DRAPER CITY

STORM WATER MANAGEMENT PROGRAM

2025-2026

Permittee: Draper City

Permit Number: UTR090111

MS4 Location: Southeast Corner of Salt Lake County

For questions or comments about this program, please contact either of the following:

Robert Markle *Deputy Public Works Director/City Engineer:* (801) 576-6360

Colton Konesky *Draper City Storm Water Specialist*: (801) 576-6331

Delegation of Authority

Utah Department of Environmental Quality
Division of Water Quality
195 North 1950 West
DEQ 3rd Floor
Salt Lake City, Utah 84116

Dear Executive Director:

As the principal executive officer (or ranking elected official) of Draper City, I hereby authorize Robert Markle, acting as the Draper Deputy City Engineer/ Deputy City Public Works Director, to act on my behalf relative to documents, reports, notices or activities pertaining to our City's Small MS4 UPDES Stormwater Discharge Permit.

Respectfully Submitted,

Name: Michael Barker

Signature:

Title: City Manager

Date: 8-21-25

Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: ROBERT MARKLE

Signature:

Title: DEPUTY PUBLIC WORKS DIRECTOR

Date: 8/21/25

INTRODUCTION

With urbanization[1], natural pervious surfaces like soil and vegetation are increasingly replaced by structures and impervious surfaces such as driveways, parking lots, sidewalks, and roads. Where stormwater once naturally infiltrated into the ground, it is now directed into public or private stormwater infrastructure through gutters and other hard surfaces—often ending up in nearby streams, rivers, or lakes.

Urbanization also brings increased human activity, construction, and municipal, industrial, and commercial operations—all of which raise the potential for pollutant[2] generation and mismanagement. During or after a storm, stormwater runoff[3] can easily collect exposed pollutants and carry them into a Municipal Separate Storm Sewer System[4] (MS4).

The combination of expanding impervious surfaces, extended stormwater infrastructure, and increased human activity, construction, and municipal, industrial, and commercial operations raises the likelihood that pollutants will enter an MS4 and ultimately reach a stream, river, or lake. Since most MS4s do not treat stormwater, any polluted stormwater that enters the MS4 may be discharged into water bodies, potentially harming aquatic ecosystems and posing health risks to wildlife and humans engaged in recreational water activities.

To address this, a Storm Water Management Program (SWMP) is implemented to reduce pollutant discharges from an MS4 to the maximum extent practicable.

[1] Urbanization refers to the increasing concentration of human populations in urban areas, leading to the transformation of land for residential, commercial, and other purposes.
[2] A pollutant refers to anything that is discharged into water and can harm water quality, such as sediment, nutrients, oil and grease, pathogens, pesticides and herbicides, and trash and debris.
[3] Storm Water Runoff is generated from rain and snowmelt that flows over land or impervious surfaces, such as paved streets and parking lots, and does not soak into the ground.
[4] A MS4 is defined as a conveyance or system of conveyances, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains that is:

1) owned by a state, city, town, county, district, association, or public body having jurisdiction over disposal of wastes or storm water that discharges to waters of the state;
2) designed to collect and convey stormwater;
3) not a combined sewer; and
4) not a part of a publicly owned treatment works.

REGULATORY FRAMEWORK: FEDERAL, STATE, AND LOCAL

The Clean Water Act (CWA) is the primary federal law governing water pollution in the United States. Its objective is to restore and maintain the chemical, physical, and biological integrity of the nation's waters.

The Utah Water Quality Act (Utah Code Title 19, Chapter 5) resembles the CWA and grants authority to the Utah Division of Water Quality (DWQ) to implement and enforce water quality programs. This includes issuing permits under the Utah Pollutant Discharge Elimination System (UPDES), which functions as the state-level equivalent of the federal National Pollutant Discharge Elimination System.

Under the UPDES program, eligible MS4 operators—such as cities and counties—are required to obtain a Notice of Intent and comply with a stormwater discharge permit. This permit requires the development, implementation, and enforcement of a SWMP designed to reduce pollutants in stormwater discharges to the maximum extent practicable.

BACKGROUND

In 1987, amendments to the CWA established a phased approach to regulating urban stormwater runoff through the NPDES permit program.

In 1990, the U.S. Environmental Protection Agency (EPA) promulgated rules establishing Phase I of the NPDES stormwater program. Phase I requires operators of "medium" and "large" MS4s—those generally serving populations of 100,000 or greater—to obtain NPDES (or UPDES in Utah) permit coverage and to develop, implement, and enforce a stormwater management program to control stormwater discharges from these MS4s.

In 1999, the EPA promulgated rules establishing Phase II of the NPDES stormwater program. The Phase II program expands upon the Phase I program by requiring operators of "small" MS4s (those serving populations less than 100,000) to obtain NPDES (or UPDES in Utah) permit coverage and to develop, implement, and enforce a stormwater management program to control stormwater discharges from these MS4s.

PURPOSE

This SWMP:

- Is developed to fulfill the requirements of the UPDES Small MS4 General Permit. By implementing and enforcing the SWMP, Draper City will reduce pollutant discharges from its MS4 to the maximum extent practicable and protect water quality.
- Provides a framework for how Draper City will plan, implement, and enforce stormwater management strategies in accordance with state and local regulations. It outlines and references Best Management Practices (BMPs), measurable goals, and procedures related to the following minimum control measures:
    - Public Education and Outreach
    - Public Involvement/Participation
    - Illicit Discharge Detection and Elimination
    - Construction Site Stormwater Runoff Control
    - Post-Construction Storm Water Management
    - Pollution Prevention and Good Housekeeping for Municipal Operations
- Is a living document that will be updated as needed to reflect permit requirements, ordinance changes, new guidance from the DWQ, and ongoing efforts to improve stormwater management practices within Draper City.

