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# City of Prattville

101 West Main Street  
Prattville, Alabama 36067



# Municipal Separate Storm Sewer System (MS4) 2023 Annual Report

NPDES Permit No. ALS000010

January 2024

Prepared By:



2124 Moore's Mill Road ♦ Suite 120 ♦ Auburn, Alabama 36830

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- ACIC Brochures
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# SECTION 1

General Information



# 1. General Information

## 1.1. Signatory Requirements

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 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.

Bill Gillespie, Jr.  
Name

Mayor  
Title

  
Signature

1-24-2024  
Date

Address: 101 West Main Street  
Prattville, AL 36067  
Phone: (334) 595-0101



## 1.2. List of Contacts

Part IV.3.a. of National Pollutant Discharge Elimination Systems (NPDES) Permit Number ALS000010 requires the Permittee to provide a list of contacts and responsible parties (e.g., agency, name, phone number) that had input to and are responsible for the preparation of the annual report. City Staff from Administration, Public Works, Engineering Services, General Government, Public Safety, and Performing Creative Arts and Recreation contributed materials and data for incorporation into this annual report.

Personnel directly responsible for the preparation of this annual report include the following.

**Table 1.1 Contact List**

Jonathan Larkin Public Works Assistant Director Stormwater Coordinator 101 West Main Street Prattville, AL 36067 (334) 595-0482	Dewayne Smith, P.E., CPESC, CPSWQ, CPMSM Consultant Hydro Engineering Solutions 2124 Moore’s Mill Road, Suite 120 Auburn, AL 36830 (334) 740-6000
Brian Kane, P.E., CPESC, CPMSM Consultant Hydro Engineering Solutions 2124 Moore’s Mill Road, Suite 120 Auburn, AL 36830 (334) 332-8035	

Any questions concerning the City of Prattville’s (City) Municipal Separate Storm Sewer System (MS4) 2023 Annual Report shall be directed to Mr. Jonathan Larkin.

## 1.3. Overview and Summary

In 1990, the U.S. Environmental Protection Agency (EPA) promulgated regulations establishing Phase I of the National Pollutant Discharge Elimination Systems (NPDES) storm water program. The Phase I program for municipal separate storm sewer systems (MS4s) requires operators of “medium” and “large” MS4s that generally serve populations of 100,000 or greater to implement a storm water management program to control polluted discharges from certain municipal, industrial and construction activities into the MS4.

In 1999, EPA promulgated regulations establishing Phase II of the NPDES storm water program. The Phase II program extends coverage of the NPDES storm





water program to regulated “small” MS4s. A regulated “small” MS4 is defined as an MS4 located within an “urbanized area” as defined by the Census Bureau or as designated by the NPDES permitting authority.

The Alabama Department of Environmental Management (ADEM) presently has primary jurisdiction over permitting and enforcement of storm water program in Alabama. On 9 May 2022, ADEM issued MS4 Phase II Individual Permit (NPDES Number ALS000010) for storm water discharges associated with the City of Prattville’s (City) MS4. The City’s NPDES Permit became effective on 9 May 2022 and will expire on 8 May 2027. A copy of the NPDES Permit is included in the SWMP Plan.

The City’s SWMP has been developed to include the storm water pollution prevention and management programs described in the NPDES Permit. Part II.B of the NPDES Permit describes five (5) program elements that are required to be incorporated in the City’s SWMP:

1. Public Education and Public Involvement on Storm Water Impacts;
2. Illicit Discharges Detection and Elimination (IDDE);
3. Construction Site Storm Water Runoff Control;
4. Post-Construction Storm Water Management in New Development and Redevelopment; and,
5. Pollution Prevention / Good Housekeeping for Municipal Operations.

This annual report summarizes the City’s efforts for the reporting period from 1 October 2022 through 30 September 2023 to comply with the NPDES Permit and the above listed five (5) program elements to the maximum extent practicable (MEP).

#### **1.4. MS4 Area**

A Municipal Separate Storm Sewer System (MS4) is defined at 40 CFR Part 122.26(b)(8) as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

- (i) **Owned or operated** by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special district under State law such as a sewer district, flood control district or drainage



district, or similar entity, or tribal organization, or designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;

- (ii) Designed or used for collecting or conveying stormwater;
- (iii) Which is not combined sewer; and,
- (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

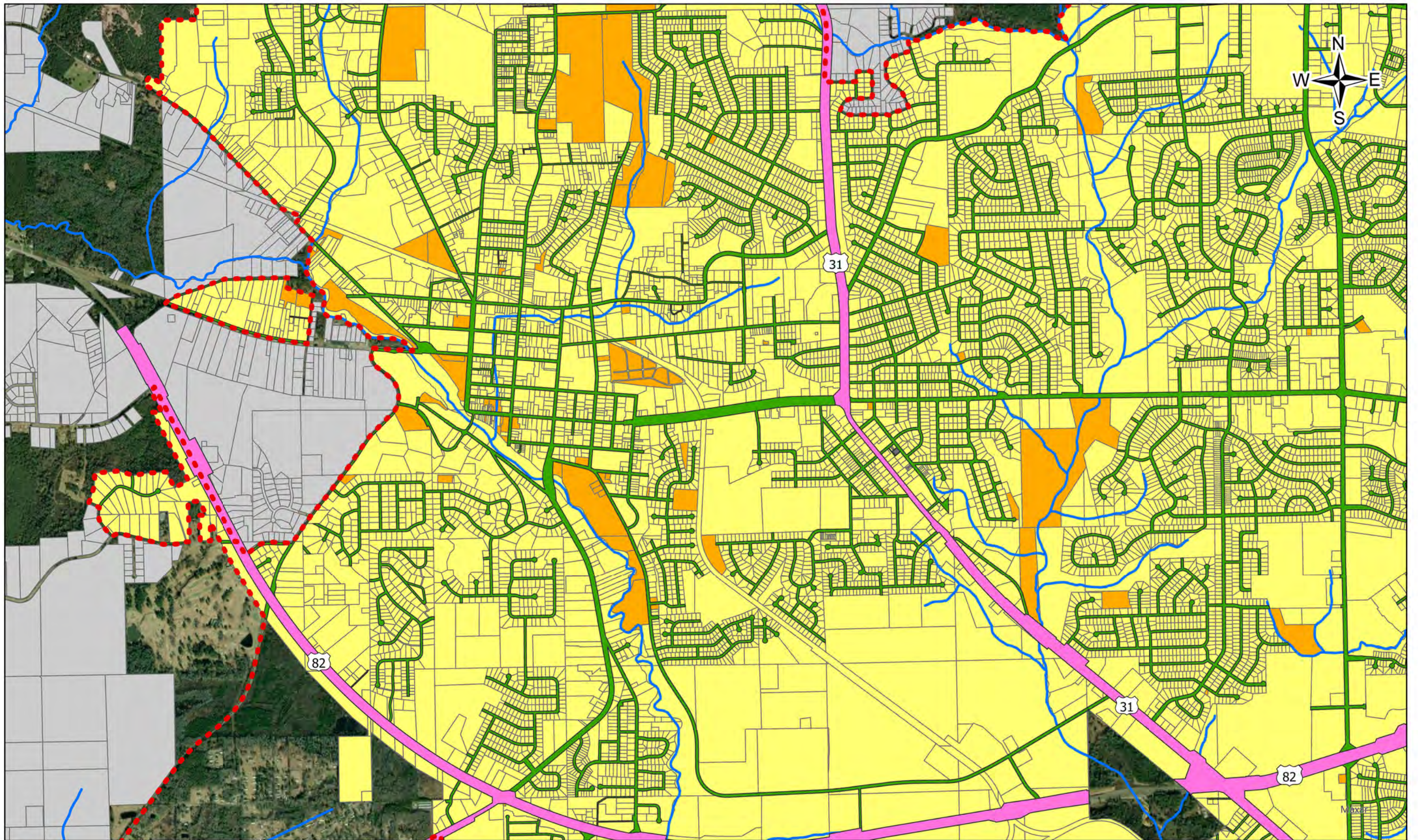
For a small (Phase II) MS4, 40 CFR Part 122.32(a)(1) states that a small MS4 is not located entirely within an urbanized area, only the portion that is within the urbanized area is regulated.

It is important to note that the definition of MS4 is limited to roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains that are Owned or Operated by a City located within the urbanized area. To further illustrate how the definition of a MS4 applies to the City of Prattville, Figure 1.1 shows how the City has defined its MS4 Area. Information presented on this figure is summarized in Table 1.2.

**Table 1.2 MS4 Area**

Description	Feature	Color	Area (mi <sup>2</sup> )	UA Area (%)
Prattville City Limits	Polygon		36.595660	
Prattville City Limits within UA	Polygon		21.402165	100.00
Private Property within UA	Polygon	Yellow	20.297090	82.28
Prattville Property within UA	Polygon	Orange	1.111141	5.19
Private Property not within UA	Polygon	Grey	13.626897	
Prattville MS4 Area	Polygon	Green	2.047891	9.57
ALDOT MS4 Area	Polygon	Pink	0.633429	2.96
UA Boundary	Dashed Line	Red		
Stream	Line	Blue		









The City shall implement its stormwater program within the MS4 Area as described in this section and supported by the Alabama laws and NPDES permit requirements as described below:

1. Section 94 of the Alabama Constitution prohibits Alabama municipalities from using public money and resources on private property unless the expenditure is deemed to fulfill a “public purpose.”
2. Alabama law limits the jurisdictional scope of its local MS4 program requirements to that absolutely required by federal law as shown in code sections set forth below.
  - a. **§11-89C-1(e)** states “It is further the intention of the Legislature to limit the jurisdictional scope of local storm water management programs to include only those sites discharging into the municipal separate storm sewer system and, because this federal initiative is an unfunded mandate, to limit the substantive scope of such local programs to include only those rules, regulations, and/or aspects that are absolutely required to satisfy the Clean Water Act, as specifically set out in the Code of Federal Regulations. ...”
  - b. **§11-89C-1(f)** states “It is further the intention of the Legislature for an individual governing body or public corporation to primarily rely upon ADEM, to the fullest extent allowed by applicable state and federal laws, for the permitting and enforcement of all ADEM NPDES sites rather than subjecting such sites to double regulation. ...” To require that set forth in Part II.B.4.a.8. would subject such sites to double regulation in contradiction to state law.
  - c. **§11-89C-2(12)** defines “STORM WATER LAWS. Those provisions of the Clean Water Act, 33 U.S.C. §1251 et seq., together with all other and subsequent applicable federal and state laws, rules, and regulations, as set out in applicable permits, relating specifically to the control of discharges into and from municipal separate storm sewers, but specifically excluding any EPA guidance and/or interpretations of said laws, rules, and/or regulations not promulgated in accordance with the Alabama Administrative Procedure Act or Administrative Procedure Act, 5 U.S.C. §500 et seq.”
3. Part V. O. of the City’s existing permit (Permit No. ALS000010) that states “This permit is issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter that are applicable to this permit are hereby made part of this permit. *This permit does not authorize the non-compliance with or violation of any laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws.*”



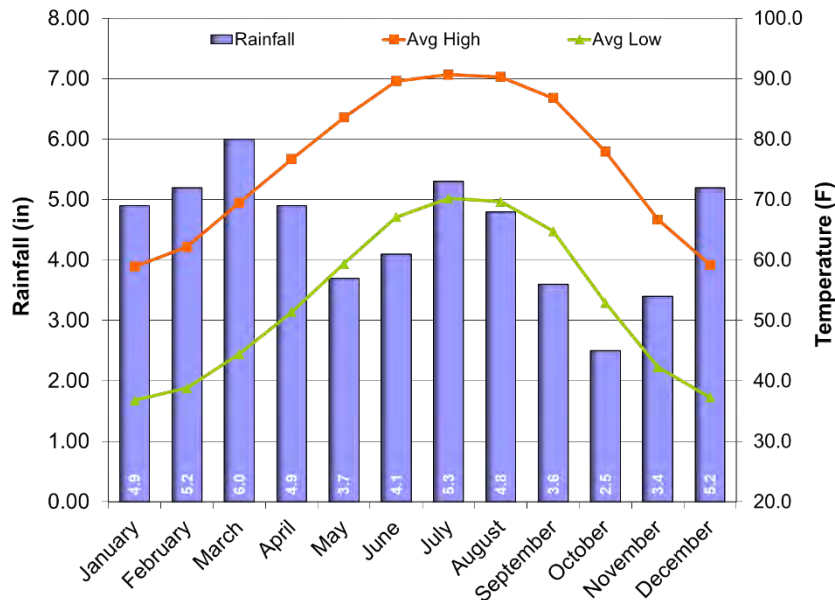
The City of Prattville is in the central part of the state along the Alabama River in Autauga and Elmore Counties. The City occupies approximately 35.88 square miles and is bordered on the east by the City of Millbrook. Approximately 17.81 square miles (49.6%) of the City is located within Montgomery, Alabama Urbanized Area as defined by 2010 Census. Areas of the City located within the Urbanized Area is the City’s regulated MS4 area.

