



*City of Naples*

STREETS & STORMWATER

TELEPHONE (239) 213-5000 • FACSIMILE (239) 213-5010  
295 RIVERSIDE CIRCLE • NAPLES, FLORIDA 34102

July 20, 2021

Sent via email

NPDES Stormwater Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station 2500  
Tallahassee, FL 32399-2400

Subject: Year 2 Annual Report  
City of Naples Phase II Municipal Separate Storm Sewer System (MS4)  
NPDES Permit ID Number FLR04E080

Dear Mr. Maron:

Please find attached the completed City of Naples Year 2 Annual report which covers February 5, 2020 through February 4, 2021. The City of Naples conducts independent monitoring and the report summarizing those results is also attached for reference.

Please let me know if you have any questions.

Sincerely,

Katie Laakkonen  
Environmental Specialist  
City of Naples  
(239) 213-7122

Cc: Gregg Strakaluse, Director, Streets & Stormwater Department

*Ethics above all else... Service to others before self... Quality in all that we do.*

**NPDES ANNUAL REPORT  
Phase II MS4 Permit ID # FLR04E080**

**PHASE II MS4 ANNUAL REPORT for Permit Year :**  1  2  3  4  5 **Other:** \_\_\_\_\_

Instructions for completing this form:

- Complete Sections I through V and submit to the Department to fulfill the annual reporting requirement under the Generic Permit for Discharge of Stormwater from Phase II Municipal Separate Storm Sewer Systems, Rule 62-621.300(7)(a), F.A.C.
- The numbering and references to Best Management Practices (BMPs) on the Annual Report Form should reflect the information given in the MS4's Notice of Intent (NOI) form previously submitted to the Department. **PLEASE REFER TO ORIGINAL AND APPROVED PHASE II MS4 NOI SUBMITTAL WHILE COMPLETING SECTION II OF THIS FORM.** Proposed changes to the approved SWMP shall be indicated in Section III of this form.
- When complete, submit this Annual Report form to the following address:  
 NPDES Stormwater Section  
 Florida Department of Environmental Protection  
 2600 Blair Stone Road  
 M.S. 2500  
 Tallahassee, FL 32399-2400.
- Do **NOT** include any attachments **EXCEPT** for Monitoring Data in Section IV, if applicable.

**SECTION I. PHASE II MS4 OPERATOR INFORMATION**

<b>A.</b>	Name of the Phase II MS4 Operator: <b>City of Naples</b>		
<b>B.</b>	Name of the Phase II MS4 Responsible Authority: <b>Gregg R. Strakaluse, P.E.</b>		
	Title: <b>Director, Streets &amp; Stormwater Department</b>		
	Mailing Address: <b>295 Riverside Circle</b>		
	City: <b>Naples, Florida</b>	Zip Code: <b>34102</b>	County: <b>Collier</b>
	Telephone Number: <b>239-213-5000</b>		
<b>C.</b>	Name of the Designated Phase II MS4 Stormwater Management Program Contact: <b>Gregg Strakaluse, P.E.</b>		
	Title: <b>Director</b>		
	Department: <b>City of Naples Streets &amp; Stormwater Department</b>		

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	Mailing Address: <b>295 Riverside Circle</b>		
	City: <b>Naples, Florida</b>	Zip Code: <b>34102</b>	County: <b>Collier</b>
	Telephone Number: <b>239-213-5003</b>		
	E-mail Address: <b>gstrakaluse@naplesgov.com</b>		
<b>D.</b>	Location of the Phase II MS4 (if different than the mailing address in Section I.C. above): <b>Same as above.</b>		
	Street Address: <b>Same as above.</b>		
	City: <b>Same as above.</b>	Zip Code: <b>Same as above.</b>	County: <b>Same as above.</b>

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<b>SECTION II. MINIMUM CONTROL MEASURE (check only one)</b>		
1. <input type="checkbox"/> Public Education and Outreach	3. <input type="checkbox"/> Illicit Discharge Detection/Elimination	5. <input type="checkbox"/> Post-construction Stormwater Management (optional)
2. <input type="checkbox"/> Public Involvement/Participation	4. <input type="checkbox"/> Construction Site Stormwater Runoff Control	6. <input type="checkbox"/> Pollution Prevention/Good Housekeeping

**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Indicate the Phase II MS4 status of compliance in terms of progress toward each of the measurable goals described in the generic permit. Refer to the NOI for a list of the specific BMPs and Measurable Goals the Phase II MS4 committed to perform and track. Changes which will result in deviation from the NOI should be listed in Section III of this form. Include activities for all reporting periods (permit years) in this section. A summary of results is expected for the current reporting period but may be added to results from previous annual report periods. A summary of results is not expected for future reporting periods, but the anticipated BMPs, measurable goals and schedules for future reporting periods should be provided in this section.

