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*City Manager*  
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RHONDA FERRELL-BOWLES

*City Attorney*  
JAMES P. GERARD

April 12, 2024

Miranda Knepp  
Environmental Compliance Specialist  
Stormwater Unit, Watershed Protection Branch  
Environmental Protection Division  
2 Martin Luther King, Jr. Drive SE  
Suite 1462 East Tower  
Atlanta, Georgia 30334

RE: City of Garden City, Georgia Phase I Medium Municipal Separate Storm Sewer System (MS4) 2023–2024 Annual Report, Permit #GAS000208

Dear Ms. Knepp,

Enclosed you will find the Phase I Medium MS4 2023–2024 Annual Report for the City of Garden City, Georgia. This report summarizes activities that took place for the reporting period April 1, 2023–March 31, 2024. Due to the large volume of appendices referenced in the Annual Report, the appendices are included as electronic files on the enclosed flash drive. The electronic files are organized with a primary folder for each Minimum Control Measure (MCM) and subfolders for each BMP are included within the corresponding MCM folder. The specific BMP subfolders contain supporting documentation and information required per the City's Stormwater Management Plan.

If you have any questions, or require additional information, please contact me at 912-966-7777.

Sincerely,

Rhonda Ferrell  
Interim City Manager, Garden City

Cc/Christina Dolan, GMC



**State of Georgia**  
**Environmental Protection Division**

**Phase I Medium**  
**Municipal Separate Storm Sewer System**  
**Annual Report**

**Return to:**

Georgia Environmental Protection Division  
Watershed Protection Branch  
NonPoint Source Program  
2 Martin Luther King, Jr. Dr.  
Suite 1462 East  
Atlanta, Georgia 30334

Version: February 2022



**Phase I Medium Municipal Separate Storm Sewer System (MS4)**  
**Annual Report**

**Part 1- General Information**

- A. Name of Permittee: *City of Garden City*
- B. Mailing Address: *100 Central Avenue, Garden City, GA 31405*
- C. Contact Person: *Rhonda Ferrell, Interim City Manager*
- D. E-Mail Address: *rhonda@gardencity-ga.gov*
- E. Telephone Number: *912-966-7777*
- F. Reporting Period: *April 1, 2023 through March 31, 2024*
- G. List any other party or parties (e.g. Keep America Beautiful affiliates) responsible for implementing the Stormwater Management Program (SWMP) or a program component during this reporting period. If not previously submitted, provide a Memorandum of Agreement:

*Garden City shares responsibility for BMP permit implementation with one other entity- Chatham County. Chatham County is responsible for a limited amount of canal maintenance (12.64 miles) in accordance with its Service Delivery Strategy and Memorandum of Agreement (MOA) with Garden City, a copy of which is included in Appendix 1.2.*

H. Certification Statement:

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

Signature: 

Printed Name: *Rhonda Ferrell*

Title: *Interim City Manager*

Date: *April 12, 2024*



## **Part 2 - Implementation Status of SWMP Components**

### **A. Structural and Source Control Measures (Section 3.3.1)**

**Note:** The permittee must maintain an updated inventory of all permanent MS4 structures. At a minimum, include catch basins, ditches, detention/retention ponds and water quality vaults, and storm drain lines.

#### **1. MS4 Structures (Table 3.3.1, Item 1)**

a. How many permanent MS4 structures for which the permittee is responsible were added during this reporting period? (explain type and number of each) *No new MS4 structures were added to the City's inventory.*

b. Including the structures added this reporting period, what is the total number of permanent MS4 structures which the permittee is responsible for inspecting and maintaining?

catch basins	167
ditches (miles or linear feet)	241,482.10 ft
detention/retention ponds & vaults	2
storm drain lines (miles or linear feet)	98,780.66 ft

c. Are an updated inventory and map of the permanent MS4 structures attached?  
Yes ☒ No ☐ *A map and inventory of the MS4 system are provided in Appendix I.I.*

#### **2. MS4 Inspections and Maintenance (Table 3.3.1, Item 2)**

a. Were inspections of MS4 structures performed using geographical areas or sectors? Yes ☐ No ☒

b. How many permanent MS4 structures were inspected?

##### **Catch Basins**

<b>Year</b>	<b>Total Number of Catch Basins</b>	<b>Number of Catch Basins Inspected</b>	<b>% Inspected</b>
2022-2023	167	55	32.9
2023-2024	167	27	16.2
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	167	82	49.1%



**Pipes**

<b>Year</b>	<b>Total Pipes Number or Length (specify ft. or miles)</b>	<b>Number of Pipes or Length Inspected (specify ft. or miles)</b>	<b>% Inspected</b>
2022-2023	98, 780.66 ft	33,068.88 ft	33.5
2023-2024	98, 780.66 ft	8,243.62 ft	8.4
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	98,780.66 ft	41,312.5 ft	41.9 %

