



Annual Report  
April 1, 2019 – March 31, 2020  
Gadsden-Etowah MS4 Entities  
Gadsden, Etowah County, Alabama  
S&ME Project No. 4482-19-066

PREPARED FOR:  
**Gadsden-Etowah MS4**

PREPARED BY:  
**S&ME, Inc.**  
**360D Quality Circle NW, Suite 450**  
**Huntsville, AL 35806**

**May 29, 2020**



May 29, 2020

Attention: Gadsden-Etowah MS4 Steering Committee

Reference: **Annual Report: April 1, 2019 – March 31, 2020**  
**Gadsden- Etowah MS4 Entities**  
Gadsden, Etowah County, Alabama  
S&ME Project No. 4482-19-066

Dear Gadsden-Etowah MS4 Steering Committee:

S&ME, Inc. has prepared the attached Annual Report (April 1, 2019-March 31, 2020 reporting period) for the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1900354, dated September 11, 2019.

S&ME, Inc. appreciates the opportunity to provide our services to the City of Gadsden, Rainbow City, City of Hokes Buff, City of Southside, City of Glencoe, City of Attalla, and Etowah County. If you should have questions concerning this report, or if additional information is required, please contact us.

Sincerely,

**S&ME, Inc.**

A handwritten signature in blue ink that reads "Christa C. Lyons".

Christa C. Lyons  
Project Manager

A handwritten signature in blue ink that reads "Deborah J. Jones".

Deborah J. Jones, P.E.  
Senior Engineer



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**Annual Report: April 1, 2019 – March 31, 2020**

**Gadsden- Etowah MS4 Entities**

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-19-066



Appendix J-2 – Etowah County Control Measure Tables

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## 1.0 Introduction

S&ME, Inc. has prepared this Annual Report for the Gadsden – Etowah MS4 Entities that comprise the *Gadsden, Alabama Urbanized Area* Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1900354, dated September 11, 2019. Ms. Christa Lyons, Ms. Joanna Jordan, and Ms. Deborah Jones with S&ME compiled information provided by each entity and prepared this report.

The urbanized area consists of the following entities (jurisdictions): The City of Gadsden, City of Rainbow City, City of Southside, City of Glencoe, City of Hokes Bluff, City of Attalla, and portions of unincorporated Etowah County.

Authorization date and responsible official for each entity are provided in Table 1.1.

**Table 1-1: Responsible Officials and Authorization Dates**

Entity	Name	Date
City of Attalla	Larry Means, Mayor	October 11, 2019
City of Gadsden	Sherman Guyton, Mayor	October 3, 2019
City of Glencoe	Charles C. Gilchrist, Mayor	October 7, 2019
City of Hokes Bluff	Scott Reeves, Mayor	September 20, 2019
City of Rainbow City	Terry John Calhoun, Mayor	April 2, 2020
City of Southside	Wally Burns, Mayor	May 26, 2019
Etowah County	Tim Graves, Engineer	April 6, 2020

The Annual Report is required by Part VI of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) General Permit ALR040000 for discharges from regulated small municipal separate storm sewer systems (MS4). Permit numbers for each entity are provided in Table. 1.2.

**Table 1-2: Permit Numbers for MS4 Entities**

Entity	ADEM Permit Number
City of Attalla	ALR0400052
City of Gadsden	ALR0400053
City of Glencoe	ALR0400054
City of Hokes Bluff	ALR0400055
City of Rainbow City	ALR0400056
City of Southside	ALR0400057
Etowah County	ALR0400009



## 1.1 Permit History

The Storm Water Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 requires nationwide coverage of all operators of small MS4s located within the boundaries of an “urbanized area” as defined by the latest decennial Census. Based on the results of the 2010 census, the Bureau of the Census designated the *Gadsden, Alabama Urbanized Area* to include the City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and portions of unincorporated Etowah County. A map outlining the approximate boundary of the *Gadsden, Alabama Urbanized Area* is included in **Appendix A, Figure 1**.

The *Gadsden, Alabama Urbanized Area* initially applied for and received a NPDES MS4 Phase II General Permit from the ADEM in 2003. The five-year permit expired on March 9, 2008. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration and permit coverage was extended through re-issuance of the MS4 Phase II General Permit ALR04-0009 with an effective date of February 1, 2011. This permit expired on February 1, 2016 and was administratively continued. A Notice of Intent for renewal of the permit was submitted by each entity 180 days prior to expiration; therefore, the permit coverage was extended until the Alabama Department of Environmental Management (ADEM) issued a separate permit for each entity with an effective date of October 1, 2016. Maps outlining the approximate urbanized area and city limits for each entity are included in their corresponding appendix.

A copy of the NPDES General Permit is included in the 2017 Storm Water Management Program Plan (SWMPP).

## 1.2 Storm Sewer System

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

- (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;
- (ii) Designed or used for collecting or conveying storm water;
- (iii) Not a combined sewer; and,
- (iv) Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

## 1.3 Area and Population Description

The *Gadsden, Alabama Urbanized Area* is located in northeast Alabama and encompasses approximately 38,223 acres. Populations of each entity covered by the referenced NPDES General Permits are shown in the following table.



**Table 1-3: Populations from 2000 and 2010 Census**

Entity	2000 Census Population	2010 Census Population
City of Attalla	6,592	6,048
City of Gadsden	38,978	36,856
City of Glencoe	5,152	5,160
City of Hokes Bluff	4,149	4,286
City of Rainbow City	8,428	9,602
City of Southside	7,036	8,412
Etowah County	103,459*	104,430*

\* Total for the county, including municipalities

#### 1.4 Hydrologic Units in the Urbanized Area

Neely Henry Lake (Coosa River) is the primary receiving water for the Gadsden-Etowah MS4. Hydrologic Hierarchy, Watersheds, and Subwatersheds are provided in the tables below.

**Table 1-4: Hydrologic Hierarchy**

Region		
Subregion	0315	Alabama River Basin
Basin	031501	Coosa-Tallapoosa: Above the confluence of and including the Coosa and Tallapoosa River Basins
Subbasin	03150106	Middle Coosa

**Table 1-5: Watersheds in the Urbanized Area**

Watershed	HUC
Coosa River-Black Creek	03150106-01
Big Wills Creek	03150106-02
Coosa River-Big Canoe Creek	03150106-03



**Table 1-6: Subwatersheds in the Urbanized Area**

Subwatershed	HUC	Total Area (Acres)
Little Wills Creek	03150106-01-06	18,121
Black Creek	03150106-01-07	40,879
Horton Creek	03150106-01-08	16,902
Dry Creek	03150106-02-02	9,778
Big Cove Creek	03150106-02-03	18,028
Turkey Town Creek	03150106-02-04	57,474
Little Canoe Creek - Lake Sumatanga	03150106-03-04	20,260
Lower Big Canoe Creek	03150106-03-06	33,299
Coosa River - H. Neely Henry Lake	03150106-03-09	46,439
Lower Ohatchee Creek	03150106-04-05	19,980

## 1.5 Water Quality Concerns

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and EPA’s Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to their designated use classifications. The identified waters are prioritized based on severity of the pollution. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment. The TMDL process establishes the allowable loading of pollutants, or other quantifiable parameters for a waterbody, based on the relationship between pollution sources and in-stream water quality conditions.

As mentioned in Section 1.3, Neely Henry Lake is the primary receiving water for the Gadsden-Etowah MS4. In 1996, the ADEM identified five of the six reservoirs on the Coosa River within the State of Alabama’s borders as being impaired, including Neely Henry Lake. The following table summarizes the impaired segments of Neely Henry Lake.



**Table 1-7: Impaired Waterbody Segments in the Urbanized Area**

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES
AL03150106-0309-101	Coosa River (Neely Henry Lake)	Swimming  Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources
AL03150106-0309-102	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources
AL03150106-0104-101	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments
AL03150106-0104-102	Coosa River (Neely Henry Lake)	Public Water Supply  Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments

Sources of nutrient and organic enrichment from non-point sources within the Coosa River watershed include:

- ◆ Runoff from pastures
- ◆ Runoff from animal operations
- ◆ Direct discharge to streams due to cattle
- ◆ Improper land application of animal waste
- ◆ Failing septic systems
- ◆ Urban runoff

Point source contributors of storm water pollution within the Coosa River watershed include:

- ◆ Discharge from wastewater treatment plants
- ◆ Discharge from industrial operations

In 2008 the EPA approved TMDLs for Neely Henry Lake related to Nutrients (Total Phosphorous), pH, and Dissolved Oxygen. The Gadsden-Etowah MS4 is required to achieve a **30% reduction in Total Phosphorus discharge loading.**



Part IV.D of the NPDES General Permit requires that the SWMPP include BMPs and control measures specifically targeted to achieve the waste load allocations prescribed in the TMDL. The SWMPP must also include monitoring provisions to document that the waste load allocations prescribed in the TMDL are being achieved.

## 1.6 Coordination Between Entities

Each of the eight entities will provide at least one member to the Gadsden-Etowah Storm Water Steering Committee. Each entity will be responsible for providing the required annual updates and monitoring data to the Steering Committee.

Coordination between departments and individuals internal to each of the eight entities is established in each section of the Plan specific to the individual entities.

In March 2014, the Gadsden-Etowah Storm Water Steering Committee developed an Illicit Discharge Detection and Elimination (IDDE) Program for the entities to collectively use as a guidance. The IDDE Program is included in the 2017 SWMPP.

