STORM WATER MANAGEMENT PROGRAM

2025-2026

Permit Number: UTR090111

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

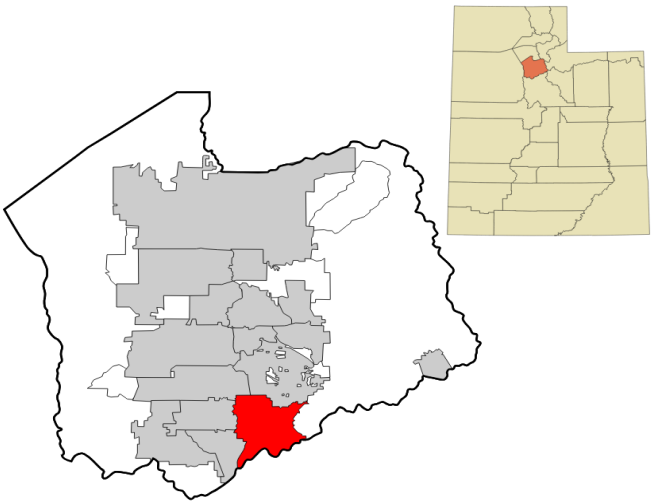
Signature:

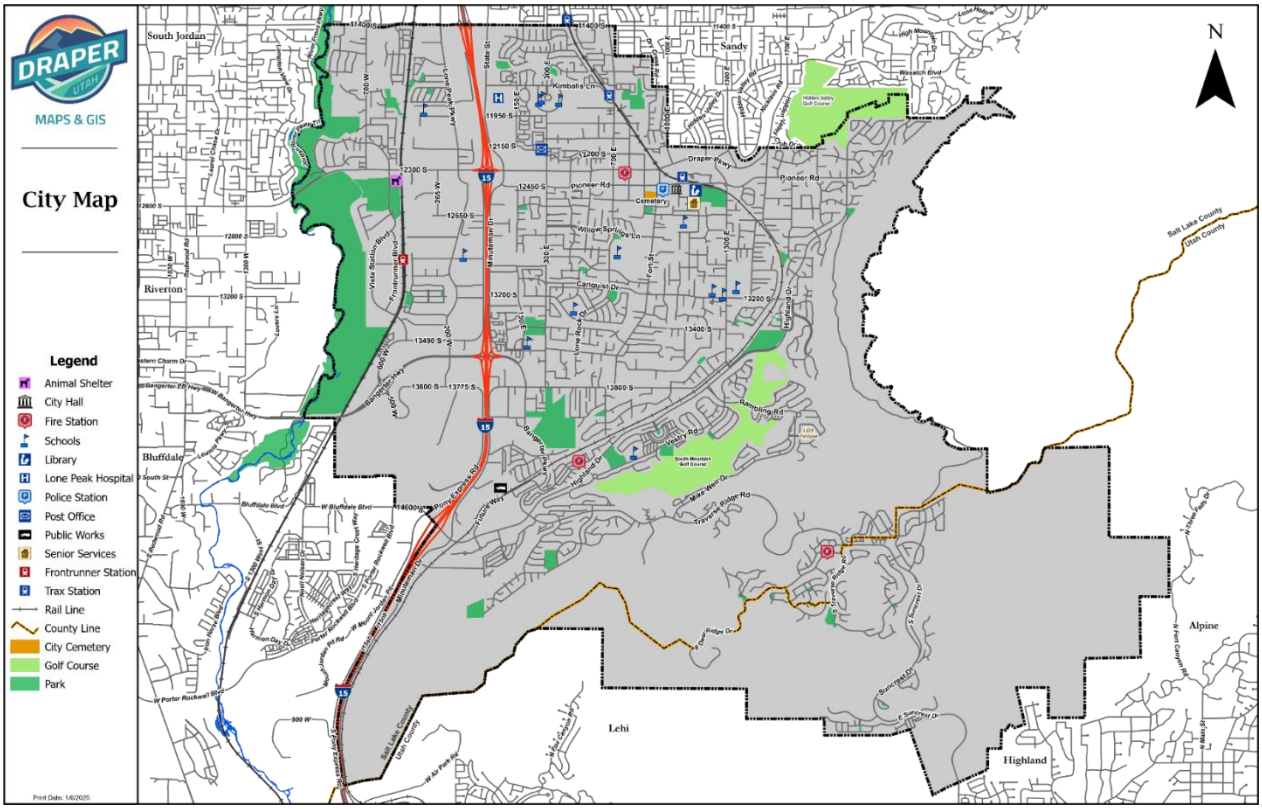
Title: DEPUTY PUBLIC WORKS DIRECTOR

Date: 8/21/25

Draper City MS4 General Location

Southeast corner of Salt Lake County, with a portion extending into northern Utah County





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DEFINITIONS

Beneficial Uses	Uses of the surface waters of the state, which include but are not limited to: domestic, agricultural, industrial, recreational, and other legitimate beneficial uses.
BMP	"Best Management Practice" Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. BMPs also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
Common Plan of Development	One plan for development or sale, separate parts of which are related by any announcement, piece of documentation (including a sign, public notice or hearing, sales pitch, advertisement, drawing, plat, blueprint, contract, Permit application, zoning request, computer design, etc.), physical demarcation (including contracts) that identify the scope of the project. A plan may still be a common plan of development or sale even if it is taking place in separate stages or phases, is planned in combination with other construction activities, or is implemented by different owners or operators.
Dry Weather Screening	Monitoring done in the absence of storm events to discharges representing, as much as possible, the entire storm drainage system for the purpose of obtaining information about illicit connections and improper dumping.
Groundwater	Water in a saturated zone or stratum beneath the surface of the land or below a surface water body.
Illicit Discharge	Any discharge to a MS4 that is not composed entirely of storm water except discharges pursuant to a UPDES Permit (other than the UPDES Permit for discharges from the municipal separate storm sewer) to waters of the state.
Impaired Waters	Any segment of surface waters that has been identified by the State as failing to support one or more of its designated uses.
LID	"Low Impact Development" An approach to land development (or re-development) that works with nature to more closely mimic pre-development hydrologic functions. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product.

MS4	"Municipal Separate Storm Sewer System" 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 stormwater that 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.
Outfall	A point source as defined by UAC R317-8-1.5(34) at the point where a municipal separate storm sewer discharges to waters of the state and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the state are used to convey waters of the state.
Pollutant	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.
Redevelopment	The replacement or improvement of impervious surfaces on a developed site.
SOP	"Standard Operating Procedure" A set of written instructions that document a routine or repetitive activity.
Stormwater	Water resulting from rain or snowmelt.
Stormwater Infiltration	Stormwater that soaks into the ground.
Stormwater Runoff	Stormwater that flows over land or impervious surfaces, such as paved streets and parking lots, and does not soak into the ground.
SWMP	"Storm Water Management Program" The SWMP document is the written plan that is used to describe the various control measures and activities the Permittee will undertake to implement the storm water management program.
TMDL	"Total Maximum Daily Load" Refers to a study that: 1) quantifies the amount of a pollutant in a stream; 2) identifies the sources of the pollutant; and 3) recommends regulatory or other actions that may need to be taken in order for the impaired waterbody to meet water quality standards.
Urbanization	The increasing concentration of human populations in urban areas, leading to the transformation of land for residential, commercial, and other purposes.

Waters of the State	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 (UAC R317-1-1).

INTRODUCTION

For this document, stormwater management refers to management designed to reduce pollution in stormwater runoff and infiltration. Stormwater management is necessary for protecting, maintaining, and restoring the following beneficial uses of surface waters of the state:

- Class 1 – Domestic: Protection of water used as sources of drinking water.
- Class 2 – Recreational Use and Aesthetics: Protection for recreational activities such as swimming, boating, or fishing, and for the enjoyment of scenic or aesthetic qualities.
- Class 3 – Aquatic Wildlife: Protection for fish, other aquatic organisms, and wildlife that depend on surface waters.
- Class 4 – Agriculture: Protection for irrigation of crops and watering of livestock.
- Class 5 – Great Salt Lake: Protection of the unique ecological and recreational values associated with the Great Salt Lake.

