City staff strives to provide outreach to relevant citizen groups when requested, but have found it unlikely that any one group will continue to exist over the next five years. Therefore, no specific commitment to present to particular citizen groups is described here.</p> <p>Presentations for contractors and homeowners associations are included in the Construction and Post-Construction minimum control measures of the permit.</p>	

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

MS4 NAME	ILLICIT DISCHARGE DETECTION AND ELIMINATION	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
-------------	--	---

A. Program Perspective

The goal of the Illicit Discharge Detection and Elimination Program is, to the maximum extent practicable, to reduce the frequency and environmental impact of illicit discharges in which pollutants are intentionally or accidentally discharged into the storm sewer system.

B. Permit Requirements

The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 61.2) into the permittee's MS4. Illicit discharges do not include discharges or flows from fire fighting activities, or other activities specifically authorized by a separate CDPS permit.

The permittee must:

- 1) *Develop and maintain a current storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and locations of all state waters that receive discharges from those outfalls.*
- 2) *To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges (except those identified in subparagraph 5 and 6 of this section) into the storm sewer system, and implement appropriate enforcement procedures and actions. (Clarified permit requirement)*
- 3) *Develop, implement, and document a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges, including areas with higher likelihood of illicit connections; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.*
- 4) *Develop and implement a program to train municipal staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observations and therefore receive training, and how staff will report observed suspected illicit discharges. (New permit requirement)*
 - i) ***Specific Deadline for Renewal Permittees:** Renewal Permittees must comply with the requirement of subparagraph (4) by no later than December 31, 2009.*
- 5) *Address the following categories of non-stormwater discharges or flows (i.e., illicit discharges) only if the permittee identifies them as significant contributors of pollutants to the permittee's MS4: landscape irrigation, lawn watering, diverted stream flows, irrigation return flow, rising*

ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, springs, flows from riparian habitats and wetlands, water line flushing, discharges from potable water sources, foundation drains, air conditioning condensation, water from crawl space pumps, footing drains, individual residential car washing, dechlorinated swimming pool discharges, and water incidental to street sweeping (including associated side walks and medians) and that is not associated with construction.
(Clarified permit requirement)

The permittee may also develop a list of occasional incidental non-stormwater discharges similar to those in the above paragraph, (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-stormwater discharges must not be reasonably expected (based on information available to the permittee) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the permittee has established for allowing these discharges to the MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs, etc.). The permittee must document in their program any local controls or conditions placed on the discharges. The permittee must include a provision prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to the MS4.

- 6) *The following sources are excluded from the prohibition against non-stormwater discharges and the requirements of subsections (2) and (3) above:*
- i) Discharges resulting from emergency fire fighting activities. Such discharges are specifically authorized under this permit (see Part I.A.2).*
 - ii) Discharges specifically authorized by a separate CDPS permit.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

1. Outfall map

The City's inventory map has been completed as required. The map includes inlets, manholes, storm sewer piping, open channels, and streams that make up the City's drainage system. It is used by Utilities for stormwater system cleaning, utility locates, and tracking illicit discharges. The maps are updated regularly following the addition, approval, and field verification of new stormwater features.

2. Regulatory mechanism

MUNICIPAL CODE:

ARTICLE VII. STORMWATER UTILITY

Sec. 26-498. Water Quality Control. (Rev. 2002) - prohibits the discharge of pollutants or contaminated water into or upon any public street or right-of-way, watercourse, stormwater facility, or other public or private property within the city; also authorizes the City to impose BMPs or effluent limitations more stringent than those required by the State.

Sec. 26-206. Definitions. (Rev. 2007) - defines pollutant

Sec. 26-491. Definitions. (Rev. 2002) - defines contaminated water; defines suitable treatment.

CHAPTER 1

GENERAL PROVISIONS

Sec. 1-15. General Penalty and Surcharges for Misdemeanor Offenses, Traffic Offenses and Traffic and Civil Infractions. (Rev. 2006) – authorizes fines of up to \$1000 per day per violation.

3. Illicit Discharge Detection and Elimination Plan

The City has developed its Illicit Discharge Detection and Elimination Plan for locating priority areas, tracing the source of an illicit discharge, and removing the source of an illicit discharge. The IDDE Plan includes the following procedures:

- Priority areas are identified through routine storm sewer inspections and maintenance activities, and in areas where spills or discharges are reported. Wastewater and Stormwater field crews have been trained to identify and respond to suspected illicit discharges.
- Conduct outfall inspections as priority locations are identified
- Follow up procedures for inspection and sampling of outfalls as needed
- Track inspection data in a database
- Trace identified illicit discharges to the source
- Utilize video inspections of storm sewers if necessary
- Utilize procedures necessary to remove the source of illicit discharges including:
 - tasking the responsible party with cleaning up the spill, utilizing enforcement tools in the ERP if necessary
 - street sweeping for non-hazardous spills
 - Poudre Fire Authority HazMat responds to emergency situations
 - Hiring a clean up company where responsible party cannot be identified
 - Building Inspections department directs plumbing changes for illicit connections
- Track responses to complaint calls in a spreadsheet

Discontinued/changed elements implemented during first permit term

Reference	Summary of element and reason for discontinuing in second term.
-----------	---

3.3.a.	<p>During the first permit term, the City located priority areas by receiving water body, age of the area of town, and by land use. Extensive dry weather outfall screening was performed throughout the system, and no illicit connections to the storm sewer system were found by this method. However, illicit connections have been found in response to information provided by stormwater maintenance crews and investigation of citizen complaint calls.</p> <p>The City feels that continuation of the dry weather outfall screening as described above is an inefficient use of resources. The City proactively trains field staff as described below, and educates the public and business sectors as described in the Public Education and Outreach Program. The City will identify and act on priority areas using the information provided by field staff and citizen complaint calls.</p>
--------	---

4. Staff Education

City field staff are trained to recognize and report potential illicit discharges observed during routine activities. Review of procedures for responding to spills and abandoned waste is included in the Pollution Prevention/Good Housekeeping for Municipal Operations minimum control measure.

D. Measurable Goals

Measurable Goals are required for Staff Education as per Part I.B.3(a)(4) of the permit (Permit Requirement (4), in Part B, above), unless this new permit condition is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Staff training program(s) listed in Part C.4, above, have been fully implemented and are ongoing.



(It is not necessary to complete Part 3 below if you check this box.)

2. One or more staff training program(s) have **NOT** been fully implemented and measurable goals have been provided in Part 3 below for each of the pending programs.



(You must complete Part 3 below if you check this box.)