## 1.7 Responsible Party

Each entity is responsible for the coordination and implementation of their entity’s SWMPP. Each entity provides a representative to participate on the Storm Water Steering Committee for the urbanized area. The Storm Water Steering Committee is responsible for the implementation of the monitoring plan. Current membership of the Storm Water Steering Committee is as follows:

**Table 1-8: MS4 Storm Water Steering Committee**

ENTITY	CONTACT	PHONE NO.	EMAIL
City of Gadsden	Jeremy Ward	256-549-4527	jward@cityofgadsden.com
City of Gadsden	Heath Williamson	256-549-4520	hwilliamson@cityofgadsden.com
City of Attalla	Jason Nicholson	256-441-9200	jason.attalla@gmail.com
City of Rainbow City	Joel Garmon	256-413-1240	jgarmon@rbcalabama.com
City of Southside	Judd Rich	256-442-9775 Ext. 103	jrich@cityofsouthside.com
City of Glencoe	Todd Means	256-492-1424	toddmeans@cityofglencoe.net
City of Hokes Bluff	Lisa Johnson	256-492-2414	hbcity@cityofhokesbluff.net
Etowah County	Tim Graves	256-549-5358	tgraves@etowahcounty.org
Etowah County	Robert Nail	256-549-5358	Rnail@etowahcounty.org



## **1.8 SWMPP Components**

Part III.B of the NPDES General Permit requires that the Permittee develop and implement a storm water management program that includes the following five minimum control measures:

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

In 2016, S&ME was retained by the Gadsden-Etowah Storm Water Steering Committee to revise and update the SWMPP for the Gadsden-Etowah MS4. The updated SWMPP was submitted to the ADEM on January 1, 2017. The ADEM approved the submitted SWMPP in January of 2017.

## **1.9 Annual Review**

The SWMPP will be reviewed annually by each entity in preparation for the annual report required by Part V of the NPDES General Permit. The Storm Water Steering Committee will review the monitoring plan annually.

## **1.10 Updates to the SWMPP**

The SWMPP may be updated following the procedures laid out in Part IV.B.2 of the NPDES General Permit. Changes to the SWMPP adding components, controls, or requirements may be made at any time, provided the ADEM is notified in writing. The changes must also be documented in the annual report.

Permission to make changes to the SWMPP to remove or replace components, controls, or requirements must be requested from the ADEM a minimum of 60 days prior to making the change. If the request is denied, the ADEM will provide a written response giving the reason for the decision.

## **1.11 Annual Report Components**

Part VI of the NPDES General Permit requires that the Gadsden-Etowah MS4 prepare and submit annual reports to the ADEM each year by May 31. The Annual Report must cover the year prior to the submittal date (April 1 through March 31) and is required to include the following:

1. Contacts and responsible parties who had input to and are responsible for the preparation of the annual report
2. Overall evaluation of the SWMPP developments and progress for the following:
  - a. Major accomplishments
  - b. Overall program strengths/weaknesses
  - c. Future direction of the program

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**Gadsden- Etowah MS4 Entities**

Gadsden, Etowah County, Alabama

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- d. Overall determination of the effectiveness of the SWMPP considering water quality/watershed improvements
  - e. Measurable goals that were not performed and reasons why the goals were not accomplished
  - f. Evaluation of the monitoring data
3. A narrative report of all minimum storm water control measures of the permit to include the following:
  - a. Minimum control measures completed and in progress
  - b. Assessment of the controls
  - c. Discussion of proposed BMP revisions or any identified measurable goals that apply to the minimum storm water control measures
4. Summary table of the storm water controls that are planned/scheduled for the next reporting cycle
5. Results of information collected and analyzed during the reporting period including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the Maximum Extent Practical (MEP)
6. Notice of reliance on another entity to satisfy some of your permit obligations
7. All monitoring results collected during the reporting period
8. Proposed changes to the SWMPP



## 2.0 Storm Water Monitoring

### 2.1 Rationale Statement

As discussed in Section 1.4, the Gadsden-Etowah MS4 currently discharges to an impaired waterbody. Part IV.D.1(c) of the NPDES General Permit requires that the SWMPP include a monitoring plan to assess the effectiveness of the BMPs in achieving the waste load reductions/allocations outlined in the TMDL.

The intent of the proposed monitoring program is to evaluate the effectiveness of the City's BMPs in achieving the required reduction as established in the TMDL and to generally evaluate overall water quality. Where deviations are documented and/or expected, the collected monitoring data will be used to determine the extent and cause of the pollutant of concern.

The Storm Water Monitoring Plan including monitoring parameters, monitoring locations, field documentation, and sampling procedures is described in Section 2 of the SWMPP dated January 1, 2017.

### 2.2 Monitoring Events

Since January 2013, S&ME, Inc. was been retained by the Gadsden-Etowah Storm Water Steering Committee to collect the required quarterly water samples for 2013 and the subsequent years as well as provide analyses of the sampling events.

**Table 2-1: Monitoring Events**

MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2012 – March 31, 2013	2013 Q1	March 12 & 13, 2013
April 1, 2013 – March 31, 2014	2013 Q2	May 8 & 20, 2013
	2013 Q3	September 23, 2013
	2013 Q4	December 10, 2013
	2014 Q1	February 6, 2014
April 1, 2014 – March 31, 2015	2014 Q2	June 26, 2014
	2014 Q3	September 30, 2014
	2014 Q4	November 19, 2014
	2015 Q1	March 23, 2015
April 1, 2015 – March 31, 2016	2015 Q2	April 22, 2015
	2015 Q3	September 30, 2015
	2015 Q4	November 19, 2015

## Annual Report: April 1, 2019 – March 31, 2020

### Gadsden- Etowah MS4 Entities

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-19-066



MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
	2016 Q1	March 15, 2016
April 1, 2016 – March 31, 2017	2016 Q2	June 29, 2016
	2016 Q3	August 9, 2016
	2016 Q4	December 7, 2016
	2017 Q1	March 2, 2017
	2017 Q2	June 21, 29, & 30, 2017 and July 5, 2017
April 1, 2017 – March 31, 2018	2017 Q3	August 16 & 17, 2017
	2017 Q4	October 25 & 26, 2017
	2018 Q1	March 27 & 28, 2018
	2018 Q2	June 26 & 29, 2018
April 1, 2018 – March 31, 2019	2018 Q3	August 1 & 2, 2018
	2018 Q4	December 10 & 11, 2018
	2019 Q1	April 15 & 17, 2019
	2019 Q2	June 11 & 12, 2019
April 1, 2019 – March 31, 2020	2019 Q3	August 27 & 28, 2019
	2019 Q4	October 29 & 30, 2019
	2020 Q1	March 30 & 31, 2020

A monitoring report was issued to the members of the Steering Committee following each monitoring event. Copies of the reports for the monitoring events conducted during the April 1, 2019 to March 31, 2020 reporting period are provided in **Appendix C**.

### 2.3 Analysis of Monitoring Results

A total of 29 quarterly monitoring events have been conducted since the Monitoring Program was first implemented in March of 2013. Charts 1 through 9 in **Appendix B** summarize the analytical data collected during these monitoring events. The accumulated monitoring data was evaluated using statistics described in the Statistical Evaluation located in **Appendix B**. Additionally, the location of monitoring points was evaluated to determine if they were adequately characterizing the stormwater influence of the MS4 area. A summary of our findings and recommendations are provided below.



### 2.3.1 Discussion

When compared to the other monitoring points, elevated levels of orthophosphate, total phosphorous, nitrate-nitrite, total Kjeldahl nitrogen, and total suspended solids have consistently been observed at monitoring point AT5. Monitoring point SME1 was sited to observe water quality at the location where the combined flow from Big Wills Creek, Black Creek, and Horton Creek enters the Coosa River, approximately 6.6 miles downstream from AT5. Monitoring point GD8 is located in Black Creek and monitoring point RC2 is located in Horton Creek. The monitoring locations are identified on Figure 2 in **Appendix A**.

The analytical results for phosphorous and nitrogen at SME1 have consistently been lower than those recorded at AT5, indicating that dilution is occurring before the combined flow from AT5, GD8, and RC2 discharges to the Coosa River.

## 2.4 Statistical Results

In the past Annual Reports, it was reported that HB3 and AT5 stood out as having elevated levels of some parameters. Based on the results of the Wilcoxon Rank-Sum test, an SSI was observed in HB3 for TSS when compared to GD5, GD7, and GD3 which are all downstream of HB3. An SSI was also observed in HB3 when compared to GD7 for Turbidity. AT5 is located upstream of SME1 and based on the Wilcoxon rank-sum test, an SSI was observed in AT5 when compared to SME1 for total phosphorous, orthophosphate, and nitrate-nitrite. The results of the Sen's Slope Estimator indicate no trend downward or upward for the parameters with SSIs.

The Statistical Evaluation in **Appendix B** reports the statistical evaluation for each analyte for the compared monitoring points. It also shows which monitoring points were compared using the Wilcoxin-Rank Sum test that resulted in no SSIs.

## 2.5 Evaluation of Monitoring Points Location

The Statistical Evaluation supports that the watershed as a whole is reducing the output of phosphorous and nitrogen into the Coosa. However, there is not sufficient data to quantify the reduction in Total Phosphorous from the MS4. Additional monitoring points may be needed to fully evaluate whether the observations in AT5 and HB3 are indicative of the MS4 or if resulting from activities outside the MS4.