DEPARTMENT RESPONSIBILITIES

The individuals responsible for implementing or coordinating the BMPs contained within this SWMP:

Colton Konesky *Storm Water Specialist | Engineering*

Robert Markle *Deputy Public Works Director/City Engineer*

Program or Program Element	Responsible Departments and Entities
Public Education and Outreach on Storm Water Impacts	Public Works - Engineering Division
Public Involvement/Participation	Public Works - Engineering Division
Illicit Discharge Detection and Reporting	All Departments and Salt Lake County Health Department
Illicit Discharge Elimination	Public Works - Engineering, Storm Water, and Streets Divisions; Community Development - Code Enforcement; Salt Lake County Health Department
Construction Site Storm Water Runoff Control	Public Works - Engineering Division
Long-Term Storm Water Management in New Development and Redevelopment	Public Works - Engineering Division; Community Development
Pollution Prevention and Good Housekeeping for Municipal Operations	Public Works Engineering, Fleet, Storm Water, Streets, and Solid Waste Divisions; Parks & Recreation – Parks Division

A Memorandum of Understanding (MOU) exists between Salt Lake County, on behalf of its Salt Lake County Health Department, and Draper City. This MOU pertains to the Illicit Discharge Detection and Elimination minimum control measure and describes each party's responsibilities and overall coordination. A copy of the MOU is available here.

SPECIAL CONDITIONS

Discharges to Water Quality Impaired Waters

Does storm water discharge from any part of Draper City contribute to a 303(d) listed (i.e., impaired) waterbody? ☒ Yes ☐ No

Jordan River

Several segments of the Jordan River, known as assessment units (AUs), are listed as impaired[5] by the State of Utah due to elevated levels of E. Coli and/or low dissolved oxygen. Several of the Jordan River's AUs have an approved total maximum daily load[6] (TMDL).

Jordan River-6

Draper City discharges stormwater into Jordan River-6, which is the AU of Jordan River that extends from 7800 South to Bluffdale at 14600 South. It is 303(d) listed as impaired for the following:

- E. Coli
- Total Dissolved Solids

While a TMDL has been developed for this AU's impairments, it has not yet been approved.

Measures and BMPs to Control Discharges of Pollutants of Concern:

E. coli

Pollutant Source(s): Fecal matter from humans, wildlife, and domestic pets

Highlighted Areas: Locations with onsite wastewater systems, high recreational use, dense wildlife populations (particularly waterfowl), and areas with frequent domestic pet activity.

Impact to Water Quality: High levels of E. coli in water indicate fecal contamination, which poses a public health risk. Fecal-contaminated water can contain harmful pathogens (e.g., viruses, bacteria, parasties) that can cause illness through direct contact or ingestion. Water with high levels of E. coli may be unsafe for swimming, fishing, and other recreational activities.

Control Measures and BMPs (listed by priority):

1. Educate the public that it is illegal to dump waste or any pollutants into the storm drain system.
2. Discourage waterfowl feeding through posted signs and public outreach.
3. Promote the Draper City emergency line for reporting illicit discharges and environmental concerns.
4. Provide and maintain restroom facilities in high-use recreation areas.

[5] Waters are assessed as impaired when an applicable water quality standard is not being attained.
[6] Impaired waters may require a total maximum daily load (TMDL) or alternative restoration plan to reduce pollutant loadings and restore the waterbody.

5. Provide the public with information on proper maintenance and management of onsite wastewater systems.
6. Enforce canine-waste ordinances

Dissolved Oxygen (DO)

Pollutant Source(s): Decomposing organic matter (e.g., grass clippings, leaves, yard debris), excess nutrients (nitrogen and phosphorus)

Highlighted Areas: Residential, commercial, and industrial lawns/landscapes, parks

Impact to Water Quality: As organic matter decomposes in water, it consumes DO. Low DO levels can stress or kill aquatic organisms, leading to reduced biodiversity and, in severe cases, ecosystem collapse. Nutrient pollution can also lead to algal blooms, which further deplete DO in water when the algal blooms die and decompose.

Control Measures and BMPs (listed by priority):

1. Educate the public on proper disposal of grass clippings, leaves, and yard waste (i.e., not dumping into storm drains or waterbodies).
2. Conduct street sweeping annually and as needed.
3. Promote the Adopt-a-Storm-Drain program to help keep storm drains clear of organic debris.

Total Dissolved Solids (TDS)

Pollutant Source(s): Urban runoff, fertilizers and pesticides used on lawns and agricultural areas, road salts, erosion

Highlighted Areas: Residential zones, commercial zones, industrial areas, MS4 facilities, and active construction sites

Impact to Water Quality: While some dissolved minerals are naturally present and beneficial to aquatic ecosystems, high levels of TDS can:

- Alter water chemistry and disrupt ecological balance
- Inhibit the growth of aquatic organisms
- Cause stress or death in sensitive species
- Decrease water clarity, reducing sunlight penetration and impairing photosynthesis in aquatic plants

Control Measures and BMPs (listed by priority):

1. Educate residents, businesses, developers and contractors, and relevant MS4 personnel on proper use of fertilizers and pesticides, and proper storage of road salts.
2. Conduct street sweeping annually and as needed.
3. Require sediment and erosion control measures at construction sites outlined in MCM 4 of the SWMP.

JORDAN RIVER E. COLI TMDL COMPLIANCE PLAN

This is a written plan addressing the pollutant reduction requirements of the Jordan River E. Coli TMDL for Draper City

Public Education and Outreach

Draper City contributes to and participates in the Salt Lake County Storm Water Coalition, a collaborative program focused on preventing water pollution through public education and outreach. The coalition evaluates, identifies, targets sources, as well as, provides outreach that addresses E. coli.

