



Public Services Department
Office of the Director

January 13, 2012

United States Environmental Protection Agency
Attention: Storm Water Program
NPDES Compliance Unit
1200 6th Avenue, Suite 900 (OCE-133)
Seattle, WA 98101

Idaho Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

RE: Third Annual Report for MS4 Permit IDS-028231, City of Post Falls

Pursuant to the referenced permit, Section IV. C., the enclosed Annual Report summarizes the City of Post Falls' storm water program activities from January 1, 2011 to December 31, 2011. If you have any questions or need additional information, please contact the undersigned at (208) 262-7353.

"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."

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Werner".

Terry Werner, Director
Department of Public Services

Encl.

c: City Clerk
Mike Neher, Environmental Manager
Dick Froehlich, Chief Operator

City of Post Falls

2011 Annual Report on the Storm Water Program

MS4 Permit IDS-028231

Pursuant to the referenced permit, Section IV. C., this report summarizes the City's stormwater program activities from the January 1, 2011 to December 31, 2011.

A. Assessment of permit compliance, pursuant to Parts II.B and II.C.

The permit requirements to be met by December 31, 2011 and the City's completion date for each requirement are as follows:

EVENT OR REQUIREMENT	PERMIT SECTION	DEADLINE	Implemented or Completed
Annual distribution of educational materials to local paper and target audiences	II.B.1.c.	12/31/2011	11/7/11
Annual training of City employees	II.B.6.b.	12/31/2011	12/5/11
Post on-line all required Annual reports	IV.C.2.	12/31/2011	1/10/11
Begin dry-weather field screening	II.B.3.f.	12/31/2011	8/10/11
Inventory industrial discharges to MS4	II.B.3.g.	12/31/2011	11/2/11
Implement construction site complaint tracking program	II.B.4.f.	12/31/2011	11/18/11
Post-construction runoff program controls for new and re-developments	II.B.5.a.	12/31/2011	2007
Update City ordinance to address post-construction runoff	II.B.5.b.	12/31/2011	2007
Ensure proper long term O&M of storm water controls	II.B.5.c.	12/31/2011	12/31/11
Description of how SWMP activities control discharge of pollutants to MS4	II.C.	Annual Report	1/31/2012
Review of SWMP implementation	II.D. and IV.C.	Annual Report	1/31/2012

Assessment: The City has met the permit compliance schedule as of December 31, 2011.

B. Storm water monitoring results.

Five (5) storm events were monitored in 2011. The results are summarized in Appendix A.

C. Summary of inspections and enforcement actions conducted by the City.

August 10, 2011

Adam Tate, Stormwater Technician and Mike Neher, Environmental Manager, inspected the City's Third Avenue maintenance yard for potential stormwater discharges to the river. No evidence of discharge to the river was found as the yard drainage terminates in closed swales.

August 10, 2011

Mike Neher, Environmental Manager, inspected City Hall at 408 N. Spokane Street. The entire site drains to swales and no evidence of discharge to the MS4 was observed.

October 18, 2011

Dry weather field screening for industrial discharges to the MS4 was conducted by Adam Tate, Stormwater Technician, and no industrial discharges were found.

In September, October and November, 2011, City maintenance staff inspected and cleaned out the catch basins of the MS4.

No illicit discharges were identified in 2011, and no violation notices were issued.

In 2011, there were no construction projects in the City that disturbed one or more acres or less than one acre that was a part of a larger project that disturbed one or more acres and had the potential to discharge to the MS4 system.

The City received no complaints in 2011 about runoff from construction sites in the City that disturbed one or more acres or less than one acre that was a part of a larger project that disturbed one or more acres and had the potential to discharge to the MS4 system.

D. Summary of enforcement actions received by the City.

No enforcement actions have been received by the City.