### 2.5.1 Comparison of Coosa River Levels

During this evaluation, it was noted that data is not collected from within the Coosa River where it enters and leaves the MS4 area. To adequately determine the reduction of Phosphorus loads within the Coosa River, it's necessary to know the water quality levels that enters and leaves the MS4 area. Therefore, a monitoring point should be added within the Coosa River where it enters and leaves the MS4 area. These locations are generally located near HB3 and the confluence of Greens Creek and the Coosa River.



Additionally, a monitoring point should be added within the Coosa River near the central portion of the MS4 area to help evaluate the upper and lower portions of the watershed.

### *2.5.2 Comparison of AT5 Watershed Levels*

Monitoring point AT5 evaluates flow in Big Wills Creek approximately 0.27 mile downstream of its confluence with Little Wills Creek. Big Wills Creek flows from the City of Valley Head, Alabama to Gadsden, Alabama, passing through the City of Fort Payne. Big Wills Creek totals approximately 87 miles in length, with a watershed of over 365 square miles. Approximately seven square miles of the Gadsden-Etowah MS4 contribute to Big Wills Creek upstream of monitoring point AT5.

As previously discussed, the Gadsden-Etowah MS4 encompasses approximately 1.9% of the Big Wills Creek watershed; therefore, there is potential for the elevated levels to be a result of upstream activities outside of the MS4 area. Since elevated levels of phosphorous and nitrogen continue to be observed, the Gadsden-Etowah MS4 proposes the addition of an upstream monitoring point where Big Wills Creek enters the MS4 area. This additional monitoring point will help verify whether the source is external to the MS4 area.

### *2.5.3 Comparison of HB3 Watershed Levels*

Monitoring point HB3 evaluates flow from an unnamed tributary of the Coosa River. The monitoring sample is collected prior to the confluence with the Coosa River. The total drainage area for the HB3 watershed is 1.58 square miles; however, only 0.21 square miles is within the MS4 area. Elevated levels of total suspended solids continue to be observed in HB3, the Gadsden-Etowah MS4 proposes the addition of an upstream monitoring point where the watershed drainage leaves the MS4 area. This additional monitoring point will help verify whether the source is external to the MS4 area.

### *2.5.4 Elimination of Monitoring Points*

Monitoring Point CO14 evaluates the flow from an unnamed tributary of the Coosa River within the central portion of the MS4 area. The total drainage area for the CO14 watershed is 0.54 square miles. The monitoring sample is collected by vehicle and has been dry 7 of the 29 monitoring events. The Gadsden-Etowah MS4 proposes the removal of this monitoring point as it is not providing an accurate representation of the MS4 area based on the size of the watershed and number of dry events.

Monitoring Point GD3 evaluates flow from an unnamed tributary of the Coosa River on the northern end of the MS4 area. The monitoring sample is collected prior to the confluence with the Coosa River. The total drainage area for the GD3 watershed is 8.32 square miles; however, only 1.03 square miles is within the MS4 area. The Gadsden-Etowah MS4 proposes the removal of this monitoring point as it is not providing an accurate representation of the MS4 area.

Monitoring Point SME2 evaluates the flow from an unnamed tributary of the Coosa River within the central portion of the MS4 area. The total drainage area for the SME3 watershed is 1.05 square miles. The monitoring sample is collected by vehicle. The Gadsden-Etowah MS4 proposes the removal of this



monitoring point as it is not providing an accurate representation of the MS4 area based on the size of the watershed.

## **2.6 Summary of Recommendations**

The entities that create Gadsden-Etowah MS4 took a watershed approach regarding their Storm Water Monitoring Plan. This approach has allowed them to see how the overall watershed is responding to the established BMPs and to generally evaluate overall water quality. Based on the evaluation presented above, the Storm Water Monitoring Plan has successfully evaluated portions of the watershed. Therefore, the Gadsden-Etowah MS4 entities plan to continue the watershed approach and proposes the following revisions to their Storm Water Monitoring Plan.

- ◆ Addition of 3 monitoring points within the Coosa River Channel for comparison of the water quality that enters and leaves the MS4 area
  - Monitoring point near HB3
  - Monitoring point near the central portion of the MS4 area
  - Monitoring point near the confluence of Greens Creek and the Coosa River
- ◆ Addition of a monitoring point upstream of AT5 near the location where Big Wills Creek enters the MS4 area
- ◆ Addition of a monitoring point upstream of HB3 near the location where the drainage leaves the MS4 area
- ◆ Removal of monitoring points CO14, GD3, and SME3

## **2.7 Continual Actions**

### *2.7.1 Analytical Results*

Field observations and analytical results will be recorded at the time of sampling. The resulting field notes and laboratory analytical reports will be retained by each entity for a minimum of 3 years.

### *2.7.2 Evaluation of Results*

Results from each sampling event will be evaluated annually and reported in the annual report.



## 3.0 Reporting and Record-Keeping

Part V.A of NPDES General Permit ALR040000 issued to each entity of the Gadsden-Etowah MS4 that comprises the *Gadsden, Alabama Urbanized Area* outlines the monitoring, recordkeeping, and reporting requirements.

### 3.1 Annual Reports

Annual reports are due to the ADEM by May 31 of each year. The annual report will cover the period from April 1 through March 31 of the year prior to the submittal date and will include:

1. List of contacts/responsible parties for the preparation of the Annual Report
2. Evaluation of SWMPP and discussion of the following:
  - a. Major accomplishments
  - b. Overall program strengths/weaknesses
  - c. Future direction of the program
  - d. Evaluation of the effectiveness of the SWMPP in achieving water quality/watershed improvements
  - e. Measurable goals that were not performed and reasons why
  - f. Evaluation of monitoring data
3. Measurable goals for each of the five minimum control measures
4. Proposed changes to the SWMPP, including changes to BMPs or measurable goals
5. An assessment of whether the existing BMPs are appropriate
6. Summary of storm water activities planned for the upcoming year
7. Progress toward reducing the discharge of pollutants to the maximum extent practicable

### 3.2 Recordkeeping

The following records must be maintained by each entity and will be made available for examination. Records will be retained for a minimum period of at least three (3) years from the data of the sample, measurement, report, or application for the term of the NPDES General Permit, whichever is longer.

The following is a list of records to be retained:

- ◆ Copies of all reports required by the permit
- ◆ Copies of monitoring reports
- ◆ Copy of the NPDES General Permit
- ◆ Copy of the Notice of Intent



## 4.0 City of Attalla (ALR0400052)

The City of Attalla (City) encompasses approximately 7.5% of the Urbanized Area and accounts for approximately 9% of the population. A map depicting the City of Attalla’s urbanized area and city limits is in **Appendix D-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Jason Nicholson, P.E.  
City Engineer  
612 4<sup>th</sup> Street, NW  
Attalla, Alabama 35954  
(256) 538-9986  
jason.attalla@gmail.com

### 4.1 Public Education and Public Involvement on Storm Water Impacts

#### 4.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Attalla completed seven (7) of the seven (7) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Attalla also completed five (5) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies were:

- The City of Attalla enforced a Litter Ordinance (Activity 8)
- The City of Attalla performed brush and leaf pickup for residents (Activity 9)
- The City of Attalla provided bulk item pickup to residents (Activity 10)



- The City of Attalla provided curbside garbage pickup and a collection can to residents (Activity 11)
- The City of Attalla placed educational materials on the City Hall bulletin board (Activity 12)

A table identifying each Public Education and Public Involvement strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

#### 4.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

#### 4.1.4 *Proposed Changes*

The City of Attalla requests no changes to the Public Involvement and Public Involvement strategies identified in the 2017 SWMPP.

#### 4.1.5 *Responsible Party*

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

### 4.2 **Illicit Discharge Detection and Elimination**

#### 4.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Attalla completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.



#### 4.2.2 *Proposed Activities for the April 2, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

#### 4.2.4 *Proposed Changes*

The City of Attalla requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

#### 4.2.5 *Responsible Party*

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the IDDE program in the City of Attalla regulated MS4 area.

### 4.3 **Construction Site Storm Water Runoff**

#### 4.3.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Attalla completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

#### 4.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



#### 4.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

#### 4.3.4 *Proposed Changes*

The City of Attalla requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

#### 4.3.5 *Responsible Party*

The City of Attalla Mayor's office is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

### 4.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

#### 4.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Attalla completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

#### 4.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.



#### 4.4.4 *Proposed Changes*

The City of Attalla requests no changes to the Post-construction Storm Water Management strategies identified in the 2017 SWMPP.

#### 4.4.5 *Responsible Party*

The City of Attalla Mayor's office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

### 4.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

#### 4.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Attalla completed seven (7) of the seven (7) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Attalla also completed six (6) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- The City of Attalla provided bulk item pickup to residents (Activity 8)
- The City of Attalla maintained the oil recycling underneath a shelter to limit contact with stormwater (Activity 9)
- The City of Attalla provided curbside garbage pickup and a collection can to residents (Activity 10)
- The City of Attalla maintained a filter in the floor drain in the fire station (Activity 11)
- The City of Attalla collected garbage at the sports complex and parks (Activity 12)
- The City of Attalla collected trash at the municipal facilities (Activity 13)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

#### 4.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



#### 4.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

#### 4.5.4 *Proposed Changes*

The City of Attalla requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

#### 4.5.5 *Responsible Party*

The City of Attalla Mayor's office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

### 4.6 **Overall Program Evaluation**

#### 4.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 44 out of 44 planned strategies and 11 additional strategies. This is a significant improvement over previous reporting periods. The number of total completed activities (55) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The City conducted stream-walking activities on 2.38 miles of streams within the Urbanized Area and therefore completed the stream-walking required for this permit cycle. Eleven (11) outfalls were identified during the reporting period and 12 outfalls were inspected. Dry weather flow was not observed at the outfalls. The City completed the Storm Water System Map this reporting period.