Written Inventory

Potential areas in the MS4 that are potential sources of E. coli:

- Dayland Dog Park
- Deer Ridge Trailhead
- East Bench Trailhead
- Galena Hills Dog Park
- Ghost Falls Trailhead
- Mehraban Wetlands Park

Prioritization Plan for E. coli Reduction Activities

Prioritization Criteria:

- Locations with identified onsite wastewater treatment systems, sources of pet waste, and dense waterfowl
- Areas closer to creeks, canals, streams, or stormwater outfalls discharging to the Jordan River
- Areas contributing higher E. coli loads based on sampling data or land use (e.g., parks with high dog activity, high-density residential with older infrastructure)

BMPs for E. Coli Reduction:

- Non-Structural
    - Pet Waste Management
        - Routinely empty pet waste receptacles
        - Post clear and visible signage encouraging pet owners to pick up after their pets
        - Enforce canine-waste ordinances
    - Public Education and Outreach
        - Develop and/or contribute to outreach campaigns that educate the public about the connection between fecal matter and water pollution
        - Distribute educational materials through websites, social media, and signage
    - Wildlife management
        - Post signage to discourage feeding of waterfowl in parks
- Structural
    - Pet Waste Stations
        - Install pet waste bag dispensers and trash receptacles in high-pet traffic areas.
        - Position stations strategically near entrances, exits, and high-traffic paths.
    - Low Impact Development (LID) controls with bacterial reduction benefits
        - Implement LIDs such as bioswales to allow natural bacterial removal

NITROGEN AND PHOSPHORUS REDUCTION

Target Sources

Residential, industrial, commercial, agricultural, development/construction, and MS4 owned or operated facilities have the potential to contribute nitrogen and phosphorus to waters of the state[7].

Public Education and Outreach

Draper City contributes to and participates in the Salt Lake County Storm Water Coalition, a collaborative program focused on preventing water pollution through public education and outreach. The coalition evaluates, identifies, targets sources, as well as provides outreach that addresses the reduction of water quality impacts associated with nitrogen and phosphorus in the Jordan River watershed.

[7] Means all streams, lakes, ponds, marshes, water-courses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, which are contained within, flow through, or border upon this state or any portion thereof, except that bodies of water confined to and retained within the limits of private property, and which do not develop into or constitute a nuisance, or a public health hazard, or a menace to fish and wildlife, shall not be considered to be "waters of the state" under this definition.

MINIMUM CONTROL MEASURE (MCM) 1 – PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

MCM Regulation: Implement a public education and outreach program to promote behavior change by the public to reduce water quality impacts associated with pollutants in storm water runoff and illicit discharges. Outreach and educational efforts shall include a multimedia approach and shall be targeted and presented to specific audiences for increased effectiveness. The educational program must include documented education and outreach efforts for the following four audiences: (1) residents, (2) institutions, industrial, and commercial facilities, (3) developers and contractors (construction), and (4) MS4 owned and operated facilities.

Summary of Existing Efforts

Coalition Participation

- Draper City is an active member of the Salt Lake County Storm Water Coalition, a regional collaborative focused on public education and outreach to prevent stormwater pollution
- Signage referencing stormwater pollution prevention and the Coalition website is posted at multiple city parks

Education and Outreach Activities

- Residents
    - The Draper City website provides information on illicit discharges, improper waste disposal, and their impacts on water quality
    - A city newsletter featuring stormwater education content is published annually
- Institutions, Industrial Facilities, and Commercial Facilities
    - The Draper City website provides information on illicit discharges, improper waste disposal, and their impacts on water quality
    - Draper City hosts an annual stormwater fair for elementary students. As part of this fair, stormwater pollution prevention awareness is raised
- Developers and Contractors
    - Education is provided on a case-by-case basis, including during the SWPPP review process or during active construction phases. Information includes proper BMP implementation and compliance expectations
- MS4 Owned or Operated Facilities
    - Annual IDDE training is provided to all relevant Draper City employees who are likely to encounter or observe illicit discharges or illicit connections
    - Draper City engineers participate in Low Impact Development (LID) training

Best Management Practices (BMPs)

City Newsletter (Public)

- Target Audience(s): Residents
- Target Pollutant(s): E. coli, dissolvable material related to TDS, organic matter and nutrients related to DO, trash, hydrocarbons, detergents and soaps
- Measurable Goal: Publish an article on stormwater pollution prevention in the city newsletter
    - Frequency: Annually

    - Timing: Each article will be published in June, beginning June 2026
    - Interim Milestone: Content drafted by April each year for review

City Email (Internal)

- Target Audience(s): Draper City personnel
- Target Pollutant(s): E. coli, dissolvable material (TDS), organic matter and nutrients (DO), trash, hydrocarbons, detergents and soaps
- Measurable Goal: Send a brief educational email to all or specific City departments
    - Frequency: Biannually
    - Timing: Emails will be sent in July and December, beginning December 2025
    - Interim Milestone: Content drafted for review a week prior to each scheduled send

Draper City Stormwater Fair

- Target Audience(s): Institutions
- Target Pollutant(s): E. coli, dissolvable material (TDS), organic matter (DO), trash
- Measurable Goal: Participate in the annual Draper City Stormwater Fair and update the questionnaire
    - Frequency: Annually
    - Timing: Event scheduled for June each year
    - Interim Milestone: Questionnaire updates and rewards planning completed by May of each year

Informative Emails and/or Brochures

- Target Audience(s): Residents, institutions, industrial facilities, commercial facilities, and developers and contractors
- Target Pollutant(s): E. coli, dissolvable material (TDS), Total Suspended Solids (TSS), organic matter (DO), pH, heavy metals, hydrocarbons, detergents and soaps, trash
- Measurable Goal: Develop and distribute emails and/or brochures
    - Frequency: Annually
    - Timing: Distribution in June, beginning June 2026
    - Interim Milestone: Content drafted by May each year