Element ID/BMP #	A		B	C	D
	BMP Description		Measurable Goals	Schedule for Implementation/Completion	Summary of Results
1a 01	Fertilizer and Irrigation Education and Outreach: Develop and conduct education and outreach efforts pertaining to proper fertilizer and irrigation practices		1. Develop education & outreach efforts pertaining to proper fertilizer & irrigation practices 2. Implement program. Document & report the number of outreach activities conducted 3. Document and report the number of outreach materials distributed	1. Year 1 2. Years 2-5 3. Years 2-5	1. Education brochures were created for proper Fertilizer/Irrigation practices and for Illicit Discharges. A fertilizer calculator was also developed that incorporates reclaimed water usage. All were made available on City website 2. Two classes were taught (Rookery Bay) with 181 participants total, 5 classes were taught (UF IFAS) with 67 attending (16 classes via zoom open to Collier County residents) 3. Educational materials were distributed to all 248 participants in addition to outreach materials accessed via the City's website
1a 02	Maintain and update the City's web page on Stormwater Management and Natural Resources: Provide a stormwater program information page with links to state and other relevant existing City websites		1. Document and report the number of stormwater-related web page hits per year	1. Annually	1. 720 page views were documented for the Stormwater Management Page

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**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A BMP Description	B Measurable Goals	C Schedule for Implementation/Completion	D Summary of Results
1a	03	Stormwater Drain Decals: Install/replace stormwater drain decals that were placed throughout the City	1. Document and report the number of new/replaced decals  2. Document and report the total number of decals installed	Years 1-5 on an as needed basis	1. 2 new decals were installed 2. 2 new decals were installed

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**SECTION II. MINIMUM CONTROL MEASURE (check only one)**

- |  |  |  |
|--|--|--|
| 1. Public Education and Outreach           | 3. Illicit Discharge Detection/Elimination     | 5. Post-construction Stormwater Management |
| 2. <u>Public Involvement/Participation</u> | 4. Construction Site Stormwater Runoff Control | 6. Pollution Prevention/Good Housekeeping  |

**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A	B	C	D
		BMP Description	Measurable Goals	Schedule for Implementation/Completion	Summary of Results
2a	01	Public Involvement in Policy, SWMP, and Ordinances: The City will involve the public in policy decisions related to SWMP, such as revisions to the SWMP and relevant ordinances. Public input meetings are noticed via email and posting flyers in public places	1. Document and report the number meetings where SWMP-related policy decisions are on the agenda 2. Document and report the number of publicly noticed comment opportunities 3. Document and report the number of meeting attendees	1. Annually	1. Stormwater code was updated and over 20 public meetings were held to gather input. Code now requires increased stormwater treatment/retention and an increased stormwater permit fee. 2. 8 meetings were publicly noticed, 5 being City Council meetings 3. There were approx. 180 attendees total
2a	02	Public Workshops & Presentations: Inform the general public including business groups, neighborhood associations, clubs and elected officials about stormwater management rules, regulations, management practices, permitting and projects. Input through public comment opportunities are heard and considered during the meetings. Council meetings are publicly noticed on the City's website 1 week in advance	1. Document and report the number of Council Workshops conducted (all are broadcasted on local TV government channel) 2. Number of City Council meetings addressing stormwater issues 3. Document and report the number of neighborhood association meetings and their attendees	1. Annually	1. There were 49 publicly noticed City Council meetings held 2. 24 items that were on City Council agendas were relating to Stormwater 3. Neighborhood association meetings were limited due to COVID-19 restrictions, however, 6 Presidents Councils comprising multiple associations were held and 2 of those covered stormwater topics. Many one-on-one interactions took place with residents with 33 occurring for one stormwater project on 3 <sup>rd</sup> St.