The City investigated and eliminated two reported illicit discharges. Additionally, ten (10) Sanitary Sewer Overflows (SSOs) were reported, investigated, and eliminated.

The City used the previously established Standard Operating Procedures (SOPs) and an associated checklist for inspections of 5 municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified two deficiencies that have been corrected.

The Litter Ordinance had 200 enforcements.



#### 4.6.2 *Overall Programs Strengths and Weaknesses*

The City of Attalla's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The City's Litter Ordinance has been successful in enforcement of no littering resulting in 200 enforcements during the reporting period.

Another strength is the completion of the Storm Water System Map with the identification of 42 outfalls and 11.26 miles of streams.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. This limits their availability to participate in activities throughout the City related to the SWMPP. The City currently employs a City Engineer as the primary executive of the storm water program. The Building Inspector will assist with the storm water program responsibilities; the program duties are handled by two individuals. The City does not currently have the ability to expand the Department for the storm water program; therefore, this weakness is expected to remain for several years.

#### 4.6.3 *Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Attalla is committed to educating the citizens of the SWMP Program and how the actions of others can impact the storm water and the Coosa River.

#### 4.6.4 *Overall effectiveness of the SWMPP*

The City of Attalla is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



#### 4.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in cursive script that reads "Larry Means".

Larry Means, Mayor  
City of Attalla, Alabama

A handwritten date "5/21/20" written in cursive script.

Date



## 5.0 City of Gadsden (ALR0400053)

The City of Gadsden (City) encompasses approximately 41.7% of the Urbanized Area and accounts for 56.2% of the population. A map depicting the City of Gadsden's urbanized area and city limits is in **Appendix E-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Jeramy Ward, CPMSM, CPESC  
Engineering Superintendent  
90 Broad Street  
Gadsden, AL 35901  
256-549-4527  
[jward@cityofgadsden.com](mailto:jward@cityofgadsden.com)

### 5.1 Public Education and Public Involvement on Storm Water Impacts

#### 5.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Gadsden completed thirteen (13) of the thirteen (13) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed thirty-one (31) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies were:

- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 9a)



- The City of Gadsden posted a Construction and LID educational pamphlet on the stormwater web page (Activity 9b)
- The City of Gadsden has placed 60 recycling trailers at 47 locations around the County to collect cardboard to be taken to the City's recycling center (Activity 14)
- The City of Gadsden recycled copy paper and newspapers, bottles, and cans at City Hall (Activity 15)
- The City of Gadsden maintained No Dumping / No Littering Signs (Activity 16)
- The City of Gadsden participated in Public Meetings and educational training classes related to non-point source and storm water issues (Activities 17 and 41)
- The City of Gadsden has maintained the Black Creek Trail along the creek (Activity 18)
- The City of Gadsden supported the Gadsden Beautification Board (Activity 19)
- The City of Gadsden advertised events and council meetings as well as photos from events promoted by the City on the Facebook page (Activity 20)
- The City of Gadsden coordinated and participated in cleanups along Black Creek Gorge and Wildlife Sanctuary (Activity 21)
- The City of Gadsden coordinated and participated in cleanups at the River Walk at Coosa Landing (Activity 22)
- The City of Gadsden has participated and provided in-kind services at the Habitat Dragon Boat Festival (Activity 23)
- The City of Gadsden attended the Keep Etowah Beautiful Breakfast and received 3 awards for participation and cooperation in KEB events (Activity 24)
- The City of Gadsden community group conducted a cleanup at the Noccalula Gorge (Activity 25)
- The City of Gadsden Engineering Department maintained five pet waste stations (Activity 26)
- The City of Gadsden maintained a storm water inspection camera to help find storm water issues in the closed storm water system portions. (Activity 27)
- The City of Gadsden sponsored the AG Day Event (Activity 28)
- The City of Gadsden sponsored the KEB Message in a Bottle event (Activity 29)
- The City of Gadsden installed dog waste signs in downtown residential areas (Activity 30)
- The City of Gadsden installed inlets with water quality message cast in them (Activity 31)
- The City of Gadsden announced storm water activities, events, and information at Council Meetings (Activity 32)
- The City of Gadsden used a digital sign to promote and advertise events (Activity 33)
- The City of Gadsden provided curbside garbage pickup and collection cans for residents (Activity 34)
- The City of Gadsden enforced a Litter Ordinance (Activity 35)
- The City of Gadsden provided brush pickup to residents (Activity 36)
- The City of Gadsden provided street sweeping within City Limits (Activity 37)
- The City of Gadsden utilized County inmate crews for litter pickup throughout the City (Activity 38)
- The City of Gadsden provided large item pickup to residents (Activity 39)
- The City of Gadsden participated in Arbor Day Tree give-a-way (Activity 40)
- The City of Gadsden opened a dog park to help confine pet waste (Activity 42)



A table identifying each Public Education and Public Involvement strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Gadsden, and a brief description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

### *5.1.2 Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### *5.1.3 Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

### *5.1.4 Proposed Changes*

The City of Gadsden requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

### *5.1.5 Responsible Party*

The City of Gadsden Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

## **5.2 Illicit Discharge Detection and Elimination**

### *5.2.1 Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Gadsden completed eighteen (18) of the eighteen (18) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed one (1) strategy beyond those proposed in the previous Annual Report and 2017 SWMPP:

- The City of Gadsden participated in educational training classes related to non-point source and storm water issues (Activity 19)



A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

### *5.2.2 Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### *5.2.3 Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### *5.2.4 Proposed Changes*

The City of Gadsden requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### *5.2.5 Responsible Party*

The City of Gadsden Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Gadsden regulated MS4 area.

## **5.3 Construction Site Storm Water Runoff**

### *5.3.1 Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Gadsden completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed four (4) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP:

- The City of Gadsden provided an all-inclusive pamphlet on storm water impacts from construction site runoff to individuals requesting building/development permits (Activity 7)
- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 8)



- The City of Gadsden Engineering Employees discussed with the contractor's responsibility for Erosion and Sediment Control during construction project meetings (Activity 9)
- The City of Gadsden participated in Public Meetings and educational training classes related to non-point source and storm water issues (Activity 9)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

### 5.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 5.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 5.3.4 *Proposed Changes*

The City of Gadsden requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 5.3.5 *Responsible Party*

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

## 5.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

### 5.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Gadsden completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.



The City of Gadsden also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP:

- The City of Gadsden participated in Public Meetings and educational training classes related to non-point source and storm water issues (Activity 8)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

#### 5.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 5.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

#### 5.4.4 *Proposed Changes*

The City of Gadsden requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.

#### 5.4.5 *Responsible Party*

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

### 5.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

#### 5.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Gadsden completed nine (9) of the nine (9) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.



The City of Gadsden also completed thirteen (13) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Gadsden recycled copy paper and newspapers, bottles, and cans at City Hall (Activity 10)
- The City of Gadsden placed 60 recycling trailers at 47 locations around the County to collect cardboard to be taken to the City's recycling center (Activity 11)
- The City of Gadsden maintained petroleum spill kits on municipal trucks and equipment and replaced when needed (Activity 12)
- Mr. Jeramy Ward, Engineering Superintendent, is a Certified Professional in Erosion and Sediment Control (Activity 13)
- Mr. Jeramy Ward, Engineering Superintendent, is a Certified Professional in Municipal Storm Water Management. (CPMSM) (Activity 14)
- The City of Gadsden provided large item pickup to residents (Activity 15)
- The City of Gadsden utilized County inmate crews for litter pickup throughout the City (Activity 16)
- The City of Gadsden provided curbside garbage pickup and collection cans for residents (Activity 17)
- The City of Gadsden coordinated and participated in cleanups along Black Creek Gorge and Wildlife Sanctuary (Activity 18)
- The City of Gadsden coordinated and participated in cleanups at the River Walk at Coosa Landing (Activity 19)
- The City of Gadsden purchased a storm water inspection camera to help find storm water issues in the closed storm water system portions. (Activity 20)
- The City of Gadsden participated in educational training classes and public meetings related to non-point source and storm water issues (Activities 21 and 22)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

### 5.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 5.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.



#### 5.5.4 *Proposed Changes*

The City of Gadsden requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

#### 5.5.5 *Responsible Party*

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

### 5.6 **Overall Program Evaluation**

#### 5.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 53 out of 53 planned strategies and 47 additional strategies. The number of total completed activities (100) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The City completed the Storm Water System Map in 2016 by walking 53.21 miles of streams within the Urbanized Area and identifying 898 outfalls. During this reporting period, the City walked 16.6 miles of streams during inspection activities. The City inspected 119 outfalls and dry weather screening was conducted at each of the outfalls. Three (3) dry weather flows were observed and 2 were confirmed to be illicit discharges. Through investigation, these discharges were eliminated.

The City added 1,862 storm features to the Storm Water Map to include 926 Inlets, 143 Manholes, 724 Pipes, 41 Culverts, and 28 Open Channels.