Stormwater Pollution Prevention Signage

- Target Audience(s): Residents and general public
- Target Pollutant(s): E. coli, dissolvable material (TDS), organic matter (DO), TSS, detergents and soaps, trash
- Measurable Goal: Inspect and maintain stormwater signage in City parks
    - Frequency: Annually
    - Timing: Inspections performed in July, starting July 2026, and maintenance or replacement completed within 30 days

Storm Water Coalition

- Target Audience(s): Residents and businesses
- Target Pollutant(s): E. coli, dissolvable material (TDS), organic matter and nutrients (DO)
- Measurable Goal: Support coalition advertisements

    - Frequency: Annually
    - Timing: August
    - Interim Milestone: Pay coalition invoice in July

Program Evaluation Methods

- Target Audience(s): All
- Target Pollutant(s): All
- Measurable Goal: Review education program evaluation methods
    - Frequency: Annually
    - Timing: January

LID Training Meeting

- Target Audience(s): MS4 personnel
- Target Pollutant(s): All pollutants
- Measurable Goal: Conduct a meeting with all engineers, development and plan review staff, and land use planners to review the city's LID goals.
    - Frequency: Annually
    - Timing: February
    - Interim Milestone: Schedule in January

Employee Training

- Target Audience(s): MS4 personnel
- Target Pollutant(s): All
- Measurable Goal: Conduct training
    - Frequency: Annually
    - Timing: March
    - Interim Milestone: Review training resources in February each year

Website

- Target Audience(s): Residents and general public
- Target Pollutant(s): E. coli, dissolvable material (TDS), TSS, organic matter (DO), hydrocarbons, detergents and soaps, trash
- Measurable Goal: Evaluate website content and update as needed
    - Frequency: Annually
    - Timing: April

Evaluation

Draper City contributes to and participates in the Salt Lake County Stormwater Coalition, which provides an effective platform for public education throughout the Jordan River watershed. While this regional effort supports broad awareness, there are opportunities to strengthen Draper City's local outreach efforts. The BMPs outlined above have been developed to improve localized public education and outreach across all required audience groups and increase program effectiveness.

MCM 2 – PUBLIC INVOLVEMENT/PARTICIPATION

MCM Regulation: Implement a program that complies with applicable State and Local public notice requirements. The SWMP shall include ongoing opportunities for public involvement and participation, but at minimum two (2) times annually.

Summary of Existing Efforts

Public Notification

- Draper City notifies the public of proposed policy or code changes through the City Council Agenda and City Recorder

SWMP Availability

- A current version of Draper City's SWMP is made available for public review on the Draper City website

Adopt-a-Storm Drain Program

- Draper City launched its Adopt-a-Storm Drain program in August 2024 to encourage residents to help maintain local storm drains by clearing debris and reporting issues

Best Management Practices (BMPs)

Adopt-a-Storm-Drain Program

- Target Audience(s): Residents
- Target Pollutant(s): dissolvable material (TDS), TSS, organic matter (DO), trash
- Measurable Goal: Promote the Adopt-a-Storm-Drain program to increase active involvement
    - Frequency: Annually
    - Timing: September
    - Interim Milestone: Finalize promotional content/materials in August

SWMP Document

- Target Audience(s): General public
- Measurable Goal: Post updated SWMP document to City website
    - Frequency: Annually
    - Timing: September
    - Interim Milestone: Send document to Communications Department by last week of August

Public Notification

- Target Audience(s): Residents and general public
- Target Pollutant(s): All pollutants
- Measurable Goal: Notify the public of SWMP updates
    - Frequency: Annually (or as needed)
    - Timing: August

State and Local Public Notice Requirements

- Target Audience(s): Residents and general public
- Target Pollutant(s): N/A
- Measurable Goal: Review state and local public notice requirements
    - Frequency: Annually
    - Timing: July

Evaluation

Draper City has made progress in promoting public involvement through the Adopt-a-Storm Drain program, which initially received strong interest, as demonstrated by the number of storm drains adopted. However, one year after the program's launch, City data indicates that only 16% of adopted storm drains are being actively monitored and maintained. A warning system involving email notifications for inactive adopted storm drains is developed but has not yet been implemented. The BMPs outlined above have been developed to improve public involvement/participation and increase program effectiveness

MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

MCM Regulation: Implement and enforce an Illicit Discharge Detection and Elimination (IDDE) program to systematically find and eliminate sources of non-storm water discharges from the MS4 and implement defined procedures to prevent illicit connections and discharges.

Summary of Existing Efforts

Ordinances

Draper City Municipal Code (DCMC):

16-2-130:

- Requires waste or excess concrete or concrete truck rinse water be discharged into preapproved facilities or designated areas
- Prohibits illegal dumping into the MS4

DCMC 16-2-140:

- Prohibits the discharge of any pollutants or waters containing any pollutants into the storm drain system that cause or contribute to a violation of applicable water quality standards
- Grants access to enter and inspect facilities upon the discovery of an illicit discharge or an illicit connection

DCMC 16-2-200

- Outlines enforcement measures such as a Stop Work Order and payment of a fine if necessary

Coordination

A Memorandum of Understanding (MOU) exists between Salt Lake County, on behalf of its Salt Lake County Health Department, and Draper City. This MOU pertains to the Illicit Discharge Detection and Elimination minimum control measure and describes each party's responsibilities and overall coordination. A copy of the MOU is available here.

Mapping

Draper City maintains a GIS map of the storm drain system that includes:

- Outfall locations
- Locations and names of receiving surface waters
- Storm drain inlets and pipes

IDDE Plan

Forms, flow charts, spreadsheets, and maps have been developed for the purpose of addressing non-stormwater discharges to the MS4. High priority areas are identified and inspected based on criteria such as:

- Direct discharge into the MS4 or state surface waters
- Proximity to commercial or industrial areas susceptible to stormwater pollution

- Historical data indicating patterns of non-compliance (e.g., spills, leaks, erosion)

Dry Weather Screening

All identified outfalls and priority areas are inspected during dry weather conditions to detect illicit discharges or illicit connections. Inspections use electronic forms with photo documentation and comments. The list of outfalls and priority areas is reviewed annually and updated, with each site inspected at least once during each MS4 permit cycle.