**Ditches**

<b>Year</b>	<b>Total Ditches Number or Length (specify ft. or miles)</b>	<b>Number of Ditches or Length Inspected (specify ft. or miles)</b>	<b>% Inspected</b>
2022-2023	241,482.10 ft	55,491.70 ft	23.0
2023-2024	241,482.10 ft	10,754.19 ft	4.5
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	241,482.10 ft	66,245.89 ft	27.5%

**Detention/Retention Ponds & Vaults**

<b>Year</b>	<b>Total Number of Ponds &amp; Vaults</b>	<b>Number of Ponds &amp; Vaults Inspected</b>	<b>% Inspected</b>
2022-2023	2	0	0
2023-2024	2	2	100
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	2	2	100%

- c. Documentation of each inspection performed must be attached as an addendum to this report. Is documentation attached? Yes ☒ No ☐



*Documentation is provided in Appendix 1.2, including a map; a summary database that documents inspections of catch basins, pipes, and ditches that were recorded in a GIS database; and completed pond inspection checklists.*

- d. How many permanent MS4 structures were maintained during this reporting period?

catch basins / other inlets	521(a)
ditches (miles or linear feet)	61,947 ft
detention/retention ponds & vaults	1 (weekly basis)
storm drain lines (miles or linear feet)	1,000 ft

*a/Maintenance of catch basins is grouped with maintenance of other stormwater inlet structures (yard inlets, drop inlets, etc.). In addition, this number may reflect maintenance activities taking place on different days for the same structure.*

- e. Documentation of each maintenance activity performed must be attached as an addendum to this report. Is documentation attached? Yes ☒ No ☐

*See documentation provided in Appendix 1.2 (Public Works and Water/Sewer Operations Monthly reports and summary tables)*

- f. Describe any tasks associated with control structure inspection and maintenance (e.g. repairs), not addressed in the questions above: *Detailed information about stormwater infrastructure maintenance, repairs, and other activities performed by the City's Public Works and Water and Sewer Operations Departments is provided in the monthly reports in Appendix 1.2. Chatham County is responsible for a limited amount of canal maintenance (12.64 miles) in accordance with its Service Delivery Strategy and MOA with Garden City, a copy of which is included in Appendix 1.2.*

### 3. Planning Procedures (Table 3.3.1, Item 3)

- a. Does your municipality have a comprehensive planning document (e.g. Master Plan), which in part addresses stormwater? Yes ☒ No ☐

- b. If the answer to A.3.a was "yes", describe any changes made to the stormwater portion of the comprehensive planning document during the reporting period:

*The City's Comprehensive Plan was updated in 2020, and City Council approved the revisions in October 2021. A copy of the updated plan is provided in Appendix 1.3.*

### 4. Street Maintenance (Table 3.3.1, Item 4)

- a. What method do you use to conduct street cleaning:



- Street sweeping ☒
- Litter removal ☒

- b. If you engage in street sweeping, how many miles of streets were swept during the reporting period? (Provide documentation): *155 miles*  
(see *Public Works monthly reports and summary table in Appendix 1.4*)
- c. If you engage in litter removal, describe any litter removal activities performed during the reporting period (e.g. dates, people performing litter pickup, etc.), including the amount of debris removed (e.g., pounds, number of bags, or area cleaned) (e.g., miles of streets, areas) (Provide documentation): *Routine litter removal activities are conducted in-house by Public Works staff. Public Works staff manually remove litter/trash routinely at public parks and public spaces, and litter removal is also completed anytime a citizen complaint is made to the City or if there is a specific work order for any materials dumped throughout the City. The City also manually picks up litter and trash on streets and manually removes litter from ditches before mowing on an as-needed basis. Amounts of mixed dry trash collected by the City each month are recorded in the Public Works Department monthly reports. Litter removal reduces the amount of litter and trash that could enter the City's stormwater system. Documentation (monthly logs from the Public Works Department) is provided in Appendix 1.4.*
- d. Describe any practices for maintaining streets that were not addressed in the questions above (deicing practices, road repair procedures, etc.) that reduce pollution from stormwater runoff: *The City of Garden City routinely spot patches roadways and fills potholes; this may be done inhouse and/or by a third-party contractor. Streets and street shoulders are routinely repaired, and dirt and gravel roads are scraped and graded if needed. Garden City also ensures that all land disturbances resulting from road construction is initially stabilized with silt fencing and then temporary or permanent vegetation is placed as soon as possible to prevent erosion. Street repairs are documented in Public Works Department monthly logs (Appendix 1.4)*

## 5. Flood Management Projects (Table 3.3.1, Item 5)

### a. **New** flood management projects

1. Were any newly proposed flood management projects (e.g. wet or dry retention ponds, water quality vaults, channels) assessed for water quality impacts during site plan review during the reporting period?  
Yes ☒ No ☐
2. If yes, provide the number of new projects where water quality assessments were performed: *5 sites (see Appendix 1.5)*



3. Provide the number of projects that resulted in a new detention/retention structures: *4 projects*

b. **Existing** flood management projects

1. Provide the number of existing permittee-owned flood management projects (e.g. detention and retention ponds) on the inventory: *Two detention ponds (see the Pond Inventory provided in Appendix 1.1).*

2. Previously evaluated flood management devices

- a. Were any existing permittee-owned structural flood management devices (e.g. wet or dry retention basins, water quality vaults, channels) evaluated during a previous reporting period to determine if retrofitting the device for additional pollutant removal is feasible?