The following subsections provide an overview of the factors that drive the need for stormwater management, concluding with the purpose of Draper City's Storm Water Management Program.

History

In the early to mid-19th century, rapid industrialization and urban growth along with the absence of applicable regulations in the United States led to widespread pollution of rivers, lakes, and coastal waters.

In 1948, the Federal Water Pollution Control Act (FWPCA) was enacted, marking federal legislation aimed at addressing water pollution. However, this law primarily provided support for relevant research and financial aid, and gave the federal government little power to enforce pollution controls.

In 1969, two major environmental disasters drew national attention to environmental pollution:

- The Cuyahoga River in Ohio caught fire due to oil and industrial waste floating on its surface.
- The Santa Barbara oil spill released millions of gallons of crude oil into the Pacific Ocean, severely impacting marine life and coastal ecosystems.

In response to growing public concern, the Environmental Protection Agency (EPA) was established in 1970 to lead federal environmental protection efforts.

In 1972, the FWPCA was significantly amended and became known as the Clean Water Act (CWA). These amendments established a national goal to restore and maintain the integrity of the nation's waters.

In 1987, further amendments to the CWA introduced requirements to address stormwater runoff, a major source of water pollution not previously regulated under the Act. These changes called for a phased implementation of stormwater controls through the NPDES 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.

Regulations

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, certain 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.

Urbanization

Urbanization fundamentally transforms the natural landscape by replacing pervious surfaces like soil and vegetation with impervious ones such as roads, parking lots, sidewalks, and buildings. This conversion reduces or prevents stormwater from infiltrating into the ground and increases the volume of stormwater runoff.

To compensate for the loss of natural infiltration and manage the resulting increase in stormwater runoff, developed areas rely on stormwater infrastructure such as gutters, storm drains, and underground pipes. These systems are designed to expeditiously collect and convey stormwater, with most stormwater eventually being discharged into nearby streams, rivers, or lakes.

Pollutants that are exposed on impervious surfaces are easily picked up by stormwater runoff and often transported into the Municipal Separate Storm Sewer System (MS4). Because most MS4s are designed to convey—not treat—stormwater, these pollutants are often discharged directly into nearby streams, rivers, or lakes.

As urban areas expand, impervious surfaces and stormwater infrastructure increase alongside population growth, construction activity, and municipal, industrial, and commercial operations. These factors contribute to greater pollutant generation and increase the likelihood that pollutants will be washed into the MS4 during storm events. Pollutants entering the MS4 and ultimately reaching surface waters can impair the beneficial uses of the receiving surface water.

Purpose

This SWMP:

- Is developed to fulfill the requirements of the UPDES Small MS4 General Permit. By implementing and enforcing the six MCMs, including any applicable special conditions, Draper City will reduce pollutant discharges from its MS4 to the maximum extent practicable.
- Provides shortened or combined permit requirements to enhance readability, public understanding, and encourage public input.
- Is a living document that will be updated as needed to reflect permit requirements, relevant ordinance changes, new guidance from the DWQ, and ongoing efforts to improve stormwater management practices within Draper City.

ROLES AND RESPONSIBILITIES

4.1.3.2 BMP Implementation and Coordination

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

Storm Water Specialist

- Name: Colton Konesky

Deputy Public Works Director / City Engineer

- Name: Robert Markle

4.1.3.3. Positions, Offices, Departments, and Other Entities

The positions, departments, divisions, and other entities responsible for implementing the BMPs contained within this SWMP document:

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 IDDE minimum control measure and describes each party's responsibilities and overall coordination.

Minimum Control Measure (MCM)	Responsible Departments and Other Entities
MCM 1 - Public Education and Outreach on Storm Water Impacts	• Public Works – Engineering Division
MCM 2 - Public Involvement/Participation	• Public Works – Engineering Division
MCM 3 - Illicit Discharge Detection and Elimination (IDDE)	1) Reporting Elements: • All Departments; • Salt Lake County Health Department 2) All Other Elements of IDDE: • Public Works – Engineering, Storm Water, and Streets Divisions; • Community Development – Code Enforcement; • Salt Lake County Health Department
MCM 4 - Construction Site Storm Water Runoff Control	• Public Works – Engineering Division;
MCM 5 - Long-Term Storm Water Management in New Development and Redevelopment	• Public Works – Engineering Division; • Community Development
MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations	• Public Works – Engineering, Fleet, Storm Water, Streets, and Solid Waste Divisions; • Parks & Recreation – Parks Division

Position / Office	Responsibilities
City Manager *(Principal Executive Officer)*	• Sign permit applications
Deputy Public Works Director / City Engineer *(Duly Authorized Representative of the Principal Executive Officer)*	• Review SWMP updates • Review SWMP SOP developments and updates • Sign all reports required by the permit and other information requested by the permitting authority • Support implementation or coordination of permit requirements, SWMP SOPs, and BMPs

Storm Water Specialist *(A position within the Public Works – Engineering Division)*	• Review and revise the SWMP based on evaluation findings or permit changes
	• Develop and update SWMP SOPs
	• Maintain documentation of SWMP activities
	• Prepare annual reports
	• Implement and coordinate SWMP SOPs, requirements, and BMPs, including:
	  ○ Minimum Control Measure (MCM) 1 coordination with:
	  ▪ Communications
	  ▪ Public Works
	  ▪ Parks & Recreation
	  ○ MCM 2 coordination with:
	  ▪ Communications
	  ▪ GIS
	  ○ MCM 3 coordination with:
	  ▪ Code Enforcement Officer
	  ▪ Communications
	  ▪ Community Development – Building
	  ▪ Fire
	  ▪ GIS
	  ▪ Human Resources
	  ▪ Parks & Recreation – Parks
	  ▪ Police
	  ▪ Public Works
	  ▪ Salt Lake County Health Department
	  ○ MCM 4 coordination with:
	  ▪ Storm Water Compliance Inspector
	  ▪ Community Development – Building

	▪ GIS ▪ Public works – Engineering ○ MCM 5 coordination with: ▪ Community Development – Planning ▪ Public Works – Engineering ○ MCM 6 coordination with: ▪ Community Events ▪ Fire ▪ GIS ▪ Parks & Recreation ▪ Police ▪ Public Works
Storm Water Compliance Inspector	• Implement specific MCM 3 SOPs and requirements • Implement specific MCM 4 SOPs, requirements, and BMPs
Code Enforcement Officer	• Implement specific MCM 3 SOPs and requirements
Community Events	• Implement or support implementation of a specific MCM 6 SOP requirement
Communications	• Support implementation of specific MCM 1 requirements and BMPs • Support implementation of specific MCM 2 requirements and BMPs • Support implementation of specific MCM 3 requirements and BMPs
Community Development – Building	• Implement specific MCM 3 SOPs and requirements
Community Development – Planning	• Implement specific MCM 5 requirements
Fire	• Implement specific MCM 3 SOPs and requirements • Support continued development of a specific MCM 6 SOP
GIS	• Support implementation of specific MCM 2 BMPs • Support implementation of specific MCM 3 SOPs and requirements • Support implementation of specific MCM 4 requirements • Support implementation of specific MCM 6 requirements
Human Resources	• Support implementation of specific MCM 3 requirements and BMPs
Parks & Recreation – Parks	• Implement specific MCM 1 BMPs

	• Implement specific MCM 3 SOPs and requirements • Implement specific MCM 6 SOPs and requirements
Police	• Implement specific MCM 3 SOPs and requirements • Implement a specific MCM 6 SOP
Public Works – Engineering	• Support implementation of a specific MCM 1 requirement • Implement specific MCM 3 SOPs and requirements • Implement specific MCM 5 requirements
Public Works – Fleet	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Solid Waste	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Storm Water	• Support implementation of a specific MCM 1 BMP • Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Streets	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Water	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements

SPECIAL CONDITIONS

In addition to the six minimum control measures required under the Small MS4 Permit, supplemental conditions apply when certain environmental or watershed-specific circumstances exist. These conditions are intended to address local surface water impairments by targeting the sources of pollution contributing to them. The goal is to implement focused management that supports the restoration of impaired surface waters of the state.