The Alabama Department of Transportation (ALDOT) MS4 extends through the City’s MS4 Area. As a result, ALDOT is responsible for activities within their MS4. The City’s corporate limits, MS4 Area, Autauga and Elmore City boundaries, major roads, major streams, and surrounding communities are presented in Figure 1.3.

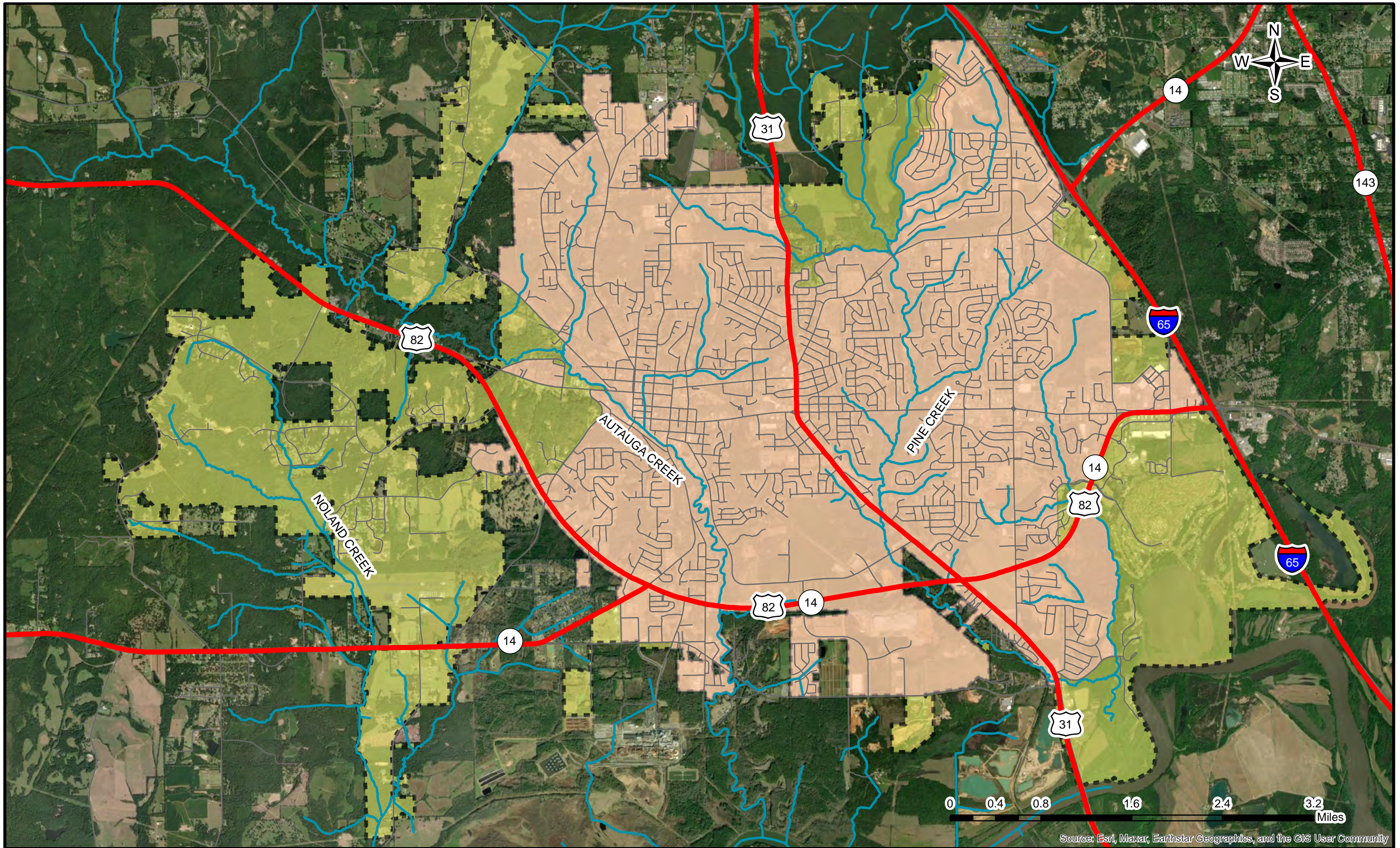
### 1.4.1. Climate

The City has a humid subtropical climate, with short mild winters, warm springs and autumns, and long, hot, humid summers. Winter temperatures average 47.9°F in January with lows rarely dipping below 20°F. Summer temperatures average 80.4°F in July with highs exceeding 90°F for more than 72 days per year. The City receives approximately 53.6 inches of rainfall annually. Rainfall tends to be evenly distributed throughout the year with dryer periods occurring during late summer and early fall. Light snowfall occurs in some winters. Average monthly rainfall and temperature are summarized in Figure 1.2. Significant snow fall events are rare in the City.

**Figure 1.2 Average Rainfall and Temperatures**









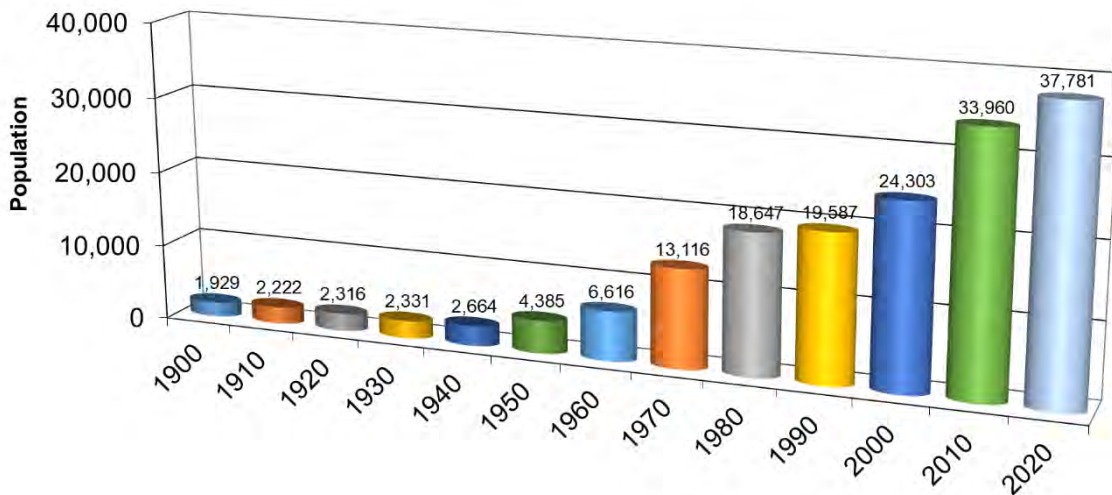


### 1.4.2. Population

Since becoming incorporated in 1839, the City experienced a small increase in population until 1960. From 1960 to 2020, the City has experienced a significant population growth. Figure 1.4 provides a graph showing the historical population of the City since 1900.

The 2020 Census estimated the total population of the City to be 37,781, indicating a population increase of 3,821 (approximately 10.1%) over the past 10 years.

**Figure 1.4 Historical Population**

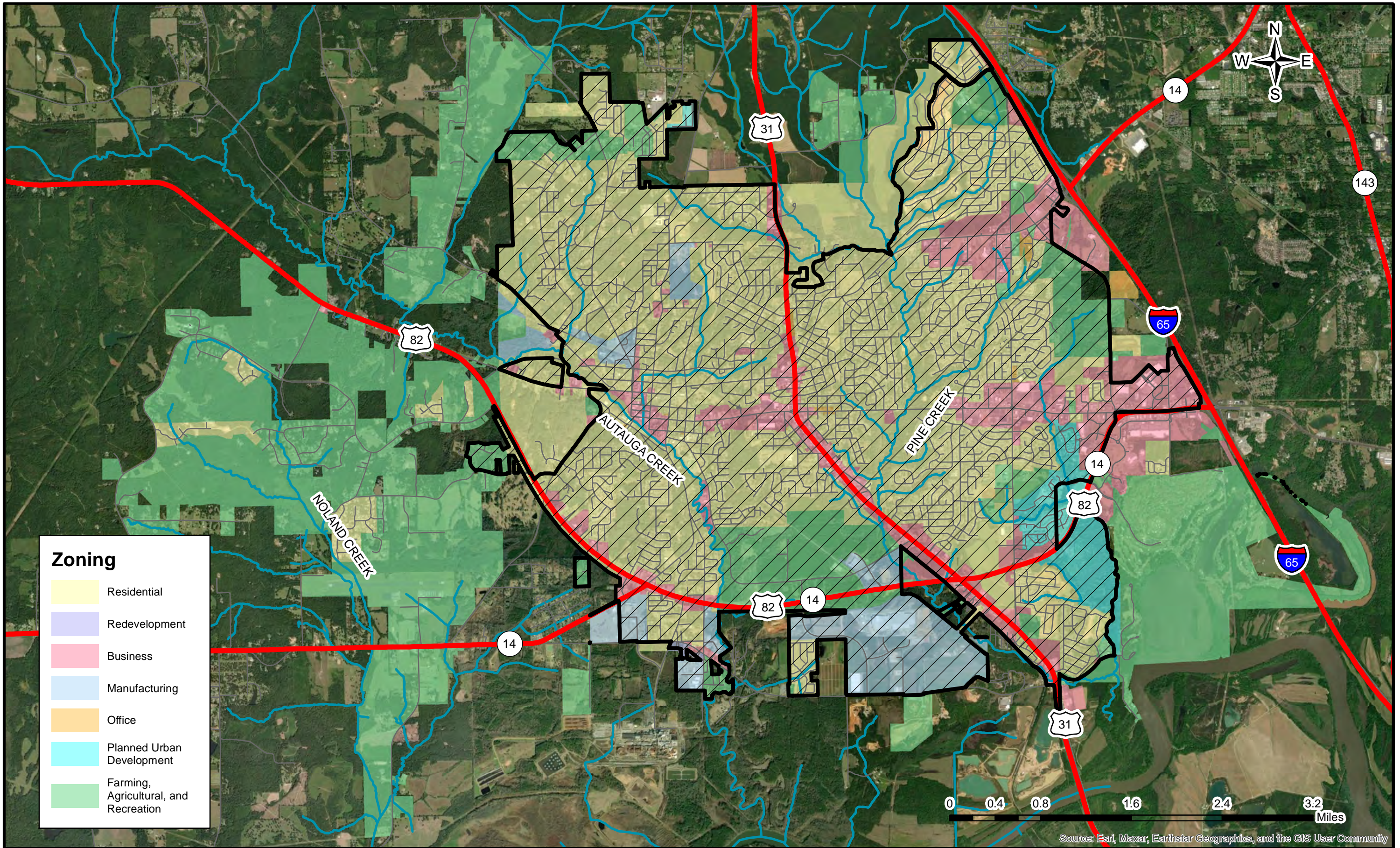


### 1.4.3. Land Use

The City utilizes various zoning districts for the development of land within the City. These zoning categories have been generalized into residential, redevelopment, business, manufacturing, office, planned unit development, and agricultural districts. A summary of the zoning districts is summarized in Table 1.3 and shown in Figure 1.5.

Overlapping the land use with watershed boundaries helps the City to identify and implement Best Management Practices (BMPs) targeted to improve water quality.





**Zoning**

- Residential
- Redevelopment
- Business
- Manufacturing
- Office
- Planned Urban Development
- Farming, Agricultural, and Recreation

- Prattville Urbanized Area
- Streets
- ALDOT Roads
- Streams



**City of Prattville**  
Land Use Summary

**Figure 1.5**  
September 2023

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community





**Table 1.3 Zoning Districts**

District	City		MS4 Area	
	Area (mi <sup>2</sup> )	Area (%)	Area (mi <sup>2</sup> )	Area (%)
Residential	15.615	43.8	13.719	64.3
Redevelopment	0.028	0.1	0.022	0.1
Business	3.747	10.5	2.842	13.3
Manufacturing	1.808	5.1	1.504	7.1
Office	0.111	0.3	0.062	0.3
Planned Unit Development	0.424	1.2	0.661	3.1
Agriculture	13.926	39.0	2.519	11.8
Total	35.659	100.0	21.329	100.0

### 1.5. Known Problems

According to ADEM's 2022 303(d) list, there are no streams within the City that have been designated as impaired. There are no streams with EPA approved Total Maximum Daily Loads (TMDLs) located within the City.