Yes ☒ No ☐

- b. If yes, is documentation of the previous evaluation attached?

Yes ☒ No ☐

- c. If no, explain why the documentation is not attached: *Evaluations were conducted during the previous 2017-2022 permit period; however, the previous assessments are not provided because new retrofitting assessments have been conducted for the current reporting period.*

3. For evaluated flood management projects, the permittee must attach a table listing the structure location or identification, the date of assessment, the results of the assessment, and the status of any retrofitting activities.

- a. Is a table attached?

Yes ☒ No ☐

*See Appendix 1.5 for a copy of the completed retrofitting assessment checklists and a summary table.*

- b. If the table is not attached, explain the reason: *N/A*

6. Municipal Facilities with the Potential to Cause Pollution (Table 3.3.1, Item 6)

- a. The permittee must maintain and provide a current inventory of municipal facilities with the potential to cause pollution. Is an updated inventory attached to this report?

Yes ☒ No ☐

- b. Provide the date of the inventory: *2023-2024 Inventory (Appendix 1.6)*



- c. Provide the number and percentage of the municipal facilities inspected:

Year	Total Number of Municipal Facilities	Number of Municipal Facilities Inspected	% Inspected
2022-2023	6	2	33.3
2023-2024	6	1	16.7
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	6	2	50%

- d. SWMP Compliance

1. Did you comply with the inspection frequency described in the SWMP?

Yes ☒ No ☐

2. If not, describe the reason and provide the steps taken to comply with the SWMP during the next reporting period: *N/A*

- e. Documentation of each inspection performed must be attached as an addendum to this report. Are completed inspection reports or some other type of documentation attached? Yes ☒ No ☐

*Inspection documentation is provided in Appendix 1.6.*

- f. Describe any problems identified during the inspection and any corrective actions taken: *No issues were found during the City's inspection of the Police Department.*

- g. Were any measures to control runoff from municipal facilities implemented during the reporting period?

Yes ☐ No ☒

If yes, provide details: *The City is currently evaluating a new landscaping plan for the wastewater treatment plant to provide additional stormwater runoff control and water quality management, pending future funding sources.*

7. Pesticide, Fertilizer and Herbicide (PFH) Application (Table 3.3.1, Item 7)

- a. Were any of the following tasks related to a pesticide, herbicide, fertilizer management program completed during the reporting period?



Task Completed	Yes	No	Not Applicable
Developed or updated inventory of PFH used by MS4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Municipal employee safety training in use, storage and disposal of PFH	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Implemented program for municipal use of native, low-maintenance, or drought-resistant vegetation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- b. Provide details for the tasks listed as completed in question Part 2.A.7.a above or describe any other programs or tasks performed during the reporting period (e.g. educational activities, certification of employees by Department of Agriculture, procedures or practices, etc.) related to PFH reduction at municipal facilities and rights-of-way. Where appropriate, provide date(s) and other specifics: *The City currently outsources the application of pesticides / herbicides to a third-party contractor and a copy of the contractor's Pesticide Applicator's license is provided in Appendix 1.7. The City is not required to maintain a chemical inventory or provide staff training because the City does not store/apply restricted use PFHs.*

*The City does not rely on any PFHs to maintain vegetative growth in City-owned ponds. The City Hall pond exists in a natural vegetative state and manual maintenance is conducted if needed. Vegetative maintenance at the Sharon Park pond is performed via biological means (the pond is stocked with grass carp and the City recently installed new aerators to increase oxygen levels and maintain the biological ecosystem). These efforts by the City are protecting of water quality and demonstrate the City's commitment to PFH reduction.*

*While not required, the City has opted to provide general education to its employees and the general public, as well as commercial and private businesses, regarding safe and sustainable practices for landscape maintenance via its stormwater webpage at <http://www.gardencity-ga.gov/city-government/public-works/sustainable-land-use>. Documentation is provided in Appendix 1.7.*

- c. Provide details for the tasks or programs performed during the reporting period (e.g. educational activities, verification of certification, permitting procedures, etc.) related to pollution reduction by commercial applicators and distributors. Where appropriate, provide date(s) and other specifics: *The City verifies that third-party contractors used for PFH application are licensed through the Georgia Department of Agriculture (DoA). The City relies on the DoA to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of*



*pesticides (herbicides and insecticides) to obtain and retain a “Commercial Pesticide Applicators License”. The DoA also requires that distributors of restricted pesticides obtain and retain “Distributor Licenses”.*

*Even though not required to do so, the City has opted to provide educational information related to proper landscaping practices on its website at <http://www.gardencity-ga.gov/city-government/public-works/sustainable-land-use> and documentation is provided in Appendix 1.7.*

