

GSWMD MCM-5: Post-construction Storm Water Runoff Control

1. DESCRIPTION OF PROGRAM

Post-construction storm water management in areas undergoing new development or redevelopment is necessary because runoff from these areas affect receiving waterbodies. Planning and design for the minimization of pollutants in post-construction storm water discharges is a cost-effective approach to storm water quality management.

There are generally two forms of substantial impacts from post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post-construction runoff impact occurs by increasing the quantity of water delivered to the waterbody during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

The GSWMD recognizes the adverse effects post-construction storm water runoff can have on the receiving waters in Gary and plans to develop, implement, and enforce a post-construction storm water runoff program, which includes the following:

1. Develop and implement strategies, which include a combination of structural and/or nonstructural best management practices (BMPs);
2. Has an ordinance requiring the implementation of post-construction runoff controls to the extent allowable;
3. Ensures adequate long-term operation and maintenance of controls;

1.1 Structural and Non-Structural BMPs

The GSWMD has created a list of pre-approved structural and non-structural BMPs permitted in The GSWMD. This dynamic standards list will provide an opportunity and standards to review new technologies as they become available.

The City of Gary Stormwater Management Ordinance discusses BMP technical standards in Chapter 5, Sections 2 and 3, Page 21. The City of Gary Stormwater Technical Standards Manual provides a list of construction site BMPs in Chapter 7, Table 7-1, Page 3; provides method for approving new BMPs in Chapter 8, Section B, Page 1; provides list of pre-approved post-construction BMPs in Chapter 8, Section C and Table 8-1, Pages 1-3; covers construction BMPs in Appendix C; and covers post-construction BMPs in Appendix D.

1.2 Ordinance

The GSWMD through its City of Gary Stormwater Management Ordinance will comply with Rule 13 and Rule 5 regulations as stated in Chapter 1, Section 1, Page 1 and Chapter 1, Section 1, Page 3.

The GSWMD has created the City of Gary Stormwater Technical Standards Manual in coordination with Lake County. BMPs not previously accepted by the Gary Drainage Board and/or the Gary City Engineer and/or the Gary Public Works Commissioner, must be certified by a professional engineer licensed in State of Indiana and accepted through the Gary Drainage Board and/or Gary City Engineer and/or Gary Public Works Commissioner. ASTM standard methods must be followed when verifying performance of new measures. New BMPs, individually or in combination, must meet the 80% TSS removal rate at 50-125 micron range (silt/fine sand) without re-entrainment and must have a low to medium maintenance requirement to be considered by the Gary Drainage Board and/or Gary City Engineer and/or Gary Public Works Commissioner. Testing to establish the TSS removal rate must be conducted by an independent testing facility, not the BMP manufacturer.

1.3 Operation and Maintenance of controls

The GSWMD recognizes there must be maintenance of the post-construction BMPs. As part of the site review process, the applicant will be required to develop a plan for adequate operation and maintenance of post-construction BMPs that have not been pre-approved. An explanation of the information to be submitted is included as part of the Stormwater Application Checklist in Appendix B of the City of Gary Stormwater Technical Standards Manual.

2. BMPS

2.1 Website

- 2.1.1 BMP Description - The GSWMD will create and maintain a website with relevant storm water information.
- 2.1.2 Measurable Goals - Create website and post information.
- 2.1.3 Possible Partners - NIRPC.
- 2.1.4 Timetable / Schedule - Beginning in 2005, the GSWMD will work with NIRPC to create and maintain a website with storm water information. This will be ongoing.
- 2.1.5 Specific Target Outreach / Target Constituents - Residents, Construction Site Personnel
- 2.1.6 Reduction Goal Percentage - 100% Reduction of lack of GSWMD website.
- 2.1.7 Record Keeping Requirements - Track the number of visitors to the website.
- 2.1.8 Environmental Benefits - By having informed citizens, it increases the likelihood of their participation in the program.
- 2.1.9 Applicable MCMs - This applies to MCMs 1, 2, 3, 4, 5, and 6.