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<b>SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES</b>					
<b>Element ID/BMP #</b>		<b>A BMP Description</b>	<b>B Measurable Goals</b>	<b>C Schedule for Implementation /Completion</b>	<b>D Summary of Results</b>
2a	03	Coastal Clean-Up Program: The City of Naples coordinates coastal cleanups with volunteers. This local program is scheduled with the International Coastal clean-up event held in over 900 Florida locations. It is publicly noticed through Keep Collier Beautiful email blasts, website, & TV commercials	1. Document and report the number of volunteers and the amount of trash collected	Annually in September	1. Events were canceled due to COVID-19 restrictions. It is anticipated that events will resume this coming September.
2a	04	Bay Days /Great American Clean-up: City of Naples coordinates volunteers to participate in the annual event to pick-up trash and debris. The program is similar to the Coastal Clean-up event. It is publicly noticed through Keep Collier Beautiful email blasts, website, & TV commercials	1. Document and report the number of volunteers and the amount of trash collected	Annually in April	1. Events were canceled due to COVID-19 restrictions. It is anticipated that events will resume this coming April. An additional coastal cleanup was scheduled for July 5 <sup>th</sup> , 2021

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**SECTION II. MINIMUM CONTROL MEASURE (check only one)**

- |                                     |  |  |
|-------------------------------------|--|--|
| 1. Public Education and Outreach    | <input checked="" type="checkbox"/> 3. Illicit Discharge Detection/Elimination | 5. Post-construction Stormwater Management |
| 2. Public Involvement/Participation | 4. Construction Site Stormwater Runoff Control                                 | 6. Pollution Prevention/Good Housekeeping  |

**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A BMP Description	B Measurable Goals	C Schedule for Implementation/ Completion	D Summary of Results
3a	01	Outfall Map: Continue improvement of the Geographic Information System that contains detailed information on the City's existing stormwater drainage collection & conveyance system. Map shows locations of known outfalls along with the receiving surface waters. Collect field information about each of the 12 City drainage basins to improve and refine map	<ol style="list-style-type: none"> <li>1. Document and report the percentage of the entire stormwater collection and conveyance systems mapped in the GIS database</li> <li>2. Document and report through mapping, the number of new, consolidated &amp; net total outfalls</li> </ol>	Annually	<ol style="list-style-type: none"> <li>1. Approximately 24% of the entire stormwater collection and conveyance system were verified and mapped in the GIS database</li> <li>2. 7 new outfalls were verified and mapped, net total outfalls = 349.</li> </ol>
3b	01	Illicit Discharge Ordinance: Enforcement of existing City of Naples Article VII, Chapter 52; Article III, Section 16-115; Article VIII, Section 16-291; Article I, Section 42-5; regarding illicit discharges into the storm sewer system and illegal dumping. Ordinance pertaining to discharge of pollutants will be evaluated and clarified regarding illicit discharge	<ol style="list-style-type: none"> <li>1. Evaluate and clarify pollutant discharge ordinance</li> <li>2. Document and report any changes or amendments to the applicable codes</li> </ol>	<ol style="list-style-type: none"> <li>1. Year 1</li> <li>2. Annually</li> </ol>	1. & 2. The process of creating a new Illicit Discharge Ordinance was started within the reporting period and is based on the EPA's model ordinance. It has since undergone first and second readings and was added as a new section of the City's Code of Ordinances (Ch. 30, Article VIII).



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<b>SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES</b>					
<b>Element ID/BMP #</b>		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
		<b>BMP Description</b>	<b>Measurable Goals</b>	<b>Schedule for Implementation/Completion</b>	<b>Summary of Results</b>
3c	01	Illicit Discharge Inspections: Inspect public discharges and illegal dumping. Incidences will be documented through daily proactive stormwater staff inspections and in response to reports from residents. If fines are issued, those will be recorded in the computer system as well	1. Document and report the number of proactive illicit discharges discovered, reported and confirmed 2. Document and report the number of illegal discharges where fines were levied 3. Document and report the number of illicit discharges corrected	Monthly	1. 143 inspections found erosion and sediment violations which contributed to illicit discharges. 2. 9 NOVs were issued, 1 resulted in fines 3. 100% of illicit discharges were corrected.
3c	02	Water Quality Monitoring: Collect water quality samples monthly and evaluate pollutant loading in an effort to identify target pollutants for reduction and monitor existing efforts in pollution reduction	1. Document and report any trends in target pollutant levels	Years 1-5	Sampling program of stormwater ponds and pump stations continues. A comprehensive data analysis effort showed statistically significant trends in individual stormwater lakes for a range of parameters. The full report is attached.