B. Illicit Discharge Detection and Elimination (IDDE) Program (Section 3.3.2)

1. Legal Authority (Table 3.3.2, Item 1)

- a. Provide the date when the MS4’s illicit discharge ordinance was adopted or last updated: *August 15, 2011*
- b. Provide the date that the permittee evaluated the ordinance during the reporting period: *March 25, 2024 (see documentation of evaluation in Appendix 2.1)*
- c. If the ordinance was updated during this reporting period, then a copy of the adopted ordinance must be attached to this report. Is a copy of the ordinance attached?  
Yes ☒ No ☐

*Although the ordinance was not updated during the reporting period, a copy of the ordinance is included for reference in Appendix 2.1.*

2. Outfall Inventory and Map (Table 3.3.2, Item 2)

- a. The permittee must maintain a current inventory and map of all of the MS4 outfalls and the names and location of all waters of the State that receive discharges from those outfalls. How many outfalls, owned or operated by the MS4, were added during the reporting period? *No outfalls were added or removed from the inventory during the current reporting period.*
- b. The permittee must submit an updated inventory and map showing the outfalls and the location and names of all receiving streams with each annual report. Are the inventory and map attached?  
Yes ☒ No ☐

*An updated outfall inventory and map are provided in Appendix 2.2.*

3. Outfall Inspections (Table 3.3.2, Item 3)

- a. Provide the status of the outfall inspections conducted:



<b>Year</b>	<b>Total Number of Outfalls</b>	<b>Number of Outfalls Inspected</b>	<b>% Inspected</b>
2022-2023	85	16	18.8
2023-2024	85	15	17.7
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	85	31	36.5%

- b. Did you comply with the inspection frequency described in the SWMP?  
Yes ☒ No ☐
- c. If not, describe the reason and provide the steps taken to comply with the SWMP during the next reporting period: *N/A*
- d. Of the outfalls screened during the reporting period, how many of the outfalls had flow? *No outfalls had flow. See forms in Appendix 2.2.*
- e. Attach completed outfall inspection forms for all outfalls inspected during the reporting period. Are inspection forms attached?  
Yes ☒ No ☐ *Inspection forms completed this reporting period are provided in Appendix 2.3.*
- f. For those outfalls with dry weather flow detected, provide information on the results of source identification activities. If laboratory testing was performed in order to verify a pollutant identity, then complete the last column of the table (attach additional sheets if necessary):

<b>Outfall Designation (number or location)</b>	<b>Date Field Screening Performed</b>	<b>Date Laboratory Testing Performed</b>
<i>None</i>		

- g. For those outfalls with dry weather flow identified, describe the source tracing activities taken to identify the source, the identified source, and if the source was eliminated (attach additional sheets if necessary): *N/A*
- h. Provide documentation on any enforcement actions taken for each illicit discharge during the reporting period: *N/A*



i. Alternate Method *N/A*

1. Was an alternate method used to conduct inspections for illicit discharges? If yes, describe the activities conducted: *No*
2. Is documentation attached demonstrating that at least one alternate method activity was performed during the reporting period?  
Yes ☐ No ☐
3. If not, explain the reason the activity was not performed or the documentation was not attached: [Click here to enter text.](#)

j. Stream Walks (Table 3.3.2, Item 3)

1. Were any stream walks conducted during the reporting period?  
Yes ☐ No ☐ NA ☒
2. If the stream walks were performed for a reason other than part of the dry weather outfall screening, explain the reason, provide the miles of stream walked, and documentation of the activity (e.g. stream walk form, photographs, etc.): *N/A*
3. Were the stream walks performed in conjunction with dry weather outfall screening? Yes ☐ No ☐

If yes, provide the following:

Year	Total Stream Miles	Number of Stream Miles Walked	% Walked
2022-2023	N/A	N/A	N/A
2023-2024			
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	0	0	0

4. Spill Response (Table 3.3.2, Item 4)

- a. Provide information on any spill incidents which occurred during the reporting period, in which a substance entered the storm sewer system (e.g. sanitary sewer overflows, HAZMAT incidents, etc.) (attach additional sheets if necessary):



Spill Date	Spill Location	Party Responsible for Spill	Substance(s) Spilled	Amount Spilled
<i>N/A (There were no spills that entered the stormwater system.)</i>				

5. Public Reporting (Table 3.3.2, Item 5)

- a. Describe any activities performed during this reporting period to publicize and facilitate public reporting of illicit discharges (provide documentation): *The City's main website has a link to the Service Request Page for reporting "Issues or Concerns" at <http://www.gardencity-ga.gov/i-want-to/submit-service-request>. Illicit Discharges and other stormwater concerns can also be reported via a link on the Citizen Stormwater Information page at <http://www.gardencity-ga.gov/city-government/public-works/citizen-stormwater-information>. Screenshots of these pages are provided in Appendix 2.5.*
- c. Provide information on each complaint related to an illicit discharge received during the reporting period, including the nature of the complaint, investigatory actions, and the status of resolution (Table 3.3.2, Item 5): *Every time a request for Public Works service is made by phone call, written request, email request, or an actual one-on-one request to a PW employee, a service request is generated. This builds a computerized record of all requests made. A work order is created each time a work crew or individual is assigned a task either because of service requests, pre-planned maintenance projects, or by other situations as they arise. This produces a database of work accomplished and the time and materials it took to do the work. The City summarizes this information in Monthly Reports that are presented to Council and also in a separate database. Documentation of these activities is provided in Appendix 2.5. See the file titled "Stormwater Complaint Tracking" for specific information about complaints received and how the complaints were addressed.*