3. Illicit Discharge Detection and Elimination Measurable Goals: Include those staff training program(s) that have **NOT** already been fully implemented, and provide the year by which implementation will occur. **Measurable Goals must be completed by 2009.**

	Illicit Discharge Detection and Elimination Measurable Goals - Training <i>List each program element, briefly describe. Provide the year(s) for implementation</i>	Implementation Year
3.a	Not Applicable	
3.b		
<i>Add additional rows as needed.</i>		

MS4 NAME	CONSTRUCTION SITES RUNOFF CONTROL	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
-------------	--------------------------------------	---

A. Program Perspective

The goal of the Construction Sites Runoff Control Program is to reduce, to the maximum extent practicable, sediment and other construction-related pollutants from entering the municipal separate storm sewer system.

B. Permit Requirements

The permittee must:

- 1) *Develop, implement, and enforce a program to reduce pollutants in any stormwater runoff, and to reduce pollutants in, or prevent when required in accordance with I.B.3, non-stormwater discharges that have the potential to result in water quality impacts (e.g., construction dewatering, wash water, etc.), to the MS4 from construction activities that result in a land disturbance of one or more acres. Reduction of pollutants in discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one or more acres. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B) (the “R-Factor” waiver), the permittee is not required to develop, implement, and/ or enforce its program to reduce pollutant discharges from such a site. **(Clarified permit requirement)***
- 2) *Develop and implement the program to assure adequate design, implementation, and maintenance of BMP’s at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include, at a minimum, the development, implementation, and documentation of:*
 - i) *Program Requirements, including:*
 - A) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions and procedures adequate to ensure compliance, to the extent allowable under State or local law.*
 - B) *Requirements for construction site operators to implement appropriate erosion and sediment control BMP’s.*
 - C) *Requirements for construction site operators to implement BMP’s to control waste such as discarded building materials, concrete truck washout, chemicals, litter, sanitary waste, and other non-stormwater discharges including construction dewatering and wash water, at the construction site that may cause adverse impacts to water quality. **(Clarified permit requirement)***
 - ii) *Compliance Assessment, including:*

A) *Procedures for site plan review which incorporate consideration of potential water quality impacts.*

B) *Procedures for construction site compliance assessment, including:*

1) *Site inspections; and*

2) *Receipt and consideration of information submitted by the public.*

iii) *Compliance Assurance, including:*

A) *Procedures for enforcement of control measures that includes documented procedures for response to violations of the permittee's program requirements. Procedures must include specific processes and sanctions adequate to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures. **(New permit requirement)***

1) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (A) to develop, document and implement response procedures that specifically address chronic and recalcitrant violators by no later than December 31, 2009.*

B) *An education and training program for municipalities, their representatives and/or construction contractors. At a minimum, the program must include an information program for construction site operators unfamiliar with the reviewing authority's regulatory requirements.*

C. Program Elements: By using existing, on going program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

1. Regulatory Mechanism to require BMPs and sanctions to ensure compliance

MUNICIPAL CODE:

CHAPTER 1

GENERAL PROVISIONS

Sec. 1-15. General Penalty and Surcharges for Misdemeanor Offenses, Traffic Offenses and Traffic and Civil Infractions. (Rev. 2006) – authorizes fines of up to \$1000 per day per violation.

ARTICLE VII. STORMWATER UTILITY

Sec. 26-206. Definitions. (Rev. 2007) - defines pollutant

Sec. 26-491. Definitions. (Rev. 2002) - defines contaminated water; defines suitable treatment.

Sec. 26-492. Declaration of Purpose. (Rev. 1991) – requires stormwater facilities for drainage and control of flood and surface waters within the City, including areas to be subdivided and developed, in order that storm and surface waters may be properly drained and controlled, pollution may be reduced and the environment enhanced.

Sec. 26-498. Water Quality Control. (Rev. 2002) - prohibits the discharge of pollutants or contaminated water into or upon any public street or right-of-way, watercourse, stormwater facility, or other public or private property within the city; also authorizes the City to impose BMPs or effluent limitations more stringent than those required by the State.

Sec. 26-544. Stormwater Facilities Required by Subdivisions. (Rev. 2002) – requires that prior to final approval of the plat for any subdivisions and the commencement of any construction upon any lot or parcel of land in the city, the owners of the property must submit for approval a detailed drainage report and construction plans, all in conformity with the master plan of the stormwater basins and the City of Fort Collins Design Criteria and Construction Standards.

LAND USE CODE

ARTICLE 3 – GENERAL DEVELOPMENT STANDARDS

Division 3.3 Engineering Standards

3.3.2. Development Improvements (Rev. 2004)

- (A) ***Approval of City Engineer*** - requires approval of improvements by City Engineer prior to final plat acceptance and construction or land disturbing activity initiated.
- (B) ***Project Development Agreements*** – requires owners of every development project in the city to enter into a formal contract (Development Agreement) with the City defining owner obligations including storm drainage on the project. The development agreements cite the owner's responsibility to provide and maintain construction site stormwater runoff control improvements as shown on approved development plan documents.
- (C) ***Development Guarantee and Maintenance and Repair Guarantees*** – requires the owner to submit a financial security to guarantee proper installation and maintenance of the stormwater BMPs indicated on the approved project plans prior to issuance of the Development Construction permit.
- (D) ***Required Improvements Prior to Issuance of Building Permit*** - requires improvements made as specified in 26-544 prior to the issuance of a Building Permit.
- (E) ***Required Improvements Prior to Issuance of Certificate of Occupancy*** - requires improvements made as specified in 26-544 prior to the issuance of a Certificate of Occupancy.

3.3.5 Engineering Design Standards – states that all projects must comply with the design standards, requirements and specifications for the various services as certified by the appropriate agency.

Division 3.4 Environmental, Natural Area, Recreational, and Cultural Resource Protection Standards

3.4.3 Water Quality – requires developments to comply with all applicable local, state, and federal water quality standards, including, but not limited to those regulating erosion and sedimentation, storm drainage and runoff control, solid wastes, and hazardous substances. Requires projects to be designed in accordance with the Storm Drainage Design Criteria and Construction Standards.

ARTICLE 5 - DEFINITIONS

5.1.2. Definitions (Rev. 2007) – definition of development (includes redevelopment activities)

Discontinued/changed elements implemented during first permit term

Reference	Summary of element and reason for discontinuing in second term.
4.2.	The following code sections were added to this permit to provide clarity in the regulatory mechanisms: Municipal Code Sections 26-491 and 1-15. The Land Use Code standards were also divided for clarity.

2. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs

City of Fort Collins Storm Drainage Design Criteria and Construction Standards (Adopted 1984, Revised 1999) – requires Urban Storm Drainage Criteria Manual (vol. 1-3) criteria to be used except where specified; includes construction site stormwater runoff control criteria. The manual is available to contractors and is on the City’s web site, currently at:

<http://www.fcgov.com/stormwater/pdf/sw-manual07.pdf?20080509>

Brochure “Sediment and Erosion Control for Construction Sites” (2008)

3. Requirements for construction site operators to control waste including discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste

MUNICIPAL CODE

ARTICLE V. - DIRT, DEBRIS AND CONSTRUCTION WASTE

Sec. 20-62. Depositing on streets prohibited. (1972) – prohibits tracking, dropping or depositing of dirt, debris, construction waste or any other material by or from any vehicle onto any street or right-of-way . If the tracking, dropping or depositing occurs, the person responsible shall promptly remove all material and return the street or right-of-way to its prior condition.

Sec. 20-63. Removal of all debris required. (1972) - prohibits accumulation of construction materials, waste material, debris or rubbish as the result of the construction activity in the street or right-of-way. All construction materials, waste material, debris, rubbish, tools, construction equipment, machinery and surplus materials shall be removed from the street or right-of-way if public access to the street or right-of-way is restricted in any manner.

Sec. 20-64. Responsibility for such nuisance. (1972) - assigns responsibility to the general contractor or superintendent with overall construction responsibilities and/or supervision of the construction site or operation area for any violations of the provisions of this Article by any agents, employees, subcontractors or haulers of materials or supplies to and from the construction site.

Sec. 20-65. Removal by City. (1972) - allows the City to remove the deposits or materials and charge the general contractor, superintendent, owner of the property on which the work is being performed or other person responsible for the full cost of such removal. Until such charge has been fully paid, no such contractor, superintendent, owner or other responsible person shall be entitled to obtain further construction-related permits or certificates from the City.

Sec. 20-66. Penalty. (1972) - Any person who violates any of the provisions of this Article commits a misdemeanor and shall be subject to a fine or imprisonment in accordance with § 1-15.

4. Procedures for site plan review which incorporate consideration of potential water quality impacts –

- a. Site Plan Development
- b. Site Plan Review

4.a. *Site Plan Development*: No development plat can be certified nor any land disturbing activity begin on a parcel of land until plans, including storm drainage plans in accordance with the City's Storm Drainage Design Criteria and Construction Standards, have been reviewed and approved by City staff. The status of projects submitted for review through the development review process is tracked in a database from their initial submittal through final approval.

4.b. *Site Plan Review*: The storm drainage specifications require that development projects submit a detailed report that discusses how proposed BMPs will be used to control stormwater runoff during and after project construction. The report must include calculations to verify the effectiveness of the plan. A site map must be included, typically in conjunction with the site drainage plan, indicating the location of all BMPs, with notes, and a project schedule indicating the timing of BMP installations. The Stormwater Utility reviews all construction site erosion control plan and drainage plan submittals as described above, and will not sign off on any development plan until it is in compliance with the specification.

Discontinued/changed elements implemented during first permit term

Reference	Summary of element and reason for discontinuing in second term.
-----------	---

4.3.	The previous permit stated that the Stormwater Utility reviews all construction site stormwater management plan submittals. The City does not require submittal of the CDPS-required SWMPs, but used the wording "stormwater management plan submittals" when referring to the construction site erosion control plan and drainage plan in accordance with the City's Storm Drainage Design Criteria and Construction Standards.
------	--

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

Information submitted by the public is received by, or forwarded to the Stormwater Program. Such information may warrant a field inspection, notification to site personnel or other follow-up actions as appropriate to the situation. Information requiring follow-up on a construction site is documented in the inspection database.

6. Procedures for site inspection and enforcement of control measures

- a. Inspections
- b. Enforcement

a) Inspections Procedures for the inspection program include:

- After plan approval, the Development Construction Permit (DCP) process, holds on building permits and certificates of occupancy are placed, and initial inspection to ensure installation of BMPs, construction may begin and the project is put into the inspector's inspection database

- Inspections will be prioritized according to the following schedule:

FREQUENCY	CONSTRUCTION ACTIVITY
Once every two weeks – active construction sites	Initial site work through build-out on active construction sites
Increased frequency	As needed for sites with the following conditions: <ul style="list-style-type: none"> • sites near sensitive areas • sites with compliance concerns
Post-storm (significant event)	As needed for sites with the following conditions: <ul style="list-style-type: none"> • sites near sensitive areas • sites with compliance concerns
Monthly	Rarely used; the following situations would apply: <ul style="list-style-type: none"> • extreme winter weather • monitoring revegetation only • inactivity on site and inspector receives written notice of site inactivity
Upon demand	Complaint-driven inspections

- BMP implementation, including controls for discarded materials, concrete truck washout, chemicals, litter, and sanitary waste are included in the inspections and documented as necessary for compliance in the inspection database.
- Documentation is entered into a form that stores the information into the inspection database.

b) Enforcement The City has developed and implemented an Enforcement Response Plan that outlines enforcement procedures, including provisions for dealing with chronic and recalcitrant violators. Compliance issues and enforcement measures taken are tracked in the construction site inspection database. Enforcement measures include:

- Withholding building permits
- Withholding certificates of occupancy
- Project work stoppage
- Calling of the financial security
- Municipal summons / Fines

Discontinued elements implemented during first permit term

Reference	Summary of element and reason for discontinuing in second term.
4.1.	The previous permit stated that changes to BMP implementation will be inspected and documented during the biweekly inspections. Changes to BMP implementation will be inspected and documented as necessary for compliance purposes.
4.4.	The previous permit stated that active sites are inspected at least once every two weeks, large sites more frequently and all sites after storm events. The City feels that the new frequency schedule will provide for more efficient inspection and enforcement of BMP implementation.

7. Training and Education for Construction Site Operators

Various methods of training for construction site operators may include the following:

- Information discussed at preconstruction and DCP meetings
- City of Fort Collins Storm Drainage Design Criteria and Construction Standards
- On-site field training in the proper use and installation of BMPs
- Annual training presentations given to site operators
- Materials given on site, such as “Sediment and Erosion Control for Construction Sites”
- Material available in the Stormwater Utility Library

D. Measurable Goals

Measurable Goals are required for the requirement in Part I.B.4(a)(2)(iii) of the permit (Permit Requirement (2)(iii) in Part B, above) unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Procedures, as listed in Part C.6.b, above, have already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.



(It is not necessary to complete Part 3 below if you check this box.)

2. Procedures have **NOT** already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.



(You must complete Part 3 below if you check this box.)