The City used the previously established SOPs and an associated checklist for inspections of eight municipal facilities that have the potential to discharge pollutants through storm water runoff. 108 inspections were performed during the reporting period. The inspections identified six deficiencies that have been corrected.

Through municipal operations the City provides brush, limb, and large-item pickup, recycling, and street sweeping. The City provide curbside garbage pickup for 10,787 households. While not all collection services can be quantified a total of 14,261 tons of debris/garbage (12,310 tons brush/limp debris, 550 tons cardboard, 143 tons mixed paper, 45 tons plastic, 4 tons aluminum, 74 tons metals, 15 tons electronics, 168 tons lbs. glass, 52 tons of litter). The collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.

The City has a strong partnership with Keep Etowah Beautiful. This reporting period the City was awarded the Municipality Award, the Engineering Department received the Community Award and 5 employees



received Extra Mile Awards. The City has a strong presence in the community and the county. They offer many opportunities for the citizens to become involved in stormwater events throughout the year.

### 5.6.2 *Overall Programs Strengths and Weaknesses*

The City of Gadsden's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

The City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit. During construction project meetings, the City of Gadsden Engineering employees discuss the contractor's responsibility for Erosion and Sediment Control.

Another strength is the completion of the Storm Water System Map with the identification of 898 outfalls and 53.21 miles of streams. Additionally, the City has created an Interactive GIS database system to store illicit discharge information. This GIS database provides a significant advantage in tracking in illicit discharge investigations.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs an Engineering Superintendent as the primary executive of the storm water program. The Engineering Department assists with the storm water program responsibilities, including GIS mapping, performing required inspections and assisting with public education efforts; however, the majority of the program duties are handled by one individual. The City does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

### 5.6.3 *Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies between departments. The City of Gadsden is committed to educating the citizens of the SWMP and how the actions of others can impact the storm water and the Coosa River.

### 5.6.4 *Overall effectiveness of the SWMPP*

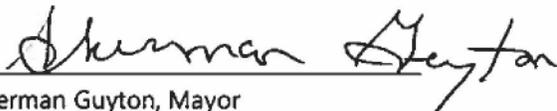
The City of Gadsden is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



## 5.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

  
\_\_\_\_\_  
Sherman Guyton, Mayor  
City of Gadsden, Alabama

5/28/2020  
Date



## 6.0 City of Glencoe (ALR0400054)

The City of Glencoe (City) encompasses approximately 5% of the Urbanized Area and accounts for 4.4% of the population. A map depicting the City of Glencoe's urbanized area and city limits is in **Appendix F-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Todd Means  
Code Official  
201 Chastain Blvd W  
Glencoe, AL 35905  
(256)492-1424  
toddmeans@cityofglencoe.net

### 6.1 Public Education and Public Involvement on Storm Water Impacts

#### 6.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Glencoe completed nine (9) of the nine (9) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed eleven (11) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Glencoe participated in educational training classes related to non-point source and storm water issues (Activity 10)



- The City of Glencoe attended the Keep Etowah Beautiful Breakfast and received an award for participation and cooperation in KEB events (Activity 11)
- The City of Glencoe announced stormwater activities and information at Council Meetings (Activity 12)
- The City of Glencoe utilized a digital sign to promote and advertise events (Activity 13)
- The City of Glencoe provided curbside garbage pickup and a collection can to residents (Activity 14)
- The City of Glencoe provided brush pickup to residents (Activity 15)
- The City of Glencoe used County inmates to pick up litter (Activity 16)
- The City of Glencoe provided dumpsters at City Hall for garbage disposal for residents (Activity 17)
- The City of Glencoe recycled used oil from city vehicles (Activity 18)
- The City of Glencoe collected and recycled scrap metal (Activity 19)
- The City of Glencoe promoted Clean Earth Day and collected paint (Activity 20)

A table identifying each Public Education and Public Involvement strategy planned for the 2020-2021 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

#### 6.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 6.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

#### 6.1.4 *Proposed Changes*

The City of Glencoe requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

#### 6.1.5 *Responsible Party*

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.



## 6.2 Illicit Discharge Detection and Elimination

### 6.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Glencoe completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP:

- The City of Glencoe participated in educational training classes related to non-point source and storm water issues (Activity 7)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

### 6.2.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to the ADEM.

### 6.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### 6.2.4 *Proposed Changes*

The City of Glencoe requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### 6.2.5 *Responsible Party*

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Glencoe regulated MS4 area.



## 6.3 Construction Site Storm Water Runoff

### 6.3.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Glencoe completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP:

- The City of Glencoe participated in educational training classes related to non-point source and storm water issues (Activity 7)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

### 6.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 6.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 6.3.4 *Proposed Changes*

The City of Glencoe requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 6.3.5 *Responsible Party*

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.



## 6.4 Post-Construction Storm Water Management in New Development and Redevelopment

### 6.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Glencoe completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed three (3) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Glencoe maintained valley gutters throughout the City (Activity 8)
- The City of Glencoe performed maintenance activities and removed debris from a storm water management controls (Activity 9)
- The City of Glencoe participated in educational training classes related to non-point source and storm water issues (Activity 10)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

### 6.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 6.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

### 6.4.4 *Proposed Changes*

The City of Glencoe requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.



#### 6.4.5 *Responsible Party*

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

### 6.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

#### 6.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Glencoe completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed six (6) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- The City of Glencoe recycled used oil from city vehicles (Activity 7)
- The City of Glencoe provided curbside garbage pickup and a collection can to residents (Activity 8)
- The City of Glencoe used County inmates to pick up litter (Activity 9)
- The City of Glencoe provided dumpsters at City Hall for garbage disposal for residents (Activity 10)
- The City of Glencoe collected and recycled scrap metal (Activity 11)
- The City of Glencoe participated in educational training classes related to non-point source and storm water issues (Activity 12)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

#### 6.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 6.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.



#### 6.5.4 *Proposed Changes*

The City of Glencoe requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

#### 6.5.5 *Responsible Party*

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

### 6.6 **Overall Program Evaluation**

#### 6.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 45 out of 45 planned strategies and 22 additional strategies. The number of total completed activities (67) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The City contracted S&ME, Inc. to conduct stream-walking activities. The Storm Water System Map was completed in 2018. During stream-walking activities, 5.63 miles of streams have been walked within the Urbanized Area and 83 total outfalls were identified. During this reporting period, the City inspected 19 outfalls and dry weather screening was conducted at each of the outfalls. One (1) dry weather flow was observed. Illicit discharges were not identified, and samples were not collected.

The City used the previously established SOPs and an associated checklist for inspections of 3 municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.

Through municipal operations the City provides brush, limb, and large-item pickup, and recycling. The City provide curbside garbage pickup for 2,191 households. While not all collection services can be quantified a total of 20 gallons of used oil and 6,760 cubic yards of brush/limbs were collected during the reporting period. The collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.

The City has a strong partnership with Keep Etowah Beautiful. This reporting period the City was awarded the Municipality Award.

#### 6.6.2 *Overall Programs Strengths and Weaknesses*

The City of Glencoe's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.



Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength is the completion of the Storm Water System Map with the identification of 83 outfalls and 5.63 miles of streams. Additionally, the City has created an Interactive database system on Google Earth for outfall locations.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs Code Enforcer/Storm Water Coordinator as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.

### *6.6.3 Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Glencoe is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

### *6.6.4 Overall effectiveness of the SWMPP*

The City of Glencoe is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



## 6.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink, appearing to read "Charles Gilchrist", written over a horizontal line.

Charles Gilchrist, Mayor  
City of Glencoe, Alabama

May 22 2020

Date



## 7.0 City of Hokes Bluff (ALR0400055)

The City of Hokes Bluff (City) encompasses approximately 5.5% of the Urbanized Area and accounts for 4.4% of the population. A map depicting the City of Hokes Bluff's urbanized area and city limits is in **Appendix G-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Ms. Lisa Johnson  
City Clerk  
3301 Alford Bend Road  
Hokes Bluff, AL 35903  
(256) 492-2414  
lisa.johnson@cityofhokesbluff.com

### 7.1 Public Education and Public Involvement on Storm Water Impacts

#### 7.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Hokes Bluff completed ten (10) of the eleven (11) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP. The City planned to coordinate a community cleanup day in March 2020 (Activity 7); however, the event was cancelled due to COVID-19.