2.2 Storm Water Hotline

- 2.2.1 BMP Description - Complaints, information requests, and inquiries related to construction site erosion and sediment control will be incorporated into the Storm Water Hotline. Calls will be received at the City Hall and complaints forms will be completed. Complaints will be investigated, tracked, and resolved by the GSWMD.
- 2.2.2 Measurable Goals - The establishment of the Storm Water Hotline to record, investigate, and track calls. Filing of complaint forms and resolution of complaints. Sorting of complaints by type; for example flooding, erosion, water quality, dumping, construction site, or other. Advertisement of the Storm Water Hotline on the GSWMD webpage, in the newspaper, or printed on a utility bill.
- 2.2.3 Possible Partners - None
- 2.2.4 Timetable / Schedule - The Storm Water Hotline will be initiated in 2005 and will continue throughout the permit term.

- 2.2.5 Specific Target Outreach / Target Constituents - Residents, Construction Site Personnel
 - 2.2.6 Reduction Goal Percentage - 100% reduction of lack of formal complaint system.
 - 2.2.7 Record Keeping Requirements - Complaint forms and investigation records will be kept on file at the City Hall office and reviewed annually to determine pollution concerns and recommendations for BMPs, if necessary.
 - 2.2.8 Environmental Benefits - By understanding where problems occur, it will enable Gary to inspect and correct these problems.
 - 2.2.9 Applicable MCMs - This applies to MCMs 2, 3, 4, and 5.
- 2.3 City of Gary Stormwater Management Ordinance
- 2.3.1 BMP Description - The GSWMD has created the City of Gary Stormwater Management Ordinance. This ordinance establishes the regulatory authority and complies with the updated Rule 13 and Rule 5 requirements.
 - 2.3.2 Measurable Goals - Adoption of the City of Gary Stormwater Management Ordinance.
 - 2.3.3 Possible Partners - None
 - 2.3.4 Timetable / Schedule - The City of Gary Stormwater Management Ordinance will be adopted in 2005.
 - 2.3.5 Specific Target Outreach / Target Constituents - Residents, Visitors, Public Service Employees, Commercial Facilities, Industrial Facilities, Construction Site Personnel
 - 2.3.6 Reduction Goal Percentage - 100% reduction of the lack of an illicit discharge and detection ordinance, construction site runoff control ordinance, and a post-construction runoff control ordinance.
 - 2.3.7 Record Keeping Requirements - The MS4 operator will retain a copy of the ordinance and the adoption date.
 - 2.3.8 Environmental Benefits - By establishing an ordinance, it allows the GSWMD to comply with the state regulations.
 - 2.3.9 Applicable MCMs - This applies to MCMs 3, 4, 5, and 6.

2.4 City of Gary Stormwater Technical Standards Manual

- 2.4.1 BMP Description - The GSWMD has created the City of Gary Stormwater Technical Standards Manual. This Manual includes principals and practices that comply with the updated Rule 13 and Rule 5 regulations.
- 2.4.2 Measurable Goals - The City of Gary Stormwater Technical Standards Manual will be implemented for all development or redevelopment within the MS4 area that meet the land disturbance criteria.
- 2.4.3 Possible Partners - The GSWMD has worked with Lake County to establish these standards.
- 2.4.4 Timetable / Schedule - Implementation of the standard will be ongoing. The standards will be adopted in 2005.
- 2.4.5 Specific Target Outreach / Target Constituents - Residents, Public Service Employees, Commercial Facilities, Industrial Facilities, and Construction Site Personnel
- 2.4.6 Reduction Goal Percentage - Varies based on structural BMP installed.
- 2.4.7 Record Keeping Requirements - The GSWMD MS4 operator will retain a copy of the current City of Gary Stormwater Technical Standards Manual.
- 2.4.8 Environmental Benefits - By establishing the Technical Standards, it provides for compliance with the state regulations, and consistency among new stormwater facilities.
- 2.4.9 Applicable MCMs - This BMP applies to MCMs 3, 4, 5 and 6.

2.5 Training of Plan Reviewer and Post-Construction Inspector

- 2.5.1 BMP Description - MS4 area personnel responsible for plan review, inspection, and enforcement of post construction BMPs will receive annual training addressing appropriate control measures, inspection protocol, and enforcement procedures.
- 2.5.2 Measurable Goals - All MS4 reviewers and inspectors will receive training on an annual basis.
- 2.5.3 Possible Partners - The GSWMD may work with the following organizations in order to provide training: IDEM, IDNR, IACT, and County SWCD.