3.1. Discharges to Water Quality Impaired Waters

Impaired waters are those that do not fully support designated beneficial uses such as recreation, aquatic life, or agriculture. To address these impairments, the State of Utah develops Total Maximum Daily Loads (TMDLs). These regulatory plans identify sources of pollution, establish pollutant load limits, and propose measures to restore water quality.

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

Jordan River Watershed

Several segments of the Jordan River, known as Assessment Units (AUs), are listed as impaired surface waters under Section 303(d) of the Clean Water Act due to exceedances of water quality standards for E. coli and/or low dissolved oxygen.

A watershed-wide TMDL for the Jordan River Watershed has been developed by the State and approved by the Environmental Protection Agency (EPA) for the following impairments:

- E. Coli
  Levels of E. coli bacteria exceed the standard for Beneficial Use Class 2B—*Infrequent Primary Contact Recreation*, which includes activities such as wading and fishing.
- Low Dissolved Oxygen
  Levels of phosphorus exceed the standard for Beneficial Use Class 3D—*Waterfowl, Shorebirds, and Associated Wildlife*.

Jordan River-6

The Jordan River-6 AU extends from 7800 South to Bluffdale at 14600 South. Draper City discharges stormwater into this segment.

This AU is currently listed on Utah's 303(d) list of impaired surface waters due to the following impairments:

- E. Coli:
  Levels of E. coli bacteria exceed the standard for Beneficial Use Class 2B—*Infrequent Primary Contact Recreation*, which includes activities such as wading and fishing.
- Total Dissolved Solids (TDS):
  Levels of dissolved solids exceed the standard for Beneficial Use Class 4—*Agriculture*, which includes crop irrigation and livestock watering.
- Aquatic Life Impairment (Biological Indicators):

Biological monitoring, known as Benthic Invertebrate Assessments, indicates poor aquatic habitat and water quality conditions that do not support Beneficial Use Class 3B—*Warm Water Fishery and Aquatic Life*.

While a TMDL has been developed for Jordan River-6, it has not yet been approved by the EPA.

Pollutants Contributing to Impaired Waters:

Fecal Matter (E. coli Impairment)

- Pollutant Source(s): Fecal matter from humans, wildlife, and domestic pets
- Targeted 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. Contaminated water may contain harmful pathogens (e.g., viruses, bacteria, parasites) that can cause illness through direct contact or ingestion. Water with high levels of E. coli may be unsafe for wading, fishing, and other recreational activities.

Organic Matter (Dissolved Oxygen Impairment):

- Pollutant Source(s): Decomposing organic matter (e.g., grass clippings, leaves, yard debris), excess nutrients (nitrogen and phosphorus)
- Targeted Areas: Residential, commercial, municipal, and industrial landscapes
- Impact to Water Quality: As organic matter decomposes in water, it consumes Dissolved Oxygen (DO). Low DO levels can stress or kill aquatic organisms, leading to reduced biodiversity and, in severe cases, ecosystem collapse. Nutrient pollution can also fuel algal blooms, which further deplete DO in water when the algal blooms die and decompose.

Dissolvable Solids (Total Dissolved Solids Impairment)

- Pollutant Source(s): Urban runoff, fertilizers and pesticides applied to lawns and agricultural areas, road salts, sediment erosion
- Targeted Areas: Residential, commercial, municipal, and industrial areas, as well as construction sites
- Impact to Water Quality: While some dissolved minerals are naturally occurring and beneficial, high levels of Total Dissolved Solids (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

Measures and BMPs to Control Pollutant Discharges Contributing to:

E. coli:

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

Dissolved Oxygen:

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:

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.

3.2. Jordan River E. coli TMDL Compliance Plan

This plan is made to address the pollutant reduction requirements of the Jordan River Watershed Wide E. coli TMDL. Source control BMPs are developed and implemented to reduce the discharge of E. coli, and funding stems from Draper City's stormwater utility fee.

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 educational content and outreach that addresses E. coli.

Inventory

- Potential Sources of E. coli in the MS4 are currently being evaluated.

  Inventoried areas will be added to the priority areas identified in subsection 4.2.3.3.-4 of this SWMP and inspected annually.

- Potential Sources of E. coli for MS4 owned and/or Operated Facilities include:
  - 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, high pet activity, and waterfowl congregation
- Areas directly adjacent to or upstream of waterways
- Neighborhoods with aging sewer infrastructure (in development)

Highest Priority: Areas with two prioritization criteria present (e.g., residential areas with older infrastructure near waterways).

BMP plan:

Non-Structural BMPs

- Pet Waste Management
  - Enforce canine-waste ordinances
  - Public Education and Outreach
  - Contribute to and participate in the Salt Lake County Stormwater Coalition
  - Distribute, share, or display relevant educational content via municipal websites, social media platforms, public signage, and newsletters
- Human Waste Management
  - Implement Standard Operating Procedures (SOPs) for vault restroom maintenance
  - Establish SOPs to ensure that the need for portable toilets is evaluated during the planning phase of applicable municipally-sponsored events, and that they are appropriately located and scheduled for regular servicing when required.

Structural BMPs

- Pet Waste Management
  - Install pet waste bag dispensers and trash receptacles in high-pet traffic areas.
  - Routinely empty pet waste receptacles
  - Post clear and visible signage encouraging pet owners to pick up after their pets
- Wildlife Waste Management
  - Install signage in parks advising visitors not to feed waterfowl
- Human Waste Management
  - Provide and maintain portable or permanent restroom facilities at trailhead entrances, parks, and other high-use public areas.

3.3 Nitrogen and Phosphorus Reduction

Draper City targets residential, industrial, commercial, and municipal sources that are contributing, or have the potential to contribute, nitrogen and phosphorus to waters of the state.

The 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 educational content and outreach that addresses pollutants contributing to low dissolved oxygen.

MINIMUM CONTROL MEASURES (MCMs)

Six MCMs serve as the foundation of the Storm Water Management Program. They are required under the Utah Pollutant Discharge Elimination System (UPDES) Small MS4 permit, and each measure focuses on a specific program for preventing or reducing pollutants in stormwater runoff and infiltration. Collectively, the MCMs are designed to reduce stormwater pollution to the maximum extent practicable.

The six MCMs are as follows:

- MCM 1: Public Education and Outreach on Storm Water Impacts
- MCM 2: Public Involvement/Participation
- MCM 3: Illicit Discharge Detection and Elimination
- MCM 4: Construction Site Storm Water Runoff Control
- MCM 5: Long-Term Storm Water Management in New Development and Redevelopment
- MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

The remainder of this SWMP document describes Draper City's approach to implementing each MCM, including best management practices and ongoing documentation.

For questions, comments, or input regarding the City's Storm Water Management Program, please contact:

Colton Konesky

colton.konesky@draperutah.gov

(801) 576-6331

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.

4.2.1.1. Targeted Pollutants and Pollutant Sources

Requirement: Target pollutant and pollutant sources known to be impacting, or have the potential to impact, the beneficial uses of receiving waterways or waterbodies. This includes providing:

- Information which describes the potential impacts from stormwater discharges
- Methods for avoiding, minimizing, reducing and/or eliminating the adverse impacts from stormwater discharges
- The actions individuals can take to improve water quality

Implementation:

Draper City is an active member of the Salt Lake County Storm Water Coalition, a county collaborative dedicated to public education and outreach aimed at preventing stormwater pollution. The Coalition collaborates to evaluate and identify pollutant sources, develop targeted outreach, and provide educational content and outreach that address pollutants affecting the Jordan River and other common stormwater pollutants.