## SECTION 2

Program Evaluation



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## 2. Program Evaluation

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### 2.1. Program Objectives

The primary objective of the SWMP is to effectively prohibit the discharge of non-storm water discharges into the MS4 and reduce the discharge of pollutants from the MS4 to the MEP. The City has implemented, maintained, and revised the SWMP as necessary to comply with the requirements of the NPDES permit.

The City has made significant progress over the past year in developing and implementing its SWMP to the MEP. Major accomplishments are summarized below.

### 2.2. Public Education

The MS4 NPDES permit requires the City to develop, implement, and evaluate a public education and public involvement program. Goals of the program are to:

- Educate the community about the impacts of storm water discharges into streams, rivers, lakes, and ponds;
- Identify steps that the community can take to help reduce pollutants in storm water runoff;
- Provide opportunities for public input and feedback;
- Engage the public to actively participate; and,
- Facilitate opportunities to provide public education.

As the public gains a greater understanding of the benefits of a storm water program, the City is likely to gain more support for the SWMP and increased compliance with the NPDES permit requirements. Public education and public involvement provide a mechanism to help the public understand how their actions can potentially impact storm water quality. Public participation can also help reduce the amount of pollution generated and identify potential pollution causing activities and/or sources.

The City has utilized a variety of techniques to inform its citizens about activities that are occurring throughout the City as well as provide information to help educate the local community on how to protect water resources. At a minimum, the City's SWMP Plan committed to performing one public education BMP during each permit year. Activities utilized by the City during this permit year are summarized in the following sections.



### 2.2.1. Local Partnerships

The City has formed partnerships with local and statewide organizations to capitalize on education materials and programs that have already been developed. Ongoing activities with partnership organizations that support the City's SWMP include the following:

Autauga Creek Improvement Committee (ACIC)

[www.ataugacreek.org](http://www.ataugacreek.org)

- City provides links to organization on website; and,
- Maintains Canoe Trail Park.

Alabama Cooperative Extension System (ACES)

[www.offices.aces.edu/autauga/](http://www.offices.aces.edu/autauga/)

- Water Festival organization.

Alabama Soil and Water Conservation Committee (ASWCC)

[www.alconsevationdistricts.gov](http://www.alconsevationdistricts.gov)

- ASWCC provides the City with technical resources to support various program components.

ADEM

[www.adem.alabama.gov](http://www.adem.alabama.gov)

- Coordinate on non-storm water discharge investigations.

The City's contributions to the above referenced organizations may include but are not limited to staff participation, financial contributions, land contributions, and/or technical assistance. Additional educational activities performed by each entity are further documented on their website.

### 2.2.2. Website

The internet provides a very accessible mechanism for making information and data available to City residents. The City has maintained a website (<http://www.prattvilleal.gov/>) that provides information about the City, including general information regarding what the public can do to help minimize pollution and how to protect the quality of stormwater runoff. Some topics provided on the website include but are not limited to the following:

- Storm Water Management Program
  - NPDES Permit ALS000010
  - SWMP Plan
  - Annual Report(s)



- Erosion and Sediment Control
- Post Construction Stormwater Runoff
- Stormwater Resources
  - How Can YOU Prevent Stormwater Pollution?
  - EPA Educational Materials
  - Brochures, guides, and booklets
- Sanitation
  - Household garbage collection
  - Yard trash collection
  - Recycling Center and information
  - Hazardous Waste Disposal
    - Household Cleaner Alternatives
    - Gardening and Pest Control Alternatives
- Wastewater
  - Recycling Grease
- Building Department
  - Codes and Permits
  - Development Forms
- Floodplain Management

Through the website, citizens are provided access to the City's regulations, ordinances, permitting requirements, and a variety of other information. The website is maintained and updated on an as needed basis. Information from the website can be obtained from the above link.

### **2.2.3. Social Media**

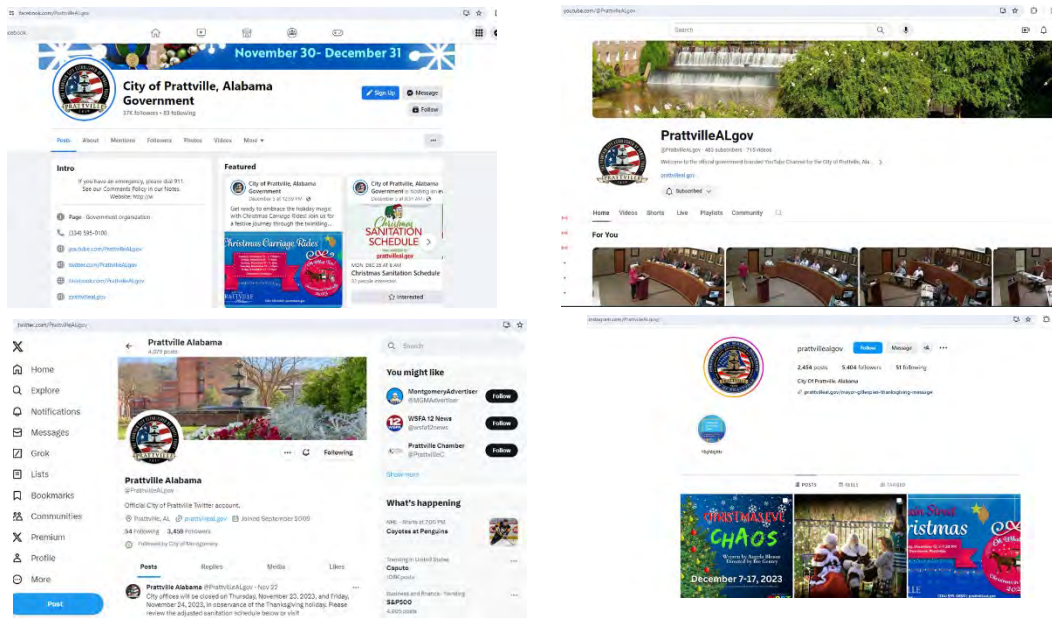
The City is active on several social media platforms and can send direct messages in a timely manner to residents, businesses, property owners, and others actively following the City on these platforms. This offers a cost effective, environmentally friendly mechanism to potentially inform the public regarding storm water related issues. Selected screenshots of the City's social media sites are provided in Figure 2.1.



Social media accounts setup by the City for the primary purpose of communicating with the public include the following:

- Facebook [www.facebook.com/PrattvilleALgov](http://www.facebook.com/PrattvilleALgov)
- Twitter [www.twitter.com/PrattvilleALgov](http://www.twitter.com/PrattvilleALgov)
- YouTube [www.youtube.com/PrattvilleALgov](http://www.youtube.com/PrattvilleALgov)
- Instagram [www.instagram.com/PrattvilleALgov](http://www.instagram.com/PrattvilleALgov)

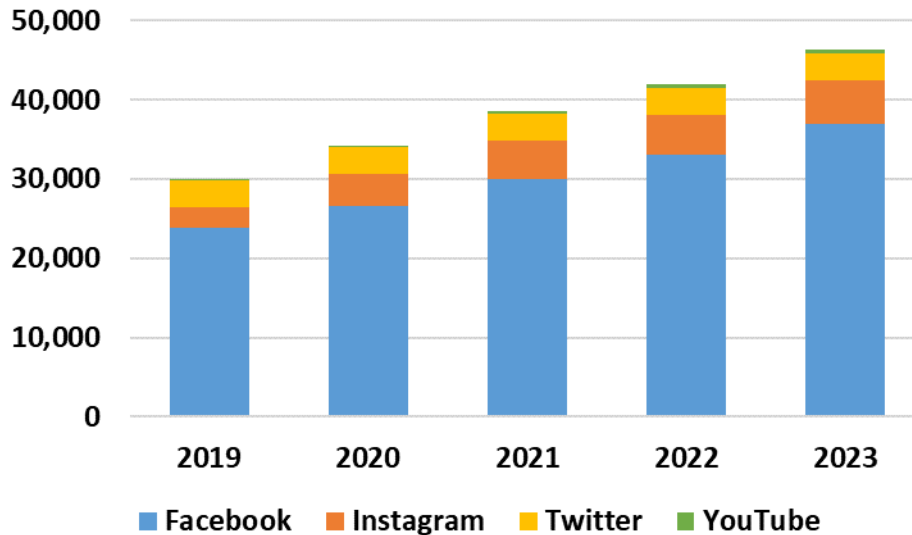
**Figure 2.1 City Social Media Pages**



To show the effectiveness of social media in communicating with the public, Figure 2.2 provides a chart depicting the steady growth in the number of people following the City’s social media sites. This chart shows that residents are seeking information about City events, programs, and schedules through social media platforms. Social media as an information conduit has gained traction since its inception as residents seek up-to-date alerts, timely information, and deeper understanding of City services.



**Figure 2.2 Social Media Followers**



#### 2.2.4. Public Service Announcements

Several public service announcements (PSAs) help educate citizens on reoccurring problems with pollution that impacts the City’s MS4. The City has created a YouTube channel to allow continual access to these PSAs at <https://www.youtube.com/user/PrattvilleALgov>. A summary of the PSAs available to the public includes the following:

- Litter PSAs – Four (4) videos with various volunteer organizations, Public Works Department employees, Mayor Gillespie, and other residents removing litter from public areas. The videos encourage residents not to litter and “Do Your Part” to remove existing litter. Residents are encouraged to use the “hashtag” phrase #WHYlitter. The YouTube feeds are available at:
  - [https://www.youtube.com/watch?v=sYA-iMG\\_1c](https://www.youtube.com/watch?v=sYA-iMG_1c)
  - <https://www.youtube.com/watch?v=ct5bOi3tRCY>
  - <https://www.youtube.com/watch?v=sj3el4U7-lc>
  - <https://www.youtube.com/watch?v=YZWOgbY4LD8>
- Garbage Can Tips – The City provided a YouTube video showing proper can placement, how to dispose of garbage in the can, and where instructions are located on the can. This may increase proper usage of cans and could potentially decrease stray litter. The YouTube feed is available at: <https://www.youtube.com/watch?v=bOaN-dN3wTg>.





- Recycling in Our Community – The City published a video describing the four (4) different ways City residents can recycle. Recycling is available through curbside pickup, drop off at the Recycling Center, drop off at recycling dumpsters located throughout the City, and simply placing recyclables in the garbage. More detail of the City’s recycling program is discussed in Section 2.3.5. The YouTube feed is available at: <https://www.youtube.com/watch?v=FTAQb6XyaEQ>.

The City has also embedded one litter PSA and the Garbage Can Tips PSA on Public Works Department webpages.

### **2.2.5. Brochures**

The City of Prattville has developed several brochures, booklets, and handouts to provide general information about storm water related issues. Brochures are made available through the City’s website at the “Storm water Resources” webpage. Some brochures are developed to address either a specific storm water related issue or to a particular audience. These brochures are typically provided to the audience of interest.

During the development of the City’s SWMP, the City determined that using the website is the most cost-effective mechanism to communicate with residents. This provides the City with more flexibility and creativity to reach a wide public audience. There are many advantages to this strategy, including the following:

- Environmental impact of reduced printing;
- Reduced cost of printing;
- Distribution to a wide-reaching audience independent of visiting a physical location;
- Ability to always reach an audience through the website; and,
- Increased communication with City employees, residents, community groups, and neighborhood leaders.

Copies of the existing brochures and booklets available on the website are provided in Appendix A. Table 2.1 provides a summary of the brochures that have been developed.





**Table 2.1 Brochures**

Description	Target Pollution Source	Target Audience	Distribution
<b>Brochures</b>			
Storm Drain Stewardship	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
<b>Booklets</b>			
Down Stream – A Guide for Preventing Urban Runoff and Stormwater Pollution	General Information	Homeowners Renters Schools Business Owners	Website
Stormwater Requirements for Construction	Construction Site Permitting Informational Links	Contractors Professionals Developers	Website
<b>Posters</b>			
Stormwater and the Construction Industry	Construction Site Runoff ESC Plans BMP Maintenance	Contractors Professionals Developers	Website
Community Rainwater and Stormwater Capture and Use	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website

The City coordinated with the following groups to utilize existing materials and develop educational materials that are unique to the City.

- Environmental Protection Agency (EPA);
- Erie County, New York;
- City of Bryan, Texas; and,
- Mid-America Regional Council (MARC).

**2.2.1. Training**

On 13 September 2023, the City’s Storm Water Coordinator gave a presentation to 62 City employees from the Public Works Department about different components of the City’s MS4 program. The presentation was titled “Preventing



Storm Water Pollution – What We Can Do” and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E.

### 2.3. Public Involvement

The City has utilized a variety of techniques to implement its public involvement and outreach program. Mechanisms and activities that have been implemented this permit year are summarized in the following sections.