E. List of written materials produced pursuant to the referenced permit (copy of each document enclosed).

Document Name	PERMIT SECTION	Document Date	Appendix
Monitoring Data	IV.A.5.	9/27/11	A
SWM-001 Stormwater Monitoring Procedure, updated	IV.A.2.	3/9/09, Updated 3/2/11	B
SWM-007 Construction Sites Complaint Tracking Procedure	II.B.4.f.	11/17/11	B
SWM-008 Construction Site Inspection and Enforcement Procedure	II.B.4.g.	11/7/11	B
Educational materials distributed to local paper	II.B.1.c.	10/26/10	C
Educational Materials to Public	II.B.1.b.	9/27/11	C
Long Term O&M Memorandum	II.B.5.c.	1/10/12	D

F. Summary of activities planned for the next reporting cycle.

Distribute educational materials to the public
Training of City staff
Implement pre-construction review and inspection of permanent stormwater controls
Stormwater monitoring
MS4 inspections for illicit discharges

G. Schedule of additional BMPs needed to ensure compliance with applicable water quality standards.

The City has met the permit deadlines for 2011. No additional BMPs are needed at this time.

H. Notice regarding reliance on another entity to meet permit obligations, if any.

The City has not relied on any other entity to meet permit obligations. However, the City has cooperated with the City of Coeur d'Alene, local highway districts and the Panhandle Area Council to provide a public education event in 2011. This event occurred on September 27, 2011.

APPENDIX-A

MONITORING DATA

2011

Stormwater/Events Data Files/Water Quality Data

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
TN, mg/L	0.08	SM 4500N B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 8082

Concentration					
	4th Avenue Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS, mg/L	135	14	142	173	60
TP, mg/L	0.159	0.052	1.11	0.29	0.354
Lead, mg/L	0.011	ND	0.011	0.014	ND
TN, mg/L	0.75	0.58	4.88	1.19	3.5
Zinc, mg/L	0.13	0.033	0.23	0.21	0.15
Hardness, mg/L	36.5	20.1	72.40	1.36	41.1
PCBs, ug/L	ND	ND	ND	ND	ND
Discharge Volume (cubic feet)	6,146	26,888	58,385	32,265	53,007
Discharge volume (gallons)	45,970	201,120	436,718	241,344	396,494

2011

Stormwater/Events Data Files/Water Quality Data

Event Pollutant Discharge (lbs)					
	4th Avenue Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS	51.79	23.50	517.51	348.42	198.52
TP	0.06	0.09	4.05	0.58	1.17
Lead	0.004	ND	0.040	0.028	ND
TN	0.29	0.97	17.78	2.40	11.58
Zinc	0.05	0.06	0.84	0.42	0.50
Hardness	14.00	33.73	263.86	2.74	135.99
PCBs	ND	ND	ND	ND	ND
Discharge Volume (gallons)	45,970	201,120	436,718	241,344	396,494
Event Precip (inches)	0.08	0.35	0.76	0.42	0.69
total inches per year=	26.07 inches average annual precipitation				

Estimated Load/Inch Precip (lbs/inch)					
	4th Avenue Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS	647.36	67.13	680.93	829.58	287.72
TP	0.76	0.25	5.32	1.39	1.70
Lead	0.05	ND	0.05	0.07	ND
TN	3.60	2.78	23.40	5.71	16.78
Zinc	0.62	0.16	1.10	1.01	0.72
Hardness	175.03	96.39	347.18	6.52	197.09
PCBs	ND	ND	ND	ND	ND
Disch Vol (gals.)	45,970	201,120	436,718	241,344	396,494

2011 Average Annual Load, lbs/day*		
	4th	Centennial
TSS	35.89	16.92
TP	0.13	0.04
Lead	0.00	0.00
TN	0.75	0.17
Zinc	0.05	0.03
Hardness	11.75	4.17
PCBs	ND	ND

*Estimate only, subject to errors and assumptions.