3. Construction Sites Program Measurable Goals: The Measurable Goal has been provided. Include the year by which full implementation of procedures will be achieved to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures will be implemented. **Measurable Goals must be completed by 2009.**

	Construction Sites Program Measurable Goals – Chronic and Recalcitrant Violators <i>Provide the year for implementation</i>	Implementation Year
3.a	Fully Implement procedures to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures	Not applicable

MS4 NAME	POST-CONSTRUCTION STORMWATER MANAGEMENT	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 – 2013
-------------	--	---

A. Program Perspective

The goal of the Post-Construction Stormwater Management program is to implement planning procedures and enforcement mechanisms to reduce, to the maximum extent practicable, stormwater impacts resulting from areas of new development and significant redevelopment.

B. Permit Requirements

Post-construction stormwater management in new development and redevelopment.

The permittee must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. The permittee must:

- 1) Develop, implement, and document strategies which include the use of structural and/or non-structural BMPs appropriate for the community that address the discharge of pollutants from new development and redevelopment projects, and/or that maintain or restore hydrologic conditions at sites to minimize the discharge of pollutants and prevent in-channel impacts associated with increased imperviousness; (**Clarified permit requirement**)*
- 2) Use an ordinance or other regulatory mechanism to address post- construction runoff from new development and redevelopment projects to the extent allowable under State or local law;*
- 3) Develop, implement, and document procedures to determine if the BMPs required under Item (1), above, are being installed according to specifications. (This may be developed in conjunction with the Construction program area, as described in Part I.B.4);*
- 4) Develop, Implement, and document procedures to ensure adequate long-term operation and maintenance of BMPs, including procedures to enforce the requirements for other parties to maintain BMPs when necessary; (**Clarified permit requirement**)*
- 5) Develop, implement, and document an enforcement program, which addresses appropriate responses to common noncompliance issues, including those associated with both installation (subparagraph (3), above) and long term operation and maintenance (subparagraph (4), above) of the required control measures; (**Clarified permit requirement**)*
- 6) Develop and implement procedures and mechanisms to track the location of and adequacy of operation of long-term BMPs implemented in accordance with the program. (**Clarified permit requirement**)*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

1. Regulatory mechanism

MUNICIPAL CODE:

ARTICLE VII. STORMWATER UTILITY

Sec. 26-492. Declaration of Purpose. (Rev. 1991) – requires stormwater facilities for drainage and control of flood and surface waters within the City, including areas to be subdivided and developed, in order that storm and surface waters may be properly drained and controlled, pollution may be reduced and the environment enhanced.

Sec. 26-541. Property owners to provide stormwater facilities. (Rev. 1998) - requires owners to provide stormwater facilities on site.

Sec. 26-544. Stormwater Facilities Required by Subdivisions. (Rev. 2002) – requires that prior to final approval of the plat for any subdivisions and the commencement of any construction upon any lot or parcel of land in the city, the owners of the property must submit for approval a detailed drainage report and construction plans, all in conformity with the master plan of the stormwater basins and the Design Criteria and Construction Standards

LAND USE CODE

ARTICLE 3 – GENERAL DEVELOPMENT STANDARDS

DIVISION 3.3 ENGINEERING STANDARDS

3.3.3. Development Improvements (Rev. 2004)

- (A) ***Approval of City Engineer*** - requires approval by City Engineer that improvements are designed according to City's various design criteria and construction standards prior to any construction or land disturbing activity being initiated on any parcel of land.
- (B) ***Project Development Agreements*** – requires owners of every development project in the city to enter into a formal contract (Development Agreement) with the City defining owner obligations including storm drainage on the project. The development agreements cite the owner's responsibility to provide and maintain construction site stormwater runoff control improvements as shown on approved development plan documents.
- (C) ***Development Guarantee and Maintenance and Repair Guarantees.***
 - (1) ***Construction Security*** – requires the developer to provide to the City a financial security to guarantee the completion of all public improvements to be constructed as shown on the approved plans for the development.

Division 3.4 Environmental, Natural Area, Recreational, and Cultural Resource Protection Standards

3.4.4 Water Quality – requires developments to comply with all applicable local, state, and federal water quality standards, including, but not limited to those regulating erosion and sedimentation, storm drainage and runoff control, solid wastes, and hazardous substances. Requires projects to be designed in accordance with the Storm Drainage Design Criteria and Construction Standards.

ARTICLE 5 - DEFINITIONS

5.1.2. Definitions (Rev. 2007) – definition of development (includes redevelopment activities)

Discontinued/changed elements implemented during first permit term	
Reference	Summary of element and reason for discontinuing in second term.
4.2.	Sections 3.3.3 and 5.1.2 of the Land Use Code was added to this permit to provide clarity in the regulatory mechanism.

2. Design Criteria and Standards

Municipal Code requires that selection and design of appropriate BMPs conforms with the master plan of the appropriate stormwater basin and the City of Fort Collins Design Criteria and Construction Standards manual. The manual requires Urban Storm Drainage Criteria Manual (vol. 1-3) criteria to be used except where specified. Where regional BMPs have been constructed, the City may waive the requirement for on-site BMPs.

3. Review and Approval Procedures

- i. Plan Review
- ii. Field verification
- iii. If different procedures are used for municipal projects, roadway construction, etc., include a description here.

<p>3.i <u>Plan review</u> procedures are established by ordinance. Plans are reviewed by several departments for approval of all drainage facilities, including stormwater treatment. Plan reviews and approvals are tracked in a database.</p> <p>3.ii Field Verification is performed to confirm correct installation once features are constructed. The City must sign off on the Project Engineer's certification that features are correctly installed. Additional enforcement tools include:</p> <ul style="list-style-type: none"> • Withholding building permits • Withholding certificates of occupancy • Project work stoppage • Calling of the financial security <p>3.iii The same plan review process above applies to City projects, except no financial security is required or called as an enforcement measure.</p>

4. Tracking

Following the addition, approval, and field verification of permanent BMPs, they are added to the Utilities stormwater mapping system. Inspections and maintenance history are tracked in a database that is linked to the mapping system.

5. Requiring long-term operation and maintenance of BMPs

The Development Agreement is the primary tool for requiring the responsible party to maintain in perpetuity any required post-construction stormwater control measures as identified in the approved development plan documents. Requirements may also be referenced in:

- Drainage Easements
- Plat Requirements
- Home Owners Association Requirements

6. Monitor long-term compliance –

- a. Inspections
- b. Enforcement

6.a. *Inspections* – The City has developed and implemented a Post-Construction Program for the long-term operation and maintenance of BMPs. Inspection program elements include:

- Regular inspection of Post-Construction water quality BMPs
- Educational component that includes brochures and presentations for responsible parties
- Follow up inspections as needed for compliance

6.b. *Enforcement* – The City has developed and implemented an Enforcement Response Plan that outlines follow-up and enforcement procedures to gain compliance on BMPs that require maintenance. Compliance issues and enforcement measures taken are tracked in the post-construction BMP database. Enforcement measures include:

- Letter of deficiency with deadline to correct
- Notice of Violation
- Fines
- Municipal Summons

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

MS4 NAME	POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
-------------	---	---

A. Program Perspective

The goal of the Pollution Prevention/Good Housekeeping for Municipal Operations program is to reduce, to the maximum extent practicable, the amount and type of pollution that is generated by municipal operations or from municipally-owned property.