The City's program is targeting fecal matter, organic matter, and salt as pollutants known to be impacting the beneficial uses of the Jordan River. Fuels, oils, sediment, and concrete washout are targeted as common urban pollutants with the potential to adversely affect the beneficial uses of receiving waters. Best practices are shown on City's website. Targeted pollutant sources are as follows:

Fecal Matter (E. coli Impairment)

- Source(s): Domestic pet waste, waterfowl waste, illicit discharges (e.g., RV waste dumping), and onsite wastewater systems (e.g., septic systems)

Organic Matter (Dissolved Oxygen Impairment)

- Source(s): Landscape maintenance (e.g., grass clippings, shrub trimmings), seasonal leaf litter, leaking dumpsters, and food waste and garbage

Salt (Total Dissolved Solids Impairment)

- Source(s): Uncovered or improperly managed salt storage piles

Fuels and Oils

- Source(s): Leaking or spilled fuel/oil from construction, commercial, industrial, or consumer vehicles, illicit dumping of motor oil, and improper storage or handling of chemicals

Sediment

- Source(s): Exposed soil at construction and landscaping sites, poorly maintained construction or residential access points

Concrete Washout Water

- Source(s): Concrete trucks or tools at construction or landscaping sites

4.2.1.2.-3. General Public, Institutions, Industrial, and Commercial Facilities

Requirements: Provide and document education and outreach given to the general public, institutions (annually), industrial (annually), and commercial facilities (annually) on Draper City's prohibitions against illicit discharges and improper disposal of waste and the impacts to water quality associated with these types of discharges.

Implementation:

Draper City promotes its prohibitions against illicit discharges and improper disposal of waste annually through the city newsletter.

The City's Public Works Department hosts an annual Stormwater Fair for elementary school students. As part of this event, students have the opportunity to participate in a brief questionnaire activity designed to assess and reinforce their understanding of the stormwater system. Correct answers are rewarded, and the questions emphasize on where storm drains often lead to and how proper waste disposal helps protects local waterways.

Records of all education and outreach activities are maintained within the City's electronic filing system.

4.2.1.4. Developers/Contractors and Municipal Review Staff

Requirement: Provide and document education and outreach given to engineers, construction contractors, developers, development review staff, and land use planners concerning the development of storm water pollution prevention plans and BMP use, to reduce adverse impacts from stormwater runoff from development sites.

Implementation:

Draper City gives education and outreach to construction contractors and developers on a case-by-case basis, typically during the SWPPP review process and/or throughout active construction phases. These efforts typically focus on proper selection and implementation of BMPs and on ensuring compliance with applicable permit requirements.

Education and outreach are given to development review staff and land use planners concerning BMP use. The Storm Water Specialist generally conducts all SWPPP reviews; however, a standardized checklist is available and utilized to ensure consistency in the review process.

Records of all education and outreach activities are maintained within the City's electronic filing system.

4.2.1.5.-6. Municipal Staff

Requirements: Provide and document education and training given to:

- Draper City employees concerning Draper City's prohibitions against illicit discharges and improper disposal of waste and the impacts to water quality associated with these types of discharges
- MS4 engineers, development and plan review staff, land use planners, and other pertinent parties about Low Impact Development (LID) practices, green infrastructure practices, and the specific requirements for post-construction control and the associated BMPs chosen within the SWMP.

Implementation:

All Draper City employees receive training on the City's prohibition against illicit discharges, improper waste disposal, and the impacts to water quality associated with these types of discharges. This training is provided to all new employees upon hire and to all staff on an annual basis.

City engineers receive training on LID principles and practices. This training is completed through online courses.

Records of all education and training activities are maintained within the City's electronic filing system.

4.2.1.7. Method(s) to Evaluate Program Effectiveness

Requirement: Identify specific messages for each targeted audience and identify methods that will be used to evaluate the effectiveness of the educational messages and overall education program.

Implementation:

Draper City uses the Salt Lake County Stormwater Coalition survey to evaluate the effectiveness of public outreach.

4.2.1.8. BMP Rationale

Requirement: Include written documentation or rationale as to why particular BMPs were chosen for the public education and outreach program.

Implementation:

BMP rationale is incorporated into the BMPs provided in the next section.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

Implementation:

BMP	Measurable Goal	Rationale
City Newsletter	Distribute an article on Draper City's prohibitions against illicit discharges and improper disposal of waste. Timing: Annually. Distribute in June. Interim Milestone: Draft content for review by April.	The city newsletter is an established communication tool that reaches a segment of the community. It also allows for the distribution of more detailed and comprehensive content.
City Email	Distribute supporting educational content to all or specific City departments. Timing: Biannually. Distribute to all or specific City departments in July and December, beginning December 2025. Interim Milestone: Draft content for review a week prior to each scheduled send.	Email is an established communication tool used for internal audiences.
Stormwater Fair	Provide public education and outreach during the Draper City Stormwater Fair. Timing: Annually. The event typically takes place around June each year. Interim Milestone: Update questionnaire and plan participation rewards by May.	The annual stormwater fair is an opportunity to provide outreach to elementary school students.
Brochures	Develop and distribute educational brochures. Timing: Annually. Distribute in June, beginning June 2026. Interim Milestone: Content drafted by May each year.	Brochures can reach audiences who may not engage with or be recipients to electronic channels like the city newsletters or social media.
Signage	Maintain water pollution prevention signage posted in City parks and trails. Timing: Annually. Inspect in July, beginning July 2026. Conduct maintenance or replacements activities within 30 days of the inspection.	City parks attract a wide range of visitors, and several of these parks are located near canals where waterfowl tend to congregate. By maintaining water pollution prevention signage in these areas, the city can offer visible reminders to the public, discouraging the feeding of waterfowl and promoting the proper disposal of pet waste.
Storm Water Coalition	Support Coalition advertisements, and participate in monthly Coalition meetings. Timing: Pay invoice in July.	By supporting coalition advertisements, Draper City can help public education and outreach spread to a broader audience.

Program Evaluation Method	Develop a localized approach to the program evaluation method. Timing: Complete by July 2026. Interim Milestone: Coordinate with Communications prior to June.	Since the goal is to assess the effectiveness of the public education and outreach across all targeted audiences, it is important to adopt an evaluation approach that captures data from local participants.
LID Training	Initiate a meeting with all engineers, development and plan review staff, and land use planners to review the City's LID goals. Timing: Annually. Complete in February. Interim Milestone: Schedule meeting in January.	Holding LID training at the start of the year helps establish a clear understanding of the city's LID goals before the spring and summer, when construction and capital improvement projects typically ramp up.
Employee Training	Give training to City employees on the City's prohibitions against illicit discharges and improper waste disposal. Timing: Annually. Complete in March. Interim Milestone: Review training resources in February.	By reviewing training resources and conducting annual training, this ensures topics remain relevant and engaging, and concise information is being presented.
Website Review	Evaluate website content and update as needed. Timing: Annually. Complete in December.	Reviewing the information provided on the website helps ensure that contact details, reporting information, and educational resources remain visible and accessible to the public.

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

Implementation:

- The Salt Lake County Stormwater Coalition is considered effective in helping achieve MCM 1 requirements. The Coalition produces advertisements, and its website offers a wide range of educational resources tailored to a variety of audiences. Electronic public outreach efforts are shared within the Coalition, which can be further shared locally.
- 4.2.1.4 – The EPA's guide to developing a SWPPP is planned to be attached to the stormwater portion of the Draper City website.
- 4.2.1.7. – A more localized approach to evaluating program effectiveness is in development.

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.

4.2.2.1. Public Notification

Requirement: Establish a program or policy that allows public input during the development, implementation, and updates of the SWMP and related ordinances.

Implementation:

Draper City notifies the public of proposed policy or code changes through the City Council Agenda.

4.2.2.2.-3. SWMP Availability

Requirements: Make the revised SWMP publicly available within 180 days of the Permit's effective date and keep it accessible for the duration of the Permit, including contact information for public review and input.