6. Proper Management and Disposal (Table 3.3.2, Item 6)

- a. Describe any activities performed during this reporting period to facilitate the proper management and disposal of used oil and toxic materials, including educational activities, household waste collection programs, etc. (provide details where appropriate, such as dates): *The City performs multiple activities to promote the proper management and disposal of used oil and toxic materials. The City's Stormwater webpage titled "Stormwater Program Elements" at <http://www.gardencity-ga.gov/city-government/public-works/stormwater-program-elements> features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous household wastes and other wastes commonly generated by automobile maintenance, gas stations, and restaurants & food service entities. The Stormwater webpage also includes a link to the Chatham County Resource Conservation Education Center website which provides additional information regarding how to properly dispose of hazardous waste and used oil, as well as other common "hard to recycle" wastes. This website includes a listing of facilities and businesses that will accept waste oil, toxic wastes, and recyclables from the general public, including Garden City residents. Documentation, including website screenshots and copies of downloadable brochures, is provided in Appendix 2.6.*

7. Sanitary Sewer Infiltration (Table 3.3.2, Item 7)

- a. Does your MS4 own/operate the sanitary sewer system? If no, skip to Section C. Describe any activities performed during this reporting period to detect and eliminate seepage from municipal sanitary sewers to the storm sewer system: *Garden City currently has a routine inflow and infiltration (I&I) program that includes routine visual inspections as well as sewer line inspections based on complaints. Weekly chemical treatments are added to sewer manholes to reduce the likelihood of sewer blockages. The City also conducts routine maintenance of its system throughout the year and addresses any known issues. Documentation of repairs are included in the Water and Sewer Operations monthly reports in Appendix 2.7. No sanitary sewer releases or spills occurred during the reporting period.*

C. Industrial Facility Stormwater Discharge Control Program (Section 3.3.3)

1. Inventory (Table 3.3.3, Item 1)

- a. The permittee must maintain a current inventory of industrial facilities that discharge to the MS4. Is an updated inventory attached to this report?  
Yes ☒ No ☐ *An inventory of industrial facilities is provided in Appendix 3.1.*



- b. Provide the date of the inventory: *The inventory was reviewed & updated in the 23-24 reporting year (November 2023). Updates are made continually / as needed during each reporting period.*

2. Inspections (Table 3.3.3, Item 2)

- a. Were any inspections of industrial facilities conducted during the reporting period? Yes ☒ No ☐
- b. If inspections of industrial facilities were performed, then a copy of each completed inspection report form must be attached as an addendum to this report. **(Note: The MS4 should ensure that the inspection report addresses stormwater issues, not just industrial pretreatment requirements).** Are any industrial facility inspection reports attached?
- a. Yes ☒ No ☐ *Inspection reports, photos, and recommended corrective actions are provided in Appendix 3.2.*
- c. Provide the number and percentage of the total number of industrial facilities inspected:

Year	Total Number of Facilities	Number of Facilities Inspected	% Inspected
2022-2023	14	3	21.4
2023-2024	17	4	23.5
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	17	7	44.9%

d. SWMP Compliance

1. Did you comply with the inspection frequency described in the SWMP?  
Yes ☒ No ☐
2. If not, describe the reason and the steps taken to comply with the SWMP during the next reporting period: N/A

e. Monitoring (Table 3.3.3, Item 2)

1. Did the permittee determine that any industrial users are a substantial pollutant loading to the MS4?  
Yes ☐ No ☒



2. Was any monitoring of the stormwater runoff from these industrial users conducted by the permittee or were monitoring results requested and received from the industrial facility during the reporting period?

Yes ☐ No ☐ NA ☒

3. The results of any monitoring performed should be attached as an addendum to this report. Are monitoring results attached?

Yes ☐ No ☒

3. Enforcement (Table 3.3.3, Item 3)

- a. Were any enforcement actions taken against industrial facilities for stormwater violations during the reporting period (Table 3.3.3, Item 3)?

