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NOTICE OF MEETING

MEETING OF: **SERVICE COMMITTEE**
CALLED BY: JUSTIN TISDALE, CHAIR
DATE: **MARCH 28, 2022**
LOCATION: VIRTUAL MEETING
TIME: 5:00 P.M.
RE: STORMWATER MANAGEMENT PLAN

COMMITTEE/COUNCIL MEMBERS:

JOHN FAHSBENDER

JOE FRANK

MEMBERS OF COUNCIL:

SARA CONTINENZA

CHANELL ELSTON

RUTH GRAY

SUSAN HARDY

ADMINISTRATION:

ANDY BLACKLEY, CITY ENGINEER

JIM ANDERSON, SERVICE DIRECTOR

KEITH BENJAMIN, DIRECTOR OF COMMUNITY SERVICES

City of South Euclid, Ohio

MS4 Stormwater General Permit #3GQ00103*CG



Stormwater Management Program

Ohio EPA NPDES General Permit #OHQ000004

April 1, 2022

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List of Acronyms

In the preparation of this document, the following acronyms have been used:

BMP	Best Management Practice
CRWP	Chagrin River Watershed Partners, Inc.
CSWCD	Cuyahoga Soil and Water Conservation District
DO	Dissolved Oxygen
E&SC	Erosion and Sediment Control
EPA	Environmental Protection Agency
ECWC	Euclid Creek Watershed Council
GIS	Geographical Information System
GPS	Global Positioning Satellites
HSTS	Home Sewage Treatment System
MCM	Minimum Control Measure
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NEORS	Northeast Ohio Regional Sewer District
NOACA	Northeast Ohio Areawide Coordinating Agency
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SWMP	Stormwater Management Program
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids

Executive Summary

The previous NPDES Small MS4 general permit (#OHQ000002) required the development and implementation of a Stormwater Management Program that satisfied the appropriate water quality requirements of Ohio Revised Code (ORC) 6111 and the Clean Water Act. This document must identify and describe the best management practices (BMPs) the MS4 has selected to address the six MCMs in the permit, why those particular BMPs were selected by the MS4 in light of local water quality issues, and performance standards for BMP implementation. The six MCMs are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The NPDES Small MS4 permit was reissued on September 11, 2019 (#OHQ000004), and requires MS4 communities which are renewing coverage under this permit to update their SWMP to be consistent with #OHQ000004 and submit to Ohio EPA for review. #OHQ000004 requires that where applicable, BMPs shall be selected to address U.S. EPA approved TMDL recommendations for identified water quality problems associated with MS4 discharges within **City of South Euclid's** watersheds.

Legal Authorities to Implement the Stormwater Management Program

MUNICIPALITY

The **City of South Euclid** has the legal authority to implement the following Stormwater Management Program under Article XVIII, Section 3 of the Ohio Constitution granting municipalities the authority to adopt land use and control measures for promoting the peace, health, safety and general welfare of their citizens.

Financial Authorities to Implement the Stormwater Management Program

The **City of South Euclid** will fund the additional activities necessary to implement its SWMP through dollars from the general fund. Periodically, the Stormwater Management Committee will evaluate the SWMP and, if necessary, suggest alternative funding arrangements.

Overview of Community Stormwater System and TMDLs

The City of South Euclid is located in the Euclid Creek, Nine Mile Creek, Green Creek, and Dugway Brook watersheds. The City of South Euclid is 4.66 square miles in area and drains into Euclid Creek, Nine Mile Creek, and the Dugway Brook. (See attached map). The vast majority of the City is sewerage. Through the Regional 208 Plan, the City has determined that the three (3) remaining on-lot systems will be maintained and that no new on-site treatment systems will be installed. New sanitary sewer lines, as needed, will be constructed for new developments.

The City storm water system consists mostly of streets with curbs, gutters, and storm sewers; major conveyance culverts; a regional retention basin known as the Langerdale Retention Basin; some roadside ditches; and open creeks such as the Euclid Creek and portions of Nine Mile Creek. The City is located in the headwaters of Nine Mile Creek, Green Creek, and Dugway Brook, and most of the length of these creeks within the City limits are in enclosed storm sewers.

The subsequent watersheds in the City of South Euclid have had U.S. EPA-approved TMDL reports prepared for the following water quality problems and pollutants:

- Euclid Creek
 - Phosphorus, Habitat, Sediment/TSS

In order to maintain compliance with #OHQ000004, the City of South Euclid will use the recommendations made in the TMDLs for the above watersheds to better tailor our BMP selection to address noted water quality problems attributed to MS4 discharges.

Description of Program Development and Decision Process

To develop its SWMP, the City of South Euclid followed the steps outlined below:

1. **Assigned staff to participate in the Euclid Creek Watershed Program-Storm Water Management Work Groups:** In 2002 a Euclid Creek Watershed Storm Water Ordinance Task Force and Public Involvement/Public Education (PIPE) Work Group was formed which included representatives from each community in the watershed. The groups met monthly in 2002. Our City's representatives included the Public Service Director, and Andrew K. Blackley, P.E., City Engineer. Working with Euclid Creek Watershed Council, the Committee reviewed the general requirements of each MCM and discussed Best Management Practices (BMPs) to meet these general requirements.

Two public meetings were held in June, 2002. Approximately 75 residents attended to learn more about the work of the Euclid Creek Watershed Council and NPDES Phase II. These residents were also given an opportunity to discuss water quality concerns and possible actions to correct the problems.

On September 18, 2002 a meeting was held for elected officials, engineers, and service directors in the watershed to discuss the permit process and to present recommended Best Management Practices (BMPs) being suggested for the six MCMs.

Currently, the Mayor, Service Director, City Engineer, Building Commissioner, Economic Development Director, and Community Services Director comprise the Stormwater Management Committee which is responsible for the continuing implementation of the SWMP. The Committee is assisted by the Euclid Creek Watershed Coordinator.

2. **Reviewed the specific requirements of the Ohio EPA NPDES Phase II permit:** The City of South Euclid is predominantly residential in character and is an “inner ring” suburb of the City of Cleveland. Nearly all open land tracts were developed by the early 1960s. Redevelopment activities are encouraged and are beginning to occur.

After reviewing the general Phase II requirements and inventorying our existing Best Management Practices (BMPs), we examined the specific requirements of under each MCM. We determined the extent to which our current activities meet these specific requirements and selected additional BMPs to fill any short falls in our existing programs. Our BMPs were selected based on our financial and legal ability to implement these practices as well as their suitability for our community.

3. **Selected measurable goals and assigned responsible parties:** After BMPs were selected, we assigned these to specific staff and set dates for implementation. The Service Director and City Engineer worked with the Chagrin River Watershed Partners and Euclid Creek Watershed Council as well as the Cuyahoga County Board of Health and Cuyahoga Soil and Water Conservation District to prepare this current SWMP to comply with OHQ000004. See SWMP Table of Organization in the appendix.
4. **Finalized Storm Water Management Program:** Using the Draft developed by CRWP, we finalized our Storm Water Management Program in 2016. This document is the current version of that plan.
5. **Held Public Hearings:** The Council of the City of South Euclid the reviewed the original SWMP at a public meeting held on February 10, 2005. The Service Director and City Engineer presented revised Stormwater and Sediment Pollution Prevention Ordinances and discussed the revised draft SWMP for 2022 to the Service Committee of Council at a meeting on **March 28, 2022** for their review and comment. This is a publicly advertised meeting and was open for the public’s comments. See appendix for the meeting agenda.
6. **Approved:** The City of South Euclid Council approved the original SWMP on February 10, 2005.
7. **Updated:** The SWMP was updated April 1, 2022.

Stormwater Management Program

MCM 1: Public Education and Outreach

Program Responsibility and Oversight

The Public Service Director is responsible for the overall management and implementation of our public involvement and public education (PIPE) program. The Service Director and City Engineer, with assistance from the Euclid Creek Watershed Coordinator, report to the Stormwater Management Committee.

To assist in implementing our SWMP under MCM 1, we have entered into a joint Memorandum of Understanding with the Cuyahoga Soil and Water Conservation District (CSWCD) to provide a Euclid Creek Watershed Coordinator, Ms. Claire Posius, and receives additional assistance from the Chagrin River Watershed Partners. The MOU is attached in the SWMP Appendix and these partner organizations are listed in *Table 1*. The CSWCD's Education Program Staff prepares an annual Outreach Strategy document for our program that outlines the specific themes and activities they will be assisting us with for the year. A copy of the most recent Outreach Strategy document is included in the SWMP as an appendix annually.

CSWCD participates in the Northeast Ohio Public Involvement Public Education (NEO PIPE) committee. The NEO PIPE committee is a regional consortium of Soil and Water Conservation Districts, conservation organizations and other government agencies committed to improving water quality in Northeast Ohio. The group shares resources and publications, pursues grant funding for large-scale outreach initiatives, and strives to bring a unified message across Northeast Ohio. The NEO PIPE committee generates the themes for the 5-year permit term based on relevant TMDL issues that need to be addressed in the communities. CSWCD incorporates these regional NEO PIPE efforts into our overall PIPE program.