Identification of Need for Separate UPDES Permit

When a discharger is discovered or suspected to require coverage under a separate UPDES Permit (e.g., Industrial Storm Water permit, Dewatering Permit), Draper City's Storm Water Specialist may notify the responsible party and will notify the Department of Environmental Quality accordingly.

Standard Operating Procedures (SOPs)

IDDE-related SOPs are established and maintained.

Hazards Communication and Outreach

Draper City utilizes its website and newsletter to educate the public on illicit discharges and proper waste disposal methods. The city will begin promoting disposal of hazardous household waste (HHW) at the newer HHW Collection Center in Sandy.

Public Reporting

An emergency hotline is posted on the Draper City website. An illicit discharge report can also be completed and reported online through the City's website.

Training

Annual IDDE training is provided to all relevant Draper City employees who are likely to encounter or observe illicit discharges or illicit connections.

Best Management Practices

Priority Area Identification

- Target Audience(s): MS4 personnel
- Target Pollutant(s): All
- Measurable Goal: Review and update (if needed) written procedures for identifying areas likely to have illicit discharges
    - Frequency: Annually
    - Timing: April

Storm Drain System Map

- Target Audience(s): MS4 Personnel
- Target Pollutant(s): All pollutants
- Measurable Goal: Maintain and update the GIS map to reflect new development and capital improvement projects
    - Frequency: Per new development or project

    - Timing: Updates completed following project completion

IDDE SOPs

- Target Audience(s): MS4 personnel
- Target Pollutant(s): All pollutants
- Measurable Goal: Review and update IDDE SOPs to verify current waste disposal facility acceptances and ensure SOP effectiveness
    - Frequency: Annually
    - Timing: Review completed by June each year

IDDE Flow Charts

- Target Audience(s): MS4 personnel
- Target Pollutant(s): All pollutants
- Measurable Goal: Review and update the IDDE flow chart to ensure it effectively reflects current procedures for identifying, characterizing, and responding to illicit disharges.
    - Frequency: Annually
    - Timing: June

Dry-Weather Screening Inspections

- Target Audience(s): MS4 personnel
- Target Pollutants(s): E. coli, TSS, pH, hydrocarbons, detergents and soaps, trash
- Measurable Goal: Inspect and rotate 20% of outfalls each year
    - Frequency: Annually
    - Timing: Complete inspections by June each year

Emergency Spill Hotline

- Target Audience(s): All
- Target Pollutants(s): All
- Measurable Goal: Verify accuracy and visibility of the emergency hotline number on the City's website
    - Frequency: Annually
    - Timing: June

IDDE Training

- Target Audience(s): MS4 personnel
- Target Pollutant(s): E. coli, dissolvable materials (TDS), pH, heavy metals, hydrocarbons, nutrients (DO), sediment, TSS
- Measurable Goal: Conduct training for relevant personnel
    - Frequency: Annually
    - Timing: March
    - Interim Milestone: Review and update (if needed) training materials in February each year

Website

- Target Audience(s): Residents, businesses, contractors and developers, and general public

- Target Pollutant(s): All
- Measurable Goal: Review and update (if needed) the website to ensure public reporting tools are accurate and that supplemental information is available to help identify and report illicit discharges
    - Frequency: Annually
    - Timing: April

Evaluation

Illicit discharges within city boundaries are often reported directly to the City, as well as to the County or State. Continued or improved effectiveness will depend on:

- Regular SOP reviews
- Timely GIS updates
- Consistent dry-weather screening
- Maintaining active public education and reporting mechanisms

The outlined BMPs have been developed to maintain or enhance the program's effectiveness.

MCM 4 – CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

MCM Regulation: Revise (as necessary), implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from public or private construction projects with a land disturbance of greater than or equal to one acre. This includes projects less than one acre that are part of a larger common plan of development or sale which collectively disturbs land greater than or equal to one acre.

Summary of Existing Efforts

Ordinances

Draper City Municipal Code (DCMC) 18-2-070:

- Requires applicants for a Land Disturbance Permit to include an erosion and sediment control plan for the proposed land disturbance activity and site.

DCMC 16-2-150:

- Requires that a SWPPP describe how the applicant will prevent erosion and sediment through the implementation of BMPs
- Requires that a SWPPP be prepared prior to the issuance of certain City permits.
- Requires any person or business responsible for disturbing one acre or more of ground or less than one acre but whose project is part of a larger common plan of development to obtain a state stormwater permit.
- Outlines that the SWPPP shall include provisions allowing city personnel for access and inspections on a reasonable basis

Standard Operating Procedures (SOPs)

The Storm Water Enforcement for Construction Sites SOP describes how storm water enforcement will be implemented in regard to sites that do not comply with their SWPPP and state-issued Construction General Permit or Common Plan Permit.