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<b>SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES</b>					
<b>Element ID/BMP #</b>		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
		<b>BMP Description</b>	<b>Measurable Goals</b>	<b>Schedule for Implementation/ Completion</b>	<b>Summary of Results</b>
3d	01	<p>Illicit Discharge Education and Outreach:            Develop education &amp; outreach materials. Provide public awareness to employees, residents, and businesses regarding the hazards of illegal discharges and dumping of wastes</p>	<ol style="list-style-type: none"> <li>1. Develop education &amp; outreach plan.</li> <li>2. Document and report the type and number of public awareness activities for employees</li> <li>3. Document and report the type and number of public awareness activities for residents</li> <li>4. Document and report the type and number of public awareness activities for businesses</li> </ol>	<ol style="list-style-type: none"> <li>1. Year 1</li> <li>2. Years 2-5</li> <li>3. Years 2-5</li> <li>4. Years 2-5</li> </ol>	<ol style="list-style-type: none"> <li>1. An illicit discharge brochure was developed and public meetings held for a new illicit discharge ordinance</li> <li>2. The brochure was posted on the intranet so that all City employees would be notified how they could help report illicit discharges. It was also distributed to code enforcement staff and posted on the City's Facebook page for public, staff, and business to view and download</li> <li>3. The brochure and ordinance were made available to the public by posting it on the City's website. Over 20 public meetings were held about the new illicit discharge ordinance.</li> <li>4. In addition to posting materials on the website and Facebook, educational materials were also distributed to 5 new food service establishments regarding proper maintenance, BMPs, and proper disposal of grease.</li> </ol>

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<b>SECTION II. MINIMUM CONTROL MEASURE (check only one)</b>		
1. Public Education and Outreach	3. Illicit Discharge Detection/Elimination	5. Post-construction Stormwater Management
2. Public Involvement/Participation	<u>4. Construction Site Stormwater Runoff Control</u>	6. Pollution Prevention/Good Housekeeping

**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A BMP Description	B Measurable Goals	C Schedule for Implementation/Completion	D Summary of Results
4a	01	Construction Compliance: Maintain the City's existing City Code Article VIII, Section 16-291; applying Appendix A-Fees and Charges; pertaining to the requirement for construction contractors to maintain SWP3's on construction site ordinance requiring erosion and sediment controls to reduce pollutants associated with stormwater discharge and prevents direct runoff to abutting properties	1. Document and report any changes to amendments to the ordinance(s)/code(s)	Annually	1. On November 18, 2020, a presentation was given to City Council to facilitate a discussion regarding this section of the code and Construction Site Management requirements. The outcome of the discussion did not result in any proposed code changes.
4b	01	Sediment and Erosion Control Requirements: Monitor the City's existing City Code Article VIII, Section 16-291; applying Appendix A-Fees and Charges; pertaining to maintenance of BMP's on site that reduce pollutants associated with stormwater discharge	1. Document and report the number of construction site violations pertaining to erosion and sediment controls	Annually	1. 143 construction sites required erosion control

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**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A BMP Description	B Measurable Goals	C Schedule for Implementation/ Completion	D Summary of Results
4c	01	Waste Control Requirements: Monitor existing City Code Chapter 32 requiring construction site operators to control all waste on sites, and review the code language for potential enhancement	1. Document and report the number of construction site violations pertaining to waste controls	Annually	1. A total of 34 construction sites operated with waste control requirements
4d	01	Site Plan Review: Continue to implement City Code Article VIII, Section 16-291; applying Appendix A-Fees and Charges; pertaining to the review of site development plans and the requirement for a SWP3 & BMP's. Provide applicants with information regarding potential need for CGP or ERPs	1. Document and report the number of building permits issued 2. Document and report the number of site plans reviewed and approved requiring stormwater control 3. Document and report the number of applicants that were informed of the potential need for CGP/ERP	Annually	1. 1309 building permits issued 2. 158 permits required stormwater control 3. 410 permittees were informed of the potential need for additional state permits
4e	01	Construction Complaints: Continue to implement the City's current policy to receive public complaints, questions, and comments regarding construction site stormwater management concerns	1. Document and report the number of public inquires received 2. Document and report the number of follow-up actions to calls received	Annually	1. Over 100 complaints were received regarding construction site management. 2. 100% of public inquiries are followed up on and it is ensured all issues are corrected