Rationale for Themes and Target Audience Selection

Our MS4 is located in the Euclid Creek watershed, which has TMDLs for sediment/TSS, nutrients (phosphorous and nitrogen), and habitat. We also have several other urbanized streams in our MS4. Because the majority of these pollution problems are caused by increases in impervious cover and the resulting increases in stormwater volume and velocity, we will focus much of our Public Education and Outreach program on increasing public awareness of the links between land use practices and stormwater pollution. We will target pollutant sources identified in our TMDL's, such as sediment pollution from stream bank erosion and improperly controlled construction sites and habitat alteration due to land use changes. Our education and outreach program focuses on addressing these pollutants. During the permit term, we will follow the themes detailed in *Table 1*.

Our community's population was 22,295 in the 2010 census. Our primary target audience is residential landowners as single-family residential comprise 77% of our community's land use, so their actions on their properties contribute significantly to stormwater runoff in our MS4. We also target the development community as they contribute significant amounts of sediment pollution to our MS4.

Rationale and Description of Chosen Mechanisms

Our primary mechanisms for delivery are the following:

- An article is included in our community newsletter, prepared by the CSWCD Education Program Staff. The newsletter is edited by our City Administrator and mailed to every residential address on a quarterly basis, reaching 100% of our population annually. It also includes upcoming

events for informing people of public involvement opportunities. A copy of the newsletter is included in the Appendix.

- Community display of education materials. Our community displays information provided to us by CSWCD in a display located in our City Hall and Service Department office. Materials on display include an annual poster, stormwater educational article related to the annual theme and any other materials provided to us by CSWCD.
- The *South Euclid Magazine* is mailed annually to the 9,542 households and to all businesses in the community. It includes a full page educational message related to the year's theme, with the goal of 100% being reached by the end of the five year permit cycle.
- Our community website, www.cityofsoutheuclid.com is updated by the South Euclid Webmaster and receives an average of 6,767 unique visitors a month. We have a "Euclid Creek Watershed Information" section on the website that is updated frequently with information relevant to the year's chosen theme, as well as archiving information from prior themes. Link: <http://www.cityofsoutheuclid.com/service/euclid-creek-watershed-information/>
- We estimate that the website reaches 20% of our population. We also include a link to CSWCD's Stormwater Education page
- (<http://www.cuyahogawcd.org/programs/stormwater-education>), which in turn links you to the education theme for the year (<http://www.cuyahogawcd.org/programs/lake-erie-starts-here>).
- Our community Facebook page, City of South Euclid, as of the date of this report, has 2,707 likes with 4,721 visitors. We also have a Twitter Page with 1,583 followers. The South Euclid Webmaster updates the Facebook page periodically with educational stormwater information and links to upcoming events. We estimate each post reaches 12% of our population.
- Community events, workshops and presentations. Some examples include our annual Pancake Breakfast. We also work with the CSWCD Education Program Staff to host stormwater related annual workshops on our relevant stormwater theme. CSWCD Education Program Staff also presents on stormwater related topics to civic groups, scout troops or schools as requested. Lastly, we promote annual county-wide teacher workshops to our local schools in order to educate our educators about nonpoint source pollution and watershed issues.

In addition to these primary mechanisms, we may use other mechanisms such as posters, flyer mailings, permit inserts or new resident outreach mailings. Any additional mechanisms used will be tracked and documented by the Service Directors Assistant for reach and success, and included in the annual reporting to Ohio EPA. Our measurable goal is to reach a minimum of 50% of our MS4 population over five years, using a minimum of five themes with at least two mechanisms of delivery for each theme. If it does not appear that these objectives are being reached, the program will be re-evaluated and different mechanisms will be selected to meet our measurable goal.

Table 1: Public Education and Outreach Program Summary

MCM 1: Public Education and Outreach					Community TMDLs:					
2021-2026 Overall Theme: Lake Erie Starts Here - Everyone lives in a watershed, and in Cuyahoga County everyone lives in the Lake Erie watershed. Because of this watershed connection, our activities at home, at school, at work, and throughout the community directly impact not only Lake Erie, but also our local waterways. Outreach and involvement activities will identify this connection and provide recommendations and opportunities to make a positive watershed impact to various target audiences.					Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
Performance Standards: Must use more than one mechanism of delivery to residents. Must use at least 5 different themes, one of which must be for the development community. Must reach at least 50% of the population by the end of the permit cycle.					Nutrients	Habitat	Bacteria	TSS/sediment	DO/Org Enrich	Flow
Theme	Target Audience(s)	Mechanisms for Delivery (minimum of 2)	Schedule and Measurable Goal	Responsible Party						
<p>Message 1 (Winter): Sensible Salting Road salt directly impacts aquatic life when it runs off into local streams. By adopting alternative deicing techniques and sensible salting strategies, the amount of road salt reaching local waterways will be reduced.</p>	<p>Homeowners (salting driveways and sidewalks) Parking lot owner/operator/managers and their contractors Community Service Director and Service Department Staff</p>	<p>Targeted mailings, quarterly newsletters, annual theme-based poster and educational materials available at community locations, presentations to target audiences, pledges and point-of-decision reminders for residents (such as sensible salting messages on salt scoops).</p>	<p>At least 10% of residents will receive a message about sensible salting around the home.</p> <p>At least 50% of parking lot owners/operators/managers will receive a message about salt management.</p>	<p>CSWCD Education Program Staff</p>		X				
<p>Message 2 (Spring): Backyard Conservation Small changes in lawn care, landscaping and soil health management practices can lead to local water quality improvements. Converting lawn areas to native trees, shrubs, rain gardens, wildflowers or prairie grasses improves soil health, increases rain water infiltration and reduces pollution from lawn runoff. Rain Barrels improve water quality by reducing stormwater</p>	<p>Homeowners, Commercial/Industrial/Institutional Property-owners (including schools and places of worship), Landscapers, Community Leaders, Community Staff</p>	<p>Will include placement of theme-based poster and distribution of printed educational materials at the community hall or other appropriate facility, placement of articles in community newsletters and Cuyahoga SWCD newsletter, and on community and Cuyahoga SWCD websites. All materials, as well as additional information and guidance will be housed on the Cuyahoga SWCD Stormwater Education web page. All outreach materials will direct readers to this page for additional information.</p>	<p>At least 10% of the community's residents will be reached with a message about Backyard Conservation.</p> <p>At least 25% of the other targeted audiences will be reached with a message about Backyard Conservation specifically developed for that audience.</p>	<p>CSWCD Education Program Staff</p>	X	X	X	X	X	X

MCM 1: Public Education and Outreach					Community TMDLs:					
2021-2026 Overall Theme: Lake Erie Starts Here - Everyone lives in a watershed, and in Cuyahoga County everyone lives in the Lake Erie watershed. Because of this watershed connection, our activities at home, at school, at work, and throughout the community directly impact not only Lake Erie, but also our local waterways. Outreach and involvement activities will identify this connection and provide recommendations and opportunities to make a positive watershed impact to various target audiences.					Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
Performance Standards: Must use more than one mechanism of delivery to residents. Must use at least 5 different themes, one of which must be for the development community. Must reach at least 50% of the population by the end of the permit cycle.					Nutrients	Habitat	Bacteria	TSS/sediment	DO/Org Enrich	Flow
Theme	Target Audience(s)	Mechanisms for Delivery (minimum of 2)	Schedule and Measurable Goal	Responsible Party						
runoff and therefore the delivery of pollutants to the storm sewer system.		Targeted mailing of brochure/fact sheet. Workshops and presentations. Native seed/plant sales through Cuyahoga SWCD.								
Message 3 (Summer): Waste – There Is No Away Waste materials that are improperly managed or disposed of negatively impact water quality and aquatic ecosystems.	Residents, Community Staff, Pet-owners, Licensed Drivers, Restaurants and other businesses, Golf Courses (nuisance geese), homeowners associations (nuisance geese)	Placement of theme-based poster and distribution of printed educational materials at the community hall or other appropriate facility, placement of articles in community newsletters and Cuyahoga SWCD newsletter, and on community and Cuyahoga SWCD websites. All materials, as well as additional information and guidance will be housed on the Cuyahoga SWCD Stormwater Education web page. All outreach materials will direct readers to this page for additional information. Additionally: •Targeted mailings to residents (including conservation easement boundary residents, if applicable) – proper leaf disposal, dog owners, golf courses, Homeowners Associations and restaurants. •Pledges: Stow It-Don't	At least 10% of the community's residents will be reached with a "Waste – There Is No Away" message, including how to report illegal dumping. 100% of licensed dog owners in the community will be reached with a message about managing pet waste. 75% of golf courses and Homeowners Associations for which contact info is available in the community will be reached with a message about practices for discouraging geese.	CSWCD Education Program Staff	X	X	X	X	X	X