B. Permit Requirements

The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutants in runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable. The permittee must:

- 1) *Develop and maintain written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations. The program must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of industrial facilities the permittee owns or operates that are subject to separate coverage under the State's general stormwater permits for discharges of stormwater associated with industrial activity; **(New permit requirement)***
 - i) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirements of subparagraph (1) by no later than December 31, 2009.*
- 2) *Develop and implement procedures to provide training to municipal employees as necessary to implement the program under Item 1, above. **(Clarified permit requirement)***

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

1. Implementation of an operation and maintenance program

The City continues to implement pollution prevention for municipal operations. A variety of practices, policies, and procedures are in place for various city facilities and activities that occur, many of which are included or referenced in facility Runoff Control Plans (RCPs.) Oversight of the program occurs through periodic review of facilities, practices, and procedures by the RGA Division. When a situation arises, the need for additional training, revising procedures or policies, or developing additional tools is evaluated.

2. Employee Training program - Describe your program(s) to educate municipal employees on implementing procedures for the Pollution Prevention and Good Housekeeping program.

Training specific to potential stormwater impacts from municipal operations is ongoing. Annual training for facilities with RCPs includes one or more of the following classes:

- Pollution Prevention/ Good Housekeeping
- RCP, Illicit Discharge, and Spill Decision Tree
- Various waste/chemical management classes such as Hazardous Communications
- Spill Prevention, Control, and Countermeasure training for applicable sites
- Additional training is provided in informal, one-on-one interactions, including informing staff of follow-up response to concerns or reports of specific incidents

In addition, City employees are trained to notify and work in conjunction with the Regulatory and Government Affairs Division for any environmental questions, concerns or problems. If deficiencies are found, appropriate follow-up may include one or more of the following:

- discussion with employee(s) involved
- Division or Department meeting
- assessment of current practices and how to change or improve them
- development of a policy, procedure, or procedural manual, depending upon the situation

Presentations are made to applicable engineering staff regarding construction site runoff control as part of the Construction Sites Runoff Control minimum control measure.

D. Measurable Goals

Measurable Goals are required as per Part I.B.6(a)(1) of the permit (Permit Requirement (a)(1) in Part B, above), unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Written procedures and lists, as listed in Part C.3, above, for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations, have already been developed.
☐ **(It is not necessary to complete Part 3 below if you check this box.)**
2. Written procedures and lists for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations have **NOT** already been fully developed.
☒ **(You must complete Part 3 below if you check this box.)**
3. Pollution Prevention/ Good Housekeeping Measurable Goals: The Measurable Goal has been provided. Include the year when written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations will be fully developed. **Measurable Goals must be completed by 2009.**

	Pollution Prevention/ Good Housekeeping Measurable Goals <i>Provide the year(s) for implementation</i>	Implementation Year
3.a	Review existing documented procedures, and develop new written procedures, as necessary, for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations. The documentation must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The documentation must also include a list of the industrial facilities the permittee owns or operates that are subject to separate coverage under the State's general stormwater permits for discharges of stormwater associated with industrial activity. *The City has written procedures and lists but will review and update exiting documented procedures as described above.	2009



Fort Collins Utilities
Regulatory and Government Affairs Division
700 Wood Street
Fort Collins, CO 80522
970.221.6900
970.221.6970 - fax
fcgov.com/utilities

2010 Changes to the CDPS Stormwater Management Program

In 2010, the City of Fort Collins Regulatory and Government Affairs Division and City Attorneys Office reviewed and revised Chapter 26 of the City of Fort Collins Municipal Code to improve enforcement mechanisms related to its MS4 permit. No changes to BMPs or identified measurable goals were made.

The Code changes reflect improvements and provide the following:

1. Definitions and language to allow Utilities staff to investigate and abate imminent hazards to the Utilities systems that may cause the City to violate environmental requirements, and to allow the City to recover costs it may incur in stopping or mitigating imminent hazards:
 - a. 26-1 – Definitions: *imminent hazard* added
 - b. 26-22 – Right of Entry clarified
 - c. 26-28 – Abatement of Imminent Hazards added
2. Definitions applicable to the Stormwater Utility Article added and/or modified to improve enforcement mechanisms:
 - a. 26-491 – Definitions: *best management practices, maintenance best management practices, connection, CDPS, pollutant, private storm drainage facilities, public storm drainage facilities, storm drainage facility* added
 - b. 26-491 – Definitions: *contaminated water* amended to exclude allowable non-stormwater discharges
 - c. 26-491 – Definitions: *suitable treatment* amended to include treatment pursuant to CDPHE Low-Risk Discharge Guidance
3. 26-498 – Water Quality Control amended to clarify the purpose of storm drainage facilities, clarify the prohibition of illicit connections and obstructions to stormwater facilities, and addition of language to address maintenance of private stormwater quality facilities
4. 26-499 – Violations and Penalties added to clarify that any violation of Article VII of Chapter 26 of the Code relating to stormwater is a criminal misdemeanor
5. 26-518 – Enforcement modified to reflect changes in 26-22, Right of Entry
6. 26-547 – Maintenance of Storm Drainage Facilities amended to clarify responsibility for operation and maintenance of private storm drainage facilities in accordance with industry best practices
7. 26-548 – Stop Work Orders added to allow issuance of stop work orders for violations of the Stormwater Utility Article

Chapter 26 is available online at: <http://www.colocode.com/ftcollins/municipal/chapter26.htm>



Fort Collins Utilities
Regulatory and Government Affairs Division
700 Wood Street
Fort Collins, CO 80522
970.221.6900
970.221.6970 - fax
fcgov.com/utilities

2011 Changes to the CDPS Stormwater Management Program

In 2011, the City of Fort Collins Utilities made minor changes to its Public Education and Outreach Program elements. In addition, the City of Fort Collins Storm Drainage Design Criteria and Construction Standards were revised and adopted by City of Fort Collins Municipal Code 26-500, the Fort Collins Stormwater Criteria Manual. No changes to identified measurable goals were made.

Changes to program elements are as follows:

1. Public Education and Outreach, Forming Partnerships:

Current language: 1.e *Discovery Science Center Museum* - The City provides instruction on the museum's watershed model at open houses when requested.