2011

Stormwater/Events Data Files/Water Quality Data

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
TN, mg/L	0.08	SM 4500N B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 8082

Concentration					
	Centennial Trail Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS, mg/L	260	18	164.00	260	54
TP, mg/L	0.261	0.062	1.02	0.345	0.223
Lead, mg/L	0.018	ND	0.013	0.02	ND
TN, mg/L	1.05	0.76	3.40	1.64	2.8
Zinc, mg/L	0.29	0.11	0.37	0.37	0.33
Hardness, mg/L	55.2	24.6	90.50	2.55	45.2
PCBs, ug/L	ND	ND	ND	ND	ND
Discharge Volume (cubic feet)	2,163	9,462	20,545	11,354	18,653
Discharge volume (gallons)	16,177	70,773	153,679	84,928	139,524

2011

Stormwater/Events Data Files/Water Quality Data

Event Pollutant Discharge (lbs)					
	Centennial Trail Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS	35.10	10.63	210.32	184.27	62.87
TP	0.04	0.04	1.31	0.24	0.26
Lead	0.002	ND	0.017	0.014	ND
TN	0.14	0.45	4.36	1.16	3.26
Zinc	0.04	0.06	0.47	0.26	0.38
Hardness	7.45	14.53	116.06	1.81	52.63
PCBs	ND	ND	ND	ND	ND
Discharge Volume (gallons)	16,177	70,773	153,679	84,928	139,524
Event Precip (inches)	0.08	0.35	0.76	0.42	0.69
total inches per year=	26.07 inches average annual precipitation				

Estimated Load/Inch Precip (lbs/inch)					
	Centennial Trail Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS	438.73	30.37	276.74	438.73	91.12
TP	0.44	0.10	1.72	0.58	0.38
Lead	0.03	ND	0.02	0.03	ND
TN	1.77	1.28	5.74	2.77	4.72
Zinc	0.49	0.19	0.62	0.62	0.56
Hardness	93.15	41.51	152.71	4.30	76.27
PCBs	ND	ND	ND	ND	ND
Disch Vol (gals.)	16,177	70,773	153,679	84,928	139,524

Summary of All Storm Event Loads, pounds per event

4th Avenue Outfall

Sample Date	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
8/12/09	196.367	0.558	0.019	3.148	0.190	56.728	ND
3/17/10	73.655	0.027	0.007	0.871	0.081	13.312	ND
5/19/10	374.607	0.577	0.022	3.041	0.394	98.485	ND
8/11/10	7.672	0.139	ND	1.244	0.046	16.256	ND
9/16/10	20.140	0.066	0.003	0.609	0.046	12.300	ND
3/10/11	51.789	0.061	0.004	0.288	0.050	14.002	ND
5/7/11	23.497	0.087	ND	0.973	0.055	33.735	ND
5/15/11	517.506	4.045	0.040	17.785	0.838	263.855	ND
7/13/11	348.425	0.584	0.028	2.397	0.423	2.739	ND
9/27/11	198.524	1.171	ND	11.581	0.496	135.989	ND
average	181.218	0.732	0.012	4.194	0.262	64.740	ND
std dev	178.959	1.220	0.014	5.804	0.269	82.362	ND
rel std dev	99%	167%	113%	138%	103%	127%	ND

Centennial Trail Outfall

Sample Date	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
8/12/09	87.747	0.222	0.011	1.217	0.193	28.408	ND
3/17/10	73.572	0.126	0.004	0.580	0.107	11.569	ND
5/19/10	116.231	0.159	0.007	0.889	0.102	17.576	ND
8/11/10	80.997	0.094	0.007	0.648	0.257	24.468	ND
9/16/10	6.412	0.017	0.001	0.239	0.024	3.282	ND
3/10/11	35.099	0.035	0.002	0.142	0.039	7.452	ND
5/7/11	10.631	0.037	ND	0.449	0.065	14.529	ND
5/15/11	210.322	1.308	0.017	4.360	0.475	116.062	ND
7/13/11	184.268	0.245	0.014	1.162	0.262	1.807	ND
9/27/11	62.874	0.260	ND	3.260	0.384	52.628	ND
average	86.815	0.250	0.006	1.295	0.191	27.778	ND
std dev	67.776	0.382	0.006	1.396	0.152	34.404	ND
rel std dev	78%	153%	91%	108%	80%	124%	ND

ND = not detectable


APPENDIX – B

STANDARD OPERATING PROCEDURES

City of Post Falls
Department of Public Works
Storm Water Management Program

Standard Operating Procedure #: SWM-001

Title: Storm Water Monitoring

Issued Date: 3/2/2011 By:  _____, Environmental Manager

Purpose

The purpose of this procedure is to provide instructions for field personnel to monitor storm water as required by Permit IDS-028231, and in accordance with the Quality Assurance Plan dated March 23, 2009.