- 2.5.4 Timetable / Schedule - Training will begin in 2005 with each new hire, and will be conducted at least annually.
 - 2.5.5 Specific Target Outreach / Target Constituents - Public Service Employees.
 - 2.5.6 Reduction Goal Percentage - 100% of untrained plan reviewers and inspection staff will be trained.
 - 2.5.7 Record Keeping Requirements - Documentation includes sign-in sheets, meeting agendas, and training handouts for post-construction training sessions.
 - 2.5.8 Environmental Benefits - By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.
 - 2.5.9 Applicable MCMs - This applies to MCMs 5 and 6.
- 2.6 Plan Review for SWPP and Erosion and Sediment Control
- 2.6.1 BMP Description - Plan Review for Storm Water Pollution Prevention (SWPP) and Erosion and Sediment Control will be incorporated into the current process. The plan reviewer will evaluate the plans per the City of Gary Stormwater Technical Standards Manual. A plan review checklist will be developed for the project site developer to use in the development of the SWPP and Erosion and Sediment Control Plans. The reviewer will use a Technical Review and Comment Form during SWPP and Erosion and Sediment Control Plan review. Comments on the SWPP and Erosion and Sediment Control Plans will be forwarded to the developer. Developer will make revisions based on the comments and submit revised SWPP and Erosion and Sediment Control Plans to the reviewer. This process will continue until an acceptable SWPP and Erosion and Sediment Control Plan is produced.
 - 2.6.2 Measurable Goals - All construction projects meeting the requirements of 327 IAC 15-5 (Rule 5) will be reviewed for SWPP and Erosion and Sediment Control measures. A plan review checklist for SWPP and Erosion and Sediment Control Plans will be made available to all developers.
 - 2.6.3 Possible Partners - Lake County Soil and Water Conservation District.
 - 2.6.4 Timetable / Schedule - The plan review process will be developed during 2005 and will be reviewed annually.

- 2.6.5 Specific Target Outreach / Target Constituents - Public Service Employees, Construction Site Personnel.
 - 2.6.6 Reduction Goal Percentage - 100% reduction of applicable construction sites that do not have SWPP and Erosion and Sediment Control Plans.
 - 2.6.7 Record Keeping Requirements - GSWMD will record the number of permits issued by the MS4 each year and the number of hours dedicated to reviewing SWPP and Erosion and Sediment Control Plans.
 - 2.6.8 Environmental Benefits - By ensuring that construction sites have adequate plans in place prior to disturbing soil, it reduces the amount of sediment in the receiving streams.
 - 2.6.9 Applicable MCMs - This applies to MCMs 4, 5, and 6.
- 2.7 Erosion and Sediment Control Inspections
- 2.7.1 BMP Description - The MS4 will develop policies and procedures for erosion and sediment control inspections and assign responsibilities for inspections. Inspections will be coordinated through the GSWMD.
 - 2.7.2 Measurable Goals - All construction sites issued Rule 5 permits will be inspected by the MS4.
 - 2.7.3 Possible Partners - Inspections to be conducted by construction site inspectors and MS4 personnel or their representatives.
 - 2.7.4 Timetable / Schedule - Erosion and sediment control inspections of construction sites will begin once the City of Gary Stormwater Management Ordinance has been approved.
 - 2.7.5 Specific Target Outreach / Target Constituents - Public Service Employees, Construction Site Personnel.
 - 2.7.6 Reduction Goal Percentage - 100% reduction of applicable construction sites not being inspected.
 - 2.7.7 Record Keeping Requirements - The results of inspections and enforcement actions will be recorded on inspection sheets and included in the monthly reports and the annual report. Record the total number of construction sites inspected. Record the number of incidents of non-compliance or deficiencies identified through inspections. Document corrective actions taken by project site

owners/contractors based upon site inspections. Maintain copies of inspection forms.

2.7.8 Environmental Benefits - By inspecting construction sites, it ensures that sediment remains on site and not in the receiving streams.