Pre-Construction

A pre-construction SWPPP review checklist, developed by the Utah Division of Water Quality, is used to evaluate all submitted SWPPPs

Priority construction sites are assigned a biweekly oversight inspection frequency during the SWPPP review process. Priority status is based on site-specific factors, such as soil erosion potential, site slope, project size and type, sensitivity of receiving waterbodies, proximity to receiving waterbodies, or a history of non-compliance by the project operator and/or owner

Once a SWPPP is approved, an approval email is sent to the project operator and/or owner. This method of communication includes the Notice of Termination (NOT) procedures, as well as instructions for scheduling a pre-construction meeting and site inspection—which must be completed with Draper City staff prior to the start of earth disturbing activities

During Construction

A qualified individual is assigned to conduct monthly or biweekly construction storm water oversight inspections at all known disturbed project sites within Draper City that:

- Disturb one acre or more of land; or
- Disturb less than one acre of land but are part of a larger common plan of development or sale which collectively disturbs one acre or more of land

All storm water oversight inspections are documented using the inspection form found on Utah Division of Water Quality's website

Necessary follow-up actions are taken to ensure compliance in accordance with Draper City's enforcement strategy. Inspections, re-inspections, and enforcement actions are tracked and documented

Project Completion

When a project nears completion, a qualified individual will coordinate with the construction operator or owner to:

- Reiterate Notice of Termination (NOT) requirements
- Verify final site stabilization
- Confirm removal of temporary control measures, unless required to remain in place

Training

All staff whose primary job duties are related to implementing the construction storm water runoff control program are annually trained

Recordkeeping

Records of all projects disturbing one acre or more of land or less than one acre of land but are part of a larger common plan of development or sale which collectively disturbs one acre or more of land are kept for at least five years or until construction is completed, whichever is longer.

Best Management Practices

BMP	Code	Appendix
Ordinance Development	OD	B,C
Erosion Control Plan	ECP	B,C
Zoning	ZO	B,C
Land Use Planning/ Management	LIP	B,C
Contractor Certification and Inspector Training	CCIT	B,C

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4A	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.1 Raise awareness of contractors and developers on what is expected on construction sites	Require a SWPPP for every construction site over one acre	Ongoing	OD	Successful if enforced and 95% of all active construction sites have an approved SWPPP
4B	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.2 Develop a written enforcement strategy and implement the enforcement provisions of the ordinance or other regulatory mechanism	Draft ordinance to include escalating enforcement provisions	Completed	OD	Successful if completed
4C	"	MS4 Staff	4.2.4.2 Documentation and tracking of all enforcement actions	Use the developed construction site enforcement action log/database	Ongoing	OD	Successful if we have a log and are using it as required
4D	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.3 Develop and implement SOPs for pre-construction SWPPP review for construction sites	Develop checklist and begin to do preconstruction reviews of SWPPP	Ongoing	ECP	Successful if we are conducting SWPPP reviews
4E	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	MS4 staff and Contractors and Developers	4.2.4.3.1 Conduct a pre-construction meeting	Hold Pre-con meetings on all sites greater than 1 acre or as part of common plan of development	Ongoing		Successful if we are conducting Pre-con meetings

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4H	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	MS4 Staff	4.2.4.3.3 Identify priority construction sites, including at a minimum those construction sites discharging directly into or immediately upstream of waters that the State	Develop a "sensitive area" map showing areas within the city where "additional" protection may be desired	Ongoing	LIP	Successful when map is completed and ready for use
4I	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.4.1 Inspections of all new construction sites ... at least monthly by qualified personnel	Conduct monthly inspections of all construction sites - Emphasize self inspections - sensitive areas to be inspected twice monthly	Ongoing	CCIT	Successful if 100% of all active construction sites are inspected monthly
4J	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers, MS4 Staff	4.2.4.5 Provide training to city staff and 3rd party designers	Develop a city policy to require all SWPPP inspectors to be RSI inspectors within 6 months	Completed	CCIT	Successful if completed

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4K	"	Contractors and Developers, MS4 staff	4.2.4.4.2 ...The Permittee must include in its SWMP document a procedure for being notified by construction operators/owners of their completion of active construction so that verification of final stabilization and removal of all temporary control measures may be conducted.	Develop a written Notice of Termination process for use within the city	Ongoing	ECP	Successful if 95% of all active construction sites are terminated appropriately

4L	All Pollutants	MS4 staff	4.2.4.5 Provide training to city staff and 3rd party designers	Train SWPPP inspectors, their supervisors, and any personnel who grant final occupancy permits on the NOT process	Ongoing	ECP	Successful if the stormwater specialist and stormwater compliance inspector are trained annually
4M	All Pollutants	MS4 Staff	4.2.4.4.3 Conduct Bi-weekly inspections on high priority construction sites	Inspect high priority sites	Ongoing	ECP	Successful if all high priority sites are inspected bi-weekly
4N	"	"	4.2.4.6 Maintain a log of active construction sites	Establish a log	Ongoing	ECP	Successful if active construction sites are recorded in the log

Evaluation

The primary objective of MCM 4 is to prevent pollutants originating from construction activities[8]—such as sediment, debris, hydrocarbons, pH-altering substances, and bacteria—from entering Draper City's MS4 or discharging into waters of the state. This is supported through mandatory SWPPP submittals and reviews, pre-construction meetings and site inspections, routine inspections, and an enforcement strategy. Program effectiveness is evaluated on the consistent and documented execution of MCM 4 requirements and the associated BMPs outlined above.

[8] Means construction activities 1) located within Draper City and 2) covered under a UPDES construction stormwater permit

MCM 5 – POST-CONSTRUCTION STORMWATER MANAGEMENT

MCM Regulation: Revise (as necessary), implement, and enforce a program to address post-construction runoff to the MS4 from private and public new development and redevelopment construction sites.

Summary of Existing Efforts

Ordinances

Draper City Municipal Code (DCMC) 16-2-170:

- References documents that include a list of acceptable LID and BMPs that include specific design performance criteria and operation and maintenance requirements for each stormwater practice.
- Requires LID/BMPs to be incorporated into site drainage and water quality for sites that require a UPDES construction general permit.
- Requires agreements for new development and redevelopment construction sites completed after January 1, 2003, disturbing greater than or equal to one acre including projects less than one acre that are part of a larger common plan of development or sale, and to be served by a private on-site stormwater management facility. This agreement grants the City permission to access the property at reasonable times and to inspect the drainage facilities, maintenance and preservation plan, and owner annual inspection records to ensure the maintenance and preservation plan is being executed.