Reference Documents:

Permit IDS-028231, EPA Authorization to Discharge From a Municipal Separate Storm Sewer System, November 20, 2008.

City of Post Falls' Quality Assurance Plan For Monitoring Storm Water, March 23, 2009.

Locations

There are two (2) locations where storm water is required by the City's MS4 permit to be monitored:

- Centennial Trail Outfall
- Fourth Avenue Outfall

When to Monitor

There are four (4) periods during which storm events must be monitored. At least one storm event per period must be monitored at each of the two storm water outfalls. A storm event may include rain or snow melt off. Exception: *No monitoring is required if there are no storm events during a monitoring period.* The four monitoring periods are:

- March -- April
- May -- June

- July - August
- September – October

Both outfalls must be sampled and flow measured within the first 30 to 60 minutes of the storm event.

How to Monitor

There are three steps for monitoring the water discharged from the storm drains.

1. Collect the water samples.

The sample bottles are provided by the laboratory. The bottles have been specially prepared to maintain sample integrity. Some of the bottles may have a liquid in them. Do not empty the liquid out or get any of it on you. It is an acid and is needed to preserve the sample. If you do get any of the acid on you, immediately rinse off the affected part with water for at least one minute.

Carefully fill the sample bottle by placing it into the stream coming out of the outfall pipe and allow the sample bottle to fill just to the top. Do not overfill and wash out the preservatives. If stream flow is too great, a larger, laboratory cleaned sample bottle may be needed to collect the sample and then to pour off into the individual sample bottles.

To maintain sample integrity and prevent cross-contamination, be sure to:

- Wear a clean pair of talc-free surgical gloves prior to the collection and handling of each sample at each location.
- Do not contaminate the inside of the sample bottle by allowing it to come into contact with any material other than the water sample.
- Discard sample bottles or sample lids that have been dropped onto the ground prior to sample collection.
- Do not leave the cooler lid open for an extended period of time once samples are placed inside.
- Do not touch the exposed end of a sampling tube, if applicable.
- Avoid allowing rain water to drip from rain gear or other surfaces into sample bottles.
- Do not eat, smoke, or drink during sample collection.
- Do not sneeze or cough in the direction of an open sample bottle.

- Minimize the exposure of the samples to direct sunlight, as sunlight may cause biochemical transformation of the sample.

2. Sample Integrity and Transportation to Laboratory

Immediately following collection, sample bottles for laboratory analytical testing will be capped, labeled, documented on the Chain-of-Custody Form, placed in an ice-chilled cooler at as near to four (4°) degrees Celsius as practicable, and then delivered to the lab listed below. If the Lab is not open for business, place the samples in the sample refrigerator at the wastewater lab and deliver the samples to the following lab as soon as they reopen.

Accurate Testing Lab
7950 Meadow Way, Coeur d'Alene, Idaho, 83815
Telephone number: (208) 762-8378
Fax: (208) 762-9082
Point of Contact: Walter Mueller or Jim McMaster

3. Record Keeping

All original data documented on sample bottle identification labels, Chain-of-Custody Forms, Field Sample Logs, and Inspection Checklists will be recorded using waterproof ink. These will be considered accountable documents. If an error is made on a document, the individual will make corrections by lining through the error and entering the correct information. Do not obliterate erroneous information. All corrections will be initialed and dated. Provide a copy of all forms to your supervisor. Examples of the Field Sample Log and Chain of Custody form are provided below.

Be sure to provide a copy of the completed Form to your supervisor.

**City of Post Falls
Department of Public Works**

Storm Water Management Program

Standard Operating Procedure #SWM-007

Title: Construction Sites Complaint Tracking

Issued Date: 17 Nov 2011 By: Jerry Culmer, Public Services Director

Purpose

The purpose of this procedure is to maintain compliance with the City's storm water discharge permit, IDS-028231, sections 11.B.4.f., construction sites complaint tracking.