2.7.9 Applicable MCMs - This applies to MCMs 4, 5, and 6.

2.8 Enforcement of Erosion and Sediment Control Requirements

2.8.1 BMP Description - As required, the MS4 will take enforcement actions for noncompliance with the construction site runoff and erosion control program requirements. Enforcement actions will be as stated in the City of Gary Stormwater Management Ordinance.

2.8.2 Measurable Goals - All enforcement actions will be recorded on inspection sheets, included in monthly reports to IDEM, and included in annual reports.

2.8.3 Possible Partners - None.

2.8.4 Timetable / Schedule - Policies and procedures for enforcement of erosion and sediment control requirements will be put into place once the City of Gary Stormwater Management Ordinance has been accepted.

2.8.5 Specific Target Outreach / Target Constituents - Public Service Employees, Construction Site Personnel.

2.8.6 Reduction Goal Percentage - 80% reduction of construction site non-compliance.

2.8.7 Record Keeping Requirements - Record the number and type of enforcement actions taken. Record the results of the enforcement actions (project termination, correction of deficiencies, etc.).

2.8.8 Environmental Benefits - By enforcing the City of Gary Stormwater Management Ordinance and the City of Gary Stormwater Technical Standards Manual it will reduce the pollution in the receiving streams.

2.8.9 Applicable MCMs - This applies to MCMs 4, 5, and 6.

2.9 Erosion and Sediment Control Construction Plan Review for MS4 Projects

- 2.9.1 BMP Description - All applicable construction activities operated by the MS4 will be submitted to the Lake County Soil and Water Conservation District (SWCD) for review and approval. The post-construction plans will be reviewed for conformance with the City of Gary Stormwater Ordinance and the City of Gary Stormwater Technical Standards Manual.
- 2.9.2 Measurable Goals - All construction plans for applicable MS4 projects will be reviewed by the Lake County Soil and Water Conservation District for post-construction erosion and sediment control.
- 2.9.3 Possible Partners - Lake County Soil and Water Conservation District.
- 2.9.4 Timetable / Schedule - All GSWMD plans are currently reviewed by the SWCD. This process will continue until one year following the acceptance of the City of Gary Stormwater Management Ordinance in 2005, if the DNR and MS4 agree that the MS4 is in compliance and able to review its own plans.
- 2.9.5 Specific Target Outreach / Target Constituents - Public Employees, Construction Site Personnel.
- 2.9.6 Reduction Goal Percentage - Not Applicable.
- 2.9.7 Record Keeping Requirements - Notices of Intent will be sent to IDEM after plans are approved. Correspondence between the SWCD/DNR and the MS4 regarding plan review will be kept on file for evaluation.
- 2.9.8 Environmental Benefits - By having Lake County Soil and Water Conservation District review MS4 operator's construction plans, it ensures that erosion controls are being applied appropriately.
- 2.9.9 Applicable MCMs - This applies to MCMs 4, 5, and 6.

2.10 Water Quality for Flood Control Projects

- 2.10.1 BMP Description - New flood management projects within the GSWMD will address storm water quantity and evaluate the potential for addressing storm water quality. During the pre-construction phase for new projects, a determination will be made to see if a practice can be modified to address the reduction of pollutants associated with stormwater runoff or if additional BMPs

can be designed into the watershed of the project to improve the water quality.

- 2.10.2 Measurable Goals - Document that all new MS4 controlled flood management projects are evaluated for water quality impacts.
- 2.10.3 Possible Partners - Consultants, IDNR, IDEM.
- 2.10.4 Timetable / Schedule - The GSWMD is already implementing this BMP. This practice will continue indefinitely.
- 2.10.5 Specific Target Outreach / Target Constituents - Public Service Employees.
- 2.10.6 Reduction Goal Percentage - This BMP will reduce the amount of flood management projects without water quality measures.
- 2.10.7 Record Keeping Requirements - Include a description of flood management projects that have been evaluated for water quality in annual reports.
- 2.10.8 Environmental Benefits - By ensuring that flood management projects are evaluated for water quality impacts it will reduce the likelihood that pollution will enter receiving streams.
- 2.10.9 Applicable MCMs - This applies to MCMs 5 and 6.