#### 2.3.1. Public Input

As required by the City’s new NPDES Permit, the City was required to develop a SWMP Plan. As part of this process, the City solicited public input by posting the proposed SWMP Plan on the website for a 30-day comment period.

On 16 December 2022, the City created a page on its website informing the citizens that a draft SWMP Plan was available for review and where to obtain a copy of the draft SWMP Plan, as shown in Figure 2.3.

Since no public comment was received by the City, the SWMP Plan was finalized and made available on the website.

Figure 2.3 SWMP Plan Notice





### 2.3.2. Citizen Reporting Tools

The City has implemented various citizen reporting tools and hotlines for the public to provide suggestions and/or report incidents that may potentially impact the MS4. A citizen can report an issue of concern by using one of the following:

Hotline: (334) 595-0481

Citizen Request Portal:

<https://citizenportal.dudesolutions.com/CityOfPrattville/home>

The City has developed and implemented a Citizen Request Portal which may be accessed through the City's website or through a mobile application. This feature allows citizens to report problems at specific locations. The City then distributes the request to the appropriate department.

### 2.3.3. Autauga Creek Improvement Committee (ACIC)

In July 2011, the Mayor formed the Autauga Creek Improvement Committee (ACIC) to help protect one of the City's most iconic natural resources, Autauga Creek. A core group of citizens jumped on board and quickly began the process of removing debris and trash from Autauga Creek. As the ACIC continued to evolve, it obtained status as a nonprofit 501(c)(3) organization and developed the following mission statement:

*"To provide a natural, scenic, and educational recreation experience through ecological conservation and preservation of quality public access to Autauga Creek Canoe Trail"*

In the past couple of years, ACIC has not only secured a spot for Autauga Creek on the Alabama Scenic River Trail, but also acquired the designation as a National Recreational Trail. Signs have been posted along the 14-mile blueway trail to help provide visitors with information about the trail. The sign installed at Doster Well Park and a map of the four (4) mile section of the blueway trail are provided in Figure 2.4. ACIC provides educational opportunities and materials as well as supports cleanup activities along the blueway trail. Information about ACIC is provided at [www.ataugacreek.org](http://www.ataugacreek.org). Selected brochures developed and distributed by ACIC are provided in Appendix A.

**Figure 2.4 Autauga Creek Blueway Trail**



### 2.3.4. Autauga County Water Festival

Autauga County Water Festival is open to all fourth-grade students in Autauga County, including all public school, private school, and home school students. The festival is designed to be a fun, educational, and memorable event in a field day atmosphere. The purpose of this event is to educate children about all aspects of water and other related natural resources through interactive hands-on activities. The goal of the festival is to instill in each student a general environmental awareness and stewardship ethic. The City is not only a sponsor of the festival, but also provides volunteers that help organize and host the festival. The Water Festival was held on 28 February 2023 and 742 students attended. Photographs from the event are provided in Figure 2.5.

**Figure 2.5 Water Festival**





### **2.3.5. Recycling**

The City offers single-stream recycling as a part of the existing garbage collection process. On 20 August 2019, the City authorized the mayor to enter into an agreement with RePower South for delivery of the City's waste stream to the Montgomery Recycling and Recovery Facility. The facility removes recyclable material and salvageable items before disposing of any waste to the landfill. This allows the residents of Prattville to recycle by simply including recyclables in their standard garbage. This program became effective on 26 August 2019. For this permit year, approximately 10,884 tons of recyclable material was recovered for the City through the RePower South facility.

The City does operate one (1) truck with three (3) crew members dedicated to collecting cardboard and paper products separated by the residents at the curb. For this permit year, the City has collected and recycled approximately 558 tons of cardboard.

The City operates a Recycling Center located at 530 Doster Road. The Center is open on Monday through Saturday from 7:00 AM to 3:00 PM. On Saturdays, the City also collects garbage and yard debris. The City accepts the following items for recycling:

- Aluminum cans;
- Paper;
- Newspaper;
- Magazines;
- Cardboard;
- Steel and tin cans;
- Appliances;
- Plastics (codes 1 and 2); and,
- Phone books.

The City also operates 17 cardboard drop off locations on City properties. These dumpsters are emptied twice weekly.

#### **2.3.1. Pet Waste Stations**

The City has seven (7) pet waste disposal stations at various locations in Prattville parks and public areas. These stations are regularly maintained including emptying, refilling bags, and general maintenance. The City typically purchases 3,000 bags each permit year. A photograph of the pet waste disposal system installed at Pratt Park is provided in Figure 2.6.



**Figure 2.6 Pet Waste Disposal Station**



### **2.3.2. Autauga PALS Cleanups**

The City and the Autauga County Commission occasionally have citizens performing mandated community service within the City. This service includes litter cleanups associated with People Against a Littered State (PALS).

## **2.4. Illicit Discharge Detection and Elimination (IDDE)**

The City is continuously implementing an Illicit Discharge Detection and Elimination (IDDE) Program in accordance with the SWMP Plan.

### **2.4.1. Legal Authority**

On 5 June 2018, the City of Prattville adopted an Illicit Detection and Elimination (IDDE) Ordinance (Ordinance No. 2018-007). The IDDE ordinance establishes the legal authority for the City to prohibit, monitor, and eliminate illicit discharges and/or illicit connections to the City's MS4. The ordinance was not revised or updated during this permit year.

### **2.4.2. Public Education**

Public education activities associated with the IDDE program are described in Sections 2.3 and 2.4 of this report.



### **2.4.1. Citizen Reporting Tools**

The City has implemented various citizen reporting tools and hotlines for the public to provide suggestions and/or report incidents that may potentially impact the MS4. A citizen can report an issue of concern by using one of the following:

Hotline: (334) 595-0481

Citizen Request Portal:

<https://citizenportal.dudesolutions.com/CityOfPrattville/home>

The City has developed and implemented a Citizen Request Portal which may be accessed through the City's website or through a mobile application. This feature allows citizens to report problems at specific locations. The City then distributes the request to the appropriate department.

### **2.4.1. Outfall Inventory**

As of September 2021, the City completed the initial outfall inventory of the City's entire MS4 area based upon the 2010 U.S. Census. The City is in the process of evaluating new MS4 areas based upon the 2020 U.S. Census and updating the outfall inventory. Figure 2.8 shows the City's regulated outfall screening schedule for the current five-year period.

During this permit year, 98 outfalls have been located and evaluated for the presence of non-stormwater discharges. The City screened all regulated outfalls designated for permit year 2023. There were no illicit discharges identified during the inspections.

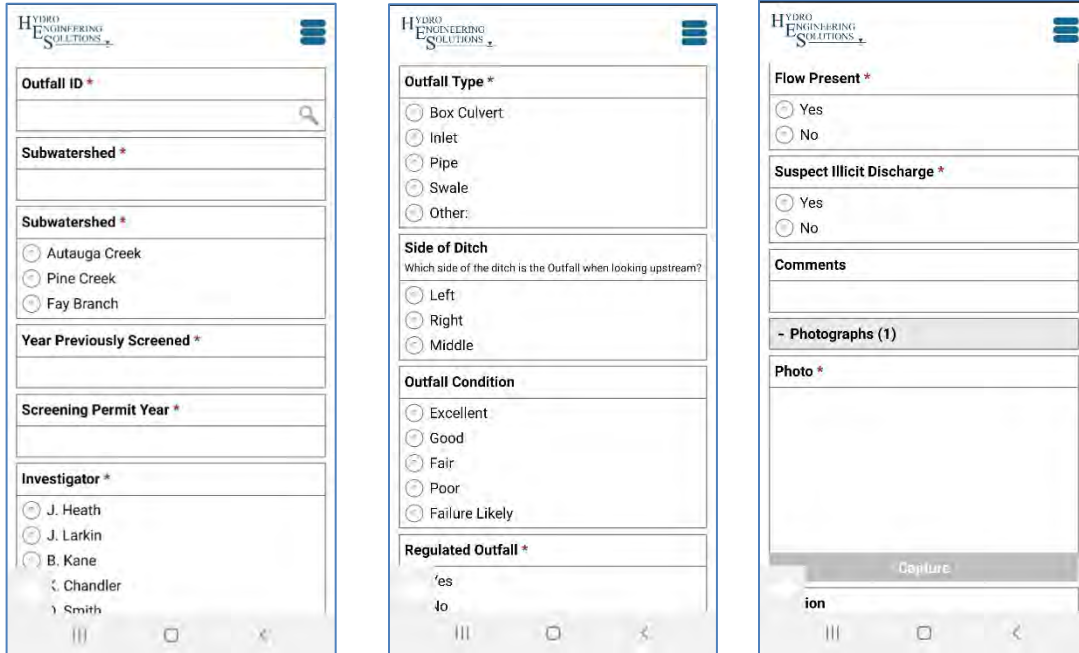
The City utilizes best available technology for completing an Outfall Reconnaissance Inventory (ORI) to map and screen stormwater outfalls. A mobile application was used to convert the ORI form into an electronic format.

This mobile application provides field crews with the following enhanced capabilities:

- GPS mapping to facilitate outfall location;
- Electronic data collection;
- Minimize the types of equipment needed for field work;
- Ability to report a problem immediately when it is discovered;
- Ability to automatically create an outfall screening report; and,
- Data collected is easily converted to a format for ArcGIS.

Data collected during the ORI is maintained in the City’s GIS dataset for stormwater outfalls. Screen shots of the mobile application are provided in Figure 2.7. A summary of the outfalls screened from 1 October 2022 through 30 September 2023 is provided in Table 2.2 and shown in Figure 2.8. Copies of the outfall mapping forms are provided in Appendix B.

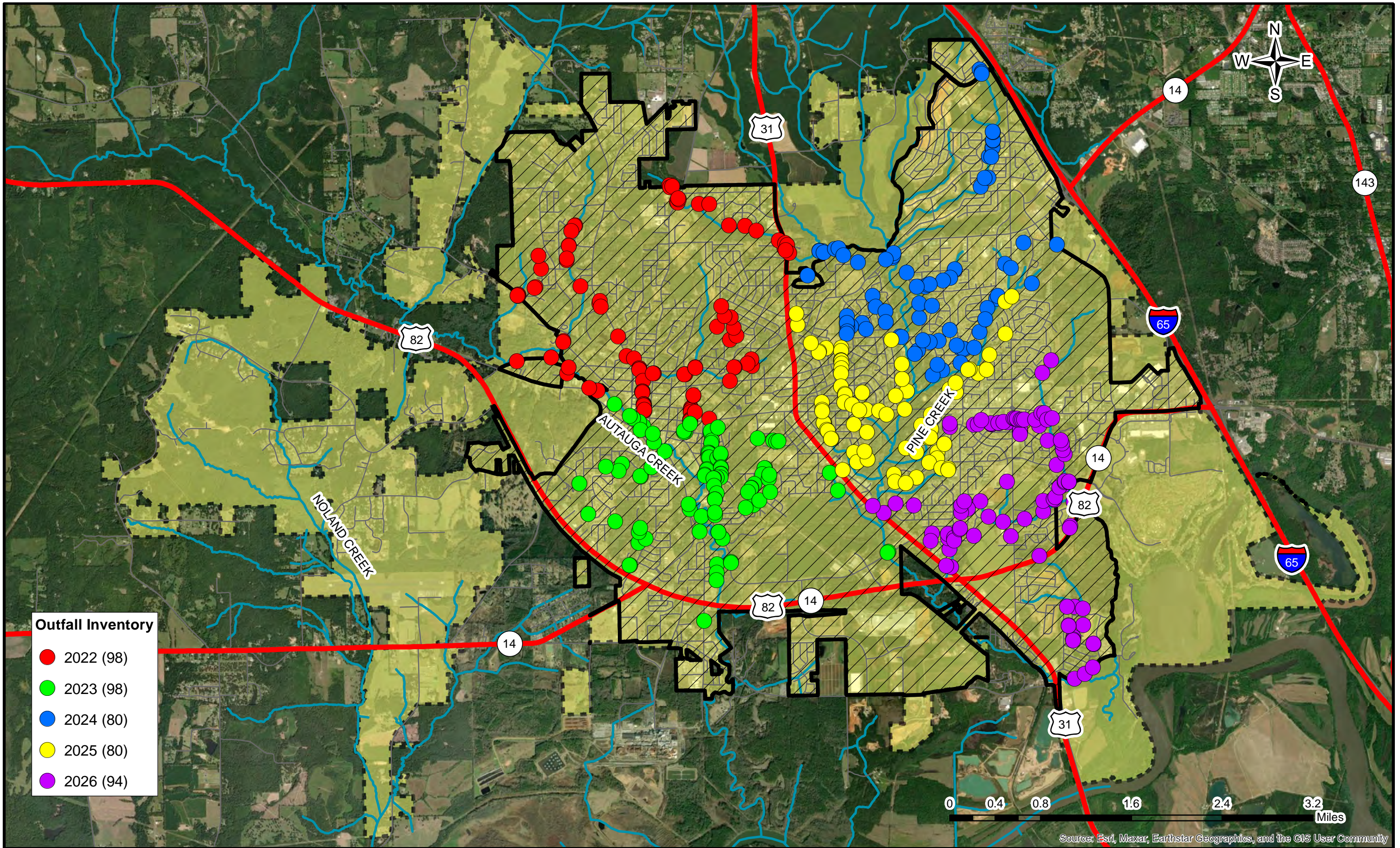
**Figure 2.7 Mobile Application Screen Shots**



**Table 2.2 2023 Outfalls Screened by Watershed**

Watershed	Total	2022	2023	2024	2025	2026
Autauga Creek	173	79	94			
Pine Creek	23	19	4			
Fay Branch						
Totals	196	98	98			









### **2.4.1. Priority Areas**

Based on the outfall screening activities and the City knowledge of existing infrastructure, land use, and previously observed illicit discharges, the City has determined that there are not any priority areas that warrant more frequent screening.