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**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A	B	C	D
		BMP Description	Measurable Goals	Schedule for Implementation/Completion	Summary of Results
4f	01	<p>Construction Inspections: Inspect active construction sites for proper installation and maintenance of Stormwater BMP's and construction waste control requirements. Continue to implement Section 30-340 requiring inspections of permitted Water Management Systems on private property to ensure compliance and performance with original design. A minimum of 3 inspections—1 pre, 1 during, and 1 post construction--are conducted</p>	<ol style="list-style-type: none"> <li>1. Document and report the number of stormwater inspections performed per year</li> <li>2. Document and report the number of stormwater inspections that were not in compliance and required follow-up action</li> <li>3. Document and report the number of erosion and sediment control inspections documented in the City's tracking software.</li> </ol>	<p>Annually</p>	<ol style="list-style-type: none"> <li>1. 812 stormwater site inspections were performed by Streets &amp; Stormwater staff</li> <li>2. 222 inspections were not in compliance and required subsequent inspections</li> <li>3. 143 inspections for erosion and sediment controls</li> </ol>

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<b>SECTION A.I. MINIMUM CONTROL MEASURE (check only one)</b>					
1. Public Education and Outreach 2. Public Involvement/Participation		3. Illicit Discharge Detection/Elimination 4. Construction Site Stormwater Runoff Control		5. Post-construction Stormwater Management (optional) 6. Pollution Prevention/Good Housekeeping	
SECTION A.II. BEST MANAGEMENT PRACTICES (BMPs) For The Minimum Control Measure Identified In Section A.I. Of This Form					
<b>Element ID</b>	<b>BMP Number</b>	<b>A Description of BMP</b>	<b>B Measurable Goal(s)</b>	<b>C Schedule for Implementation/Completion</b>	<b>D Responsible Entity</b>
5a-c	01	Utilize qualifying alternative program; Naples relies on the current SFWMD and FDEP regulatory criteria by providing stormwater treatment for ERP Permitted projects	<b>1. Continue to maintain compliance with DEP and WMD criteria</b>	<b>Effective upon permit issuance.</b>	DEP and WMD

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<b>SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES</b>					
<b>Element ID/BMP #</b>		<b>A BMP Description</b>	<b>B Measurable Goals</b>	<b>C Schedule for Implementation/Completion</b>	<b>D Summary of Results</b>
6a	03	DEP adopted TMDL: The Gordon River Extension WBID does not have a BMAP to address the causative pollutant (TN) for the low dissolved oxygen impairment. The City will review its stormwater management program with respect to the TMDL goals for the reduction of pollutant loads within the City's MS4 drainage basin discharging to the TMDL waterbody as delineated by the revised 3278K WBID boundary which excludes the marine portion of the Gordon River. The City will initiate additional revisions to this WBID boundary in collaboration with DEP to reflect current stormwater flow-ways	<ol style="list-style-type: none"> <li>1. Upon review of the stormwater management program, inventory BMPs that are currently in place and identify any additional BMPs that could address reduction of pollutant loads with respect to the TMDL goals.</li> <li>2. Update WBID boundary 3278K in collaboration with DEP to reflect current stormwater flow-ways within the City.</li> </ol>	<ol style="list-style-type: none"> <li>1. Years 4-5</li> <li>2. Years 1-2</li> </ol>	<ol style="list-style-type: none"> <li>1. This has already started despite it being for years 4-5. The City is looking at increasing street sweeping BMPs and has proposed the purchase of an additional street sweeper and the addition of a heavy equipment operator.</li> <li>2. Upon further review of the WBID boundary, changing the boundary would not actually affect the way in which the WBID is assessed, therefore, it was determined a boundary change was unnecessary.</li> </ol>
6b	01	Annual Employee Training: Used Oil and Hazardous Materials Handling, Storage and Disposal, and BMP's for reducing and preventing stormwater pollution from municipal activities	<ol style="list-style-type: none"> <li>1. Document and report the number of employees receiving training</li> <li>2. Document and report the number of training sessions held</li> </ol>	Annually	<ol style="list-style-type: none"> <li>3. 14 Utilities staff completed spill prevention, 14 Fire staff attended HazMat courses, all 3 code enforcement officers completed illicit discharge detection &amp; elimination training, 6 Equipment Services staff completed Work Space Housekeeping SOP-101</li> <li>4. 10 training sessions were held</li> </ol>
6b	02	Stormwater Staff Training: Provide training/certification of appropriate stormwater staff, such as stormwater inspectors and site plan reviewers, on stormwater erosion and sedimentation controls	<ol style="list-style-type: none"> <li>1. Document and report the number of staff members trained/certified</li> </ol>	Annually	<ol style="list-style-type: none"> <li>1. 2 Streets &amp; Stormwater staff completed Certified Stormwater Operator I and 1 completed Certified Stormwater Operator 2</li> </ol>