Yes ☒ No ☐

- b. If yes, provide documentation, including the number and type of enforcement actions, the violations addressed, etc.:

*A Notice of Violation (NOV) was issued to the SRM Facility located at 4900 Old Louisville Road for illicit discharges (runoff of concrete dust) and improper waste management practices. Nine corrective actions were recommended and the site is currently implementing the recommended corrective actions and the illicit discharges have been eliminated. For a list of recommended corrective actions, see the file titled "SRM Industrial Checklist" in Appendix 3.2. Other documentation, including site photos and a copy of the NOV, are also provided in Appendix 3.2. No other violations were issued or enforcement actions were taken for the three other Industrial sites inspected by the City.*

4. Educational Activities (Table 3.3.3., Item 4)

- a. Describe the educational activities performed during the reporting period which targeted industries and attach documentation of any activities (Table 3.3.3, Item 4): *After each Industrial inspection, a copy of an informational guide is given to the property owner that provides information about the purpose of the inspections as well as educational tips and information. A copy of the guide is provided in Appendix 3.3.*

D. Construction Site Management Program (Section 3.3.4)

1. Local Issuing Authority status

- a. Are you a Local Issuing Authority (LIA)? Yes ☒ No ☐



- b. If you are an LIA, you are required to submit semi-annual reports to the Georgia Soil and Water Conservation Commission (GSWCC) per O.C.G.A. 12-7-8. Did you provide the required reports to GSWCC? Yes ☒ No ☐
- c. Provide the dates that the semi-annual reports were submitted to the GSWCC. If the reports were not submitted, then explain the reason:  
*The first report was submitted on 8/11/2023. The July – December report was submitted on 2/12/2024.*
- d. Provide copies of the semi-annual reports. Are the reports attached?  
Yes ☒ No ☐  
*Copies of both reports submitted in 2023 are provided in Appendix 4.1.*
- e. If the semi-annual reports are not attached, then explain the steps the permittee will take to correct this deficiency in the future: N/A

2. Legal Authority (Table 3.3.4, Item 1)

- a. Provide the date the Erosion and Sedimentation ordinance was evaluated during the reporting period: *March 25, 2024 (see documentation in Appendix 4.1)*
- b. When was the MS4's ordinance to control soil erosion and sediment adopted or last updated? *November 7, 2016*
- c. If the ordinance was adopted or updated during this reporting period, then a copy of the adopted ordinance must be attached as an addendum to this report. Is a copy of the ordinance attached? Yes ☒ No ☐  
*The ordinance was not revised; a copy is included for general reference in Appendix 4.1.*

3. Site Plan Review (Table 3.3.4, Item 2):

- a. Number of site plans received: 5
- b. Number of site plan reviews conducted: 5
- c. Number of site plans approved: 5
- d. Number of site plans denied: 0
- e. Other (please describe): *N/A*
- f. A list or table of site plans reviewed, denied, and/or approved during the reporting period should be provided. Is this information attached?  
Yes ☒ No ☐  
*A list of construction site plans reviewed and approved during the reporting period is included in Appendix 4.2.*



- g. Provide information on construction related permitting activities conducted during the reporting period (Table 3.3.4, Item 2):

1. Number of land disturbing activity (LDA) permits issued: 5

2. A list or table of permits issued during the reporting period should be provided.

Is this information attached? Yes ☒ No ☐

4. Inspection Program (Table 3.3.4, Item 3)

a. How many active construction sites were inspected during the reporting period? 5

b. How many total inspections of these active construction sites were conducted during the reporting period? *Thirty-eight (38) inspections were conducted; see the tracking table in Appendix 4.2.*

c. A list or table of active sites and the number and dates of inspections conducted on each of these sites should be provided. Is this information attached?

Yes ☒ No ☐ *A table listing the active construction sites and dates of inspections are provided in Appendix 4.3. Copies of inspection checklists may be obtained from the City upon request.*

5. Enforcement (Table 3.3.4, Item 4)

a. Provide information on enforcement activities (e.g. stop work orders, warning letters, etc.) at construction sites for erosion and sediment control violations taken during the reporting period, including the amount of any assessed penalties. (attach additional sheets if necessary):

Site Location	Type of Enforcement Action	Date of Enforcement	Amount of Penalty
<i>None</i>			

6. Certification (Table 3.3.4, Item 5)

a. MS4 staff involved in construction activities must be trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC). Provide documentation of each current certification (e.g. copies of certification cards, printouts from GSWCC website). Is the information



attached? Yes ☒ No ☐ *Copies of GSWCC certifications are provided in Appendix 4.5.*

- E. Highly Visible Pollutant Sources (HVPS) (e.g. commercial car washes, auto part stores, nurseries, home improvement stores, auto repair shops, gas stations, veterinary clinics, kennels) (Section 3.3.5):

1. Inventory (Table 3.3.5, Item 1)

- a. The permittee must maintain a current inventory of HVPS facilities that discharge to the MS4. Is an updated inventory attached?  
Yes ☒ No ☐  
*An updated inventory is provided in Appendix 5.1.*
- b. If any new HVPS were identified during the reporting period, what type(s) of facility were they? *Nine new facilities were identified including include three auto repair shops, five "other" automotive-related facilities; and a landscaping and irrigation company. Additional facilities were removed because they were closed.*
- c. Provide the date of the updated inventory: *The inventory was reviewed & updated in March 2024.*

2. Inspections (Table 3.3.5, Item 2)

- a. Were any inspections performed on HVPS during the reporting period?  
Yes ☒ No ☐
- b. Are copies of completed inspection forms attached?  
Yes ☒ No ☐  
*See Appendix 5.2.*
- c. Provide the number and percentage of the total number of HVPS facilities inspected:

Year	Total Number of Facilities	Number of Facilities Inspected	% Inspected
2022-2023	97	20	20.6
2023-2024	89	16(a)	18.0
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	89	36	38.6%

*a/Three additional sites were inspected and determined to be closed; they were removed from the inventory.*



d. Did you comply with the inspection frequency described in the SWMP?