### **2.4.2. Training**

On 1 March 2023, the cities of Prattville and Montgomery participated in a coordinated IDDE refresher training workshop. The City's Storm Water Coordinator and a technician tasked with outfall screening were present for the training. Hydro Engineering Solutions gave a presentation which included information about outfall screening, identifying and eliminating illicit discharges, sampling and testing, and a demonstration of the new mobile application developed for the City. A copy of the presentation and sign-in sheet is provided in Appendix B.

On 13 September 2023, the City's Storm Water Coordinator gave a presentation to 62 City employees from the Public Works Department about different components of the City's MS4 program. The presentation was titled "Preventing Storm Water Pollution – What We Can Do" and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E.

The City's Storm Water Coordinator is experienced in non-storm water discharge location, investigation, illicit discharge determination and abatement. The Storm Water Coordinator oversees all outfall screening and illicit discharge investigations within the City's MS4. Investigations conducted by the City are described in the "Illicit Discharge Investigations" section of this report.

### **2.4.3. Illicit Discharge Investigations**

The City investigated four (4) instances of suspect illicit discharges based on complaints received through the City's Complaint Tracking System, Facebook posts, or calls received by various City Departments. A summary of each complaint and investigation is listed below.

- 662 Partridge Lane – A resident observed wet ground near an inlet. The issue at this location was investigated several times previously and was found to be high groundwater after heavy rains.



- 1099 Doster Road – The Storm Water Coordinator noticed a pipe burst from a train car unloading, covering the ground in white crystallized discharge. The City notified ADEM of the incident since it was on railroad right-of-way.
- 1274 East Main Street – The Storm Water Coordinator noticed a broken sanitary sewer lateral was discharging in a stream. The lateral was reinspected and repaired within four days.
- 1259 Cooper Drive – The Storm Water Coordinator noticed a broken sanitary sewer lateral was discharging into a ditch. The homeowner was given time to make the repairs or water service would be discontinued.

All the non-storm water discharges were abated and subsequently confirmed by City personnel. A copy of the City investigation records is provided in Appendix B. A comparison of complaints received during the past five (5) permit years is shown in Table 2.3 and Table 2.4. These tables show that the City’s efforts to inform residents about public reporting methods are effective. Residents may use various methods to alert the City of potential non-stormwater discharges.

**Table 2.3 Complaint Types by Permit Year**

Complaint Type	2019	2020	2021	2022	2023	Total
Sanitary Sewer	5			1	2	8
Illegal Dumping/Trash	1	1				2
Oil/Household Hazardous Waste		1	2	1	1	5
Construction Site Runoff			1			1
Restaurant/Grease	1	1				2
Wash Water		1	1			2
Ditch Erosion		1				1
Other/No Discharge					1	1
Totals	7	5	4	2	4	22



**Table 2.4 Reporting Mechanism by Permit Year**

Reporting Mechanism	2019	2020	2021	2022	2023	Total
Phone Call / Email	5	1	1	2	1	10
Contact Mayor	1					1
City Employee	1	3	1		3	8
Social Media			1			1
ORI						0
ADEM		1	1			2
Totals	7	5	4	2	4	22

**2.4.1. Grease Control Program**

In order to minimize the disposal of used grease into the sanitary sewer system, the City has implemented a fats, oils, and grease control program. This program requires a food service establishment to install, operate, and maintain a grease interceptor or trap. A food service establishment is required to submit an annual report summarizing any maintenance activities performed on the grease interceptor or trap. Periodic inspections of the food service establishment are performed by the City.

**2.5. Construction Site Runoff**

Major accomplishments in the Construction Site Runoff Program are summarized below.

**2.5.1. Legal Authority**

On 5 June 2018, the City of Prattville adopted an Erosion and Sediment Control (ESC) Ordinance (Ordinance No. 2018-007). The ordinance was not revised or updated during this permit year.

**2.5.2. Permitting and Plan Review**

The City has a process for reviewing, approving, and permitting qualifying new development and redevelopment projects consisting of land-disturbing activities. Before the commencement of any land disturbing activity that is not exempted from obtaining a permit, the owner and/or operator of the construction site is required to submit a grading permit application for approval of the Construction Best



Management Practices (CBMP) Plan. The grading permit application requires the following information:

- Applicant Information;
- Site Information;
- Project Description;
- Type of Construction;
- If the proposed construction activity is required to obtain a General NPDES Permit for construction activity from ADEM, a copy of the Notice of Intent (NOI) submitted to ADEM and a copy of ADEM's authorization under the General NPDES Permit;
- CBMP Plan;
- Surety Bond or Letter of Credit; and,
- Application Fee.

A copy of the grading permit packet is provided in Appendix E of the SWMP Plan.

### **2.5.1. Training and Certification**

Currently, the City has five (5) Qualified Credentialed Inspectors (QCIs). A copy of the QCI certificates is provided in Appendix C.

### **2.5.2. Education and Training Materials**

The City has provided links on its website for education, training materials, and resources for construction site operators, as discussed in Section 2.3 of this report.

### **2.5.3. Inspections**

The City has a form for construction site BMP inspections and a general erosion and sediment control plan for residential construction. There were no revisions or updates to either from during this permit year. Copies of the Construction Site Inspection Form and General Residential BMP standard details are contained in Appendix E of the SWMP Plan.

The Building Department tracks General BMP inspections through Citizen Serve software by permit number. Prior to performing requested building inspections, the Building Inspectors check ESC BMPs for proper installation, damage, performance, etc. An example of a Citizen Serve inspection is provided in



Appendix C. A summary of BMP inspections performed through Citizen Serve is provided in Appendix C.

#### **2.5.4. Enforcement**

Occasionally, the City shall request that ADEM enforce compliance with NPDES permittees in non-compliance. Enforcement actions taken by the City during this permit year include the following:

- Forty-one (41) General BMP inspections with deficiencies noted and maintenance required;
- Seven (7) failed General BMP Inspections requiring Re-inspection;
- Four (4) Written Warning Notices; and,
- Two (2) Notices of Violation (NOV).

A copy of the inspection and enforcement action summary is provided in Appendix C.

#### **2.5.5. Public Reporting**

The City has implemented a citizen reporting tool for the general public to provide suggestions and/or to report incidents that may potentially impact the MS4. A citizen can report an issue of concern, nuisance, or request maintenance by visiting: <http://www.prattvilleal.gov/helpdesk/citizen-helpdesk.html>. This reports citizen complaints through the City's online portal and distributes requests to associated Departments automatically.

### **2.6. Post-Construction Storm Water Management**

The City has developed a city-wide concept that provides a systematic basis for thinking about the City's future. The future development pattern of the City has been organized with appropriate recognition given to the City's green infrastructure, its street and utility infrastructure, and major existing uses of land.

#### **2.6.1. Legal Authority**

On 5 June 2018, the City of Prattville adopted a Post-Construction Storm Water Management Ordinance (Ordinance No. 2018-008). The ordinance was not revised or updated during this permit year.



### 2.6.2. Post-Construction Technical Memorandum

The City's Post Construction Storm Water Ordinance establishes design standards through a Post Construction Stormwater Management Technical Memorandum. The Technical Memorandum describes how post-construction storm water management requirements for qualifying new development or redevelopment shall be implemented. Post-construction storm water runoff quality is an important component of the City's SWMP. For all qualifying new development or redevelopment, post-construction storm water management shall include water quality BMPs to detain and treat the first 1.1 inches of rainfall that occurs on the project site. To document design information for post-construction BMPs, the City has developed design forms for BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydrodynamic separators. Copies of the design forms are provided in Appendix F. Components of the technical memorandum include the following:

- Overview;
- Applicable Developments;
- Implementation;
- Waiver Request;
- Water Quality Requirements;
- Low Impact Development;
- Design Standards;
- As-Built Certification;
- Annual Inspections;
- Homeowner's Association (HOA) Requirements; and,
- Operation and Maintenance.

A copy of the Technical Memorandum is provided in Appendix F of the SWMP Plan.

### 2.6.3. Waiver Request

The City recognizes that certain developments may qualify for a waiver from post-construction stormwater management requirements: Developments that meet one of the following criteria may request a waiver:

- A development that has been constructed or obtained an approved permit prior to 5 October 2018;
- A development that is part of a larger existing development that has been approved prior to 5 October 2018 and all stormwater management facilities were constructed as part of the larger existing development.
- A development phase that is part of a regional stormwater management strategy previously approved by the City. The regional stormwater management facility shall be constructed, and the as-built certification approved by the City. The proposed phase of the development shall have



- the same or similar density and drainage area that was used to develop the regional stormwater management strategy.
- A redevelopment that reduces the existing impervious area within the redevelopment.
  - A development or redevelopment project that is less than 1-acre, is not part of a larger development, and does not adversely impact the City's MS4.

Copies of the Waiver Request Forms are provided in Appendix F of the SWMP Plan. The City reviewed seven (7) waiver requests during the permit year.

#### **2.6.4. Water Quality Requirements**

Post-construction stormwater runoff quality is an important component of the City's SWMP. For all qualifying new development or redevelopment, post-construction stormwater management shall include water quality BMPs to detain and treat the first 1.1 inches of rainfall that occurs on the project site.

#### **2.6.5. Low Impact Development**

The City encourages landowners and developers to incorporate the use of low impact development (LID) into development plans. The City has reviewed and adopted the latest version of the *Low Impact Development (LID) Handbook for the State of Alabama*. To encourage developers to utilize LID/GI, the City will waive post-construction permitting fees.

#### **2.6.6. Post-Construction BMP Plan Review**

The City already has a permitting and plan review process that is shown in the SWMP Plan. During the development of the Post-Construction Storm Water Management Program, the City has incorporated the post construction BMP plan review into the existing process.

During the permit year, the design for twenty (20) development project BMPs were reviewed. Copies of the Design Forms that were reviewed are provided in Appendix D.

#### **2.6.7. As-built Certification**

As a part of the NPDES permit, the City must insure the BMPs that have been designed and approved are constructed and function in accordance with their original design and intent. In an effort to confirm that the constructed BMPs meet the designer's intent, As-Built Certification Forms have been developed for various





types of BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydrodynamic separators. Copies of the as-built certification forms are provided in Appendix F of the SWMP Plan.

It is the Owner's responsibility to have as-built information, such as pond volume, embankment size and elevations, invert size and elevations, and spillway elevations field surveyed by a Professional Land Surveyor. It is the Engineer-of-Record's responsibility to utilize the field surveyed information to fill out the As-Built Certification Form.

During the permit year, seven (7) As-Built Certifications were received by the City, reviewed, and approved for either a Certificate of Occupancy (CO) or final plat approval. Copies of the As-Built Certification Forms that were reviewed are provided in Appendix D.

#### **2.6.8. Operation and Maintenance Agreement**

It is the responsibility of the Owner to operate and maintain the stormwater management facility and/or BMPs in accordance with the original design intent and approval. If the original Owner or Developer has sold the project or passed ownership on to a Homeowner's Association, then it is the new Owner or HOA's responsibility to maintain the facility and provide any required inspection and maintenance. Prior to the issuance of a Certificate of Occupancy or Final Plat Approval, the owner must submit an Operations and Maintenance Agreement (OMA) to the City for approval.

Should maintenance be needed at a facility as a result of the Annual Inspection, the Owner is required to provide the City with documentation describing the maintenance required and a schedule for completing all maintenance activities. Once all maintenance activities are completed, the Owner is required to provide documentation to the City of the maintenance performed and that the BMP operates as it was designed. Under the City's OMA, if the owner or developer does not complete the construction of BMPs fully or does not maintain BMPs according to the required standards, the City can perform any necessary measures to bring the BMPs into compliance. The owner is responsible for reimbursing the City for any reasonable costs associated with the completion or maintenance of the BMPs. A copy of the OMA is provided in Appendix F of the SWMP Plan. The City received five (5) OMAs during the permit year.