Implementation:

Draper City maintains an up-to-date copy of this document on its website for public review. The cover page, along with introduction to the Minimum Control Measures (MCMs) section, includes contact information where public input can be directed.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

Implementation:

BMP	Measurable Goal
Adopt-a-Storm-Drain Program	Promote the Adopt-a-Storm-Drain Program and highlight its goals in helping improve local water quality. Timing: Annually. Complete in September Interim Milestone: Finalize promotional content/materials in August.
SWMP Document Availability	Keep a current version of the SWMP document on the City's website. Timing: Replace the existing SWMP document on the website, typically annually and/or after changes have been made to the document. Interim Milestone: Send the updated document to the Communications Department as needed or by the last week of August.
Public Notification	Develop a method to notify residents and the general public of SWMP updates and allow for public input.

	Timing: Develop by June 2026. Interim Milestone: Coordinate with the Communications Department by April.
State and Local Public Notice Requirements	Review state and local public notice requirements. Timing: Annually. Complete in June.

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

- In August 2024, Draper City launched its Adopt-a-Storm-Drain program. This program 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. Further promotion for this program is in development.
- 4.2.2.1. – An evaluation is underway to develop a process for notifying the public of changes to the SWMP document, with an emphasis on gathering input. Options for collecting input through the Draper City website are being evaluated.

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.

A Memorandum of Understanding (MOU) exists between Salt Lake County, on behalf of its Salt Lake County Health Department, and Draper City. This MOU describes each party's responsibilities and overall coordination.

4.2.3.1. Mapping

Requirement: Maintain an up-to-date map of the MS4 showing all outfalls, receiving State waters, storm drain pipes, and other stormwater conveyance structures.

Implementation:

Draper City maintains a GIS map of the storm drain system, which includes the following features:

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

4.2.3.2.-1 Ordinances

Requirements: Establish and enforce regulations that prohibit non-stormwater discharges to the MS4, with authority to detect, investigate, and eliminate violations and apply enforcement actions as needed.

Implementation:

Draper City Municipal Code (DCMC) 16-2-130:

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

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:

- Designates the Public Works Director (defined as Draper City's Public Works Director or the Director's designee) as the legal authority responsible for implementing all aspects of the IDDE program.
- Outlines enforcement measures such as a Stop Work Order and payment of a fine if necessary.

4.2.3.3.-4 IDDE Plan

Requirements: Implement a written plan to detect and address non-stormwater discharges to the MS4, including spills, illicit connections, sanitary sewer overflows, and illegal dumping. Include:

- Priority Area Identification
- Field Inspections of priority areas
- Dry-Weather Screening
- Reporting potential UPDES Violations

Implementation:

Draper City staff, along with members of the public, play a critical role in identifying and reporting illicit discharges. In addition to the general reporting of and responding to an illicit discharge, the City implements a proactive approach to the IDDE program, in accordance with Small MS4 General Permit requirements.

To support early detection, the City conducts dry-weather screening of outfalls and has designated several industrial and commercial zones as priority areas on the City's GIS mapping system. Residential priority zones are currently in development. Priority areas are identified based on the potential type of activities, potential amount of chemicals or materials stored on site, and the potential for discharges that may contribute to E. coli contamination.

Public stormwater infrastructure connected to priority areas are inspected annually, and all identified outfalls eventually undergo routine dry-weather inspections to detect signs of illicit discharges or connections—with at least 20% inspected annually. These inspections are recorded using electronic forms, which include photo documentation and comments. The list of outfalls and priority areas is reviewed annually and updated as needed.

When illicit discharges resulting from improper practices such as illegal dumping, mismanagement of materials, or illicit connections are identified, their locations are documented and added to the City's mapping system. This data enables the City to track patterns over time, identify recurring problem areas, and revise the list of priority areas as needed.

If a discharge is discovered or suspected to require coverage under a separate UPDES Permit (e.g., Industrial Storm Water permit or Dewatering Permit), the City will attempt to notify the responsible party and will notify the appropriate permitting authority accordingly.

4.2.3.4. Tracing an Illicit Discharge

Requirements: Implement SOPs or similar types of documents for tracing the source of illicit discharges.

Implementation:

Draper city has established an SOP for tracing the source of an illicit discharge.

4.2.3.5.-1 Characterizing the Nature of Illicit Discharges and Required Documentation Upon Confirmation

Requirements: Implement SOPs or similar types of documents for characterizing the nature of illicit discharges and the potential public or environmental threat posed by them. When the source of an illicit non-stormwater discharge is identified and confirmed, record detailed information in an inspection report.

Implementation:

Draper City has established an SOP for characterizing the nature of illicit discharges, including the potential public or environmental threat posed by them. When an illicit non-stormwater discharge is identified and confirmed, documentation is collected and an inspection form is filled out.

4.2.3.6.-3 Ceasing Illicit Discharges

Requirements: Implement SOPs or similar types of documents for:

- Ceasing the illicit discharge, including notification of appropriate authorities
- Notification of the property owner
- Technical assistance for removing the source of the discharge or otherwise eliminating the discharge
- Follow-up inspections
- Escalating enforcement and legal actions if the discharge is not eliminated

Require immediate cessation of improper disposal practices, enforce as necessary, and thoroughly document all investigations.

Implementation:

Draper City has established SOPs for illicit discharge removal and spill containment and cleanup.

Upon Detection of improper disposal practices, the City requires immediate cessation and will initiate enforcement actions in accordance with established procedures. Depending on the severity and nature of the violation, enforcement may include the issuance of a Notice of Violation, Stop Work Order, and/or the imposition of fines as authorized by City ordinance.

If the City is unable to fulfill any component of subsections 4.2.3.5. or 4.2.3.6., written documentation or rationale will be submitted to the permitting authority describing the circumstances why the minimum performance measures were not possible.

4.2.3.7. Public Education on Hazards Associated with Illicit Discharges and Improper Disposal of Waste

Requirement: Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

Implementation:

The City utilizes its website and newsletter to educate the public on the impacts of illicit discharges and proper waste disposal methods. Annual training is given to City staff on the impacts associated with illicit discharges and improper disposal of waste, and a description of these impacts are incorporated into SOPs as applicable.

4.2.3.8. Collection of Household Hazardous Waste

Requirement: Promote or provide services for the collection of household hazardous waste.

Implementation:

Draper City promotes proper disposal of Household Hazardous Waste (HHW) by informing residents about available collection services, highlighting the new HHW Collection Center located in Sandy City.

4.2.3.9.-1 Spill Hotline

Requirements: Publicly list and promote a hotline or other local telephone number for public reporting of spills and other illicit discharges. Keep a record of all calls received, all follow-up actions taken, and any feedback received from public education efforts.

Develop a written spill and improper disposal response SOP or similar type of document and a flow chart for internal use.

Implementation:

Draper City provides an emergency telephone number for reporting illicit discharges, which is displayed on the City's website. All incident reports received—whether through this hotline or by other reporting methods—are documented and maintained within the City's electronic filing system.

The City has established an SOP for phone call responses, and a flow chart is available for internal use and reference.

4.2.3.10. Procedures for Program Evaluation and Assessment

Requirement: Implement procedures for program evaluation and assessment which includes maintaining a database for mapping, tracking of the number and type of spills or illicit discharges identified, and inspections conducted.

Implementation:

Draper City maintains GIS mapping and an organized electronic folder system to track and manage data related to illicit discharges and spills. This system records the number and type of incidents identified, as well as inspections conducted.

4.2.3.11. Training

Requirement: Require that all staff, contracted staff, or other responsible entities, that as part of their normal job responsibilities might come into contact with or otherwise observe an illicit discharge or illicit connection to the MS4 receives annual training in the IDDE program. Require that all new hires are trained within 60 days of the hire date and annually thereafter.

Implementation:

Annual IDDE training is given to all relevant Draper City employees who are likely to encounter or observe illicit discharges or illicit connections as part of their job duties. All new hires receive training on illicit discharge reporting and impacts to water quality associated with those discharges to ensure early awareness.