The City of Hokes Bluff also completed twenty-five (25) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Hokes Bluff purchased an advertisement within the Hokes Bluff High School Football Program (Activity 12)

**Annual Report: April 1, 2019 – March 31, 2020**

**Gadsden- Etowah MS4 Entities**

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-19-066



- The City of Hokes Bluff purchased t-shirts and gave them to participants at Hokes Bluff City Fest (Activity 13)
- The City of Hokes Bluff maintained 2 "Pet Waste Station" (Activity 14)
- The City of Hokes Bluff celebrated Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 15)
- The City of Hokes Bluff purchased an advertisement at the Softball and Football fields that included a storm water education slogan (Activity 16)
- The City of Hokes Bluff partnered with Keep Etowah Beautiful and the Etowah County Sheriff's Department to Clean up Highway 278 (Activity 17)
- The City of Hokes Bluff maintained the Ferry Landing and utilized part time labor during the months of May through October to clean up the area (Activity 18)
- The City of Hokes Bluff maintained the Mill Pond Park and utilized part time labor during the months of May through October to clean up the area (Activity 19)
- The City of Hokes Bluff offered city dumpsters for additional waste at any time (Activity 20)
- The City of Hokes Bluff advertised a trailer for cardboard at the City Hall placed by the City of Gadsden (Activity 21)
- The City of Hokes Bluff provided drink huggers with a storm water awareness slogan to all attendees of the Hokes Bluff Fest (Activity 22)
- The City of Hokes Bluff announced ways to protect storm water on radio during ball games (Activity 23)
- The City of Hokes Bluff announced ways to protect storm water on the TV during ball games (Activity 24)
- The City of Hokes Bluff purchased an advertisement at the high school gym that included a storm water education slogan (Activity 25)
- The City of Hokes Bluff enforced a Litter Ordinance (Activity 26)
- The City of Hokes Bluff provided brush pickup to residents (Activity 27)
- The City of Hokes Bluff managed a drop-off facility for used oil and scrap metal (Activity 28)
- The City of Hokes Bluff supported a Beautification Board (Activity 29)
- The City of Hokes Bluff provided curbside garbage pickup and a collection can to residents (Activity 30)
- The City of Hokes Bluff provided dumpsters for customers of garbage pickup to dispose of large items (Activity 31)
- The City of Hokes Bluff placed door hangers on residents to make them aware of storm water problem/issue at their property (Activity 32)
- The City of Hokes Bluff used a digital sign to advertise/promote events (Activity 33)
- The City of Hokes Bluff sponsored a hole in the Etowah County Sherriff's Charity Golf Tournament with Storm water Awareness (Activity 34)
- The City of Hokes Bluff provides educational materials for the Library Summer Reading Activities (Activity 35)
- The City of Hokes Bluff announced storm water activities and information at Council Meetings (Activity 36)



A table identifying each Public Education and Public Involvement strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Hokes Bluff, and a brief description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

### 7.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

### 7.1.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

### 7.1.5 *Responsible Party*

The City of Hokes Bluff Mayor's office are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

## 7.2 **Illicit Discharge Detection and Elimination**

### 7.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Hokes Bluff completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Hokes Bluff also completed one (1) strategy beyond those proposed in the previous Annual Report. This strategy was:

- The City of Hokes Bluff placed door hangers on residents to make them aware of storm water problem/issue at their property (Activity 18)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities



planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

### 7.2.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to the ADEM.

### 7.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### 7.2.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### 7.2.5 *Responsible Party*

The City of Hokes Bluff Mayor's office are responsible for overseeing, developing, and coordinating the IDDE program in the City of Hokes Bluff regulated MS4 area.

## 7.3 **Construction Site Storm Water Runoff**

### 7.3.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Hokes Bluff completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.



### 7.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 7.3.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 7.3.5 *Responsible Party*

The City of Hokes Bluff Mayor's office are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

## 7.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

### 7.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Hokes Bluff completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

### 7.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



### 7.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

### 7.4.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.

### 7.4.5 *Responsible Party*

The City of Hokes Bluff Mayor's office are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

## 7.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

### 7.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Hokes Bluff completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Hokes Bluff completed six (6) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Hokes Bluff maintained the Mill Pond Park and utilized part time labor during the months of May through October to clean up the area (Activity 9)
- The City of Hokes Bluff partnered with Keep Etowah Beautiful and the Etowah County Sheriff's Department to Clean up Highway 278 (Activity 10)
- The City of Hokes Bluff maintained 12 "No Littering" Signs within the City (Activity 11)
- The City of Hokes Bluff advertised a trailer for cardboard at the City Hall placed by the City of Gadsden (Activity 12)
- The City of Hokes Bluff provided curbside garbage pickup and a collection can to residents (Activity 13)
- The City of Hokes Bluff provided dumpsters for customers of garbage pickup to dispose of large items (Activity 14)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.



### 7.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

### 7.5.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

### 7.5.5 *Responsible Party*

The City of Hokes Bluff Mayor's office are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

## 7.6 **Overall Program Evaluation**

### 7.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 48 out of 49 planned strategies and 32 additional strategies. The number of total completed activities (80) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The City of Hokes Bluff contracted S&ME, Inc. to conduct stream-walking activities. The Storm Water System Map was completed this reporting period. During stream-walking activities, 9.16 miles of streams have been walked within the Urbanized Area and 103 total outfalls were identified. During this reporting period, the City walked inspected 23 outfalls and dry weather screening was conducted at each of the outfalls. Two (2) dry weather flows were observed. No illicit discharges were identified, and no samples were collected.

Through municipal operations the City provides brush, limb, and large-item pickup and recycling. The City provide curbside garbage pickup for 1,604 households. While not all collection services can be quantified, the collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.



The City used the previously established SOPs and an associated checklist for inspections of 9 municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.

### *7.6.2 Overall Programs Strengths and Weaknesses*

The City of Hokes Bluff's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

Even though the City has a limited number of construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the continued public education efforts. The City has continued their community education and involvement in unique ways like a football program, signs at baseball/softball fields, t-shirt give-a-ways, free drink huggers at City Fest, and free dumpster days.

Another strength is the completion of the Storm Water System Map with the identification of 103 outfalls and 9.16 miles of streams. Additionally, the City has created an Interactive GIS database system to store illicit discharge information. This GIS database provides a significant advantage in tracking in illicit discharge investigations.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs the City Clerk as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.

### *7.6.3 Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Hokes Bluff is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

### *7.6.4 Overall effectiveness of the SWMPP*

The City of Hokes Bluff is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



## 7.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

Handwritten signature of Scott Reeves in black ink.

\_\_\_\_\_  
Scott Reeves, Mayor  
City of Hokes Bluff, Alabama

5-21-2020

Date



## 8.0 Rainbow City (ALR0400056)

The City of Rainbow City (City) encompasses approximately 10.2% of the Urbanized Area and accounts for 11.3% of the population. A map depicting Rainbow City's urbanized area and city limits is in **Appendix H-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

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Director of Planning  
3700 Rainbow Drive  
Rainbow City, AL 35906  
[256-413-1240](tel:256-413-1240)  
[jgarmon@rbcalabama.com](mailto:jgarmon@rbcalabama.com)

### 8.1 Public Education and Public Involvement on Storm Water Impacts

#### 8.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Rainbow City completed nine (9) of the ten (10) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP and started working on one (1) strategy. The City advertised and promoted Water Quality Awareness Week but did not coordinate a stormwater activity associated with the week (Activity 5).

Rainbow City completed eight (8) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:



- Rainbow City participated in educational training classes related to non-point source and storm water issues (Activities 11 and 18)
- Rainbow City provided brush pickup for residents (Activity 12)
- Rainbow City utilized Etowah County inmates to pick up litter throughout the City (Activity 13)
- Rainbow City provided large item pickup for residents (Activity 14)
- Rainbow City announced storm water activities and information at Council Meetings (Activity 14)
- Rainbow City used a digital sign to promote and advertise storm water events (Activity 16)
- Rainbow City maintained recycling trailers at 18 locations (Activity 17)

A table identifying each Public Education and Public Involvement strategy planned for the 2019-2020 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

### 8.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 8.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

### 8.1.4 *Proposed Changes*

Rainbow City requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

### 8.1.5 *Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

## 8.2 **Illicit Discharge Detection and Elimination**

### 8.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Rainbow City completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.



Rainbow City completed one (1) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Rainbow City participated in educational training classes related to non-point source and storm water issues (Activity 18)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

### *8.2.2 Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### *8.2.3 Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### *8.2.4 Proposed Changes*

Rainbow City requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### *8.2.5 Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the IDDE program in the Rainbow City regulated MS4 area.

## **8.3 Construction Site Storm Water Runoff**

### *8.3.1 Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Rainbow City completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies are:



- Rainbow City participated in educational training classes related to non-point source and storm water issues (Activities 7 and 8)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

### 8.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 8.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 8.3.4 *Proposed Changes*

Rainbow City requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 8.3.5 *Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

## 8.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

### 8.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Rainbow City completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies are:



- Rainbow City participated in educational training classes related to non-point source and storm water issues (Activities 8 and 9)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

#### 8.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 8.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

#### 8.4.4 *Proposed Changes*

Rainbow City requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.

#### 8.4.5 *Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

### 8.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

#### 8.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Rainbow City completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed five (5) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Rainbow City maintained recycling trailers at 18 locations (Activity 7)



- Rainbow City participated in educational training classes related to non-point source and storm water issues (Activities 8 and 11)
- Rainbow City utilized Etowah County inmates to pick up litter throughout the City (Activity 9)
- Rainbow City provided large item pickup for residents (Activity 10)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

### 8.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 8.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

### 8.5.4 *Proposed Changes*

Rainbow City requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

### 8.5.5 *Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

## 8.6 **Overall Program Evaluation**

### 8.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 45 out of 46 planned strategies, partially completed 1 strategy, and completed 18 additional strategies. The number of total completed activities (63) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.



The City organized and categorized the 659 structures provided by Brent Means Land Surveying to identify the outfalls that enter blue-line streams of the Coosa River. Through this evaluation, 393 structures were identified within the MS4 boundary. Through aerial photography, 102 structures appeared to be in the vicinity of a probable outfall. The City evaluated 30 of the 102 structures and identified 37 outfalls. An additional 75 probable outfalls were identified based on aerial photography. Seventeen (17) of the probable outfalls were field verified resulting in 6 identified outfalls. Therefore, the City identified and inspected 43 known outfalls. Dry weather screening was conducted at each of the outfalls. Two (2) dry weather flows were identified; however, no illicit discharges were identified, and no samples were taken.