### **2.6.9. Annual Inspection**

For post-construction BMPs to continue to function in accordance with their original design and installation, annual inspections are required. The Owner of the project is required to have these annual inspections performed and must then submit the required Annual Inspection Form to the City. The Annual Inspection Form provides documentation concerning the condition of each post-construction stormwater management, and any maintenance required and/or performed. The City shall evaluate the documentation submitted to confirm that the stormwater management facilities are continuing to function as designed.

Annual inspection forms have been developed for various types of BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydrodynamic separators. Copies of the annual inspection forms are provided in Appendix F of the SWMP Plan.

The City received twenty-two (22) Annual Inspection Forms during the permit year. Copies of the annual inspection forms received this permit year are provided in Appendix D. One (1) BMP owner did not initially comply to the Annual Inspection request and received a NOV letter and a fine. The BMP Annual Inspection was received seven (7) days after the due date.

### **2.6.10. Maintenance Escrow Agreement**

For residential subdivisions with Homeowner's Associations (HOAs), the City's Post Construction Stormwater Management Ordinance requires the establishment of an escrow account to ensure that adequate funds are available to provide for the operation, long-term maintenance, inspection, repair, and replacement or reconstruction of Post Construction BMPs. An escrow account shall be established to, at minimum, cover 50% of the constructed cost of each post construction stormwater management BMP. The developer or HOA shall initially pay 10% of this amount. The developer or HOA shall annual contribute 10% of the remaining amount required until the escrow account balance is equal to 50% of the constructed cost of each BMP.

The City requires HOAs to sign a Maintenance Escrow Account Agreement form and report the annual financial status of the escrow account with the Escrow Account / Maintenance Request Form the City included with the Technical Memorandum. The City shall review and approve any escrow account disbursement requests listed on the form prior to the HOA withdrawing money for BMP maintenance. Copies of the Escrow Account Agreement and Escrow Account / Maintenance Request Form are provided in Appendix F of the SWMP



Plan. The City received two (2) Escrow Account / Maintenance Request Forms during the permit year.

### **2.6.11. Post-Construction BMP Inventory**

Upon approval of the as-built certification, the post-construction BMPs are incorporated into the City's inventory. An inventory of post-construction BMPs is provided in Figure 2.9.

## **2.7. Pollution Prevention and Good Housekeeping**

The pollution prevention / good housekeeping program is a key element to help the MS4 to reduce potential pollutants from entering storm water runoff from City facilities located within the MS4 area. This control measure requires the City to evaluate existing facilities and operations to identify areas of improvement that will help ensure a reduction in the amount and type of potential pollutants. The City's activities are summarized in the following sections.

### **2.7.1. Municipal Facilities**

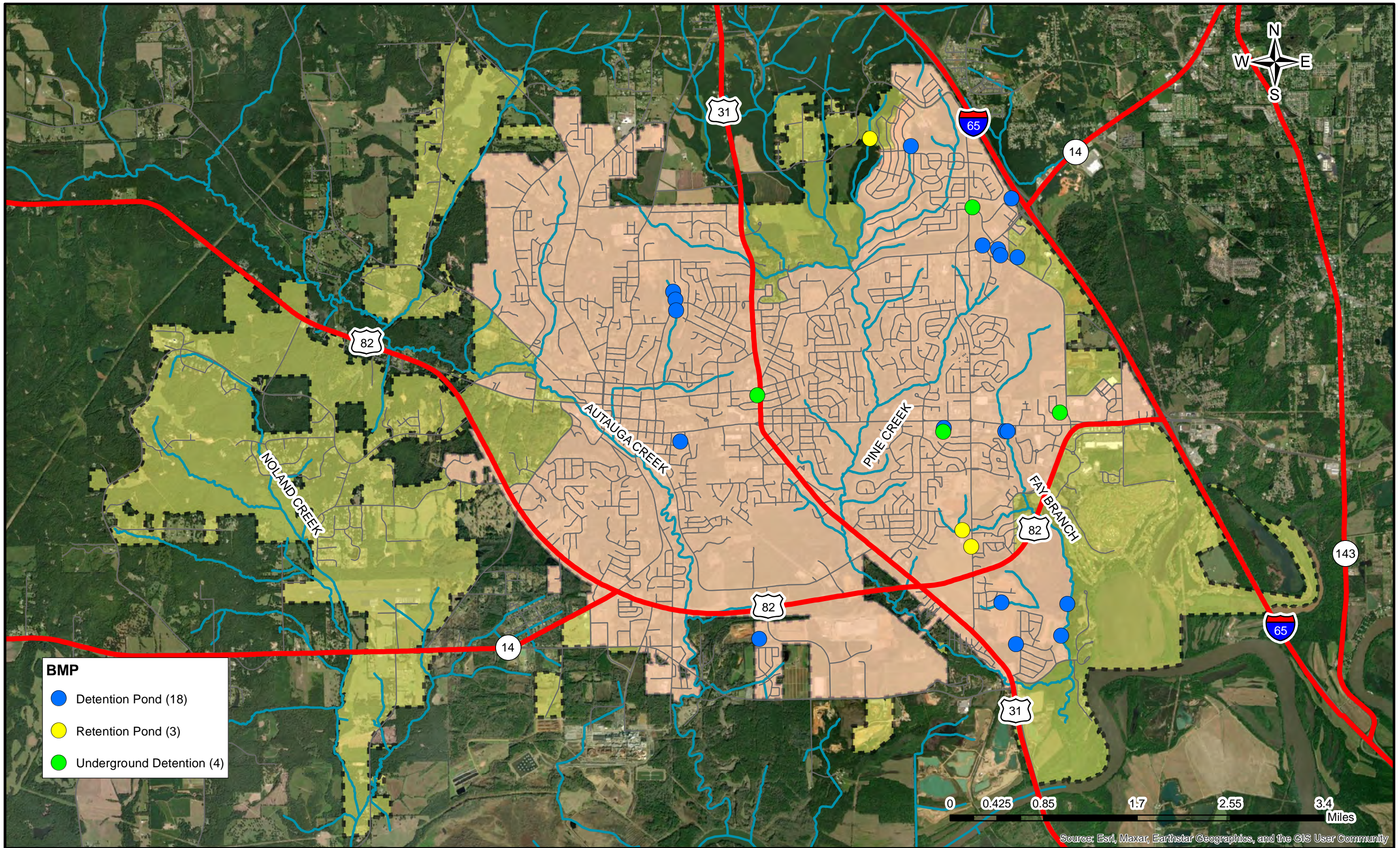
The City provides a wide range of services to its citizens by various City Departments and facilities located throughout the City.

#### **2.7.1.1. Facility Inventory**

The City has identified 29 municipal facilities located within the City's MS4 area. Municipal facilities have been categorized as either administrative, cemetery, operational, park, public safety, or recreational. A summary of the number of municipal facilities by category is provided in Table 2.5. The location of City Facilities are shown in Figure 2.10. An inventory is provided in Appendix G of the SWMP Plan.

The City has determined that municipal facilities categorized as administrative, cemetery, park, public safety, or recreational are routinely maintained, do not store significant materials that may adversely impact stormwater runoff, and do not have a significant impact to stormwater quality. NPDES permitted facilities are regulated by ADEM.





- BMP**
- Detention Pond (18)
  - Retention Pond (3)
  - Underground Detention (4)

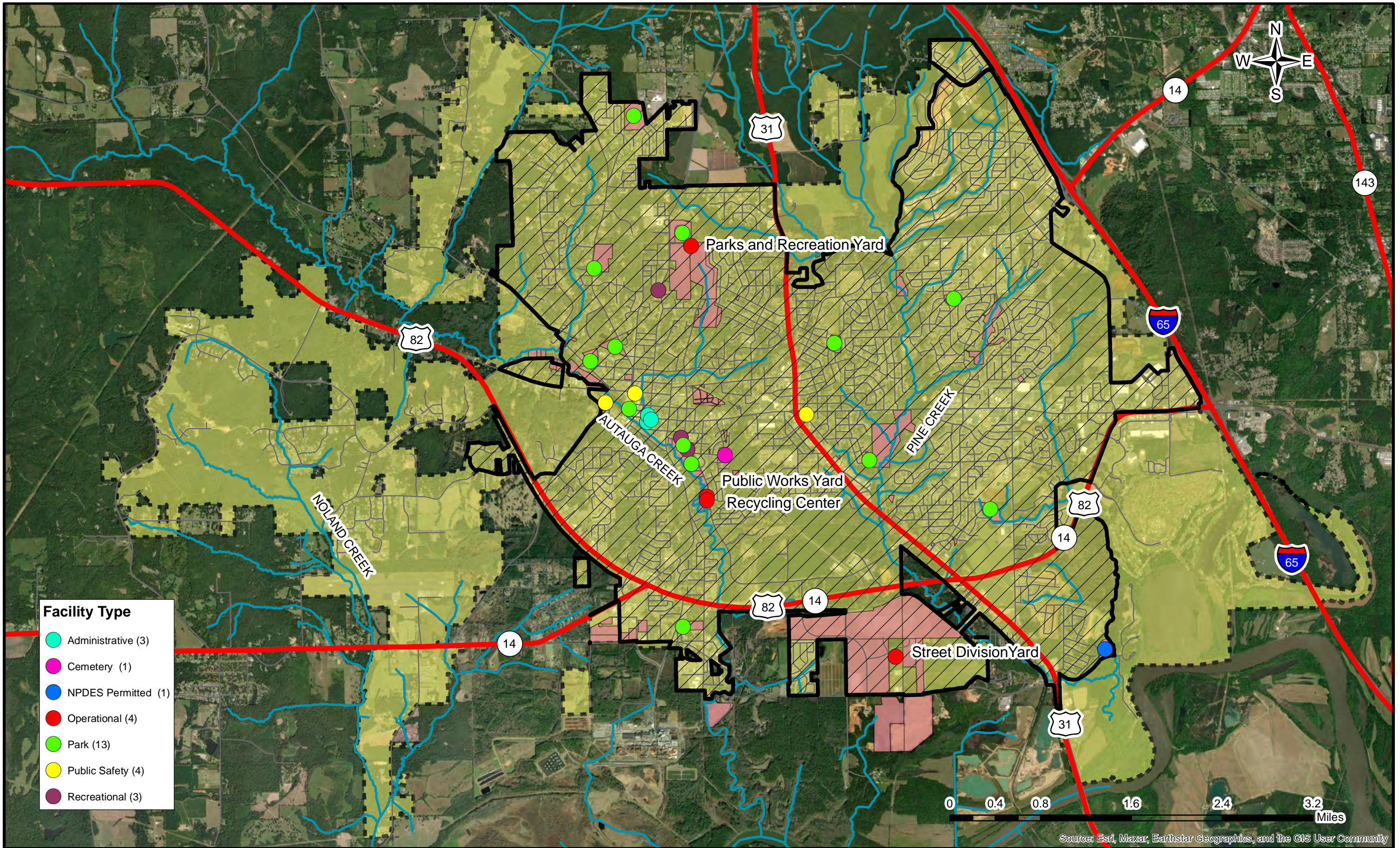
 Prattville City Limits	 ALDOT Roads	 Streams
 Prattville Urbanized Area	 Streets	



**City of Prattville**  
Post Construction BMP Inventory

**Figure 2.9**  
September 2023









**Table 2.5 Municipal Facility Inventory**

Facility Category	Division
Administrative	3
Cemetery	1
NPDES Permitted	1
Operational	4
Park	13
Public Safety	4
Recreational	3

**2.7.1.2. Facility Inspections**

The City has identified four (4) facilities where operational activities occur to support City services, three (3) of which are facilities that are included in the 2020 U.S. Census MS4 area which were not included in the 2010 U.S. Census MS4 area. Maintenance and upkeep of these facilities are performed on a routine basis. The City has developed a good housekeeping checklist that is used as part of the annual inspection for the support facilities listed in Table 2.6. The City performed an annual inspection of all four facilities during the permit year. A copy of the annual inspection reports is provided in Appendix E.

**Table 2.6 Municipal Support Facilities**

Facility Name	Department	Division
Public Works Yard	Public Works	Public Works
Recycling Center		Sanitation
Parks and Recreation Yard	Parks and Recreation	Parks and Recreation
Street Division Yard	Engineering	Engineering

**2.7.1.3. Standard Operating Procedures**

The City has developed Standard Operating Procedures (SOPs) for the various activities required for implementing the Pollution Prevention and Good Housekeeping Program. SOPs the City currently maintains include the following:

- Pesticides, Herbicides, and Fertilizers usage;



- Rain day schedules and activities for Urban Management crews;
- Emergency procedures for Spills and Leaks at Fire Stations 1 and 3 and Street Division Yard.
- SOP #25 – Pollution Prevention and Good House Keeping: Events; and,
- SOP #26 – Pollution Prevention and Good House Keeping: Municipal Facilities.