Scope

This procedure applies to construction sites that have the potential to discharge to the municipal separate storm sewer system with outfalls at Centennial Trail and 4th Avenue. This procedure describes the process for receiving, reviewing and responding to complaints received by the Department of Public Services from any source, public or private, concerning the discharge of pollutants from a construction site to the municipal separate storm sewer system (MS4).

Procedure

1. When a complaint is received by City staff, it will be forwarded to the Stormwater Technician at the Water Reclamation Facility.
2. The Stormwater Technician will log the complaint into an electronic or paper file used to track the complaints. The file shall track the following:
 - Date of complaint
 - Complainant contact information
 - Reported location of discharge
 - Reported description of discharge
 - Follow-up inspection details and date
 - Enforcement action taken and date
 - Correction action taken and date completed

**City of Post Falls
Department of Public Works**

Storm Water Management Program

Standard Operating Procedure #SWM-008

Title: Construction Site Inspection and Enforcement

Issued Date: 17 Nov 2011 By: Jerry Curran, Public Services Director

Purpose

The purpose of this procedure is to maintain compliance with the City's storm water discharge permit, IDS-028231, sections 11.B.4.g., construction site inspection and enforcement.

Scope

This procedure applies to construction sites with land disturbance of one acre or more and sites with land disturbance of less than one acre if it is part of a larger project with one acre or more of land disturbance and if such site(s) have the potential to discharge to the municipal separate storm sewer system with outfalls at Centennial Trail and 4th Avenue.

Procedure

This procedure describes the process for inspecting and enforcing city rules concerning the discharge of pollutants from a construction site to the municipal separate storm sewer system (MS4).

1. The Stormwater Technician shall inspect the construction sites meeting the criteria described in the above Scope on a regular basis until said construction site is permanently stabilized. Active construction sites should be inspected at least monthly and during a significant storm event during the construction season; inactive sites should be inspected at least once during a significant storm event.
2. Inspection should include a review of the stormwater management plan (SMP) required by the project's construction general stormwater permit. The SMP should be on-site, up to date and identify the controls to prevent or minimize discharge of pollutants in stormwater. If the SMP is not available, then the Stormwater Technician may use best professional judgment and the IDEQ BMP Catalog as guidance: <http://www.deq.idaho.gov/media/622263-Stormwater.pdf>
3. The site inspection should verify that the stormwater controls and best management practices (BMPs) found in the SMP are properly installed and functioning. If the SMP is not available,

then the Stormwater Technician may use best professional judgment and the IDEQ BMP Catalog as guidance: <http://www.deq.idaho.gov/media/622263-Stormwater.pdf>

4. Upon completion of the inspection, the Stormwater Technician will prepare a written report of findings, deficiencies and required corrective actions. The report will be written in an approved format, signed by the Stormwater Technician, and with the Supervisor's approval delivered to the construction site manager or owner.
5. Enforcement action will be in accordance with the approved Enforcement Procedure, SWM-006.

APPENDIX – C

EDUCATIONAL MATERIALS
DISTRIBUTED TO THE PUBLIC

Help protect our groundwater, river

By MIKE NEHER

When it rains or snows, most people think about staying dry, being able to see out the windshield, and keeping driveways shoveled.

But when the sun comes out, melts the snow and dries up the puddles do we think about where all the runoff goes?

In Post Falls, 97 percent of runoff flows into grass swales and drywells where the water seeps into the ground and the aquifer that supplies our irrigation and drinking water. Only 3 percent of runoff enters the storm drains that discharge into the Spokane River.

In an effort to protect our rivers, lakes and streams from pollution, the Environmental Protection Agency and city governments prohibit stormwater pollution. Disposal of chemicals, oils, debris and other pollutants into storm drains is illegal and subject to penalty. Swales and drywells are located adjacent to roads, in parks and landscape areas.