4.2.3.12. Documentation Requests (Acknowledgement)

Requirement: The permitting authority reserves the right to request documentation or further investigation of a particular non-storm water discharge of concern, to determine a reasonable basis for allowing the non-storm water discharge and excluding the discharge from the City's program or to require inclusion of the discharge in the City's program, if water quality concerns cannot otherwise be reasonably satisfied.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

BMP	Measurable Goal
Priority Area Identification	Review and update (if needed) priority areas likely to have illicit discharges. Timing: Annually and/or as needed. Complete in January.
Storm Drain System Map	Maintain and update the GIS map as needed to reflect new stormwater infrastructure from new development and new capital improvement projects. Timing: Updates completed leading up to or following project completion.
IDDE SOPs	Review and update (if needed) IDDE SOPs. Timing: Annually and/or as needed. Complete in March. Interim Milestone: Submit any IDDE SOP updates to the Deputy Public Works Director/City Engineer by the end of the first week of May.
IDDE Flow Charts	Review and update the IDDE flow chart to ensure it effectively reflects current procedures for identifying, characterizing, and responding to illicit discharges. Timing: Annually. Complete in March.
Dry Weather Screening Inspections	Inspect 20% of outfalls each year. Timing: Annually. Complete inspections by June. Interim Milestone: Review all outfalls in March and identify any new ones as needed, prior to the start of seasonally dry weather.
Emergency Spill Hotline	Verify accuracy and visibility of the emergency hotline number on the City's website. Timing: Annually. Complete in April.
Training	Ensure training is given to all Draper City employees.

	Timing: Annually. Complete in April. Interim Milestone: Review and update (if needed) training materials in February each year.
Website	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. Timing: Annually. Complete in March.

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

- Illicit discharges within Draper City are most often reported directly to the City. Reports are occasionally first received by the Salt Lake County Health Department or the Utah Division of Water Quality and subsequently forwarded to the City.
- The City's Adopt-a-Storm-Drain program encourages participants to report suspected or potential illicit discharges.

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.

Please Note: This excludes lots within a common plan of development that disturb less than one acre and for which the purpose of the lot has been completed.

4.2.4.1.-3 Ordinance(s)

Requirements: Enforce an ordinance or other regulatory mechanism that requires the use of erosion and sediment control practices at construction sites. Include sanctions to ensure compliance.

Require construction operators to prepare a Storm Water Pollution Prevention Plan (SWPPP) and apply sediment and erosion control BMPs as necessary to protect water quality, reduce the discharge of pollutants, and control waste.

Require construction operators to obtain coverage under the current UPDES Storm Water General Permits for Construction Activities for the duration of the project.

Include a provision for access by qualified personnel to inspect construction storm water BMPs on private properties that discharge to the MS4.

Implementation:

DCMC 16-2-150:

- Requires a SWPPP prior to the issuance of certain City permits
- Requires the SWPPP to describe how the operator will prevent erosion, sediment, chemicals, trash, construction debris, and other pollutants from leaving the site and/or entering waters of the state.
- Requires the SWPPP to conform to the requirements set forth by the Utah Department of Environmental Quality.
- Requires state stormwater permit coverage for construction activities from the Utah Division of Water Quality.
- Outlines that the SWPPP shall include provisions allowing city personnel for access and inspections on a reasonable basis

DCMC 16-2-200:

- Designates the Public Works Director (defined as Draper City's Public Works Director or the Director's designee) as the legal authority responsible for enforcing the construction storm water runoff control program.

4.2.4.2.-2 Enforcement Strategy

Requirements: Develop a written enforcement strategy and implement the enforcement provisions of the ordinance or other regulatory mechanism. Include:

- Standard Operating Procedures (SOPs) or similar types of documents that include specific processes and sanctions to minimize the occurrence of violations and obtain compliance from violators.
- Appropriate, escalating enforcement procedures and actions, including an appeals process.
- Documentation and tracking of all enforcement actions.

Implementation:

Draper City considers a violation to be any instance of non-compliance with a project site's UPDES General Permit for Construction Storm Water Discharges.

When a violation is identified, it is classified as either:

- A general violation, which requires re-inspections that may lead to the imposition of an Administrative Fine; or
- A river-/stream-impact violation, where pollutants are clearly entering a river, a stream, or a lake and may require the immediate issuance of a Stop Work Order.

The procedures for each enforcement measure are described below:

Administrative Fine

Administrative Fines apply to documented, ongoing general violations.

Notice of Violation #1: When a general violation is identified during an inspection, the City stormwater inspector shall, at a minimum:

1. Document the violation(s) in the City's electronic inspection form, referencing the applicable section(s) of the project site's UPDES Construction Stormwater Permit.
2. Complete the inspection record by entering all relevant information, including the reinspection date, and generate an inspection report to be automatically distributed to the project site contact(s) identified within the project's SWPPP.
3. Send a supplemental email to the site contact(s) referencing the number of the violation(s) listed in the inspection report and the scheduled re-inspection date.

Notice of Violation #2: If the same violation(s) remain uncorrected during the re-inspection, the City stormwater inspector shall:

1. Repeat the documentation process described above; and
2. Include a written warning in the inspection record and email stating that if the violation(s) are not corrected by the next re-inspection date, an Administrative Fine may be imposed.

Notice of Violation #3: If the same violation(s) remain uncorrected during this or any subsequent re-inspection, Draper City may impose an Administrative Fine.

Once imposed, an Administrative Fine may be imposed

- For each business day the specific violation continues, beginning on the day after the day which Draper City issues the administrative fine; and
- Within 30 days after the day on which the violation is corrected.

Stop Work Order

A Stop Work Order (SWO) applies to any documented river-/stream-impact violation.

When a river-/stream-impact violation is identified and confirmed, Draper City may issue an immediate SWO. The SWO remains in effect until:

- The violation has been corrected to the satisfaction of a City stormwater inspector; and
- The correction has been verified through a re-inspection by the inspector.

A stormwater enforcement flow chart and Standard Operating Procedure (SOP) are available for reference. Fine amounts are also included in the SOP.

Any person or entity that believes an enforcement has been applied erroneously may appeal to the Public Works Director. The appeal shall be in writing, state any facts supporting the appeal, and be made within ten (10) working days of the decision or action being appealed. The director may elect to hold a hearing on the appeal. The director shall decide the appeal within ten (10) working days of when the appeal is filed. If the person or entity is not satisfied with the director's decision, a further appeal may be made to the city manager. The appeal to the city manager shall follow the same procedure as the appeal to the director. The city manager's decision shall be final and binding on all parties.

Records of all enforcement actions are maintained within the City's electronic filing system.

4.2.4.3.-3 Pre-Construction

Requirements: Implement a checklist for pre-construction Storm Water Pollution Prevention Plan (SWPPP) review that is consistent with the requirements of the current UPDES Stormwater General Permits for Construction Activities. Retain records of projects for five years or until construction is completed, whichever is longer. Prior to construction:

- Conduct a pre-construction SWPPP meeting.
- Develop procedures for receiving and considering information and commented submitted by the public on proposed projects.
- Identify priority construction sites.

Implementation:

Pre-construction SWPPP review checklists, developed by the Utah Division of Water Quality, are used by qualified Draper City staff to evaluate all submitted SWPPPs. These checklists are consistent with the requirements of the applicable UPDES construction stormwater permit.

During the SWPPP review process, each project site is assessed and designated as either a standard site or a priority site, which determines the frequency of City oversight inspections:

- Standard Sites: The City will conduct oversight inspections at least once per month.
- Priority Sites: The City will conduct oversight inspections at least once every two (2) weeks.

A priority site designation is based on site-specific risk factors, such as:

- Soil erosion potential;
- Site slope;
- Project size and type;
- Proximity to receiving surface waters of the state; and/or
- A history of non-compliance by the project operator.

Once Draper City has approved a project's SWPPP, the City will send an email stating approval to the project operator and/or owner. This correspondence typically includes:

- Confirmation of the SWPPP approval;
- Instructions for scheduling a pre-construction meeting and site inspection, both of which must be completed with Draper City staff prior to the start of any earth-disturbing activities; and
- Information and procedures for submitting a Notice of Termination (NOT).