MCM 1: Public Education and Outreach 2021-2026 Overall Theme: Lake Erie Starts Here - Everyone lives in a watershed, and in Cuyahoga County everyone lives in the Lake Erie watershed. Because of this watershed connection, our activities at home, at school, at work, and throughout the community directly impact not only Lake Erie, but also our local waterways. Outreach and involvement activities will identify this connection and provide recommendations and opportunities to make a positive watershed impact to various target audiences.					Community TMDLs: Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
Performance Standards: Must use more than one mechanism of delivery to residents. Must use at least 5 different themes, one of which must be for the development community. Must reach at least 50% of the population by the end of the permit cycle.					Nutrients	Habitat	Bacteria	TSS/Sediment	DO/Org Enrich	Flow
Theme	Target Audience(s)	Mechanisms for Delivery (minimum of 2)	Schedule and Measurable Goal	Responsible Party						
		Throw It, Pick Up Poop •Dog Photo Contest •Distribute Pick Up Poop signs/materials at community offices and events	100% of restaurant operators will be reached with a message about proper grease disposal.							
Message 4 (Fall): Trees Trees intercept and infiltrate rainwater before it can be converted to runoff. Properly planting and maintaining native trees reduces runoff and improves water quality.	Homeowners /Residents, Community Leaders and Staff, Landscapers, Businesses, Developers, Schools, Religious Institutions, Large Property-owners	Tree-planting and maintenance mailing to residents - mailed to 10% of households in the community about proper tree planting and maintenance Tree Planting and Maintenance Pledge – An online pledge will be developed, through which residents can pledge to plant and care for trees. Articles & Fact Sheets - Development and publication of at least 1 article or fact sheet on tree planting and maintenance and at least 1 article on soil amendments for distribution by community in print and online. Workshops – Workshops will be conducted on proper planting, propagation and maintenance techniques.	Over the course of the permit term, at least 10% of households will receive a message about proper tree planting and maintenance.	CSWCD Education Program Staff	X	X	X	X	X	X
Message 5: We all live in a	General public,	Teachers - Annual county-wide teacher workshop	At least one teacher	CSWCD Education	X	X	X	X	X	X

MCM 1: Public Education and Outreach					Community TMDLs:					
2021-2026 Overall Theme: Lake Erie Starts Here - Everyone lives in a watershed, and in Cuyahoga County everyone lives in the Lake Erie watershed. Because of this watershed connection, our activities at home, at school, at work, and throughout the community directly impact not only Lake Erie, but also our local waterways. Outreach and involvement activities will identify this connection and provide recommendations and opportunities to make a positive watershed impact to various target audiences.					Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
Performance Standards: Must use more than one mechanism of delivery to residents. Must use at least 5 different themes, one of which must be for the development community. Must reach at least 50% of the population by the end of the permit cycle.					Nutrients	Habitat	Bacteria	TSS/Sediment	DO/Org Enrich	Flow
Theme	Target Audience(s)	Mechanisms for Delivery (minimum of 2)	Schedule and Measurable Goal	Responsible Party						
watershed and our actions on the land directly affect the quality of our water.	teachers/students	<p>will be offered to school districts serving the community.</p> <p>Students – School-based and/or civic group presentations and/or an annual poster contest will be made available to school districts serving the community.</p> <p>General Public - Workshops and presentations. Placement of theme-based poster and distribution of printed educational materials at the community hall or other appropriate facility, placement of articles in community newsletters and Cuyahoga SWCD newsletter, and on community and Cuyahoga SWCD websites. All materials, as well as additional information and guidance will be housed on the Cuyahoga SWCD Stormwater Education web page. All outreach materials will direct readers to this page for additional information.</p>	<p>workshop will be offered each year.</p> <p>Opportunities for presentations will be made available to civic, scout and/or student groups in the community. This may include community displays and participation at special events.</p>	Program Staff						

Program Evaluation

CSWCD and our community will conduct public opinion and awareness surveys in 2017 and 2019 with the goal of evaluating public knowledge and awareness of stormwater issues and to what extent the public has adopted appropriate BMPs .

As part of the Euclid Creek Watershed Program (ECWP), the Euclid Creek Watershed Council, of which our community is a member, holds meetings of its PIPE Committee two times a year. The first meeting of the year is to discuss the annual theme and to get ideas for new programs, feedback from past programs and to plan for the year to come. There is a mid-year update where the CSWCD Education Program Staff emails the PIPE Committee an update of program activities for each community in order to receive feedback from the group. And the second meeting of the year is a combined program-wide meeting to discuss accomplishments and challenges of the education program over the past year. The PIPE Committee is made up of representatives and residents from the ECWC communities and is a public meeting.

MCM 2: Public Involvement and Participation

Program Responsibility and Oversight

The Public Service Director is responsible for the overall management and implementation of our public involvement and public education program. The Service Director and City Engineer, with assistance from the Euclid Creek Watershed Coordinator, report to the Stormwater Management Committee.

Each year, the Stormwater Management Committee evaluates progress on the public involvement and participation program. They will review the year's involvement event(s) for type of target audience involvement and amount of public participation.

To assist in implementing our public involvement activities under MCM 2, we have entered into a joint Memorandum of Understanding with the Cuyahoga Soil and Water Conservation District (CSWCD) and the Euclid Creek Watershed Council (ECWC). This MOU is attached in the SWMP Appendix. The CSWCD's Education Program Staff prepares an annual Outreach Strategy document for our program that outlines the specific involvement events (also listed in *Table 2*) they will be assisting us with for year. An example of an Outreach Strategy document from the CSWCD is included in the SWMP Appendix.

As part of the Euclid Creek Watershed Program, the Euclid Creek Watershed Council holds meetings of its PIPE Committee two times a year. The first meeting of the year is to discuss the annual theme and to get ideas for new programs, involvement events, feedback from past programs success and to plan for the year to come. There is a mid-year update where the CSWCD Education Program Staff emails the PIPE Committee an update of program activities for each community in order to receive feedback from the group. And the second meeting of the year is a combined program-wide meeting to discuss accomplishments and challenges of the involvement program over the past year. The PIPE Committee is made up of representatives and residents from the ECWC communities and is a public meeting.

Public Involvement and Participation in the SWMP Process

Our Stormwater Management Committee hosts **semi-annual** meetings which are open to the public and serve as a forum for the public to express concerns and offer future enhancements to the SWMP. In addition the Committee reports to Council, most recently at a Service Committee meeting held on **March 28, 2022**. A meeting agenda is included in our MCM 2 Appendix.

The City's plan to actively involve the public in the development and implementation of our program involves organizing one public involvement event per year to build awareness of local watershed and stormwater issues and to provide opportunity for anyone to positively impact the watershed.

The following Council Committee deal with stormwater and related issues in the community: Service Committee. Concerns raised at this Committee meeting inform decisions related to target audiences and delivery mechanisms as outlined in the annual outreach strategies. These Committee meetings are open to the public.

Primary Involvement Audiences and Rationale

As described in our MCM 1 rationale, our primary audience will be homeowners as residential and open land/parks comprise over **83%** of our community's land use. We will work with individual landowners, homeowner's associations, block clubs, other residential groups to help involve our residential population in our stormwater program. We also believe engaging and involving children in environmental programs is an important component of sustaining a successful long-term program, so

we have established relationships with local scout troops and work with teachers, troop leaders, program administrators at our schools to involve their students in stormwater-related activities.

Involvement Activities and Rationale

During this permit cycle, we will offer a minimum of five public involvement activities as described in Table 2.

These activities were primarily chosen based on their ability to improve in-stream habitat and reduce nutrient pollution, and sediment, which are noted in our *watershed TMDLs* as issues of concern. Other public involvement activities not listed below may be included during the permit term to fulfill minimum requirements based on TMDL applicability, availability of resources and local opportunities. Additional detail is annually described in the Outreach Strategy provided in January by CSWCD. Events held will be included in the Annual Report to Ohio EPA.

Table 2: Public Involvement and Participation Program

MCM 2: Public Involvement and Participation			Community TMDLs: Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
<u>Performance Standards:</u> Must hold a minimum of 5 public involvement and participation activities over the permit term.			Nutrients	Habitat	Bacteria	TSS/Sediment	DO/Org Enrich	Flow
Activity	Schedule and Measurable Goal	Responsible Party						
Stream Cleanup Event	At least one stream cleanup per year, with at least 10 participants.	Service Director, CSWCD Education Program Staff	X	X		X	X	X
Rain Barrel Installation & Rain Barrel Art	At least one Rain Barrel Workshop will be conducted in the Community. Each participant will construct a rain barrel to install at their residence.	Service Director, CSWCD Education Program Staff	X					X
Watershed-friendly Landscaping and Sustainable Land Management	At least 1 commercial or institutional property owner or 2 community residents will install and/or maintain native plant gardens, rain gardens or other sustainable landscapes, including reduction of turf areas, and/or a least 5 residents will utilize soil test kits to assess lawn/soil health.	Service Director, CSWCD Education Program Staff	X	X		X	X	X
Tree Planting, Maintenance, Propagation, Pledges and Giveaways	Conduct at least one tree-planting, giveaway or maintenance event.	Service Director, CSWCD Education Program Staff		X				X
Green Yards & Healthy Homes workshop	Conduct at least one hands-on workshop, where participants will create their own environmentally-friendly lawn care and household cleaning products for use;	Service Director, CSWCD Education Program Staff	X				X	

MCM 2: Public Involvement and Participation			Community TMDLs: Organic Enrichment/DO, Nutrients, Siltation, Habitat, Bacteria					
Performance Standards: Must hold a minimum of 5 public involvement and participation activities over the permit term.			Nutrients	Habitat	Bacteria	TSS/Sediment	DO/Org Enrich	Flow
Activity	Schedule and Measurable Goal	Responsible Party						
	reaching at least 10 residents.							
Storm Drain Stenciling & Storm Drain Art	Conduct at least one storm drain stenciling event; number of participants and numbers of storm drains stenciled will be tracked.	Service Director, CSWCD Education Program Staff	X	X	X	X	X	
Citizen Participation in Watershed Planning and Management	At least one citizen participates in water quality monitoring or serves on the board of a community-based watershed organization, and/or at least 5 citizens provide input on a watershed or stormwater management plan for the community/watershed.	Service Director, CSWCD Education Program Staff	X	X	X	X	X	X
Pledges	At least 10 citizens participate in a stormwater-related Pledge to perform activities that benefit water quality. Pledge themes include: Litter, Sensible Salting, Tree Planting and Maintenance, Dog Poop, Watershed Champion (sustainable landscaping).	Service Director, CSWCD Education Program Staff	X	X	X	X	X	X