The City may develop additional SOPs and update existing SOPs for City maintenance activities, on an as needed basis. Existing SOPs are provided in Appendix G of the SWMP Plan.

#### 2.7.1.4. Training

On 13 September 2023, the City's Storm Water Coordinator gave a presentation to 62 City employees from the Public Works Department about different components of the City's MS4 program. The presentation was titled "Preventing Storm Water Pollution – What We Can Do" and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E. A picture of the City's Storm Water Coordinator giving the presentation to employees is shown in Figure 2.11.

**Figure 2.11 Pollution Prevention Training**



#### 2.7.2. Litter Program

The NPDES permit requires the City to develop and implement a litter program for the prevention and removal of trash from the City's MS4. The City has initiated the implementation of BMPs that provide a means of reducing the accumulation of





litter in public areas and road rights-of-way. A description of the BMPs being implemented by the City's MS4 is described in the following sections.

#### **2.7.2.1. Events**

From time to time, the City may host various parades, festivals, sporting events, etc. As part of the event, the City implements preventive measures that may include trash receptacles and routine trash collection. Typically, within one business day of the event concluding, trash is collected by Urban Management, Sanitation and/or street sweepers and integrated into the trash collected by Sanitation. As a result, the City does not have a mechanism to quantify the amount of trash collected for a specific event. The City has developed SOP #25 – Pollution Prevention and Good Housekeeping: Events. A copy of the SOP is provided in Appendix G of the SWMP Plan.

#### **2.7.2.2. Street Sweeping**

The Public Works Department has two (2) street sweepers dedicated for street sweeping. Curbed streets are swept at a frequency to allow the entire City to be swept monthly. Streets scheduled for resurfacing are swept and cleaned prior to resurfacing. Routine sweeping schedules have been developed to maximize the use of street sweepers. Maps showing the streets swept are included in Appendix G of the SWMP Plan.

The City has developed a Street Sweeping Collection Log to track the amount of debris removed from street sweeping activities. This information is incorporated into the Urban Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. Copies of the Street Sweeping Collection Log and Urban Management Debris Removal Summary are provided in Appendix F. During the permit year, the City swept and removed approximately 1,376 cubic yards of material. A graph showing a comparison of street sweeper material collected is shown in Figure 2.12.

#### **2.7.2.3. Litter Control**

Roadside litter control BMPs implemented by the City to address health and aesthetic concerns also improve the quality of stormwater runoff by limiting trash in runoff conveyance systems. Public Works Department crews routinely collect and dispose of litter, trash, and debris.

The Urban Management Department records Daily Checklists for each maintenance crew during the permit year. The forms incorporate tracking the amount of litter removed in bags. This information is incorporated into the Urban



Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. During the permit year, the City collected and disposed of approximately 1,476 bags of litter and 637 loads of debris. Graphs showing comparison by permit year of litter collected and debris removed is shown in Figure 2.13.

#### **2.7.2.4. Deicing Activities**

Based upon the City's location, winter weather is infrequent. The City spreads sand on roads with snow or ice cover. After winter weather has subsided, the City removes the sand using a small front-end loader and a street sweeper. Salt is not used for any deicing activities. The City did not have any deicing events during the permit year.

#### **2.7.2.5. Trash Receptacles**

The City maintains trash receptacles in areas owned, operated, and/or maintained by the City that may include but are not limited to:

- Parks;
- Recreational facilities;
- Municipal facilities/yards.

Trash collected from City parks and municipal facilities is integrated into the trash routinely collected by Sanitation. As a result, the City does not have a mechanism to quantify the amount of trash collected from a specific City park or municipal facility.

The City has developed SOP #26 – Pollution Prevention and Good Housekeeping: Municipal Facilities. A copy of the SOP is provided in Appendix G of the SWMP Plan.

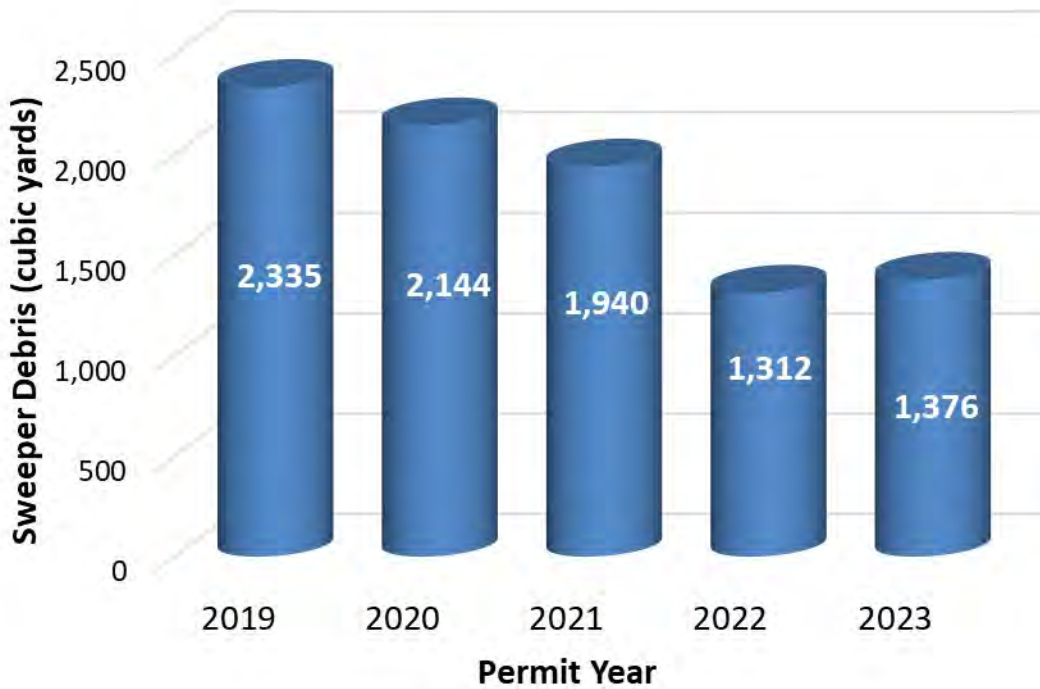
#### **2.7.2.6. Enforcement**

Chapter 46 – Nuisances, Article III. – Litter of the City's Code of Ordinances provides the City with the legal authority to enforce litter prevention measures. Any person violating any provisions of this article shall be deemed guilty of a misdemeanor and shall, upon conviction, be punished on a first offense a minimum fine of \$200 and shall serve community service to pick up litter on public rights-of-way. Any subsequent conviction shall be \$500 and community service.

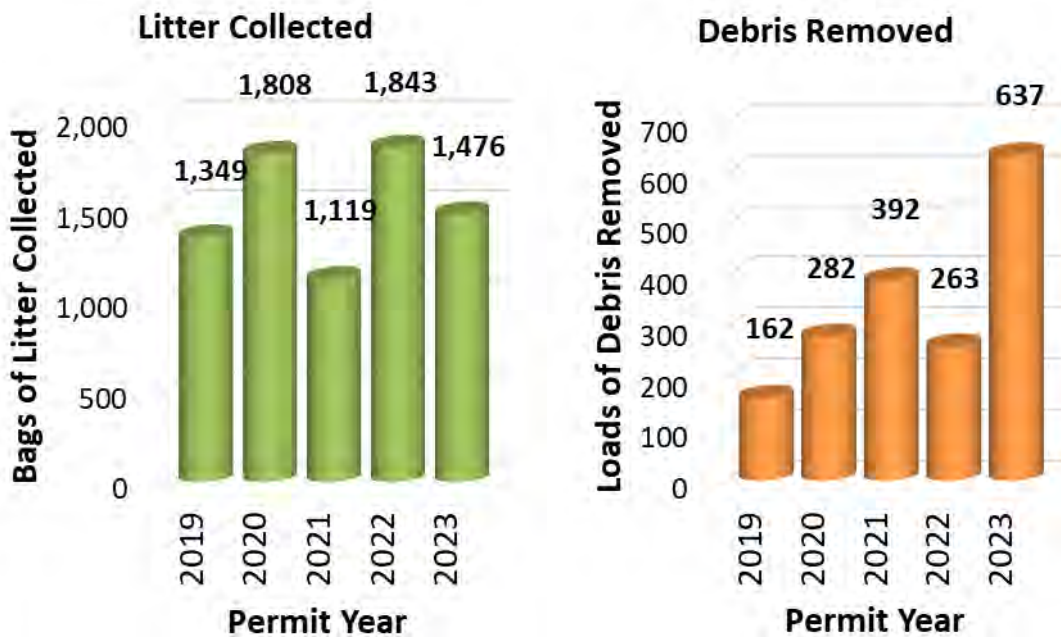
A copy of the ordinance is provided in Appendix G of the SWMP Plan and available through the City's website.



**Figure 2.12 Street Sweeper Debris – Permit Year Comparison**



**Figure 2.13 Litter and Debris Removal– Permit Year Comparison**





### 2.7.3. Pesticide, Herbicide, and Fertilizer

The City is continuously implementing an effective pesticide, herbicide, and fertilizer (PHF) program to prevent potential pollutants from entering the storm sewer system.

#### 2.7.3.1. PHF Standard Operating Procedures

Application, storage, and disposal of pesticides, herbicides, and fertilizers shall be performed in accordance with Federal and State regulations and in accordance with the manufacturer’s recommendations. The City has developed the following Standard Operating Procedures (SOPs) for mixing, application, clean up, storage, training, and record keeping:

- SOP PHF-01 – Mixing, application, clean-up, and chemical calculations

A copy of the SOP is provided in Appendix G of the SWMP Plan.

#### 2.7.3.2. PHF Storage Facilities

The City tries to optimize the use of pesticides, herbicides and fertilizers as well as minimize the quantity of chemicals stored. Chemical storage facilities located within the City’s MS4 area are summarized in Table 2.7.

**Table 2.7 PHF Storage Facilities**

Facility	Address
Parks and Recreation Yard	161 Ridgewood Road
Public Works Yard	530 Doster Road

The Parks and Recreation Yard and Public Works Yard are inspected on an annual basis.

#### 2.7.3.3. Certification and Licensing

Chemical applications are either performed by the Public Works Department or the Parks and Recreation Department. The City has four (4) staff that are certified as commercial applicators. Copies of the current certifications are provided in Appendix E.



## 2.8. Monitoring Activities

There are no 303(d) listed or TMDL waters located within the City's MS4 Area. In accordance with Part III.1 of the City's NPDES MS4 Permit, the City is not required to develop and implement a monitoring program.

If waters within the City's MS4 Area become listed on the 303(d) list, the City shall develop a monitoring program to evaluate the pollutants of concern.

## 2.9. Program Evaluation

The City has developed realistic, achievable, measurable goals and performance milestones to measure the progress in implementing its SWMP. The most basic measure to evaluate the program effectiveness is to evaluate whether the program goals are being met. During this permit year, the City has met all of its measurable goals and performance milestones as defined in the SWMP Plan.

### 2.9.1. Strengths

The biggest program strength is that the City proactively continues to develop, manage, and implement a SWMP. City staff are actively involved in the development, management, and daily implementation of BMPs that protect and help improve storm water quality. This also allows the City's SWMP to be a dynamic program with the ability to evolve as necessary to meet the specific needs of the City. Advantages of the City's SWMP include but are not limited to the following:

- City leadership actively supports the storm water program;
- City leadership can develop policies and initiatives that are in the best interest of the City, its citizens, and the environment;
- The City has a vested interest in the success of their SWMP;
- The Public Works Department has been tasked with the responsibility to coordinate with other City departments to develop, manage, and implement the SWMP;
- City staff have a better understanding and knowledge base of the facilities, infrastructure, and activities that are occurring within the City. This allows City staff to proactively address potential problems before they arise;
- City staff are involved daily with the implementation of the SWMP; and,



- The City has existing programs that are used to minimize and/or eliminate the potential for discharging pollutants in storm water runoff. Some of these programs have been operating for many years.