Revised language: 1.e *Discovery Science Center Museum* - The City will maintain its partnership with the museum, which will provide water quality components integrated into some of its activities and displays.

Explanation: The Discovery Science Center Museum was closed in 2011 and is being rebuilt at a new location. It will no longer carry the watershed model, but will integrate water quality components into its activities and displays when it reopens.

2. Public Education and Outreach, Signage and Stenciling:

Current language: 3.b *Storm Drain Stenciling* - Fort Collins storm drains are stenciled through outreach projects typically involving CSU student groups, but may also be used to educate other community groups or City staff. These stenciling projects are accompanied by discussion of the importance of protecting water quality and reasons for the stencils. A minimum of 200 storm drains are stenciled annually.

Revised language: 3.b *Storm Drain Marking* - Fort Collins storm drain marking is accomplished through volunteer groups and City staff. When volunteers are used, the storm drain marking projects are accompanied by discussion of the importance of protecting water quality and reasons for the markers. A minimum of 200 storm drains will be marked annually.

Explanation: The City of Fort Collins determined that the previous stenciling program, while an effective educational activity, was neither sustainable nor was it reaching enough geographic areas of the City. Placing permanent markers will allow for more complete coverage, with less frequent maintenance of the markers compared to stencils.

3. Construction Sites Runoff Control, Regulatory Mechanism to require BMPs and sanctions to ensure compliance:

Add to Municipal Code, **ARTICLE VII. STORMWATER UTILITY:**

Sec. 26-500. (Stormwater Criteria Manual, Adopted 2011). This section adopts by reference as the stormwater design criteria of the City, the Urban Storm Drainage Criteria Manual, 2001 Edition, published by the Denver Urban Drainage and Flood Control District, as amended by the City in subsection b of this section. It shall be referred to as the Fort Collins Stormwater Criteria Manual.

4. Construction Sites Runoff Control, Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs:

Current language: City of Fort Collins Storm Drainage Design Criteria and Construction Standards (Adopted 1984, Revised 1999) – requires Urban Storm Drainage Criteria Manual (vol. 1-3) criteria to be used except where specified; includes construction site stormwater runoff control criteria. The manual is available to contractors and is on the City's web site, currently at: <http://www.fcgov.com/stormwater/pdf/sw-manual07.pdf?20080509>

Revised language: Fort Collins Stormwater Criteria Manual (Adopted 2011). This section adopts by reference as the stormwater design criteria of the City, the Urban Storm Drainage Criteria Manual, 2001 Edition, published by the Denver Urban Drainage and Flood Control District, as amended by the City in subsection b of this section. It shall be referred to as the Fort Collins Stormwater Criteria Manual. The manual is available at the City Clerk's office.

*The Fort Collins Stormwater Criteria Manual has been substituted for the Storm Drainage Design Criteria and Construction Standards in the Municipal Code and is incorporated by general references in the Land Use Code. Specific references in the Land Use Code to the Storm Drainage Design Criteria and Construction Standards have yet to be updated, but will be corrected in the upcoming Land Use Code update process.

Chapter 26 is available online at: <http://www.colocode.com/ftcollins/municipal/chapter26.htm>



Utilities
electric · stormwater · wastewater · water
700 Wood Street
PO Box 580
Fort Collins, CO 80522
970.221.6700
970.221.6619 – fax
970.224.6003 – TDD
utilities@fcgov.com
fcgov.com/utilities

March 26, 2012

Michelle DeLaria
Colorado Department of Health and Environment
Water Quality Control Division
WQCD-P-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

RE: Clarification: Changes to the CDPS Stormwater Management Program
CDPS Permit #COR-090050, City of Fort Collins, Larimer County

Dear Ms. DeLaria,

The recently submitted 2011 Changes to the CDPS Stormwater Management Program required some clarification to reflect the adopted Fort Collins Stormwater Criteria Manual.

Attached please find revised items #3 and #4 from the City of Fort Collins' 2011 Changes to the CDPS Stormwater Management Program. These items will replace the corresponding items in the previous report. Upon your review of the enclosed documents, you may contact Susan Strong at (970) 631-3698 if you should have any questions.

CERTIFICATION STATEMENT

"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 of Permittee

3/27/12 
Date Signed

Darin Atteberry, City Manager
Title of Signatory



Fort Collins Utilities
Regulatory and Government Affairs Division
700 Wood Street
Fort Collins, CO 80522
970.221.6900
970.221.6970 - fax
fcgov.com/utilities

3. Construction Sites Runoff Control, Regulatory Mechanism to require BMPs and sanctions to ensure compliance:

Current Language: Sec. 26-544. Stormwater Facilities Required by Subdivisions. (Rev. 2002) – requires that prior to final approval of the plat for any subdivisions and the commencement of any construction upon any lot or parcel of land in the city, the owners of the property must submit for approval a detailed drainage report and construction plans, all in conformity with the master plan of the stormwater basins and the City of Fort Collins Design Criteria and Construction Standards.

Revised Language: City of Fort Collins Ordinance No. 174, 2011, amends Chapter 26 of the City of Fort Collins Municipal Code to adopt and provide for technical revision of the Fort Collins Stormwater Criteria Manual. The Fort Collins Stormwater Criteria Manual adopts by reference specific articles, sections, divisions, and subsections of the Urban Storm Drainage Criteria Manual as listed in Sec. 26-500 (b). This list includes Volume 3, November 2010 edition. Additions and deletions to the listed articles, sections, divisions, and subsections of the Urban Storm Drainage Criteria Manual described in amendments adopted by the City Council are separately codified as Fort Collins Amendments to the Urban Drainage and Flood Control District Criteria Manual.

4. Construction Sites Runoff Control, Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs:

Current language: City of Fort Collins Storm Drainage Design Criteria and Construction Standards (Adopted 1984, Revised 1999) – requires Urban Storm Drainage Criteria Manual (vol. 1-3) criteria to be used except where specified; includes construction site stormwater runoff control criteria. The manual is available to contractors and is on the City's web site, currently at: <http://www.fcgov.com/stormwater/pdf/sw-manual07.pdf?20080509>

Revised language: Fort Collins Stormwater Criteria Manual (Adopted 2011). City of Fort Collins Ordinance No. 174, 2011, amends Chapter 26 of the City of Fort Collins Municipal Code to adopt and provide for technical revision of the Fort Collins Stormwater Criteria Manual. The Fort Collins Stormwater Criteria Manual adopts by reference specific articles, sections, divisions, and subsections of the Urban Storm Drainage Criteria Manual as listed in Sec. 26-500 (b). This list includes Volume 3, November 2010 edition. Additions and deletions to the listed articles, sections, divisions, and subsections of the Urban Storm Drainage Criteria Manual described in amendments adopted by the City Council are separately codified as Fort Collins Amendments to the Urban Drainage and Flood Control District Criteria Manual.