Public Information for Involvement Opportunities

We primarily inform the public of our involvement and participation events through our community website and newsletter. The website has a link on the main page as well as a calendar that is updated weekly by our Webmaster and the site receives an average of 6767 unique visitors a month. Our community newsletter includes upcoming events for the public and is mailed to every resident on a quarterly basis. Other mechanisms, depending on event, may include event-specific flyers to be handed out at our annual Rock the Block, Harvest Fest, Open House and other public events, or distributed at public locations such as the Library or City Hall. Our Stormwater Management Committee meetings, which are open to the public, are announced in compliance with State and local public notice requirements. Our community has an educational display set up in our City Hall and Service Department Office to display stormwater educational materials provided by CSWCD, which include the annual poster, newsletters, educational flyers and brochures, involvement events, and more.

The City's Service Department maintains a dedicated phone line to receive resident complaints and violation reports. Any relevant complaints are compiled by the City's Service Director and investigated and a report documenting the resolution is generated and kept on file at the City. The City Engineer and Building Commissioner are responsible for any resulting enforcement action and escalation, such as a notice of violation or a stop work order. Any calls to CSWCD related to illicit discharge will be routed to the City's Service Department for follow up and tracking. CSWCD will assist with illicit discharge outreach as requested by City. The Cuyahoga County Board of Health facilitates education related to MCM 3.

Program Evaluation

CSWCD and our community will conduct public opinion and awareness surveys in 2023 and 2025 with the goal of evaluating public knowledge and awareness of stormwater issues and to what extent the public has adopted appropriate BMPs. Individual involvement activities will include a post-activity survey to gauge whether awareness of stormwater issues increased as a result of the program.

Also, as part of the Euclid Creek Watershed Program, our PIPE Committee meets twice a year to plan for the upcoming program year and to discuss successes and challenges of the year. From these meetings, which are open to the public, the existing SWMP is evaluated for programmatic success. BMPs that are deemed unsuccessful are replaced or revised and enhanced. Specific BMPs to address watershed TMDLs are points of discussion and a list of preferred BMPs are rationalized and compiled.

MCM 3: Illicit Discharge Detection and Elimination

Adoption of Illicit Discharge Detection and Elimination Ordinance

Our community adopted *Chapter 1329, Illicit Discharge And Illegal Connection Control* ordinance on September 14, 2009 that prohibits illicit discharges into the MS4. We chose this mechanism as it is the most efficient and enforceable way to prohibit illicit discharges to the MS4. A copy of the ordinance is included in the SWMP Appendix.

Development and Update of the Storm Sewer and Comprehensive Storm Sewer System Maps

Our community has mapped our HSTS locations into a storm sewer map and the stormwater collection system into a comprehensive storm sewer system map using the County GIS mapping as the base. Our named receiving waters for our MS4 drainage are, in order of relative size, the Euclid Creek, Nine Mile Creek, Dugway Brook, and Green Creek. Outfalls were located using existing topography supplemented by GPS field ground verification of outfall pipes by The Cuyahoga County Board of Health. The storm and sanitary sewer maps were completed in 2005. Both maps are maintained by the City Engineer who updates them annually to include any HSTS removals, catch basins, pipes, ditches, flood control facilities, and public and private post-construction water quality BMPs installed to satisfy Ohio EPA's NPDES Construction General Permit or local post-construction water quality BMP requirements. The 2015 comprehensive storm sewer system map is included in the SWMP Appendix. Updated copies of the map are available on request at the City Engineer's office.

Determination of Priority Areas

Initial dry-weather screening of all outfalls was completed during the #OHQ000002 permit period by the County Board of Health, and priority areas have been determined based on age of infrastructure, flow rates, fecal coliform or *E. coli* counts and other data. Every year, the Board of Health conducts a dry-weather outfall screening of these priority areas first, and we prioritize identification and elimination of illicit discharges in these areas. Additionally, we screen 20% of our other outfalls per year with the measurable goal of 100% of all outfalls screened by the end of each permit term. We implement this enhanced BMP to address our watersheds TMDLs for nutrient pollution. Any illicit discharges identified in the non-priority areas may be added to the priority area map and prioritized for elimination depending on the severity of the discharge and recommendations of the Board of Health. Areas which received HSTS discharges and are scheduled for installation of new sanitary sewers were noted and were not prioritized since the HSTS would be eliminated.

Enforcement and Escalation Procedures for Illicit Discharges and Illegal Dumping and Spills

The City has an MOU with the CCBH, who is responsible for locating illicit discharges and they also assist the City Service Department with tracking, and eliminating illicit discharges. The City will issue orders to eliminate the discharges and enforce corrective action under their authority according to the following enforcement procedure under Section 1329.14 Enforcement, of Codified Ordinance 1329: Illicit Discharge and Illegal Connection Control.

1329.14 ENFORCEMENT.

(a) Notice of Violation. Whenever the City finds that a person has violated a prohibition or failed to meet a requirement of this chapter, the City may order

compliance by written notice of violation to the responsible person. Such notice may require without limitation:

- (1) The performance of monitoring, analyses, and reporting;
 - (2) The elimination of illicit connections or discharges;
 - (3) That violating discharges, practices, or operations shall cease and desist;
 - (4) The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property;
 - (5) Payment of a fine to cover administrative and remediation costs; and
 - (6) The implementation of source control or treatment BMPs.
- (b) Deadline for Remediation or Restoration. If abatement of a violation and/or restoration of affected property is required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said notice shall further advise that, should the violator fail to remediate or restore within the established deadline, the work will be performed by a designated governmental agency, or a contractor, and the expense thereof shall be charged to the violator.
(Ord. 43-09. Passed 9-14-09.)

The following procedure is used for identifying and correcting illicit discharges in previously established priority areas and any newly identified areas that meet priority criteria:

1. CCBH personnel visit all outfalls in the priority area during dry weather (at least 72 hours after the last rainfall of 0.10 inches or more) to observe which are flowing.
2. For any flowing outfalls the CCBH personnel record any odorous or visual observations.
3. CCBH personnel visit these "suspect" outfalls and perform field tests to determine if sampling is warranted.
4. Outfalls with an E. coli count of 576 colony forming units (CFU) per 100 ml are placed on a list for further investigation and elimination.
5. Priority areas determined from the previous round of screening and any new outfalls that meet the priority criteria are targeted first for elimination.
6. Where the collection system is open ditches, the Service Department personnel along with the City Engineer will visually track the flow back to the source.
7. Where the collection system is piped, Service Department/Cuyahoga County Department of Public Works personnel use a closed circuit television camera to search for connections that are contributing flow.
8. Where discharges are traced back to a corporate boundary line, the upstream community is notified of our findings.
9. Illicit dischargers within the community are sent notices ordering corrective action to remove the source of the discharge. The Director of Public Service and the Building Commissioner will coordinate on notice and mitigation of required correction actions.

The following procedure is used for illegal dumping and spills:

1. Action will be initiated when a spill or dumping is reported to any community staff.
2. Hazardous materials are referred to the Fire Department for clean-up in conjunction with the procedures and guidelines in the Ohio EPA's Emergency Response Program, found here: <http://www.epa.state.oh.us/derr/ersis/er/er.aspx>. A copy of the South Euclid Fire

Department Policies and Procedures, Guidelines for a Hazardous Materials Call is included in the appendix.

3. Other spills and small scale dumping are referred to the Service Department for cleanup.
4. The offending party receives educational material on the impacts of spills and illegal dumping to stream and wetland habitat, which addresses our watershed's noted TMDL for habitat degradation. We have developed educational flyers through our MOU with the Watershed Organization and all violators receive a brochure. A copy of the flyer is included in the SWMP Appendix. Repeat offenders are referred to the Police Department for investigation and possible citation.
5. Large-scale spills and illegal dumping are reported to Ohio EPA and the Police Department for investigation and possible citation. We follow the guidelines and procedures outlined in Ohio EPA's Emergency Response Program, found here:
<http://www.epa.state.oh.us/derr/ersis/er/er.aspx>.

Coordination with MCMs 1 and 6

Our plan coordinates our MCM 3 program with our MCM 1 and MCM 6 programs. The "Lake Erie Starts Here" theme described earlier in MCM 1 will also educate the public on the environmental impacts of illicit discharges to the storm system through an article in our quarterly community newsletter, which every resident receives. All municipal facilities subject to our Pollution Prevention and Good Housekeeping program receive annual staff training on MCM 6 held by our Watershed Organization that includes training on identifying illicit discharges and disposing of waste properly at their facilities.