Once the applicable City permit(s) have been obtained and prior to the commencement of earth-disturbing activities (excluding those related to BMP installation), the operator, owner, or Duly Authorized Representative is expected to schedule and complete a pre-construction site inspection with the City Storm Water Specialist and/or Storm Water Compliance Inspector, in accordance with Utah Code § 19-5-108.3(9)(b). This inspection is conducted to verify that all phase BMPs (e.g., exit controls, perimeter controls, portable toilet, inlet protection, etc.) are properly implemented and/or installed, the SWPPP sign is posted and readable from a public right-of-way, and a copy of the SWPPP is available for review.

All SWPPP reviews, approvals, communications, and other applicable project records are maintained within the City's electronic filing system for a minimum of five (5) years or until construction is completed, whichever is longer.

4.2.4.4.-5 Oversight Inspections

Requirements: Develop and implement SOPs or similar types of documents for construction site inspection and enforcement of construction stormwater pollution control measures.

Conduct oversight inspections at all standard sites once a month, and conduct oversight inspections at all priority sites once every two weeks.

Conduct oversight inspections of all phases of construction, including prior to land disturbance, during active construction, and following active construction.

Utilize an electronic site inspection to conduct an oversight inspection at construction sites, unless there is a documented reason for justifying an on-site oversight inspection.

Take all necessary follow-up actions (i.e., re-inspection, enforcement) to ensure compliance in accordance with the enforcement strategy.

Implementation:

Draper City's Storm Water Enforcement for Construction Sites SOP identifies the Storm Water Specialist and Storm Water Compliance Inspector as the positions responsible for conducting site inspections and implementing enforcement procedures. All storm water oversight inspections are recorded using the inspection form found on the Utah Division of Water Quality website.

The Storm Water Specialist and Storm Water Compliance Inspector are RSI certified, and the Storm Water Compliance Inspector is typically assigned to:

- Conduct monthly oversight inspections at all known and qualifying standard project sites within Draper City.
- Conduct biweekly (once every two weeks) oversight inspections at all known priority sites.
- Conduct oversight inspections prior to land disturbance (pre-construction inspection), during active construction, and following active construction (Notice of Termination inspection).

Necessary follow-up actions are taken to ensure compliance in accordance with Draper City's enforcement strategy. All scheduled oversight inspections, complaint-/tip-based inspections, re-inspections, and enforcement actions are tracked and documented.

Notice of Termination (NOT) procedures for coverage under a Construction General Permit or a Common Plan Permit are distributed to the site contact(s) prior to the start of a project. As a project nears completion, the qualified person assigned to conduct oversight inspections may list applicable NOT conditions in an inspection report and may communicate with the site contact in person or via email or phone call to ensure the operator or owner understands and fulfills all applicable NOT conditions.

Electronic-Site Oversight Inspections

> An electronic-site oversight inspection is a municipality's default method of conducting oversight stormwater inspections unless there is a documented reason justifying an on-site oversight inspection.
>
> Electronic-site oversight inspections rely on the construction operator, owner, or Duly Authorized Representative (DAR) to provide photo or video documentation that accurately represents on-site conditions and is equivalent in quality to visuals observed during an on-site oversight inspection.
>
> Although Draper City is required to conduct electronic-site oversight inspections by default, the construction operator, owner, or DAR is not required to provide photo or video documentation. Participation in the electronic-site inspection process is voluntary and becomes an expectation only if the operator, owner, or DAR elects to participate.
>
> An on-site oversight inspection is considered justified when there is a documented reason, such as:
>
> - The construction operator, owner, or DAR has completed and returned a Draper City On-Site Oversight Inspection Agreement, allowing the City to conduct on-site oversight inspections by default.
> - The construction operator, owner, or DAR has not confirmed with the City whether the upcoming oversight inspection will be on-site or electronic-site, and the site contact fails

to respond to a phone call and voicemail (if possible) made at least 48 hours prior to the scheduled inspection.

In the event that photo or video documentation has been submitted with inadequate characterization of site conditions or portions of the site, or if there is any other noncompliance with permit conditions that warrants an on-site inspection, a 48-hours advance notice of an on-site inspection is provided unless there is an imminent threat of a discharge.

4.2.4.5 Training

Requirement: Maintain training records and ensure:

- That all staff whose primary job duties are related to implementing the construction storm water program are annually trained.
- All new hires are trained within 60 days of hire date and annually thereafter.

Implementation:

The Storm Water Specialist and Storm Water Compliance Inspector are the primary positions responsible for implementing the construction site storm water runoff control MCM. Individuals assigned to these positions receive initial training within 60 days of hire date and annually thereafter. Annual training typically consists of attending external training.

All training records are maintained within the City's electronic filing system.

4.2.4.6. Recordkeeping

Requirement: Maintain records of all projects described in the MCM Regulation of MCM 4. Keep records of these projects for five years or until construction is completed, whichever is longer.

Implementation:

All SWPPP reviews, approvals and other applicable project records are maintained within the City's electronic filing system for a minimum of five (5) years or until construction is completed, whichever is longer.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

Implementation:

BMP	Code
Ordinance Development	OD
Erosion Control Plan	ECP

Zoning	ZO
Land Use Planning/ Management	LIP
Contractor Certification and Inspector Training	CCIT

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

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

The objective of MCM 4 is to prevent pollutants such as sediment, debris, fuels and oils, and concrete washout from construction activities 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 BMPs.

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.

4.2.5.1.-4. Post-Construction Controls

Requirements: Have requirements or standards to ensure that any stormwater controls or management practices for new development and redevelopment will prevent or minimize water quality impacts by addressing site-specific pollutants. Include:

- Non-structural controls
- Retention Requirement
- Low Impact Development Approach
- Feasibility and Alternatives

Implementation:

Draper City requires new development and redevelopment projects to follow the City's standards for stormwater management.

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.

New development projects disturbing greater than or equal to one acre of land (individually or as part of a larger common plan of development) are required to manage rainfall on-site for rain events up to the 80th percentile rainfall event or predevelopment hydrologic conditions, whichever is less. This is achieved through the use of practices that infiltrate, evapotranspirate, and harvest and reuse rainwater.

Redevelopment projects disturbing greater than or equal to one acre of land (individually or as part of a larger common plan of development) are required to submit a submit a site-specific and project-specific plan to show net gain to on-site retention or a reduction to impervious surfaces to provide similar water quality benefits. If the project increases impervious surfaces by more than 10%, it must manage net increase in runoff volume onsite for rainfall events up to the 80th percentile event through the use of practices that infiltrate, evapotranspirate, and harvest and reuse rainwater.

All applicable new development and redevelopment projects are evaluated for Low Impact Development (LID). A Guide to Low Impact Development within Utah is provided to developers for reference, and all of the outlined LID practices in Appendix C of the document are acceptable within Draper City.

4.2.5.2.-5 Ordinances and Inspections

Requirements: Develop and adopt an ordinance or other regulatory mechanism that requires long-term post-construction stormwater controls at new development and redevelopment sites. Include:

- Enforcement provisions in the ordinance or other regulatory mechanism that contain procedures for specific processes and sanctions to minimize the occurrences of violations and

obtain compliance from chronic and recalcitrant violators. These processes and sanctions must include appropriate, escalating enforcement procedures and actions.

- 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. Adopt and implement SOPs or similar types of documents for site inspection and enforcement of post-construction stormwater control measures.
- Provisions for post-construction access for Draper City to inspect stormwater control measures on private properties that discharge to the MS4 to ensure that adequate maintenance is being performed.
- Have qualified personnel inspect permanent structural BMPs at least once during installation. Upon completion, verify that long-term BMPs were constructed as designed.
- Ensure inspections and any necessary maintenance are conducted at least once every other year. Inspect storm water control measures at least once every five years and follow up on all inspections as needed.

Implementation:

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

- References documents that include a list of acceptable LID practices 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.