*The Fort Collins Stormwater Criteria Manual has been substituted for the Storm Drainage Design Criteria and Construction Standards in the Municipal Code and is incorporated by general references in the Land Use Code. Specific references in the Land Use Code to the Storm



Drainage Design Criteria and Construction Standards have yet to be updated, but will be corrected in the upcoming Land Use Code update process.

Chapter 26 is available online at: <http://www.colocode.com/ftcollins/municipal/chapter26.htm>

ONE-TIME OPERATING PROCEDURES REPORT – Due March 10, 2010
Municipal Separate Storm Sewer Systems (MS4s) Permits, COR-070000, COR-080000 and COR-090000

COLORADO DEPT. OF PUBLIC HEALTH & ENVIRONMENT

Water Quality Control Division
WQCD-P-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

This form is intended to be filled out electronically and then printed for submittal; however, the information required for Parts 3 and 4 may instead be included in a separate attachment. One original copy (no faxes or e-mails) of the completed One-Time Operating Procedures Report Form, including attachments as appropriate, must be submitted to the Water Quality Control Division by March 10, 2010.

Each part of this form (1 through 4) must be completed, and the certification in Part 2 must be signed by the permittee (legally responsible person). Additional instructions for completing Part 3 of the form are included at the beginning of that section.

This form is used to report compliance with Part I.B.6 of the above referenced MS4 permits, which requires permittees to “develop and maintain written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee’s municipal operations. The program must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of industrial facilities the permittee owns or operates that are subject to separate coverage under the State’s general stormwater permits for discharges of stormwater associated with industrial activity”. All MS4 permittees covered under the above referenced general permits must comply with this requirement no later than **December 31, 2009**, and report it by **March 10, 2010**.

PART 1: PERMITTEE INFORMATION

Permittee (Agency name): City of Fort Collins
Mailing Address: Utilities 700 Wood St., P.O. Box 580
City and Zip Code: Fort Collins, 80522-0580
Permit Certification No: COR – 090050

PART 2: 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."

X



Signature of Permittee (legally responsible person)

2/26/10

Date Signed

PART 3: FACILITIES COVERED BY INDUSTRIAL STORMWATER PERMITS

The permittee must provide a list of industrial facilities it owns or operates that are subject to separate coverage under any State of Colorado CDPS general stormwater permit, or the No Exposure Exclusion for discharges of stormwater associated with industrial activity.

INSTRUCTIONS:

Please read the instructions in their entirety before completing the table below.

1. It is **not** necessary to list sites/facilities with permit coverage under the Stormwater Construction General Permit (COR-0300000). It is also **not** necessary to list permits that are for discharges other than stormwater.
2. **List all facilities with industrial general stormwater permit coverage or No Exposure Exclusions for which the MS4 owns the permitted operation, even if a contractor or separate operator is the permittee.** It is not required to list facilities if the MS4 owns only the land and leases it to the operating entity, but has no association with the operations of that facility.
3. **List all applicable facilities with industrial general stormwater permit coverage or No Exposure Exclusions, per the above criteria, including facilities located outside of the MS4 permit boundary or municipal boundary.**
4. For each listed facility, indicate the facility name, permittee, address, permit certification number, and the applicable CDPS general stormwater permit using the following categories:
 - a. Light – COR-010000;
 - b. Heavy – COR-020000;
 - c. Metal Mining – COR-040000;
 - d. Sand & Gravel (and other nonmetallic minerals) – COR-340000;
 - e. Recycling – COR-060000; or
 - f. No Exposure Exclusion – NOX-000000.

Name of Facility (with industrial general stormwater permit coverage or No Exposure Exclusions, per the above criteria)	Facility Permittee (if other than the MS4)	Address (street, city, and zip code)	CDPS Permit Certification Number	Stormwater Permit Type
Ft Collins/Loveland Municipal Airport	Fort Collins & Loveland, Cities of	4900 Earhart Rd Loveland	COR010022	Light Industrial
Mulberry Water Reclamation Facility	Fort Collins, City of	920 E Mulberry St Fort Collins	COR010936	Light Industrial
Drake Water Reclamation Facility	Fort Collins, City of	3036 Environmental Dr Fort Collins	COR010937	Light Industrial
Transfort Bus Facility	Fort Collins, City of	6570 Portner Rd Fort Collins	COR011107	Light Industrial

PART 4: INVENTORY OF WRITTEN PROCEDURES

The permittee must submit a one-time inventory of the written procedures developed for the Pollution Prevention/Good Housekeeping for Municipal Operations program, as described in Part I.B.6 of the permit (. The inventory must address all municipal operations (activities/facilities) listed in Part I.B.6(a) of the permit, and any other activities or facilities the permittee addressed in their Pollution Prevention/Good Housekeeping for Municipal Operations program. It is not necessary to list the specific locations of municipal facilities. The permit also states that the Division may specifically request additional types of activities or facilities be included in the inventory by providing such a list at least 6 months prior to the above applicable due date. The following table includes those additional activities and facilities.

INSTRUCTIONS:

Please read the instructions in their entirety before completing the table below:

General Instruction:

1. Column I lists activities and facilities, by category, that must be addressed. It is likely that the permittee will not have all municipal operations divided into the categories of activities and facilities provided. The permittee should do its best to address its activities and facilities using the provided list. A permittee should list an activity/facility in Row I.1 (Other) if it does not fit into one of the provided categories.

Instructions for Each Column:

2. Column II – Owned or Operated by the MS4?
Does the permittee own or operate the activity/facility within its permitted area? Enter either “Yes” or “No.” Enter “Yes” if the permittee owns or operates one or more activities/facilities fitting into the applicable category. Enter “No” if the MS4 owns only the land that is leased to the operating entity, but has no association with the activities at that facility.
3. Column III – Contractor Operated?
Is the activity/facility operated by contractors? Enter either “Yes” or “No.” Enter “Yes” if contractors operate any activity/facility associated with the applicable category. Therefore, the permittee should enter “Yes” if the activity or facility is operated by both permittee staff and contractors. If a “Yes” is entered for a category, the written procedures listed in Column V must address the contractors, as applicable, including training, contractor procedures, etc. If separate procedures are in place for staff and contractors, indicate this in Column V.
4. Column IV – Are Written Procedures in Place?
Are written procedures for pollution prevention and good housekeeping in place for the activity/facility, as required by Part I.B.6 of the permit? Enter either “Yes” or “No.” These procedures are required for all activities and facilities for which the answer in Column II is “Yes.” If a “No” is provided in this column for any activity/facility the permittee owns or operates within its permitted area, the permittee is out of compliance with the permit, and a noncompliance notification must be provided to the Division in accordance with Part II.B.1 of the permit.