Program Responsibility and Oversight

The Service Director is responsible for the overall management of the illicit discharge detection and elimination program. The Director meets once a year with the Board of Health to review the IDDE plan and ensure clear communication and implementation of the IDDE plan. We selected this enhanced BMP to our program to address our watersheds TMDLs for TSS/sediment, nutrient, habitat pollution. The Service Director and the Stormwater Management Committee meet once a year in conjunction with the annual reporting to Ohio EPA and evaluate the success of this plan by ensuring the following objectives are met:

- Annual updates to the storm sewer map as needed to include catch basins, pipes, ditches, flood control facilities, public and private post-construction water quality BMPs installed to satisfy Ohio EPA's NPDES Construction General Permit or local post-construction water quality BMP requirements;
- Implementation and enforcement of the IDDE code according to the schedule and procedure defined in the code;
- All outfalls receiving a dry weather screening by the end of the full permit term (enhanced BMP to address nutrient TMDLs); and
- Annual training for municipal staff on IDDE protocol.
- A measurable goal of all illicit discharges eliminated within a year of their identification.

Our goals were selected to reflect TMDL recommendations, permit requirements, current practices, and staff capacity to implement the BMPs.

Table 3: Illicit Discharge Detection and Elimination Program

MCM 3: Illicit Discharge Detection and Elimination program		
Required BMP	Schedule and Measurable Goal	Responsible Party
Ordinance or other regulatory mechanism that prohibits illicit discharges and illegal dumping to the MS4	Adopted Sept. 14, 2009	City Council
Maintain and continue updating the MS4 map on an annual basis (i.e., outfalls, names and locations of surface waters that receive discharges from those outfalls, catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Stormwater general permit and/or local stormwater management code requirements.	Annual review of map to ensure all necessary updates are made	City Engineer
Develop and maintain a list and map of Sewage Treatment Systems that discharge to the MS4	Annual review of list and map to ensure all necessary updates are made	City Engineer and Cuyahoga County Board of Health
Prioritization schedule for ongoing dry-weather screening of outfalls	Annual review to determine if procedure is being followed correctly	Director of Public Service, Cuyahoga County Board of Health
Implement IDDE plan that clearly defines responsible parties for investigating and resolving confirmed sources of illicit discharges, including escalation enforcement plan	Enforcement and implementation of the adopted IDDE code	Director of Public Service, Cuyahoga County Board of Health
Train street, service, public works, building, and parks and recreation staff to identify sources of illicit discharge	Annual training in conjunction with MCM 6 for municipal staff	Director of Public Service, Watershed Organization

Enhanced BMP	TMDL Applicability	Schedule and Measurable Goal	Responsible Party
All dry-weather outfalls screened during the permit term	Addresses watersheds TMDL recommendations for nutrients.	100% of dry weather outfalls screened within each 5-year permit term	Director of Public Service, Cuyahoga County Board of Health
Hold regular meetings between the County Board of Health staff and the Director of Public Service to ensure proper communication and implementation of IDDE plan	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients, habitat, and low DO/organic enrichment.	A minimum of one (1) yearly meetings between the Public Service Department and County Board of Health	Director of Public Service, Cuyahoga County Board of Health

MCM 4: Construction Site Stormwater Runoff Control

Update of Erosion and Sediment Control Ordinance

In 2016, we reviewed our existing Erosion and Sediment Control code and updated it for compliance with the latest NPDES Construction General Permit (#OHC000004), following the model ordinance developed by Chagrin River Watershed Partners, Inc. The updated code was adopted on November 28, 2016. A copy of the code is found in the SWMP Appendix.

Our community has adopted special requirements in our Erosion and Sediment Control (ESC) code to reduce runoff and erosion and address TMDLs. A summary of these special requirements is as follows:

- Require a Pre-Construction Meeting between the City Engineer, Building Commissioner, Cuyahoga County Soil and Water Conservation District, developer and contractor no less than seven days prior to soil-disturbing activity at the site.
 - Erosion and Sediment Control Section 1326.06(f)
 - Applicable TMDLs: habitat, sediment/TSS, and flow.
- Require bond or deposit to be deposited with the Finance Department for the minimum amount of \$1,500.00, plus any additional \$1,500.00 per disturbed acre of land to cover the cost to fully stabilize (vegetate) the construction site in the event of non-performance.
 - Erosion and Sediment Control Section 1326.12(a)
 - Applicable TMDLs: habitat, sediment/TSS, nutrients, and dissolved oxygen.
- Require stormwater pollution prevention plan for all commercial and industrial site development or for projects less than one acre.
 - Erosion and Sediment Control Section 1326.05(a)
 - Applicable TMDLs: habitat, sediment/TSS, nutrients, flow and dissolved oxygen.

Procedures for Stormwater Pollution Prevention Plan (SWP3) Review

Our requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites are established in SWP3s which are reviewed by the City Engineer and the Cuyahoga County SWCD and must be approved prior to any work commencing on the site. We have chosen to require a full SWP3 be developed and implemented for all commercial and industrial site development, which addresses our watersheds TMDLs for habitat, sediment/TSS, nutrients. For residential sites that disturb less than one acre, an abbreviated SWP3 is required. The City Engineer may require a full SWP3 for these sites at their discretion. Section 1326.05 of our Erosion and Sediment Control ordinance details the general requirements for SWP3 development, and a copy of the ordinance is in the SWMP Appendix. Additional site-specific requirements may be mandated at the City Engineer's discretion. Work is not allowed to commence until a fully-approved SWP3 is in place. Section 1326.08 of our ordinance outlines the required elements of a SWP3, which must take into account potential water quality impacts from construction. Our community averages about 3 to 6 active sites per year that must have SWP3s or abbreviated SWP3s prepared and approved.

In addition, our community requires a pre-construction meeting between the City Engineer, Building Commissioner, Cuyahoga County Soil and Water Conservation District, developer and contractor and any other principal parties no less than seven days prior to soil-disturbing activity

at the site to ensure that erosion and sediment control devices are properly installed, limits of disturbance and buffer areas are properly delineated, and construction personnel are aware of such devices and areas. We chose this enhancement to our SWMP to address watersheds TMDLs for habitat, sediment/TSS, nutrients.

Construction Site Inspection, Enforcement Procedures

We have a MOU with the Cuyahoga County SWCD for the provision of an ESC Inspector for the inspection of construction sites. Active construction sites are inspected on a monthly basis by the Cuyahoga County SWCD. All active construction sites are inspected at least once prior to final inspection. Inspections may be more frequent on a priority basis, determined by the City Engineer and based on the Cuyahoga County SWCD recommendations. Factors affecting the Cuyahoga County SWCD priorities are soil type, slope of land, amount of acreage disturbed, and quality of receiving water body. Letters are sent to non-compliant contractors, and follow-up inspections are conducted by the Cuyahoga County SWCD with enforcement referred to the Building Commissioner where necessary. The Cuyahoga County SWCD notifies the City Engineer, Building Commissioner and contractors when erosion control measures are deficient, and the Building Commissioner enforces the Erosion and Sediment Control code against contractors who do not meet the requirements of the approved SWP3 using the following enforcement and escalation procedures:

Description of Enforcement Escalation Protocol

- **Starting project without approval of SWP3 and ESC Plan:**

If earth moving or clearing occurs on a project site proposing disturbance of one (1) acre or greater, within the City, without approval of an SWP3, including an Erosion and Sediment Control Plan, no matter how small of an area is cleared or disturbed, the Building Commissioner will issue a "First Notice of Violation" (NOV1). The NOV1 shall contain the section(s) of the City's Codified Ordinances that have been violated and factual data supporting the violation. Once the NOV1 has been issued, the Building Commissioner, along with the City's Engineer and ESC Inspector, will schedule a meeting with the property owner, contractor, developer and consulting engineer. At this meeting the individuals will be informed of the reasoning behind the violation(s) and the process they will be required to follow to obtain approval for the construction activity. If not corrected within two (2) weeks the City's Building Commissioner, in consultation with the City's Engineer and ESC Inspector, may issue a Stop Order per Ch.1301.33.

- **Project started with all proper federal, state, local and zoning permits:**

- *First noncompliant inspection (Finding of Violation):*

The ESC Inspector will perform an inspection of the project site. If the inspection shows noncompliance, the ESC Inspector will provide an inspection letter to the property owner, contractor, developer and consulting engineer and the City's Building Commissioner and Engineer explaining the actions needed to correct the deficiencies. This inspection letter will outline the violations and explain that

if the property owner, contractor, developer and consulting engineer do not work to achieve site compliance, then a NOV1 will be issued by the City's Building Commissioner. The ESC Inspector will perform a follow up inspection no later than two (2) weeks after the date of the first inspection. This will be used at the ESC Inspector's discretion, if he/she feels the site requires work, but is not posing a large threat to water quality.

o *Second noncompliant inspection, issuing and posting a NOV on-site:*

If a second noncompliant inspection occurs, the ESC Inspector will notify the City's Building Commissioner. The City's Building Commissioner will issue and post a Second Notice of Violation (NOV2) on-site and the property owner, contractor, developer and consulting engineer will be provided a copy of the NOV2. Thereafter, a meeting will be scheduled with all responsible parties to discuss the NOV2. It is recommended that no work continue until the site is in compliance with the outlined violations.