The City established a recycling program in 2018 that includes trailers in 18 locations throughout the City. Since then, the City has maintained and expanded the recycling program.

Through municipal operations the City provides brush, limb, and large-item pickup, and recycling. The While the collection services cannot be quantified, the collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.

The City used the previously established SOPs and an associated checklist for inspections of the five municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified one deficiency that has been corrected.

### *8.6.2 Overall Programs Strengths and Weaknesses*

Rainbow City's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs a Director of Planning as the primary executive of the storm water program. The City does not have a Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.



### 8.6.3 *Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. Rainbow City is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

The City plans to complete their stream walking program during the next two reporting periods. During the 2020-2021 reporting period, the City will organize and categorize the additional 186 structures provided in April 2020 by Brent Means Land Surveying. The City will walk 6.95 miles of stream in Zones 2 & 3 and evaluate the remaining structures in Zones 2 & 3 during 2020-2021. The City will walk 7.25 miles of stream in Zone 1 and evaluate the remaining structures in Zone 1 during 2020-2021.

### 8.6.4 *Overall effectiveness of the SWMPP*

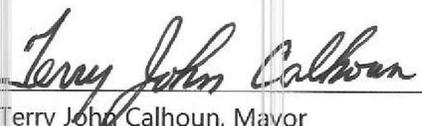
Rainbow City is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.

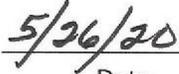


## 8.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

  
\_\_\_\_\_  
Terry John Calhoun, Mayor  
Rainbow City, Alabama

  
\_\_\_\_\_  
Date



## 9.0 City of Southside (ALR0400057)

The City of Southside (City) encompasses approximately 13.4% of the Urbanized Area and accounts for 10% of the population. A map depicting the City of Southside's urbanized area and city limits is in

### Appendix I-1, Figure 1.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Judd Rich  
2255 Highway 77  
Southside, AL 35907  
256-442-9775  
Juddrich@cityofsouthside.com

## 9.1 Public Education and Public Involvement on Storm Water Impacts

### 9.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Southside completed thirteen (13) of the thirteen (13) Public Education and Outreach strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed twenty (20) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Southside posted educational materials on the Gadsden Times website (Activity 1a)
- The City of Southside maintains signs at the storm water monitoring locations (Activity 14)
- The City of Southside provided educational pamphlets to the City Council Members (Activity 15)



- The City of Southside placed bookmarks in the library and educational materials in the community center (Activity 16)
- The City of Southside uses a digital sign to promote and advertise City sponsored storm water events (Activity 17)
- The City of Southside The City created a Beautification Board (Activity 18)
- The City of Southside participated in educational training classes related to non-point source and storm water issues (Activity 19)
- The City of Southside recycles aluminum cans in the break room at the City Hall (Activity 20)
- The City of Southside recycles metal from city projects (Activity 21)
- The City of Southside collects and recycles used oil at the Maintenance Shop (Activity 22)
- The City of Southside advertises the Gadsden Recycling Center on the webpage (Activity 23)
- The City of Southside has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 24)
- The City of Southside offers dumpsters for citizens to dispose of debris, garbage, and large items (Activity 25)
- The City of Southside announces storm water activities and information at Council Meetings (Activity 26)
- The City of Southside has installed inlets with water quality message cast in them (Activity 27)
- The City of Southside provides curbside garbage pickup and a collection can to residents (Activity 28)
- The City of Southside uses County prisoner cleanup along City, County, and State right-of-way upon request (Activity 29)
- The City of Southside has a Litter Ordinance (Activity 30)
- The City of Southside provides brush pickup to residents (Activity 31)
- The City of Southside provides large item pickup to residents (Activity 32)

A table identifying each Public Education and Outreach strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

### 9.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Public Education and Outreach Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 9.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the



community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

#### 9.1.4 *Proposed Changes*

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2017 SWMPP.

#### 9.1.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

## 9.2 **Illicit Discharge Detection and Elimination**

### 9.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Southside completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed four (4) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies were:

- The City of Southside provided chemical spill training for employees (Activity 15)
- The City of Southside maintains signs at the storm water monitoring locations (Activity 17)
- The City of Southside participated in educational training classes related to non-point source and storm water issues (Activity 20)
- The City of Southside has installed inlets with water quality message cast in them (Activity 21)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

### 9.2.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



### 9.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### 9.2.4 *Proposed Changes*

The City of Southside requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### 9.2.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Southside regulated MS4 area.

## 9.3 **Construction Site Storm Water Runoff**

### 9.3.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Southside completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. The strategy was:

- The City of Southside provides rain gauges at each construction site (Activity 7)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

### 9.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



### 9.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 9.3.4 *Proposed Changes*

The City of Southside requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 9.3.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

## 9.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

### 9.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Southside completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. The strategy was:

- The City of Southside maintained a detention pond, to alleviate occasional flooding of Powell St. & pooling around a residential structure (Activity 8).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

### 9.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Post-Construction Storm Water Management Program during the 2020-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



### 9.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

### 9.4.4 *Proposed Changes*

The City of Southside requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.

### 9.4.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

## 9.5 **Pollution Prevention and Good Housekeeping for Municipal Operations**

### 9.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the City of Southside completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed fourteen (14) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Southside used minimal amounts of herbicides at ball fields (Activity 9)
- The City of Southside provided chemical spill training for employees (Activity 10)
- The City of Southside placed materials to respond to spills at the maintenance shop (Activity 11)
- The City of Southside collects and recycles used oil at the Maintenance Shop (Activity 12)
- The City of Southside advertised the Gadsden Recycling Center on the webpage (Activity 13)
- The City of Southside recycled metal from city projects (Activity 14)
- The City of Southside recycles aluminum cans in the break room at the City Hall (Activity 15)
- The City of Southside uses County prisoner cleanup along City, County, and State right-of-way upon request (Activity 16)
- The City of Southside maintains containment facilities for Used Oil & Off-Road Diesel Storage Tanks (Activity 17)
- The City has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 18)
- The City of Southside participated in educational training classes related to non-point source and storm water issues (Activity 19)



- The City of Southside offers dumpsters for citizens to dispose of debris, garbage, and large items (Activity 20)
- The City of Southside provides large item pickup to residents (Activity 21)
- The City of Southside provides curbside garbage pickup to residents (Activity 22)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

### 9.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 9.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

### 9.5.4 *Proposed Changes*

The City of Southside requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

### 9.5.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

## 9.6 Overall Program Evaluation

### 9.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth. The City completed 51 out of 51 planned strategies and completed 40 additional strategies. This is twice the number of additional strategies than in the past reporting periods. The number of total completed activities (91) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.



The City of Southside hired a new License Inspector and Building Official in spring 2018 to help implement the SWMPP. He has been dedicated in understanding the permit and how to best implement it within the constraints of the City. He is organized and does a great job documenting the efforts of the City.

The City of Southside has completed the Storm Water System Map. Sixteen outfalls have been identified. Twelve outfalls were inspected during the reporting period and dry weather screening was conducted at each of the outfalls. No illicit discharges were observed, and no samples were collected.

Through municipal operations the City provides brush, limb, and large-item pickup, and recycling. The City provide curbside garbage pickup for 3,818 households. While not all collection services can be quantified a total of 2660 pounds of aluminum/metal and 300 gallons of used oil were collected during the reporting period. The collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.

The City used the previously established SOPs and an associated checklist for inspections of the three (3) municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.

### *9.6.2 Overall Programs Strengths and Weaknesses*

The City of Southside's SWMPP is considerably stronger and more effective than the previous reporting periods. The City continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

The main strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods. Although the City did not host a City Fest this year, that did not impede them from staffing a storm water display and advertise "Water Quality Awareness Week" at the Community Center.

Another strength is the completion of the Storm Water System Map with the identification of 16 outfalls. This will significantly help the City in illicit discharge investigations.

During this reporting period, the City has improved their ability to document and track the completion of the strategies. Photographs are taken to document inspections and quality of strategies. Information collected is organized in a binder allowing for immediate review if the need arises.

The main weakness of the program is the small number of municipal staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs Building Inspector as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.