2.11 Coordinate Training Efforts

- 2.11.1 BMP Description - The GSWMD will work with NIRPC and other governmental and professional organizations to ensure that public service employees receive at least annual training in pollution prevention and good housekeeping techniques.
- 2.11.2 Measurable Goals - All municipal employees will receive annual storm water pollution prevention and good housekeeping training.
- 2.11.3 Possible Partners - The GSWMD may work with the following organizations in order to provide training: NIRPC, IDEM, IDNR, IACT, and County SWCD.
- 2.11.4 Timetable / Schedule - Training will begin in 2005 and will continue annually.
- 2.11.5 Specific Target Outreach / Target Constituents - Public Service Employees, Commercial Facilities, Industrial Facilities.

- 2.11.6 Reduction Goal Percentage - 100% of untrained personnel staff will be trained.
- 2.11.7 Record Keeping Requirements - Retain copies of sign-in sheets, meeting agendas and training handouts.
- 2.11.8 Environmental Benefits - By ensuring that all municipal employees, the plan reviewers, and construction site inspectors are trained, it reduces the likelihood of improper erosion controls.
- 2.11.9 Applicable MCMs - This applies to MCMs 4, 5, and 6.

3. PROGRAMMATIC INDICATORS

3.1 Required Programmatic Indicators

- (1) Number, type, and location of structural BMPs installed.
- (2) Number, type, and location of structural BMPs inspected.
- (3) Number, type, and location of structural BMPs maintained or improved to function properly.
- (4) Type and location of nonstructural BMPs utilized.
- (5) Estimated or actual acreage or square footage of open space preserved and mapped in the MS4 area, if applicable.
- (6) Estimated or actual acreage or square footage of pervious and impervious surfaces mapped in the MS4 area, if applicable.
- (7) Number and location of new retail gasoline outlets or municipal, state, federal, or institutional refueling areas, or outlets or refueling areas that replaced existing tank systems that have installed storm water BMPs.

3.2 MS4 Entity Initiated Programmatic Indicator

- (1) The MS4 operator will retain a copy of the ordinance and the adoption date.
- (2) The GSWMD operator will retain a copy of the current Gary, Indiana Stormwater Technical Standards Manual
- (3) Maintain copies of sign-in sheets and agendas documenting post construction training sessions for municipal personnel.
- (4) Retain copies of sign-in sheets, meeting agendas and training handouts.
- (5) The GSWMD maintain copies of construction plan review correspondence
- (6) Include a description of flood management projects that have been evaluated for water quality in annual reports.
- (7) Include a description of flood management projects that have been evaluated for water quality in annual reports.

4. SUMMARY SHEETS

4.1 Forms

4.2 Additional Information

5. REFERENCE MATERIALS

TABLE 10.5 MCM-5: MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING SUMMARY OF MEASURABLE GOALS

BMP	MEASURABLE GOAL	SCHEDULE	RECORD KEEPING REQUIREMENTS	ENVIRONMENTAL BENEFIT
Website	Create website and post information.	Beginning in 2005, the GSWMD will create and maintain website with stormwater information. This will be ongoing.	Track the number of visitors to the website.	By having informed citizens, it increases the likelihood of their participation in the program.
Storm Water Hotline	The establishment of the Storm Water Hotline. The recording, investigation, and tracking of calls. Filing of complaint forms and resolution of complaints. Sorting of complaints by type, for example flooding, erosion, water quality, dumping, construction site, or other. Advertisement of the Storm Water Hotline on the GSWMD webpage, in the newspaper, or printed on a utility bill.	The Storm Water Hotline will be initiated in 2005 and will continue throughout the permit term.	Complaint forms and investigation records will be kept on file at the City Hall office and reviewed annually to determine pollution concerns and recommendations for BMPs, if necessary.	By understanding where problems occur, it will enable the GSWMD to inspect and correct these problems.