The ESC Inspector's report shall accompany the second noncompliance inspection and shall be of the same nature as the previous noncompliance report but will specify, if not previously set forth, the Sections of the City's Codified Ordinances being violated due to site deficiencies. It is recommended that a call be placed to the property owner, contractor, developer and consulting engineer to explain the seriousness of the report and findings of the second noncompliant inspection and NOV2. Compliance shall be requested no later than thirty (30) days unless a specific earlier time frame is set forth in the NOV2. The ESC Inspector will then continuously perform follow up inspections, reports and letters throughout the thirty (30) day time frame to monitor any progress in correcting the deficiencies. Each inspection will be performed no later than two (2) weeks after the previous inspection.

o *Second NOV letter timing:*

Before a NOV2 may be issued on-site thirty (30) days must lapse from the issuance of the NOV1 unless the seriousness of the deficiencies requires more immediate enforcement action. Fifteen (15) days must lapse from the issuance of the NOV2 before proceeding with formal administrative enforcement unless the seriousness of the deficiencies requires more immediate enforcement action.

o *Formal Administrative Enforcement for continuous noncompliance:*

When in the professional judgment of the ESC Inspector, with the approval of City's Engineer, circumstances surrounding an enforcement action warrant an escalated response, the City Engineer will present documented evidence provided by the ESC Inspector to the City Engineer, to the Building

Commissioner detailing the violations and requesting the Building Commissioner immediately issue a Stop Order (SO) per Ch. 1301.33.

If the City's Building Commissioner issues a SO with detailed violations and penalties the ESC Inspector should post the SO on-site until such time as all violations have been corrected. Only after the Building Commissioner receives a written report from the ESC Inspector, approved by the City Engineer documenting compliance, may the Building Commissioner terminate and remove the SO per Ch. 1301.33.

Penalty: City Codified Ordinance 1326.99

(a) Any person, firm, entity or corporation; including but not limited to, the owner of the property, his agents and assigns, occupant, property manager, and any contractor or subcontractor who violates or fails to comply with any provision of this regulation is guilty of a misdemeanor of the third degree and shall be fined no more than five hundred dollars (\$500.00) or imprisoned for no more than sixty (60) days, or both, for each offense. A separate offense shall be deemed committed each day during or on which a violation or noncompliance occurs or continues.

(b) The imposition of any other penalties provided herein shall not preclude South Euclid from instituting an appropriate action or proceeding in a Court of proper jurisdiction to prevent an unlawful development, or to restrain, correct, or abate a violation, or to require compliance with the provisions of this regulation or other applicable laws, codified ordinances, rules, or regulations, or the orders of South Euclid.

Per Section 1326.12 (a) a minimum bond of one thousand five hundred dollars (\$1,500.00) plus an additional one thousand five hundred dollars (\$1,500.00) for each subsequent acre or fraction thereof will be used for South Euclid to perform the obligations otherwise to be performed by the owner of the development area as stated in Ordinance 1326 and to allow all work to be performed as needed in the event that the applicant fails to comply with the provisions of this regulation. This bond addresses the watersheds TMDLs for TSS/sediment, nutrients, habitat, and low DO/organic enrichment.

Residents can contact the City via email or by phone to report violations. Complaints are forwarded to the City Engineer and/or Service Department who will investigate along with the Cuyahoga SWCD with whom the City has a MOU. The person making the complaint may be contacted to inform them of the findings of the investigation.

Program Responsibility and Oversight

The Building Commissioner is responsible for overall management and implementation of our construction site stormwater control program. Success under this MCM is evaluated through the milestones identified in Table 4. Many of the BMPs selected have specific schedules and timeframes for completion required either in the Erosion and Sediment Control ordinance or as part of the MS4 permit. An annual review is performed by the Building Commissioner, the City Engineer and the Stormwater Management Committee in conjunction with the required annual reporting to Ohio EPA to evaluate the program and determine if the schedules and timeframes set are being achieved. Our goals were selected to reflect TMDL recommendations, permit requirements, current practices, and manpower requirements of the BMPs.

Table 4: Construction Site Stormwater Control Program

MCM 4: Construction Site Stormwater Runoff Control		
Required BMP	Schedule and Measurable Goal	Responsible Party
Update existing construction runoff control code to meet or exceed the requirements of the NPDES Construction General Permit (OHC000004), including the federal effluent limitations in Part II.	Adopted updated CRWP model code on November 28, 2016	Building Commissioner, City Engineer and City Council
Ensure the most current erosion, sediment and non-sediment control BMP standards are required to be utilized (e.g., Rainwater and Land Development)	Adopted updated CRWP model code on November 28, 2016	City Engineer
Complete Stormwater Pollution Prevention Plan (SWP3) reviews and approval prior to construction commencement	All SWP3s reviewed and approved prior to construction	City Engineer, Cuyahoga County SWCD
Conduct monthly site inspections throughout construction, as well as a final site inspection to ensure correct implementation of erosion, sediment and non-sediment control BMPs in the approved SWP3	All active sites inspected monthly and a final site inspection completed	Cuyahoga County SWCD
Implement enforcement escalation plan that outlines how and when we address noncompliance with approved erosion, sediment, and non-sediment control plans	Enforce procedures for noncompliance outlined in erosion and sediment control code and Ch. 1301.33.	Building Commissioner, Cuyahoga County SWCD
Implement a standard operating procedure to respond to complaints	Continue to implement complaint procedures as established in SWMP rationale	Building Commissioner, City Engineer, Service Department, Cuyahoga County SWCD

Enhanced BMP	TMDL Applicability	Schedule and Measurable Goal	Responsible Party
Require on-site protected areas (i.e. wetlands, riparian areas, other valuable resources) to be physically marked in the field prior to commencement of earth disturbing activities	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients and habitat.	Update erosion and sediment control code to include this requirement by December 22, 2016	Building Commissioner, Cuyahoga County SWCD
Require MS4 compliance inspectors to provide a written report of findings to construction site operators for every site inspection; the report will summarize compliance and non-compliance matters and establish deadlines for corrective action	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients and habitat.	Establish this procedure in MOU with Cuyahoga SWCD and update erosion and sediment control code to include this requirement by December 22, 2016	Building Commissioner, Cuyahoga County SWCD
Require a sediment and erosion control bond equivalent to the cost to stabilize (vegetate) disturbed areas of the sites in cases of nonperformance (i.e. developer foreclosure/bankruptcy)	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients and habitat.	Update erosion and sediment control code to include this requirement by December 22, 2016	Building Commissioner, Cuyahoga County SWCD

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

Update of Comprehensive Stormwater Management Ordinance

City Council adopted a revised and updated comprehensive stormwater management regulation on November 28, 2016 that addresses both stormwater quality and quantity and encourages the use of low impact development practices on commercial and institutional areas. The ordinance has been updated to be compliant with the technical requirements set forth in the Ohio EPA NPDES Construction General Permit #OHC000004 and the Ohio EPA NPDES Small Municipal Separate Storm Sewer System General Permit #OHQ000004. A copy of our ordinance is included in the SWMP Appendix.

Our community has adopted special requirements in our Chapter 1324 “Comprehensive Stormwater Management” (CSM) code to improve stormwater management, promote the use of green infrastructure and address TMDLs. Code provisions include:

- Require stormwater management for all commercial and industrial site development or for projects less than one acre
 - Comprehensive Stormwater Section 1324.05(a)
 - Applicable TMDLs: habitat, TSS/sediment, nutrients, flow and dissolved oxygen.
 - Rationale: The City has specifically chosen to prioritize SCMs that reduce the temperature of stormwater because our MS4 is in a watersheds with coldwater habitat streams that are threatened by heated stormwater from upstream development or redevelopment.
- Require use of stormwater control measures to reduce the temperature of runoff for development projects in watersheds draining to coldwater habitat streams.
 - Comprehensive Stormwater Section 1324.09(C)(2)(e)
 - Applicable TMDL: habitat
 - Rationale: The City has specifically chosen to prioritize SCMs that reduce the temperature of stormwater because our MS4 is in a watersheds with coldwater habitat streams that are threatened by heated stormwater from upstream development or redevelopment.
- Credit volume reduction attained through low impact development stormwater control measures toward peak discharge requirements.
 - Comprehensive Stormwater Section 1324.09(D)(3)(a)(8)
 - Applicable TMDLs: flow, habitat, nutrients, dissolved oxygen .
 - Rationale: The City has specifically chosen to prioritize SCMs that reduce the temperature of stormwater because our MS4 is in a watersheds with coldwater habitat streams that are threatened by heated stormwater from upstream development or redevelopment.

Comprehensive Stormwater Management Program Overview

We use a combination of planning activities, education, non-structural and structural practices to address post-construction stormwater runoff from new development and redevelopment projects

Our community is a residential community with well-defined commercial and institutional developments. Our water quality concerns are those defined in our watersheds TMDLs: sediment/TSS, nutrients, and habitat degradation. These concerns are related to increases in stormwater runoff as impervious cover increases and include sedimentation due to streambank erosion, increased flooding due to increases in stormwater volume, increases in stormwater temperature in detention facilities, and habitat loss as riparian and wetland areas are impacted by development.

Our community is a member of the Euclid Creek Watershed Council (ECWC) and works with ECWC on identifying and implementing local stream restoration and stormwater retrofit projects outlined in the *Euclid Creek Watershed Action Plan* to improve post-construction water quality and restore and maintain pre-development runoff conditions.