### 9.6.3 *Future Direction of the Program*

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City of Southside is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

### 9.6.4 *Overall effectiveness of the SWMPP*

The City of Southside is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



## 9.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink that reads "Wally Burns".

Wally Burns, Mayor  
City of Southside, Alabama

5/28/2020  
Date



## 10.0 Etowah County (ALR0400009)

Unincorporated portions of Etowah County (County) within the *Gadsden, Alabama Urbanized Area* encompass approximately 16.5% of the Urbanized Area and account for approximately 4.5% of the population. Although only a relatively small portion of unincorporated Etowah County lies within the MS4 boundary, the majority of Etowah County lies within the Coosa River watershed. The information, resources, minimum control measures, and best management practices developed for the MS4 Storm Water Management Program can be applied to any area within the County and therefore ultimately benefit water quality of the Coosa River. A map depicting the Etowah County's urbanized area and county limits is in **Appendix J-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the County planned to undertake regarding the following five minimum control measures:

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

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 and 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Robert Nail, P.E.  
County Engineer  
402 Tuscaloosa Ave  
Gadsden, AL 35901  
(256) 549-5358  
rnail@etowahcounty.org

### 10.1 Public Education and Public Involvement on Storm Water Impacts

#### 10.1.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Etowah County completed eleven (11) of the eleven (11) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed nine (9) strategies beyond those proposed in the previous Annual Report or 2017 SWMPP. These strategies included:



- Etowah County partnered with Advanced Disposal to place open-top containers at several locations across County (Activity 12)
- Etowah County sponsored a Drug Collection Day (Activity 13)
- Etowah County supported Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 14)
- Etowah County utilized County inmates to collect trash along the County highways throughout the year (Activity 15)
- Etowah County participated in educational training classes related to non-point source and storm water issues (Activity 16)
- Etowah County announced storm water activities and information at Commission Meetings (Activity 17)
- Etowah County enforced a Litter Ordinance (Activity 18)
- Etowah County managed a drop off facility for oil waste recycling (Activity 19)
- Etowah County collected aluminum cans for recycling (Activity 20)

A table identifying each Public Education and Public Involvement strategy planned for the 2019-2020 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

#### 10.1.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Public Education and Public Involvement Program during the 2020-2021 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.1.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

#### 10.1.4 *Proposed Changes*

Etowah County requests no other changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

#### 10.1.5 *Responsible Party*

The Etowah County Engineering Department is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.



## 10.2 Illicit Discharge Detection and Elimination

### 10.2.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the Etowah County completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. The strategy was:

- Etowah County removed tires illegally dumped on roadway.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2019-2020 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

### 10.2.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Illicit Discharge Detection and Elimination Program during the 2020-2021 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 10.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

### 10.2.4 *Proposed Changes*

Etowah County requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

### 10.2.5 *Responsible Party*

The Etowah County Engineering Department is responsible for overseeing, developing, and coordinating the IDDE program in the Etowah County regulated MS4 area.



## 10.3 Construction Site Storm Water Runoff

### 10.3.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, the Etowah County completed five (5) of the five (5) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2019-2020 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

### 10.3.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Construction Site Storm Water Runoff Program during the 2020-2021 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 10.3.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

### 10.3.4 *Proposed Changes*

The Etowah County requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

### 10.3.5 *Responsible Party*

The Etowah County Engineering Department is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

## 10.4 Post-Construction Storm Water Management in New Development and Redevelopment

### 10.4.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Etowah County met seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:



- Etowah County worked to reduce runoff within our right-of way and monitor our areas for erosion using riprap and vegetation (Activity 8)
- Etowah County Partnered with Alabama Department of Conservation and Natural Resources to preserve the endangered rush darter on unnamed tributary to Bristow Creek (Activity 9)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2019-2020 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

#### 10.4.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Post-Construction Storm Water Management Program during the 2020-2021 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

#### 10.4.4 *Proposed Changes*

Etowah County requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.

#### 10.4.5 *Responsible Party*

The Etowah County Engineer's Office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post-Construction Site Storm Water Runoff strategies.

### 10.5 **Pollution Prevention and Good Housekeeping for County Operations**

#### 10.5.1 *Implementation Status*

During the April 1, 2019 to March 31, 2020 reporting period, Etowah County completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed eight (8) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:



- Etowah County removed dead animals from the roadside (Activity 9)
- Etowah County cleared and removed trees and brush from drainage ways as needed (Activity 10)
- Etowah County partnered with Advanced Disposal had open-top containers at several locations across County (Activity 11)
- Etowah County provided trash bags for cleanup, maintains the Adopt-A-Mile signs, and disposes of the garbage collected. (Activity 12)
- Etowah County maintained "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs (Activity 13)
- Etowah County utilized County inmates to collect trash along the County highways throughout the year (Activity 14)
- Etowah County removes and disposes tires as needed (Activity 15)
- Etowah County participated in educational training classes related to non-point source and storm water issues (Activity 16)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2019-2020 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

#### 10.5.2 *Proposed Activities for the April 1, 2020 to March 31, 2021 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2020-2021 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

#### 10.5.4 *Proposed Changes*

The Etowah County requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations Program strategies identified in the 2017 SWMPP.

#### 10.5.5 *Responsible Party*

The Etowah County Engineer's Office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within County operations.



## 10.6 Overall Program Evaluation

### 10.6.1 *Major Accomplishments*

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the County was successful in accomplishing the goals set forth. The County completed 48 out of 48 planned strategies and 20 additional strategies. The number of total completed activities (68) demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

Etowah County has completed the Storm Water System Map for Tillison Bend and Whorton Bend and 47 outfalls were identified. Twelve outfalls were inspected during the reporting period and dry weather screening was conducted at each of the outfalls. Two dry weather flows were observed. No illicit discharges were observed, and no samples were collected.

The County re-evaluated the boundaries of the County lines and UA. Some previously identified County areas are now annexed into the Cities. Additionally, some County areas are highly inundated with water and are not easily accessible. Both situations reduced the number of stream miles remaining.

Through County operations the County removes dead animals from the roadside, clears drainageways of trees and debris, offers free garbage disposal days, disposes of disposed tires, and eliminated 12 illegal dump sites. While not all collection services can be quantified a total of 1,368 gallons of used oil and 7.06 tons of metal/aluminum were collected during the reporting period. The collection and proper disposal prevented citizens from dumping into waterways and/or becoming litter that would be carried by stormwater into nearby waterways.

The County used the previously established SOPs and an associated checklist for inspections of the 2 municipal facilities that have the potential to discharge pollutants through storm water runoff. The inspections identified minor household deficiencies that were not related to storm water. Twenty-two vehicle or equipment leaks were identified and corrected during the reporting period.

### 10.6.2 *Overall Programs Strengths and Weaknesses*

Etowah County's SWMPP is considerably stronger and more effective than the previous reporting periods. The County continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. However, their strengths and weaknesses remain very similar as past years.

The biggest strength is Keep Etowah County Beautiful (KEB). The County created KEB to plan, coordinate, document, and complete public educational and involvement activities to create a love for the county and to increase participation in cleanup activities. KEB is a significant strength of the Public Education and Involvement Control Measure. KEB not only contributes to the County's success but also contributes to the success of the Cities within the County.

In Etowah County, Home Rule is limited by the State constitution. Counties have no general grant of power in the State Constitution and must go to the Alabama Legislature for authority to engage in any activity not currently authorized by the State Constitution. Authority may be granted through constitutional amendments or by an act



of the legislature known as "local legislation." Etowah County currently does not have the authority to enact an illicit discharge ordinance and would require action from the Alabama Legislature to gain that ability. This is a weakness to the program that is unavoidable at this time.

Another weakness of the program is the small number of staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The County currently employs two individuals who are the primary executives of the storm water program. The County does have an Engineering Department to assist with the storm water program responsibilities. The County does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

### 10.6.3 *Future Direction of the Program*

During the upcoming reporting period, the County plans to implement the 2017 SWMPP. The County is working to develop a better way to track and document the completion of the strategies. Etowah County is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

The County plans to update their UA map to show annexed areas and indicated which areas are inaccessible during the next reporting period. The County will determine the number of stream miles remaining and will identify outfalls through the stream walking program and map water bodies. The SWMP will be updated during the next reporting period with the obtained information.

### 10.6.4 *Overall effectiveness of the SWMPP*

Etowah County is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



## 10.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink, appearing to read 'Sh. Ellis', is written over a horizontal line.

Responsible Official  
Etowah County, Alabama

A handwritten date '5-26-20' is written in black ink over a horizontal line.

Date

## **Appendices**

## **Appendix A – Figures**

## **Appendix B – Charts & Statistical Evaluation**

## **Appendix C – Monitoring Reports**

**Appendix D – City of Attalla (ALR0400052)**

## **Appendix D-1 – City of Attalla Figures**

**Appendix D-2 – City of Attalla Control Measure Tables**

## **Appendix D-3 – City of Attalla Supporting Documents**

**Appendix E – City of Gadsden (ALR0400053)**

## **Appendix E-1 – City of Gadsden Figures**

**Appendix E-2 – City of Gadsden Control Measure Tables**

## **Appendix E-3 – City of Gadsden Supporting Documents**

**Appendix F – City of Glencoe (ALR0400054)**

## **Appendix F-1 – City of Glencoe Figures**

**Appendix F-2 – City of Glencoe Control Measure Tables**

**Appendix F-3 – City of Glencoe Supporting Documents**

**Appendix G – City of Hokes Bluff (ALR0400055)**

## **Appendix G-1 – City of Hokes Bluff Figures**

**Appendix G-2 – City of Hokes Bluff Control Measure Tables**

**Appendix G-3 – City of Hokes Bluff Supporting Documents**

**Appendix H – City of Rainbow City (ALR0400056)**

## **Appendix H-1 – City of Rainbow City Figures**

**Appendix H-2 – City of Rainbow City Control Measure Tables**

## **Appendix H-3 – City of Rainbow City Supporting Documents**

**Appendix I – City of Southside (ALR0400057)**

## **Appendix I-1 – City of Southside Figures**

**Appendix I-2 – City of Southside Control Measure Tables**

## **Appendix I-3 – City of Southside Supporting Documents**

**Appendix J – Etowah County (ALR0400009)**

## **Appendix J-1 – Etowah County Figures**

## **Appendix J-2 – Etowah County Control Measure Tables**

## **Appendix J-3 – Etowah County Supporting Documents**