The runoff from streets and parking lots flows into the swales. Grass and vegetation in the swale helps filter out contaminants as the water soaks into the ground. The bowl shape of the swale allows dirt and debris to settle out before the water overflows into the dry well and into the ground.

These grass swales and dry wells help keep pollutants out of the stormwater system and protect our drinking water, the aquifer and the Spokane River.

There are things you can do to help protect our groundwater and river:

■ Don't over-water your lawn.

■ Use pesticides and fertilizers according to instructions on the package label, and take care to not let the product get onto streets and sidewalks.

■ Don't leave yard waste in the street or sweep it into storm drains or ditches.

ways and parking lots, especially around storm drains.

■ Pick up pet waste in a plastic bag and dispose of it in a garbage bin or landfill.

■ Recycle or properly dispose of household chemicals such as pesticides, paint, solvents and used motor oil.

■ Cover grease storage and Dumpsters and keep them clean to avoid leaks.

You can do your part to keep household chemicals out of the river and aquifer by disposing of them safely.

Kootenai County, in association with the Division of Environmental Quality, provides free household hazardous waste collection at the Ramsey Transfer Station, 3650 N. Ramsey Road and the Prairie Transfer Station at 15580 W.

Prairie Avenue.

The stations accept hazardous waste only from homes in Kootenai County. Hazardous waste collection days for the Ramsey Transfer Station are Wednesday and Saturday from 8 a.m. to 4 p.m., and for the Prairie Transfer Station are Friday and Saturday from 8 a.m. to 4 p.m.

Do not leave your materials outside the gates. No hazardous waste can be collected at any other time. The county disposal facilities can be contacted at 446-1430, or visit <http://www.kcgov.us/departments/solidwaste/>.

Mike Neher is the environmental manager for the City of Post Falls and can be reached at 777-9857.

MEMORANDUM

DATE: January 5, 2012

TO: Storm Water Program File

FROM: Mike Neher, Environmental Manager

SUBJECT: Environmental Open House

The City of Post Falls participated in the Environmental Open House on 9/27/2011 at the Coeur d'Alene Library. We provided information to the public about the storm water program and storm water management system, as well as general information about water pollution control. We made available information packets, brochures and maps of the City's facilities. Don Ellis, Jr., manned the City's information booth during the event. See accompanying brochure for list of sponsors.



Mike Neher, Environmental Manager



ENVIRONMENTAL OPEN HOUSE 2011

For more information, contact:
Kim Harrington, City of Coeur d'Alene
(208)769-2214 or kimh@cdaid.org

Attending agencies will demonstrate
environmentally friendly practices,
and give away!

**Come and visit with your local agencies as
they demonstrate how they are working to
preserve and improve our environment.**

Sponsored by:

City of Coeur d'Alene Stormwater

Post Falls Highway District

City of Coeur d'Alene Water

Coeur d'Alene Green Team

Waste Management

Idaho Transportation Department

Kootenai Environmental Alliance

Stormwater Erosion Education Program

Panhandle Health District

Lakes Highway District

Community Action Partnership

City of Post Falls

City of Coeur d'Alene Wastewater

Aquifer Protection District

University of Idaho

Kootenai County Solid Waste

City of Coeur d'Alene Parks Dept.

Department of Environmental Quality

City of Coeur d'Alene Library
September 27, 2011
5:00 pm to 8:00 pm

APPENDIX – D

LONG TERM OPERATION

AND

MAINTENANCE



Public Services Department
Utility Services Division

MEMORANDUM

DATE: January 10, 2012
TO: Stormwater Program File
FROM: Mike Neher, Environmental Manager
SUBJECT: Long Term O&M of Stormwater Controls, Permit Section 11.B.5.c.

The long term operation and maintenance of the City's MS4 system is assured by the continuous funding of the Stormwater Management Program in the City's annual budget, by the stormwater management ordinance of 2007, and by the City's long-standing commitment to leadership and cooperation in regional water quality management initiatives.

A handwritten signature in black ink, appearing to read "Mike Neher", is written over a horizontal line.

Mike Neher, Environmental Manager