We feel that education on structural and non-structural stormwater BMPs for landowners, developers, planners, engineers, and others is necessary to support the implementation of our comprehensive stormwater management program. We provide this education through our membership in the ECWC, who work with our Storm Water Committee to provide educational post-construction opportunities. As members of the ECWC, we participate in educational workshops designed to inform both professionals and the general public of stormwater management techniques that can reduce TSS/sediment, nutrient pollution, and habitat degradation, which are identified as pollutants of concern for our watersheds.

Structural BMPs in the Program

Our community allows for various structural water quality measures such as bioretention cells, sand filters, infiltration trenches, and permeable pavements through the adoption of our comprehensive stormwater management regulation. We promote infiltrative stormwater management practices as a way to restore a more natural hydrology, improve water quality, and mitigate stormwater runoff in our watershed, as recommended in our TMDL. Our comprehensive stormwater management ordinance is enforced and updated to be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Construction Permit #OHC000004, and a copy of the ordinance is included in the SWMP Appendix. Existing structural BMPs mapped in our community include the following:

- Bio-Retention Cells
- Dry Extended Detention Basins
- Detention Basins
- Permeable Pavements/ Pavement Area Reduction
- Grass/Vegetative Swales
- Underground Detention Storage

These BMPs are mapped and documented in our Comprehensive Storm Sewer System map, a copy of which is included in the SWMP Appendix. The map is updated by the City Engineer on an annual basis to ensure all new BMPs are noted.

Non-Structural BMPs in the Program

The non-structural mechanisms we use to address post-construction runoff from new developments and redevelopment include our riparian setback ordinance and an improved comprehensive storm water management ordinance. We chose these mechanisms because they address our TMDL water quality concerns which are related to increases in storm water runoff as land is developed. These mechanisms provide flexibility to landowners, while ensuring that new impervious cover is minimized; the flood control, erosion control, and water quality functions of our watercourses and wetlands are maintained; and that when stormwater is created, it is managed for both quality and quantity.

Our community adopted a Riparian and Wetlands Setback ordinance, Chapter 780, on June 9, 2008. This ordinance follows the CRWP model and a copy is included in the SWMP Appendix. It directly addresses our watersheds TMDL recommendations for TSS/sediment, nutrients, and habitat degradation. Review and enforcement of the riparian setback is the responsibility of our Building Commissioner, who reviews any proposed development plans for compliance with the setback ordinance and evaluates any variance requests. Any new development or redevelopment, regardless of acreage, is required to comply with the setback unless a variance is requested and granted.

In addition to protecting contiguous natural areas in our MS4 through zoning, our community has a long history of preserving open space. The City currently has approximately 183 acres (6.2%) of land area which is green space or recreation. This land performs stormwater control functions for both water quality and quantity.

Non-structural BMPs including riparian and wetland setbacks are maintained as any other setbacks in South Euclid. As with all setbacks, landowners proposing activities in setbacks must request a variance and this request is reviewed, modified, and approved or disapproved by the Building Commissioner, the City Engineer, and the Planning and Zoning Commission. When considering variance requests, the Planning and Zoning Commission may consider the extent to which the requested variance impairs the flood control, erosion control, water quality protection or other functions of the riparian setback based on technical and scientific data. The ordinance states that soil disturbing activities permitted in the setback through variance should minimize clearing and use BMPs to minimize and control erosion and sediment and that variances should not be granted for asphalt or concrete paving. The Planning and Zoning Commission prioritizes granting variances where feasible to other area or setback requirements in order to maintain the riparian setback.

BMP Inspection and Maintenance Procedures and Enforcement

Structural BMPs created through our improved stormwater management regulation are maintained by post-development landowners. If these landowners do not complete necessary operation and maintenance, the City will reserve the right to complete this work and assess these landowners. An Inspection and Maintenance Agreement is required by the City to be in place for every applicable site that delineates responsibilities for maintenance of post-construction BMPs, including requiring the establishment of funds to support the maintenance of the BMPs. The Agreement is required to be established as part of the Comprehensive Stormwater Management Plan outlined in Section 1324.12 of our Comprehensive Stormwater Management ordinance and is reviewed for compliance by the City Engineer prior to the

issuance of a building permit by the Building Commissioner. Copies of the Inspection and Maintenance Agreements are kept on file at the Building Department. A sample Inspection and Maintenance Agreement along with guidance for Post Construction SCM Inspection and Maintenance Plans are included in the SWMP Appendix.

The owner must inspect structural stormwater BMPs regularly as described in the Inspection and Maintenance Agreement. The City along with the Cuyahoga SWCD has the authority to conduct inspections as necessary with prior notification of the property owner, to verify that the BMPs are being maintained and operated in accordance with our Comprehensive Stormwater Management ordinance. If a deficiency or violation is noted, the City Building Commissioner with help from the City Engineer and Cuyahoga SWCD gives a written notification to the responsible party detailing the need for maintenance or compliance. Once notified, the responsible party has either five working days or other mutually agreed-upon time to make repairs or submit a plan with detailed action items and established timelines for the City Engineer to approve. If the repairs are not made or an approved plan is not in place within this time, City staff may undertake the necessary repairs and assess the responsible party. The same sample notification letter as for erosion and sediment control violations would be used and is included in the SWMP Appendix.

Program Evaluation and Oversight

The City Engineer is responsible for overall management and implementation of our post-construction stormwater management program, with site inspection and plan review assistance from the County SWCD. We evaluate the success of this minimum measure through our ability to continue to implement our comprehensive stormwater management regulation and our riparian setback regulation, and ensuring that Inspection and Maintenance Agreements are in place and enforced for all relevant sites. The City Engineer meets with the Stormwater Committee annually to report on the success of these goals. Our goals were selected to reflect TMDL recommendations, permit requirements, current practices, and manpower requirements of the BMPs.

Table 5: Post-Construction Stormwater Management Program

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment		
Required BMP	Schedule and Measurable Goal	Responsible Party
Update existing stormwater management code to meet or exceed the requirements of NPDES OHC000004, including the federal effluent limitations in Part II	Review and adopt updated CRWP model code by December 22, 2016	City Council, City Engineer
Ensure the most current post-construction BMP standards are required to be utilized (e.g., Rainwater and Land Development)	Review and adopt updated CRWP model code by December 22, 2016	City Council, City Engineer
Complete Stormwater Pollution Prevention Plan (SWP3) reviews and approval prior to construction commencement; ensure SWP3 includes an executed Maintenance Agreement and Long-Term Maintenance Plan for post-construction SCMs	100% of SWP3 plan reviews approved prior to construction where larger common plan of disturbance/sale disturbs one or more acres	City Engineer, Law Department, Building Department, County SWCD
Conduct monthly site inspections throughout construction, as well as a final site inspection to ensure correct implementation of post-construction BMPs in the approved SWP3	All active sites inspected monthly and a final site inspection completed	Building Commissioner, County SWCD
Establish a program to ensure long-term maintenance of post-construction SCMs including a protocol for enforcement escalation of stormwater management codes	Enforce procedures for establishment of I&M and noncompliance as established in stormwater management code	Building Commissioner, City Engineer

Enhanced BMP	TMDL Applicability	Schedule and Measurable Goal	Responsible Party
Enforce our riparian setback ordinance.	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients, and habitat.	Continue to enforce community riparian setback legislation passed on June 9, 2008.	Building Commissioner, City Engineer
Require soil preservation and post-construction soil restoration.	Addresses watersheds TMDL recommendations for flow and habitat.	Update stormwater management code to include this requirement by December 22, 2016	Building Commissioner, City Engineer
Require use of stormwater control measures to reduce the temperature of runoff for development projects in watersheds draining to coldwater habitat streams.	Addresses watersheds TMDL recommendations for habitat.	Update stormwater management code to include this requirement by December 22, 2016	Building Commissioner, City Engineer
Require stormwater management for all commercial and industrial site development	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients and habitat.	Update stormwater management code to include this requirement by December 22, 2016	Building Commissioner, City Engineer
Credit volume reduction attained through low impact development stormwater control measures toward peak discharge requirements.	Addresses watersheds TMDL recommendations for nutrients and habitat.	Update stormwater management code to include this requirement by December 22, 2016	Building Commissioner, City Engineer
Require redevelopment projects to manage greater than 20% of the water quality volume and incentivize infiltration-based SCMs for redevelopment.	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients and habitat.	Update stormwater management code to include this requirement by December 22, 2016	Building Commissioner, City Engineer

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

Pollution Prevention/Good Housekeeping Program Overview

The Service Director inventories municipal activities throughout the MS4 that may impact stormwater. These include:

1. Vehicle maintenance:
 - a. All vehicle maintenance occurs under roof in the Service Garage. Maintenance includes oil changes and vehicle lubrication, brake jobs and repairs.
2. Salt application:
 - a. The City has adopted a sensible salting program that reduces the amount of road salt applied. A copy of the program is included in the appendix.
3. Catch Basin cleaning:
 - a. The City cleans approximately one quarter of the total number of catch basins annually. Debris removed is taken to the Service Garage where it is dewatered and then disposed in an approved landfill.
4. Street sweeping :
 - a. The City contracts to have the streets swept at least twice a year.
5. Recycling location for household hazardous waste:
 - a. The City works with the local solid waste district to collect household hazardous waste at least once a year. This hazardous material is store in a storage building located on the service department site until it can be disposed of properly.
6. Composting facility:
 - a. The City composts yard waste such as leafs and brush at the Service Department site and works with the Cuyahoga County Board of Health to keep this facility in compliance.