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**SECTION II. MINIMUM CONTROL MEASURE (check only one)**

- |                                     |  |  |
|-------------------------------------|--|--|
| 1. Public Education and Outreach    | 3. Illicit Discharge Detection/Elimination     | 5. Post-construction Stormwater Management       |
| 2. Public Involvement/Participation | 4. Construction Site Stormwater Runoff Control | <u>6. Pollution Prevention/Good Housekeeping</u> |

**SECTION II. SUMMARY OF STORMWATER MANAGEMENT PROGRAM ACTIVITIES**

Element ID/BMP #		A BMP Description	B Measurable Goals	C Schedule for Implementation/Completion	D Summary of Results
6a	01	Street Sweeping: Reduce trash and pollutant runoff from City streets by continuing to implement the City's street sweeping program	1. Document and report the number of lane-miles of streets swept 2. Document and report the amount of debris collected and disposed of	Annually	1. 6046.55 miles of road was swept 2. 209.72 tons of debris was collected and disposed of
6a	02	City Stormwater System Operations and Maintenance Program: Inspect and maintain City stormwater structural controls including swales, treatment ponds, filter marshes, inlet/catch basins, conveyance system, and pump stations	1. Document and report the number of pond inspections and pond maintenance activities 2. Document and report the total linear feet of pipe maintained 3. Document and report the amount of material removed during maintenance activities (ponds, filter marsh, catch basins, pump stations, and pipes) 4. Document and report the man-hours spent in operations and maintenance of the City's permitted stormwater management systems	Annually	1. 33 pond inspections and maintenance activities were completed 2. Over 10,498 LF of pipe was maintained 3. Total of 103 tons of debris removed 4. 6240 man-hours were spent inspecting, cleaning, and videoing the stormwater system



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**SECTION III. CHANGES TO STORMWATER MANAGEMENT PROGRAM**

Assess the appropriateness of each BMP that has been implemented and provide a list of changes in the space below. Include proposed changes to BMPs, Measurable Goals, or Implementation Schedules, and justification for changes. Also report new BMPs that have been added to the Stormwater Management Program in this section. Add pages if more room is needed. Include the Element ID as it is listed on the submitted NOI. BMP Number should be indicated as listed on the NOI, unless a new BMP is being proposed. Include Element ID on all extra pages, include BMP number for all changes to BMPs previously listed on NOI.

Element ID	BMP Number (where applicable)	Proposed Change or New BMP Description and Justification

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**SECTION IV. INDEPENDENT MONITORING AND RELIANCE ON ANOTHER ENTITY**

A.	<p>Please indicate whether the Phase II MS4 performed independent monitoring. If yes, please attach monitoring data collected during reporting period.</p> <p><input checked="" type="checkbox"/> The MS4 performed independent monitoring during the reporting period, (Attach monitoring results to this Annual Report form).  <input type="checkbox"/> The MS4 did <b>NOT</b> perform independent monitoring during the reporting period.</p> <p>*Full summary analysis and report is attached. Please let the City know if you would like the raw data.</p>		
B.	<p>Please indicate which elements of the Stormwater Management Plan the Phase II MS4 is relying on another entity to satisfy. Include New or revised BMP activities that met this criteria. NOTE: These elements should also be listed in Sections II or III of this form.</p>		
	<p align="center"><b>Element #</b></p>	<p align="center"><b>BMP #</b></p>	<p align="center"><b>Name of Responsible Entity</b></p>

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**SECTION V. CERTIFICATION STATEMENT AND SIGNATURE**

*The Responsible Authority listed in Section I.B. of the Annual Report form must sign the following certification statement:*

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

Name of Phase II MS4 Responsible Authority (type or print):	Gregg R. Strakaluse, Director
---	-------------------------------

Title:	Director, Streets & Stormwater Department
--------	---

Signature:		Date:	7/19/21
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