DCMC 16-2-180:

- Requires the owner of a privately owned stormwater management facility to perform an annual inspection, submit the annual inspection report to the city, and retain records for at least five years.
- States that if a property owner fails or refuses to meet the inspection, design or maintenance standards required for stormwater facilities, the public works director, after reasonable notice, may correct a violation of the standards or maintenance needs by performing all necessary work to place the facility in proper working condition. The cost of any action by the public works director shall be charged to the responsible party.

Draper City Drainage Design Criteria

The Draper City Drainage Design Criteria was adopted in October 2012 and includes specific criteria for use in the design of stormwater facilities. They are presented in two sections: Hydrologic Criteria and Design Criteria. Hydrologic Criteria includes precipitation, drainage design frequency, design storm distribution and duration, and the storm drainage modeling method. Design criteria includes street drainage, storm inlets, storm drains, stormwater quantity control facilities, and easements.

Plan Review

Draper City reviews post-construction plans for, at minimum, all relevant new development and redevelopment sites to ensure that the plans include long-term storm water management measures that meet local and state requirements.

Post-Construction Stormwater Management Training

Training is provided to all relevant Draper City employees involved in post-construction storm water management. This occurs annually and within 60 days of hire.

Best Management Practices

BMP	Code	Appendix
Ordinance Development	OD	B,C
Infrastructure Planning	IPL	B,C
Education Materials	EM	B,C
Land Use Planning/ Management	LIP	B,C
BMP Inspection and Maintenance	BMPIM	B,C

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5A	All Pollutants	All Audiences	4.2.5.1. Develop and adopt an ordinance or other regulatory mechanism that requires long-term post-construction storm water controls at new development and redevelopment sites. (4.2.5.3.1 for flood control structure issues and 4.2.5.3.2 for LID)	Draft ordinance revisions	Completed	OD	If review is complete
5B	"	"	"	Adopt updated ordinance	Completed	OD	If ordinance has been passed
5C	"		4.2.5.2.2 Documentation on how the requirements of the ordinance or other regulatory mechanism will protect water quality and reduce the discharge of pollutants to the MS4.	Draft a standard to require contractors and developers to submit documentation on: how long-term BMPs were selected, pollutant removal expected from the BMP, and technical basis supporting performance claims	Ongoing	IPL	If draft is completed by the milestone date
5D	"	"	"	Adopt revised standard	Ongoing	IPL	
5E	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Developers and Contractors	4.2.6.9. The Permittee must develop a plan to retrofit existing developed sites that are adversely impacting water quality.	Update Storm Drain Master Plan and Capital Improvement Plan to include Water Quality	Ongoing	IPL	Adopted

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5F	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Contractors and Developers	4.2.5.3.4 Each Permittee shall develop and define specific hydrologic method or methods for calculating runoff volumes and flow rates…	Review existing design standards to see if they meet new permit requirements - see section 4.2.5.3.4	Ongoing	IPL	Adopted
5G	"	"	"	Update design standards	Ongoing	IPL	If updated standards have been adopted
5H	"	"	4.2.5.4.1 Review Storm Water Pollution Prevention Plans (SWPPPs)	See goals for MCM 4	Ongoing		
5I	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	Developers and Contractors	4.2.5.4.2 Permittees shall provide developers and contractors with preferred design specifications to more effectively treat storm water for different development types...projects located in, adjacent to, or discharging to environmentally sensitive areas.	Locate environmentally sensitive areas within the MS4	Ongoing	IPL	Completed map identifying environmentally sensitive areas
5J	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Developers and Contractors	"	Review map of sensitive areas and identify preferred method(s) of treating storm water to discharge to those areas	Ongoing	IPL	List of preferred method(s)

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5M	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff	4.2.5.2.2. All Permittees shall adopt and implement SOPs or similar type of documents for site inspection and enforcement of post-construction storm water control measures.	Review and customize SOPs for inspection and enforcement of post-construction control measures	Ongoing	LIP	If inspection and enforcement SOPs are current and being utilized?
5N	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	"	4.2.5.2.3. ... require private property owner/operators or qualified third parties to conduct maintenance and provide annual certification that adequate maintenance has been performed and the structural controls are operating as designed to protect water quality. In this case, the Permittee must require a maintenance agreement addressing maintenance requirements for any control measures installed on site.	Draft a maintenance agreement template	Completed	BMPIM	If draft is completed
5O	"	"	"	Adopt a maintenance agreement template	Completed	BMPIM	If template is adopted and being used

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5P	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Businesses, Residents	4.2.5.2.5. Inspections and any necessary maintenance must be conducted annually by either the Permittee or through a maintenance agreement, the property owner/operator. On sites where the property owner/operator is conducting maintenance, the Permittee shall inspect those storm water control measures at least once every five years, ...	Inventory post-construction BMPs - see 4.2.5.7.1 for inventory inclusion items	Ongoing	BMPIM	If inventory is complete
5Q	"	"	"	Identify who is responsible to inspect and/or maintain each post-construction BMP	Ongoing	BMPIM	If list identifies person responsible for inspections/ maintenance
5R	"	"	"	Develop inspection report form for post-construction BMPs	Ongoing	BMPIM	If form is completed
5S	"	"	"	Conduct inspections annually for city owned BMP's	Ongoing	BMPIM	If completed inspection reports are properly filed
5T	"	"	"	Conduct inspections on privately owned BMP's at least 20% per year	Ongoing	BMPIM	If completed inspection reports are properly filed

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5U	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 staff	4.2.5.5. Permittees shall provide adequate training for all staff involved in post-construction storm water management, planning and review, and inspections and enforcement.	Schedule and conduct training for appropriate personnel	Ongoing	BMPIM	If all appropriate personnel are trained
5V	"	"	4.2.5.4 Maintain an inventory of post construction BMP's	Inventory log updated annually	Ongoing		If log is updated

Evaluation

The goal of MCM 5 is to manage and reduce pollutant discharges from post-construction stormwater runoff to the MS4 and waters of the state resulting from public and private development and redevelopment sites in Draper City. This is supported through the implementation and enforcement of ordinances, engineering standards, plan reviews, inventory development and management, and inspections. Program effectiveness is evaluated on the consistent and documented execution of MCM 5 requirements and the associated BMPs outlined above.