City of Gary Stormwater Management Ordinance. This Ordinance establishes the regulatory authority and complies with the updated Rule 13 and Rule 5 requirements.	Adoption of The City of Gary Stormwater Management Ordinance.	The City of Gary Stormwater Management Ordinance will be adopted in 2005.	The MS4 operator will retain a copy of the ordinance and the adoption date.	By establishing an ordinance, it allows the GSWMD to comply with the state regulations.
City of Gary Stormwater Technical Standards Manual	The Gary, Indiana Stormwater Technical Standards Manual will be implemented for all development or redevelopment within the MS4 area that meet the land disturbance criteria.	Implementation of the standard will be ongoing. The standards will be adopted in 2005.	The GSWMD MS4 operator will retain a copy of the current Gary, Indiana Stormwater Technical Standards Manual.	By establishing the Technical Standards, it provides for compliance with the state regulations, and consistency among new stormwater facilities.
Training of Plan Reviewer and Post-Construction Inspector	All MS4 reviewers and inspectors will receive training on an annual basis.	Training will begin in 2005 with each employee and each new hire, and will be conducted at least annually.	Documentation includes sign-in sheets, meeting agendas, and training handouts for post-construction training sessions.	By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.

<p>Plan Review for SWPP and Erosion and Sediment Control</p>	<p>All construction projects meeting the requirements of 327 IAC 15-5 (Rule 5) will be reviewed for SWPP and Erosion and Sediment Control measures.</p> <p>A plan review checklist for SWPP and Erosion and Sediment Control Plans will be made available to all developers.</p>	<p>The plan review process will be developed during 2005 and will be reviewed annually.</p>	<p>The GSWMD will record the number of permits issued by the MS4 each year and the number of hours dedicated to reviewing SWPP and Erosion and Sediment Control Plans.</p>	<p>By ensuring that construction sites have adequate plans in place prior to disturbing soil, it reduces the amount of sediment in the receiving streams.</p>
<p>Erosion and Sediment Control Inspections</p>	<p>All construction sites issued Rule 5 permits will be inspected by the MS4.</p>	<p>Erosion and sediment control inspections of construction sites will begin once the City of Gary Stormwater Management Ordinance has been approved.</p>	<p>The results of inspections and enforcement actions will be recorded on inspection sheets and included in the monthly reports and the annual report. Record the total number of construction sites inspected. Record the number of incidents of non-compliance or deficiencies identified through inspections. Document corrective actions taken by project site owners/contractors based upon site inspections.</p> <p>Maintain copies of inspection forms.</p>	<p>By inspecting construction sites, it ensures that sediment remains on site and not in the receiving streams.</p>

Enforcement of Erosion and Sediment Control Requirements	All enforcement actions will be recorded on inspection sheets, included in monthly reports to IDEM, and included in annual reports.	Policies and procedures for enforcement of erosion and sediment control requirements will be put into place once the City of Gary Stormwater Management Ordinance has been accepted.	Record the number and type of enforcement actions taken Record the results of the enforcement actions (project termination, correction of deficiencies, etc.)	By enforcing the City of Gary Stormwater Management Ordinance and the Gary, Indiana Stormwater Technical Standards Manual it will reduce the pollution in the receiving streams.
Erosion and Sediment Control Construction Plan Review for MS4 Projects	All construction plans for applicable MS4 projects will be reviewed by the Lake County Soil and Water Conservation District for post-construction erosion and sediment control.	All GSWMD plans are currently reviewed by the SWCD. This process will continue until one year following the acceptance of the City of Gary Stormwater Management Ordinance in 2005, if the DNR and MS4 agree that the MS4 is in compliance and able to review its own plans.	Notices of Intent will be sent to IDEM after plans are approved. Correspondence between the SWCD/DNR and the MS4 regarding plan review will be kept on file for evaluation	By having Lake County Soil and Water Conservation District review MS4 operator's construction plans, it ensures that erosion controls are being applied appropriately.
Water Quality for Flood Control Projects	Document that all new MS4 controlled flood management projects are evaluated for water quality impacts.	The GSWMD is already implementing this BMP. This practice will continue indefinitely.	Include a description of flood management projects that have been evaluated for water quality in annual reports.	By ensuring that flood management projects are evaluated for water quality impacts it will reduce the likelihood that pollution will enter receiving streams.

Coordinate Training Efforts	All municipal employees will receive annual storm water pollution prevention and good housekeeping training.	Training will begin in 2005 and will continue annually.	Retain copies of sign-in sheets, meeting agendas and training handouts.	By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.
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