Sections 5, 7, and 8 of the City's Stormwater Pollution Prevention Maintenance Agreement detail procedures for notifying an owner of deficiencies, the City taking corrective action, and the reimbursement for any corrective action taken by the City.

Draper City inspects the permanent structural BMP(s) at least once during installation and requires written verification from the project's engineer that the BMP(s) have been constructed according to the approved design.

Draper City conducts annual inspections of public permanent structural BMPs and performs maintenance as needed. The City also inspects private structural BMPs once every five years.

Private property owners who have entered into a Draper City Stormwater Pollution Prevention Maintenance Agreement are responsible for the annual inspection and maintenance of their private structural BMP(s). If an annual inspection report is not submitted, Draper City will conduct an inspection.

4.2.5.3.-2 Plan Review

Requirements: Implement procedures for site plan review which evaluates potential water quality impacts, and review post-construction plans for all projects disturbing greater than or equal to one acre of land (individually or as part of a larger common plan of development) to ensure the plans meet the requirements of this minimum control measure.

Implementation:

Draper City reviews post-construction plans, at a minimum, for all new development and redevelopment sites that are required to obtain a City Land Disturbance Permit.

4.2.5.4.-2 Inventory

Requirements: Maintain an inventory of all post-construction structural stormwater control measures installed and implemented at new development and redeveloped sites that disturb greater than or equal to one acre of land (individually or as part of a larger common plan of development).

Each entry to the inventory must include:

- Project name, owner name, and contact information
- Short description of each stormwater control measure
- Short description of maintenance requirements
- Inspection information

Update the inventory, based on annual inspections, when changes occur in property ownership or specific control measures implemented at the site.

Implementation:

Draper City maps and maintains all public post-construction structural stormwater controls and maintains a mapped and written inventory of all locations that have completed a stormwater pollution prevention maintenance agreement and preservation plan.

4.2.5.5. Training

Requirement: Ensure that all staff involved in post-construction stormwater management, including those that conduct plan review, annual maintenance inspections, and enforcement, receive

appropriate training. Ensure that all new hires are trained within 60 days of hire and annually thereafter.

Retain training records that include dates, activities or course descriptions, and names and positions of staff in attendance.

Implementation:

Online courses are given to all relevant Draper City employees involved in post-construction storm water management.

Records of all training activities are maintained within the City's electronic filing system.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

Implementation:

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

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

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

The objective 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 BMPs.

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.

4.2.6.1.-3. Potential and Identified High Priority Facilities

Requirements: Keep current a written inventory of all potential high priority facilities that are owned or operated by Draper City and all the associated stormwater controls.

Assess the written inventory and make a list of common pollutants that may originate from these facilities and how to prevent them from entering the storm water system.

Based on the assessment, identify high priority facilities.

Implementation:

A written inventory of potential high priority facilities and identified high priority facilities is maintained. This inventory is scheduled to be updated during the 2025-2026 permit year to incorporate E. coli-related high-priority factors and associated stormwater controls.

4.2.6.4. High Priority Facility SWPPP

Requirement: Include a list of the high priority facilities and prepare a SWPPP for each facility.

Implementation:

1. Draper City Public Works Facility - A SWPPP is developed.
2. Parks & Recreation Facility – A SWPPP is scheduled to be completed during the 2025-2026 permit year.
3. Dayland Dog Park - A SWPPP is scheduled to be completed during the 2025-2026 permit year.
4. Galena Hills Dog Park - A SWPPP is scheduled to be completed during the 2025-2026 permit year.

4.2.6.5.-3 High Priority Facility Inspections

Requirements: Conduct inspections of high priority facilities at the following frequencies:

- Monthly: visual inspections, including related stormwater outfalls.
- Semi-annual: comprehensive inspections, including all stormwater controls.
- Annually: visual observation of stormwater discharges.

All inspection and observation records must be documented and kept within the SWMP document.

Implementation:

Monthly visual inspections, semi-annual comprehensive inspections, and annual visual observations of storm water discharges are conducted at all high priority facilities. These inspections are documented using an electronic inspection form that includes photos and comments, and are distributed to personnel who can conduct corrective actions.

High priority facility inspection SOPs are established. Records of all inspections and observations are currently maintained within the City's electronic filing system. Utilization of recordkeeping within the SWMP document is scheduled to be completed during the 2025-2026 permit year.

4.2.6.6.-6 Standard Operating Procedures (SOPs)

Requirements: Develop and implement SOPs to protect water quality at each of the facilities owned or operated by Draper City and/or activities conducted by Draper City.

SOPs address pollution prevention practices for:

- Handling, storage, and disposal of chemicals and materials
- Waste and trash management
- Maintenance and cleaning activities (e.g., vehicles, equipment, buildings, and public spaces)
- Fertilizer, pesticide, and herbicide use
- Lawn care, landscaping, and pet waste management
- Vehicle fueling, maintenance, and storage
- Roadway and parking lot maintenance
- Cold weather operations (e.g., plowing, sanding, deicing)
- Right-of-way maintenance and special event cleanup
- Inspection and maintenance of stormwater infrastructure

Additional requirements include:

- A schedule for road sweeping and storm drain maintenance, prioritizing high-risk areas
- Proper handling and disposal of all waste and wastewater from maintenance activities
- Prohibition of discharges from vehicle or equipment washing to the storm drain system
- Coordination with the fire department to develop a spill prevention plan
- Maintenance of an inventory of floor drains in municipal buildings to ensure proper discharge locations

Implementation:

Draper City MS4 operation SOPs are established. Several SOPs are planned to be developed during the 2025-2026 permit year, and SOPs are updated as needed.

4.2.6.7. Contractors – Stormwater Compliance

Requirement: Ensure through contractually-required document and/or periodic site visits that contractors performing Operation and Maintenance activities for Draper City are using appropriate stormwater controls and following the City's SOPs, stormwater control measures, and good housekeeping practices.

Implementation:

Either the Draper City Storm Water Specialist or the Storm Water Compliance Inspector—both responsible for oversight inspections under Minimum Control Measure 3—will conduct monthly

inspections of Capital Improvement (CIP) projects to verify general stormwater compliance. If non-compliance is observed, the inspector will contact the Draper City project inspector or manager and/or the contractor's site contact to notify them of the issue, schedule a re-inspection, and document all actions and communications via email.

The development of an SOP for general stormwater compliance at these projects is under consideration.

4.2.6.8.-1 Water Quality Impact Assessment and Structural Control Design

Requirements: Implement a process to assess the water quality impacts and the design of all new flood management structural controls that are associated with Draper City or that discharge to the MS4.

Implementation:

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.

4.2.6.9. Retrofit Plan

Requirement: Develop a plan to retrofit existing developed sites that Draper City owns or operates that are adversely impacting water quality. The plan must be developed to emphasize controls that infiltrate, have evapotranspiration, or harvest and use stormwater discharges.

Include a ranking of retrofit sites based on the following criteria:

- Proximity to waterbody;
- Current assessment of waterbody with the goal to improve impaired waterbodies and protect unimpaired waterbodies;
- Hydrologic condition of the receiving waterbody;
- Proximity to sensitive ecosystem or protected area; and
- Any sites that could be further enhanced by retrofitting stormwater controls.

Implementation:

Draper City has developed a retrofit plan for all City-owned facilities, with each site prioritized based on the criteria specified in the permit.

4.2.6.10 Training

Requirement: Require all employees, contracted staff, and other responsible entities that have primary operation, or maintenance job functions that are likely to impact stormwater quality receive annual training.

Implementation:

Training is given to relevant new hires within 60 days, and annual training is given to all relevant staff.

Records of all training activities are maintained within the City's electronic filing system.

Best Management Practices

Requirement: The measurable goals for each of the BMPs shall include, at a minimum, the months and years in which Draper City will undertake required actions, including interim milestones and the frequency of the actions (if applicable).

Implementation:

BMP	Code
Housekeeping Processes	HP
Infrastructure Planning	IPL
Employee Training	ET

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

Ongoing Documentation

Requirement: Have an ongoing documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation.

The objective 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 BMPs.