### **2.9.2. Weaknesses**

While the City has made significant progress in implementing a SWMP, the City faces many challenges as the SWMP continues to evolve. Program weaknesses include the following:

- **Regulatory Requirements** – During the NPDES permit renewal process, ADEM incorporated new permit requirements not supported by the federal regulations or state law. To address these new requirements, the City is required to dedicate additional funding and resources.
- **Program Implementation** – The SWMP requires the City to develop programs for activities that have not previously been performed. As the City develops and implements its SWMP, the City anticipates that the SWMP will change and evolve as staff develop a better understanding of the NPDES permit, rules, and regulations.
- **Funding** – Since the MS4 NPDES permit is driven by an unfunded mandate, the City does not have a dedicated funding source to develop and implement the SWMP. As the City's develops and implements the SWMP, additional staff and resources may be needed to support the activities described in new program elements.
- **Enforcement** – New rules, regulations, and ordinances are being developed in support of the SWMP. Informing the community of new rules, regulations, and ordinance changes is an ongoing process. Although gradual improvement in compliance may occur over time, there still may be compliance and enforcement issues.
- **Public Expectations** – The public is aware of environmental related issues and proactively involved in community affairs. Sometimes public expectations exceed the resources and capabilities of the City.

### **2.9.3. Effectiveness**

Currently, there are no 303(d) listed or TMDL waters located within the City's MS4 Area. The City has implemented BMPs through the SWMP to maintain this designation and further improve stormwater quality within the City's MS4. Some examples of the effectiveness of the City's SWMP include:

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- Public Education – The City has tracked growth in public awareness through public participation in social media platforms. Residents have consistently utilized the City’s website and social media to stay informed of the City’s SWMP and any new developments as the program has developed.
- Public Involvement – The City has received complaints and reports through various conduits including phone calls to City Departments, Citizenserve requests, calls to the Mayor, City employee reports, and Facebook messages. This shows the effectiveness of the City’s public education program. The City has provided several opportunities for the public to participate in stormwater related activities.
- IDDE – The City has implemented an effective outfall mapping and screening program. During the mapping and screening of 98 outfalls during the permit year, the City has not identified a non-storm water discharge. This implies that citizens are aware of storm water-related issues and protecting the City’s natural resources.
- Construction Site Runoff – The City has implemented an effective construction site runoff program to help educate and hold the development community accountable for their construction activities. Enforcement actions taken by the City have helped the development community to improve its erosion and sediment control practices to reduce the loss of sediment from construction sites.
- Post-Construction Storm Water Management – The City has developed and implemented a post-construction storm water management program that provides water quality benefits and storm water management to minimize the impact of development. The program provides for review of post-construction storm water management practices in the design phase, construction phase and operation phase.
- Pollution Prevention and Good Housekeeping – The City has implemented municipal facility inspections, street sweeping, litter patrols, PHF BMPs, and other BMPs to minimize the potential of pollutants from being discharged in stormwater runoff. Also, City employees have routinely reported storm water-related issues to the City, implying that the training received is effectively promoting awareness and knowledge of the reporting process.

The City has developed and is implementing an effective SWMP to protect the natural resources within the City.





## SECTION 3

Summary Tables



### 3. Summary Tables

The purpose of the table is to document in a concise form the program activities and the permittee’s compliance status with quantifiable permit requirements. The following tables in this section provide a summary of the City of Prattville’s MS4 program activities.

#### 3.1. Public Education and Public Involvement

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Education (Minimum of 2 activities / year)	Local Partnerships Track	Yes	Water Festival Coordination ACIC Cleanup event 57 Tires Approximately 350 lbs. of litter removed
	Web Site Update as needed	Yes	Website has been updated
	SWMP Plan and Annual Report posted to Website	Yes	Documents posted to website
	Social Media Track	Yes	Facebook 37,000 Followers Twitter 3,459 Followers Youtube Channel 483 Subscribers Instagram 5,404 Followers
	Brochures Track	Yes	Available on Website 1 Brochure 2 Booklets 2 Posters
	Public Service Announcements Track	Yes	5 Public Service Announcements available online
	Training Track	Yes	Annual MS4 Training 62 City staff



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Involvement (Minimum of 2 activities / year) continued	Public Input for SWMP Plan	Yes	SWMP Plan update during permit year Public notified of update and input requested
	Citizen Reporting Tool Track	Yes	Available on City's website
	Pet Waste Disposal Stations Track	Yes	7 Stations maintained ~3,000 bags purchased annually
	Recycling Track	Yes	City Cardboard Recycling 558 tons Single-stream Recycling 10,884 tons
	Public Events Track	Yes	City Fest 6 May 2023 1,000 handouts 32 employees Library Summer Kickoff 22 and 29 June 2023 50-70 children each event STEAM Camp 21 July 2023 30 students Education trailer

**Comments**

1. Supporting information, documentation, and data summarized in the table are provided in Appendix A.
2. Records and information are maintained in the Public Works Department.





### 3.2. Illicit Discharges and Improper Disposal

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Illicit Discharge Ordinance Update as needed	Yes	No updates or revisions required
Outfall Inventory	Mapping and Screening Schedule Update as needed	Yes	Schedule was updated in the SWMP Plan
	Outfall Screening Inspection Form Update as needed	Yes	No updates or revisions required
	Outfall Map Annually	Yes	Map has been updated
	Outfall Mapping and Screening Each Outfall 1 / 5 yr	Yes	98 Outfalls
Illicit Discharges	Citizen Reporting Tools Update as needed	Yes	Available on City's website
	Inspection Form Update as needed	Yes	No updates or revisions required
	Source Tracing Procedures Update as needed	Yes	No updates or revisions required
	ADEM Notification Procedures Update as needed	Yes	No updates or revisions required
	Mitigation Procedures Update as needed	Yes	No updates or revisions required
	Training Update as needed	Yes	No updates or revisions required
	Training Track	Yes	IDDE Refresher Training 2 City Staff Annual MS4 Training 62 City Staff
	Complaints Track	Yes	4 Complaints



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Illicit Discharges (cont.)	Illicit discharge investigations Track	Yes	4 illicit discharge complaint investigations 0 Non-stormwater discharge investigation from outfall screening
	Illicit discharges abated Track	Yes	4 illicit discharges abated

**Comments:**

1. Information and data provided in Appendix B.
2. Records and information are maintained in the Public Works Department.



### 3.3. Construction Site Runoff

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Erosion and Sediment Control Ordinance Update as needed	Yes	No update or revision required
	Subdivision Regulations Update as needed	Yes	No update or revision required
Permitting	Permit Application Requirements Update as needed	Yes	No update or revision required
	Permits issued Track	Yes	245 New Residential 15 New Commercial 151 Other Residential 50 Other Commercial 13 Residential Grading 4 Commercial Grading
Plan Review	Construction Best Management Practices Plan (CBMPP) Requirements Update as needed	Yes	No update or revision required
	CBMPP Review Checklist and Procedures Update as needed	Yes	No update or revision required
Inspections	Inspection Requirements Update as needed	Yes	No update or revision required
	Inspection Form Update as needed	Yes	No update or revision required
	Inspections Track	Yes	286 General BMP 470 Monthly
Enforcement Actions	Enforcement Strategy Update as needed	Yes	No update or revision required
	Enforcement Tracking System Update as needed	Yes	Tracked through Citizenserve





Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Enforcement Actions (cont.)	Enforcement Actions Track	Yes	7 General BMP Failed Inspections 41 Deficiencies Noted and Maintenance Required 4 Written Warning 2 NOVs 0 Stop Work Order 1 Notice to ADEM
	Citizen Reporting Tools Update as needed	Yes	Available on City's website
	ADEM Notification Procedures Update as needed	Yes	No update or revision required
Training	QCI Training 1 / Year	Yes	5 Staff Certified

**Comments:**

1. Copies of the QCI training certificates are provided in Appendix C.
2. Supporting information for the Construction Site Runoff Program is provided in Appendix C.



### 3.4. Post-Construction Storm Water Management

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Post-Construction Storm Water Management Ordinance Update as needed	Yes	No update or revision required
	Zoning Ordinance Update as needed	Yes	No update or revision required
	Comprehensive Plan Update as needed	Yes	
	Subdivision Regulations Update as needed	Yes	
Permitting	Permit Application Requirements Update as needed	Yes	Post-Construction Permit Application Packet updated
	Permits issued Track	Yes	260 Stormwater permits
Plan Review	Post-Construction Storm Water Management Requirements Update as needed	Yes	Technical Memorandum, Waiver Form, and Design Form updated
	Plan Review Checklist and Procedures Update as needed	Yes	No update or revision required
	Plans Reviewed Track	Yes	20 Projects reviewed 7 Waivers reviewed
Post-Construction BMPs	As Built Certification Requirements Update as needed	Yes	As-built Certification Form updated
	BMP Inventory Track	Yes	7 BMPs
	As Built Certification Forms Track	Yes	7 As Built Certification Forms reviewed
Maintenance	Maintenance Requirements Update as needed	Yes	Annual Inspection Form updated



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Maintenance (cont.)	Operations and Maintenance Agreements (OMA) Track	Yes	5 OMAs
	Annual Inspections Track	Yes	22 BMPs Inspected
	Escrow Account Agreements Track	Yes	2 Agreements

**Comments:**

1. Supporting information and data associated with the Post-Construction Storm Water Management Program are included in Appendix D.





### 3.5. Pollution Prevention and Good Housekeeping

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Municipal Facilities	Inventory Update as Needed	Yes	4 Facilities within Urbanized Area
	Inspection Requirements Update as Needed	Yes	No update or revision required
	Inspections Track	Yes	4 Facilities Inspected
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Training Program Update as Needed	Yes	No update or revision required
	Training Track	Yes	Annual MS4 Training 62 City staff
Litter	Ditch Debris Removal Track	Yes	637 loads of debris removed
	Litter Control Track	Yes	1,476 bags of litter
	Street Sweeping Track	Yes	1,376 yards of sweeping debris
	Deicing Events Track	Yes	0 events where sand was used
Pesticides, Herbicides and Fertilizers	PHF Storage Facility Inventory Update as Needed	Yes	2 Facilities within Urbanized Area
	Training Update as Needed	Yes	4 City staff are Certified Applicators
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Chemical Inventory Track	Yes	Inventory is current

**Comments:**

1. Supporting documentation is provided in Appendix E.



## SECTION 4

Summary of Proposed  
Program Changes



## 4. Summary of Proposed Program Changes

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### 4.1. SWMP Review and Update

The United States Census Bureau developed updated urbanized area maps using the 2020 census data during the permit year. In accordance with Part II.D.3. of the NPDES Permit, the City is required to implement the SWMP Plan on all new areas of the City's MS4 as soon as practicable, but no later than one (1) year from the addition of new areas. On 22 May 2023, the City submitted to ADEM an updated the SWMP Plan to incorporate any new urbanized areas and develop a schedule to implement applicable program elements within the new urbanized areas.

### 4.2. Coordination with Surrounding Municipalities

If the City relies upon another city, county, State agency, or other entity to assist with the implementation of the SWMP, ADEM recommends that an inter-jurisdictional agreement between the city, county, State agency, or other entity be executed. Currently, the City does not rely on any other entity to perform any components of the City's SWMP Plan. Therefore, the City does not need or require inter-jurisdictional agreements with any neighboring city, county, and/or State agencies to be compliant with the NPDES Permit.





## SECTION 5

Fiscal Analysis



## 5. Fiscal Analysis

Permit Year 2023 is from 1 October 2022 through 30 September 2023. Many City Departments contribute to the City's SWMP. Since the City's budgeting process does not provide a detailed analysis of the City's effort regarding the storm water program, the gross annual cumulative budget for departments that contribute to the stormwater program is summarized in Table 5.1.

**Table 5.1 Fiscal Analysis**

Department	2023	2024
Fire	\$ 9,064,870	\$ 9,652,761
Sanitation	\$ 3,076,841	\$ 3,395,573
Wastewater	\$ 12,057,763	\$ 12,988,177
Urban Management	\$ 2,082,418	\$ 2,381,369
Parks & Recreation	\$ 4,481,149	\$ 5,036,944
Engineering	\$ 2,641,846	\$ 2,427,887
Planning	\$ 790,037	\$ 699,336
Public Works	\$ 1,012,720	\$ 1,327,413
Facilities Maintenance	\$ 1,419,509	\$ 1,524,651
Vehicle Maintenance	\$ 388,528	\$ 380,314
Building	\$ 386,634	\$ 410,181
Total	\$ 37,402,315	\$ 40,224,606

The City's stormwater program is managed by the Public Works Department. For the 2023 Permit Year, the Public Works Department spent \$99,869 for the City's storm water management program. For the 2024 Permit Year, the City has budgeted approximately the same amount specifically for the storm water management program.

### **Comments:**

1. Cost associated with some existing City programs, salaries, and/or activities that are independent of the storm water program but may provide benefit(s) to the stormwater program are not included in the storm water program budget. These items and/or activities are incorporated into the individual departments' budgets.



2. The City's final budget for 2023 and draft budget for 2024 are provided in Appendix F.