MCM 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

MCM Regulation: Implement a program for permittee-owned or operated facilities, operations and structural storm water controls that include SOPs, pollution prevention BMPs, storm water pollution prevention plans or similar type of documents, and a training component that have the ultimate goal of preventing or reducing the runoff of pollutants to the MS4 and waters of the state.

Summary of Existing Efforts

High Priority Facilities

A list of potential high priority facilities, as well as identified high priority facilities, can be found here.

High Priority Facility SWPPPs

A Public Works Facility SWPPP is developed.

High Priority Site Inspections

Monthly visual inspections, semi-annual comprehensive inspections, and annual visual observations of storm water discharges are conducted at all high priority sites.

Standard Operating Procedures (SOPs)

All existing SOPs for Draper City MS4 operations can be found here

All high priority facility inspection SOPs can be found here

Draper City Drainage Design Criteria

The Draper City Drainage Design Criteria was adopted in October 2012 and includes specific criteria for use in the design of stormwater facilities. They are presented in two sections: Hydrologic Criteria and Design Criteria. Hydrologic Criteria includes precipitation, drainage design frequency, design storm distribution and duration, and the storm drainage modeling method. Design criteria includes street drainage, storm inlets, storm drains, stormwater quantity control facilities, and easements.

Best Management Practices

BMP	Code	Appendix
Housekeeping Processes	HP	B,C
Infrastructure Planning	IPL	B,C
Employee Training	ET	B,C

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6A	All pollutants	MS4 staff	4.2.6. All components of an O & M program shall be included in the SWMP document and must identify the department (and where appropriate, the specific staff) responsible for performing each activity described in this section…	Complete Org chart annually and define specific responsibilities for all departments shown	Ongoing	HP	If org chart is complete and up to date
6B	"	“	4.2.6.1. Permittees shall develop and keep current a written inventory of Permittee-owned or operated facilities	Complete listing of MS4 owned/operated facilities and review it annually	Ongoing	HP	If list is completed
6C	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.2. All Permittees must initially assess the written inventory of Permittee-owned or operated facilities, operations and storm water controls identified in Part 4.2.6.1. for their potential to discharge to storm water the following typical urban pollutants:	Complete assessments and identify "high priority" facilities.	Ongoing	HP	If assessments are completed and documentation recorded in SWMP
6D	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.4. Each “high priority” facility identified in Part 4.2.6.3. must develop a SWPPP	Develop, review, and implement SWPPPs at high priority facilities	Ongoing	HP	If a SWPPP is implemented and reviewed annually

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6E	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.6.2. SOPs and schedule for regular inspection, cleaning, and repair of catch basins, storm water conveyance pipes, ditches and irrigation canals, culverts structural storm water controls, and structural runoff treatment and/or flow control facilities.	Review, customize and update appropriate SOPs. Inspect/repair/maintain detention basins annually	Ongoing	HP	If SOPs are updated, inspections completed of all detention basin structures
6F	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.5.1. Monthly visual inspections: The Permittee must perform weekly visual inspections of “high priority” facilities in accordance with the developed SOPs to minimize the potential for pollutant discharge.	Develop monthly inspection form and log	Completed	HP	Completed inspection form and log
6G	"	"	"	Conduct monthly inspections	Ongoing	HP	If at annual review all monthly inspections are logged and reports completed
6H	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.5.2 Semiannual comprehensive inspections: At least twice per year, a comprehensive inspection of “high priority” facilities, including all storm water controls, must be performed	Develop semiannual inspection form(s) and log	Completed	HP	Completed inspection form and log

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6I	"	"	"	Conduct semiannual comprehensive inspections	Ongoing	HP	If at annual review all semiannual inspections are logged and reports completed
6J	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.5.3 Annual visual observation of storm water discharges: At least once per quarter, the Permittee must visually observe the quality of the storm water discharges from the “high priority” facilities	Conduct annual visual observations of storm water discharges at high priority facilities	Ongoing	HP	If at annual review all annual visual monitoring is completed and logged and reports completed
6K	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 Staff, Contractors and Developers	4.2.6.8. The Permittee must develop and implement a process to assess the water quality impacts in the design of all new flood management structural controls that are associated with the Permittee or that discharge to the MS4.	Draft a policy/process to assess water quality impacts on all new flood control projects	Ongoing	IPL	If draft is prepared and ready for internal review process
6L	"	"	"	Get policy approved	Complete	IPL	If policy is approved and adopted
6M	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 staff	4.2.6.8.1 Existing flood management structural controls must be assessed to determine whether changes or additions should be made to improve water quality.	See MCM 5 for goals (part of the retrofit program)	Ongoing		

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6N	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 Staff	4.2.6.10. Permittees shall provide training for all employees who have primary construction, operation, or maintenance job functions that are likely to impact storm water quality.	See individual training goals within other MCMs	Ongoing		
6O	"	"	"	Develop a training schedule	Ongoing	ET, HP	If schedule is complete
6P	"	"	"	Conduct ongoing training according to schedule	Ongoing	ET, HP	If training is completed and documented according to schedule at annual evaluation

Evaluation

The goal of MCM 6 is to minimize pollutant discharges to the MS4 and waters of the state from Draper City municipal operations and facilities. This is supported through the implementation of BMPs, SOPs, regular inspections and maintenance, targeted staff training, and the identification and management of potential high priority sites and designated high priority facilities. Program effectiveness is evaluated on the consistent and documented execution of MCM 6 requirements and the associated BMPs outlined above.