The Service Department sweeps streets twice every year (weather permitting) or more often as needed. A general street sweeping schedule and description of the equipment used is included in the SWMP Appendix. Storm sewer catch basins are generally equipped with sumps and traps that prevent most objectionable material from entering the MS4. These are cleaned on an as-needed basis by the Service Department based on quarterly inspections. A copy of the inspection report form is included in the SWMP Appendix. Street sweeping and catch basin cleaning are enhanced BMPs we have chosen to address our TMDLs for TSS/sediment and nutrients.

All community-owned parking lots have catch basins with sumps that are cleaned on a regular basis (see above) by Service Department staff. Vehicles are repaired and maintained within an enclosed facility at the Service Department. Engines and other component parts designated for disposal are not allowed to remain in uncovered storage. Oils and other fluids from maintenance activities are collected and disposed of by a licensed contractor. The debris from catch basin cleaning is allowed to drain before being transported to an approved landfill. All salt used by the community is stored under cover in an enclosed structure at the Service Department Annex. In this permit cycle, the Service Director, with technical assistance from ECWC and the CCBH will direct the evaluation of all of our municipal parking lots by the end of the permit term to locate and use snow disposal areas where there are wide vegetative buffers or within berms. This is an enhancement to our program that will address our watersheds TMDLs for TSS/sediment, nutrients, and habitat degradation.

Facilities Subject to Pollution Prevention/Good Housekeeping Program

Our facilities subject to the PPGH program include the following:

- Service Department
 - 4224 Monticello Boulevard
 - Summary of activities/procedures at facility include indoor and outdoor material and equipment storage, road salt storage, dewatering of catch basin debris, leaf and brush collection before transfer to an approved composting facility, vehicle fueling and maintenance.

- Municipal Center/ Police and Fire Station:
 - 1349 South Green Road
 - Summary of activities/procedures at facility include vehicle fueling and washing.

A SWP3 is prepared for each of our facilities and a copy is kept on file at each facility as well as with the Service Director. Each facility SWP3 is updated to be compliant with the SWP3 requirements stated in the Ohio EPA Industrial Stormwater General Permit.

Evaluation of Flood Management Projects

For any flood management projects undertaken by municipal staff, construction and maintenance activities within the jurisdictional waters of the United States are done in compliance with Sections 402 and 404 of the Clean Water Act. Plans and specifications of such activities requiring permits and NOI are forwarded to the Ohio EPA and the US Army Corps of Engineers when appropriate. We require the use of sediment and erosion control measures on all municipal projects per our Erosion and Sediment Control ordinance. The City Engineer and the Service Director review municipal projects as appropriate to determine the feasibility of additional water quality protection devices and practices.

Municipal Staff Training

The Service Director coordinates with the ECWC, CCBH, Ohio EPA, OSHA, and ODOT to secure available employee training materials and ensure they are up to date and relevant to the community operations. An example of a past training seminar is included in the SWMP Appendix. The Service Director is responsible for the scheduling and organization of the training. We partner with ECWC, CRWP, and CCBH to provide a minimum of one training per year to community staff on MCM 6, including how to identify illicit discharges and handle hazardous spills. The Service Director is responsible for the overall management and implementation of our Pollution Prevention/Good Housekeeping program, and reports to the Stormwater Committee on an annual basis for program evaluation.

Program Evaluation and Oversight

The Service Director is responsible for management and oversight of the Pollution Prevention/Good Housekeeping program. Where distinct milestones are noted for BMPs under this MCM, they are tracked by the responsible parties noted in the below table. The Service Director meets with the Stormwater Committee for an annual review in conjunction with the annual reporting required by Ohio EPA to evaluate whether these specific milestones and other ongoing BMPs are being met. Our goals are selected to reflect TMDL recommendations, permit requirements, current practices, and manpower requirements of the BMPs. The Stormwater

Committee evaluates the success of these BMPs with the Service Director and suggests changes if warranted.

Table 6: Pollution Prevention/Good Housekeeping for Municipal Operations Program

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations Program			
Required BMP		Schedule and Measurable Goal	Responsible Party
Update and implement facility SWP3s to reflect minimum requirements of the Ohio EPA General NPDES Permit for Stormwater Associated with Industrial Activities (OHR000004): perform quarterly routine facility inspections, quarterly visual assessment of stormwater discharges, and annual comprehensive site inspection with annual report		Update all required SWP3s to be compliant by December 22, 2016	Service Director
Implement pollution prevention and good housekeeping practices at the following municipally-operated facilities: streets, roads and highways; municipal parking lots; maintenance and storage yards (including but not limited to municipal composting facilities and leaf collection yards); parks, and related maintenance facilities, compost facilities, fleet and/or maintenance shops; salt/sand storage locations; and snow disposal areas		Continue to implement SWP3 procedures at all relevant municipal facilities	Service Director
Conduct annual staff training for pollution prevention/good housekeeping		One annual training to managers and staff of all relevant municipal facilities	Service Director and CRWP and CCBH
Enhanced BMP	TMDL Applicability	Schedule and Measurable Goal	Responsible Party
Conduct street sweeping program on municipal streets	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients.	100% of streets swept at least twice a year.	Service Director
Locate snow disposal areas where there are wide vegetative buffers or within berms	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients, and habitat.	Identify and establish new snow disposal areas wherever feasible at municipal facilities by December 22, 2016	Service Director

At community-owned and operated facilities, maintain, protect and restore permanent natural vegetative buffers between developed areas and water resources	Addresses watersheds TMDL recommendations for TSS/sediment, nutrients, and habitat.	Identify, restore, and maintain buffers wherever feasible at all municipal facilities by end of permit term	Service Director
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Review and Update of the Stormwater Management Program

We perform an annual review of our SWMP in conjunction with preparation of the annual report to Ohio EPA required under Part IV.C of the MS4 Permit #OHQ000004. Any proposed additions to the SWMP during the life of the permit are made upon written notification to Ohio EPA. Changes replacing an ineffective or infeasible BMP specifically identified in the SWMP with an alternate BMP are requested of Ohio EPA according to the procedure outlined in accordance with Part V.G of the MS4 Permit #OHQ000004 and include the following information:

1. An analysis of why the BMP is ineffective or infeasible (including cost prohibitive),
2. Expectations on the effectiveness of the replacement BMP, and
3. An analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.

Unless specifically denied by Ohio EPA, the requested changes proposed in accordance with the criteria above shall be deemed approved and may be implemented 60 days from submittal of the request.

Evaluating, Record Keeping and Reporting

Through the procedures established in each MCM rationale, we evaluate our program compliance, the appropriateness of identified BMPs, and progress toward achieving identified measurable goals and satisfying the performance standards. We retain copies of all reports and documentation required by Part IV.B.1 of the MS4 Permit #OHQ000004 and will retain and make our required documentation accessible to the public if requested to do so in writing according to Part IV.B.2 of the MS4 Permit OHQ000004. For the 5-year term of the permit, yearly reports are prepared detailing the progress of our community in meeting the measurable goals of the program using the reporting forms provided by Ohio EPA. Reports are filed annually in accordance with the requirements of Part IV.C of the MS4 Permit #OHQ000004.

Appendices

- Appendix 1: Table of Organization
- Appendix 2: Euclid Creek Watershed Council MOU
- Appendix 3: South Euclid – Voice of the City, Spring 2022 News Letter w/CSWCD Flyer (Pg.18)
- Appendix 4: Cuyahoga Soil and Water Conservation District Flyers
- Appendix 5: South Euclid Stormwater Public Involvement & Public Education (PIPE) Program 2022 Outreach Strategy
- Appendix 6: South Euclid Service Committee, March 28, 2022 Meeting Agenda
- Appendix 7: Chapter 1329: Illicit Discharge and Illegal Connection Control Ordinance

- Appendix 8: Cuyahoga County Board of Health MOU

- Appendix 9: Storm Sewer Atlas and Outfall Map
- Appendix 10: Illicit Discharge Detection and Elimination Manual, A Guidance Manual for Municipalities in the State of Ohio, The Cuyahoga County Board of Health Watershed Protection, July 2006
- Appendix 11: NEORSD Illicit Discharge Detection & Elimination Manual, October 18, 2013.
- Appendix 12: South Euclid Fire Department Policies and Procedures for Hazardous Material Calls.
- Appendix 13: Illegal Dumping - Identifying and Taking Action Flyer
- Appendix 14: Chapter 1326: Erosion and Sediment Control Ordinance
- Appendix 15: Chapter 1324: Comprehensive Storm Water Management Ordinance.

- Appendix 16: Chapter 780: Riparian Wetlands Setback Ordinance.
- Appendix 17: Model Post Construction SCM Inspection and Maintenance Agreement and Guidance for Post Construction SCM Inspection and Maintenance Plans
- Appendix 18: *Service Department* Municipal Operations Pollution Prevention/Good Housekeeping Program
- Appendix 19: *Fire Department* Municipal Operations Pollution Prevention/Good Housekeeping Program
- Appendix 20: Cuyahoga County Service Directors Sensible Salting Practices Resolution

- Appendix 21: CCBH PPGH for Municipal Operations Sample Training Activity