5. Column V – How and Where are Procedures Maintained?

Procedures must be documented for all activities/facilities listed in Column I that a permittee owns or operates (i.e., all activities/facilities for which the answer in Column II was “Yes”). Use the following guidance to determine how to list a written procedure:

- Procedures contained within documents: provide the name or other identifier for the document.** Documentation can take a variety of forms, including but not limited to, procedural manuals, stormwater quality guides/manuals, internal or external web pages, facility operations manuals, ordinances, regulations, laws, employee handbooks, contracts, etc. **If the procedures are part of a large document** that addresses multiple subjects, include the section in which the applicable procedures are included.
- Multiple documents can be listed in a single row.** If procedures to cover a single category are included in multiple documents, list all of the documents. For example, a Training Plan may address comprehensive employee training, while a Facility Operations Manual addresses facility specific practices – both documents need to be listed.
- List documents separately for each applicable row.** If the same document addresses activities/facilities listed in separate rows, list it in each applicable row. For example the same procedural manual may cover A.3 (snow & ice control) and A.4 (snow storage).

I Operations Activity/Facility		II Does the permittee own or operate the activity/facility within its permitted area? (“Yes” or “No”)		III Is the activity/facility operated by contractors? (“Yes” or “No”)	IV Are written procedures in place for the activity/facility? (“Yes” or “No”)	V How and where are the written procedures maintained? If the procedures are contained within a larger manual, regulation, etc, provide the name and section of that document (List all Applicable)
A. Streets/Roads/Highways (i.e., Lane Miles) and Municipal Parking Lots						
A.1	Sweeping	Yes	No	No	Yes	Streets RCP
A.2	Power Washing	Yes	Yes	Yes	Yes	Fleet Services SOP Pressure Washing Downtown and Old Town Square Services Agreement SOP: Power Washing (Pressure Washing) wastewater
A.3	Snow & Ice Control (Including application of deicers/anti-icers)	Yes	No	No	Yes	Parks RCP Snow Removal Policy Manual Streets RCP
A.4	Snow Storage	Yes	No	No	Yes	Snow Removal Policy Manual Streets RCP
A.5	Street, Curb, and Gutter Maintenance (E.g., patching, sealing, etc.)	Yes	No	No	Yes	Streets RCP SOP: Street, Curb, and Gutter Maintenance
A.6	Large Outdoor Festivals/Events	Yes	Yes	Yes	Yes	SOP: Large Outdoor Festivals and Events
A.7	Replacement/Construction	Yes	No	No	Yes	Streets RCP SOP: Street, Curb, and Gutter Replacement and Construction

B. Outdoor Storage and Activities at Municipal Yards					
	Salt & Sand Storage	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Parks RCP Southridge Golf Course RCP Streets RCP Deicing Facility Plan
B.1		Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP
B.2	Material Storage	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP
B.3	Heavy Equipment/Vehicle Maintenance	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP
B.4	Fueling	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP
B.5	Street Sweeper Cleaning and Waste	Yes	No	Yes	Streets RCP
B.6	Waste Management	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP

					Streets RCP Traffic RCP Utilities RCP Conditionally Exempt Small Quantity Generator Handbook
	Spill Prevention and Response	Yes	No	Yes	City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP Dixon Substation SPCC Plan Drake substation SPCC Plan Fleet Services SPCC Plan Fossil Creek Park SPCC Plan Harmony substation SPCC Plan Linden substation SPCC Plan Overland substation SPCC Plan Police Services SPCC Plan Portner substation SPCC Plan Richards Lake substation SPCC Plan Spring Canyon Community Park SPCC Plan Streets SPCC Plan Timberline substation SPCC Plan Utilities Warehouse yard SPCC Plan
B.7					
C. Facilities with Fleet Maintenance					
C.1	Outdoor Material Storage	Yes	No	Yes	Fleet Services RCP
C.2	Outdoor Fleet Maintenance	Yes	No	Yes	Fleet Services RCP
C.3	Waste Management	Yes	No	Yes	Fleet Services RCP Conditionally Exempt Small Quantity Generator Handbook
D. Waste/Recyclable					
D.1	Waste/Recyclable Transfer Stations (residential drop-off collection sites)	Yes	Yes	Yes	Rivendell Site SOP: Waste Recyclable Transfer Stations
E. Building Maintenance					
E.1	Waste Management	Yes	No	Yes	Conditionally Exempt Small Quantity Generator Handbook
E.2	Power Washing	Yes	Yes	Yes	SOP: Power Washing (Pressure Washing) wastewater

						Natural Areas RCP Parks RCP
F. New Municipal Buildings, Yards, Facilities, Parks, etc						
F.1	New Construction not covered under Sections A or H. This includes construction under one acre not subject to a CDPS Construction Permit.	Yes	Yes	Yes		City Park Nine RCP Collindale Golf Course RCP Fleet Services RCP Grandview Cemetery SOP Natural Areas RCP Parks RCP Southridge Golf Course RCP Streets RCP Traffic RCP Utilities RCP SOP: New Construction Activities for Municipalities
G. Parks & Open Space						
G.1	Maintenance	Yes	No	Yes		City Park Nine RCP Collindale Golf Course RCP Grandview Cemetery Natural Areas RCP Parks RCP Southridge Golf Course RCP
G.2	Outdoor Material Storage	Yes	No	Yes		City Park Nine RCP Collindale Golf Course RCP Grandview Cemetery RCP Natural Areas RCP Parks RCP Southridge Golf Course RCP
G.3	Waste Management	Yes	No	Yes		City Park Nine RCP Collindale Golf Course RCP Grandview Cemetery RCP Natural Areas RCP Parks RCP Southridge Golf Course RCP
G.4	Large outdoor festivals/events Fertilizer, Herbicide and Pesticide Application	Yes	Yes	Yes		SOP: Large Outdoor Festivals and Events Collindale Golf Course RCP City Park Nine RCP Southridge Golf Course RCP Natural Areas RCP Parks RCP Streets RCP Traffic Utilities RCP Grandview Cemetery RCP
		Yes	Yes	Yes		
G.5						

H. Utilities (linear projects) and Storm System						
H.1	Maintenance	Yes	Yes	Yes	Utilities RCP Treated Water Management Plan	
H.2	Replacement/Construction	Yes	Yes	Yes	Utilities RCP	
I. Other (only required if applicable)						
I.1	Traffic Painting, Sign and Signal Operations	Yes	No	Yes	Traffic RCP	