Yes ☒ No ☐

e. If not, describe the reason and the steps taken to comply with the SWMP during the next reporting period: *N/A*

3. Enforcement (Table 3.3.5, Item 3)

a. For those HVPS facilities inspected during the reporting period at which the MS4 identified a problem, provide details as to any enforcement action taken by the MS4 and attach documentation:

*Sites inspections that resulted in City enforcement are listed below; documentation is provided in Appendix 5.3. Other minor recommendations are listed within the inspection reports for the remaining facilities but did not require enforcement action by the City.*

Facility Name	Facility Location	Action Taken by MS4
<i>CK Quick Tire Service</i>	<i>275 Alfred St.</i>	<i>City recommended corrective actions (removal of tires and trash and debris). NOV issued and site has been cleaned up. Documentation is provided in Appendix 5.3.</i>
<i>Savannah Truck and Repair</i>	<i>3828 B Augusta Rd.</i>	<i>NOV and court citation issued. Site clean-up is in progress/being monitored by the City and a court date is pending. For a list of recommended corrective actions, see the file titled "Checklist for Savannah Truck" in Appendix 5.3. Other documentation is also provided in Appendix 5.3.</i>
<i>Penske Truck Rentals</i>	<i>5556 Export Blvd.</i>	<i>City recommended corrective actions (clean-up of property, oil spill, etc.) and issued NOV. Re-inspected 4/4/24 and court citation issued for later in April. Clean-up is ongoing and being monitored by the City. Documentation is provided in Appendix 5.3.</i>



4. Educational Activities (Table 3.3.5, Item 4)

- a. Describe the educational activities performed during the reporting period that targeted HVPS facilities and provide documentation of the activities: *After each HVPS inspection, a copy of an informational guide is given to the property owner that provides information about the purpose of the inspections as well as educational tips and information. The guide also lists the URL for the City's website, where additional educational information can be viewed (see <http://www.gardencity-ga.gov/city-government/public-works/stormwater-program-elements>).*

*The website features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous wastes for residential, commercial and industrial operations such as automobile maintenance, gas stations, and restaurants & food service entities. The Stormwater webpage also includes a link to the Chatham County Resource Conservation Education Center website which provides additional information regarding how to properly dispose of hazardous waste and used oil, as well as other common "hard to recycle" wastes. This website includes a listing of facilities and businesses that will accept waste oil, toxic wastes, and recyclables from the general public, including the Garden City residents and businesses. A copy of the informational guide is included in Appendix 5.4 as well as copies of the educational brochures that are accessible from the City's website.*

**Part 3 - Changes to the SWMP (Section 4.1)**

A. Update of MS4 areas

1. Were any additional areas added to the MS4 system? Yes ☐ No ☒
- a. If yes, was it through development of a previously undeveloped area?  
Yes ☐ No ☐
- b. If yes, was it through annexation of an area? Yes ☐ No ☐
2. Are an inventory and map of the MS4 permanent control structures in the additional areas attached? Yes ☐ No ☒

B. Staffing

1. How many full-time equivalents were dedicated to implementing the SWMP during the reporting period? *There were eight and three-quarters (8¾) full time employees dedicated to the administration of the SWMP during the reporting period (based on man hours worked).*



2. Did the amount of full-time equivalents dedicated to implementing the SWMP during this reporting period differ from the previous reporting period either by an increase or decrease in numbers? Yes ☐ No ☒

If yes, please explain whether it was a decrease or increase and the reason for the man-hour differences: *N/A*

- C. Are there any changes to the SWMP proposed for the upcoming reporting period? If so, please describe: *The City's MS4 permit was renewed in April 2022 and the City revised its SWMP to meet new permit requirements and submitted the revised Plan to the EPD for review. The City does not plan to make any additional BMP changes based on operational needs and the City feels the BMPs in the revised SWMP are effective.*

#### **Part 4 - Enforcement Response Plan (ERP) (Section 3.3.6)**

- A. The permittee was required to develop an ERP describing the action to be taken for violations associated with the IDDE, industrial, construction, HVPS, and other SWMP programs. Has an ERP been completed?  
Yes ☒ No ☐
- B. If the ERP was not completed, explain why and provide the status of the document development: *Garden City revised its ERP in June 2023 and submitted a copy to the EPD for review. Review and approval by the EPD is pending. A copy of the revised plan is provided in Appendix 6.*

#### **Part 5 - Impaired Waters (Section 3.3.7)**

- A. Impaired waters added to 305(b)/303(d) list **this** reporting period:

1. Was a new impaired water added to the 305(b)/303(d) list during **this** reporting period?

Yes ☐ No ☒ (*Based on the 2022 305(b)/303(d) list, the latest approved list*)

If yes, provide the following information for any impaired waters located within your jurisdictional area that are included on the latest approved 305(b)/303(d) list:

Name of Water	Pollutant of Concern

2. For any impaired waters added to the 305(b)/303(d) list this reporting period, you must develop an Impaired Waters Plan (IWP). As part of the IWP, you must:



- i. Provide a map showing the impaired waters, all MS4 outfalls occurring on these waters or within one linear mile upstream, and sampling location(s). Is the map attached? Yes ☐ No ☐
  - ii. If not, provide a schedule for completing the map:
  - iii. Develop a monitoring plan for each pollutant of concern (POC), including the sample type, frequency, any seasonal considerations, and an implementation schedule for starting monitoring and confirming the location of all MS4 outfalls discharging to the segment. Is the monitoring plan attached?  
Yes ☐ No ☐
3. Was a Sampling and Quality Assurance Plan (SQAP) submitted to EPD?  
Yes ☐ No ☐ NA ☐
- a. If yes, has the SQAP been approved by EPD? Yes ☐ No ☐
4. Provide a list of best management practices (BMPs) to be implemented to address the POC, including a description of each BMP and a schedule for implementation of the BMPs:

B. Impaired waters included on the 305(b)/303(d) list during previous reporting periods:

1. Was an Impaired Waters Plan (IWP) developed during a **previous** reporting period?  
Yes ☒ No ☐

If yes, provide the following information for any impaired waters located within your jurisdictional area that are included on the latest approved 305(b)/303(d) list and addressed in a previously developed IWP:

Name of Water	Pollutant of Concern	Sampling Frequency
<i>Pipemakers Canal</i>	<i>Fecal Coliform (FC)</i>	<i>(a)</i>
<i>Salt Creek</i>	<i>FC and Dissolved Oxygen (DO)</i>	<i>(a)</i>

*a/Note that because the City has been designated by the EPD as a Permittee with a population less than 10,000, the City is not required to conduct bacteria monitoring per the requirements of the 2022 – 2027 MS4 Permit.*

2. For any impaired waters covered by an existing IWP, you must:
  - a. Attach a copy of the approved IWP. Is the IWP attached? Yes ☒ No ☐

*The City's IWP was revised in April 2023 and approved by the Georgia EPD in May 2023. Figure 1 of the IWP has been updated to reflect a slight change in the*



*location of Monitoring Site #5 due to inaccessibility issues with the previous monitoring location; the new location is located within close proximity of the previous monitoring location. A copy of the IWP with the revised Figure 1 is provided in Appendix 7.*

- b. Was a Sampling and Quality Assurance Plan (SQAP) submitted to EPD?  
Yes ☐ No ☒ NA ☐

- c. If yes, has the SQAP been approved by EPD? Yes ☐ No ☐

- d. Provide monitoring data for each POC. Is the monitoring data attached?  
Yes ☒ No ☐ *A copy of DO monitoring data is provided in Appendix 7. Bacteria monitoring for FC was not required to be conducted.*

- e. Provide an assessment of the monitoring data related to water quality (e.g. line graphs, narrative). Is the assessment attached? Yes ☒ No ☐

*A data assessment for DO levels in Salt Creek is provided in Appendix 7.*

- f. If the monitoring data and assessment are not attached, explain the reason: *N/A*

- g. Provide an assessment of the effectiveness of each BMP chosen to address the POC. Is the BMP assessment attached?: Yes ☒ No ☐

*An assessment of BMPs developed to address DO and bacteria impairments is provided in Appendix 7.*

- h. If an assessment was not performed, explain why: *N/A*

- i. If you plan to delete any BMPs, modify any existing BMPs, or use any new BMPs during the next reporting period, describe the revisions: *No additional revisions are planned at this time.*



**Part 6 – Municipal Employee Training, Public Education/Public Involvement (Sections 3.3.8, 3.3.9, and 3.3.10)**

A. Municipal Employee Training

1. Provide information on any employee training provided during the reporting period:

Date of Training: [Click here to enter text.](#)

Topic(s) of Training: [Click here to enter text.](#)

Number of employees trained: [Click here to enter text.](#)

Who conducted the training:

Method of training: [Click here to enter text.](#)

*Stormwater training events that occurred during the 23-24 reporting period are summarized below and documentation is provided in Appendix 8.*

<b>Date</b>	<b>Topic</b>	<b># Employees Training</b>	<b>Training Provider</b>	<b>Method of Training</b>
10/6/23	Reviewed SWMP program requirements; inspection protocols; etc.	6 employees	GMC	In person meeting; BMP compliance matrix
11/2/23	Regional SW Commission Meeting – green infrastructure; impaired waters monitoring requirements / bacteria sampling; public education/involvement BMP opportunities; etc.	3 employees	GMC	In person meeting; meeting handouts
2/8/24	Stormwater inspection protocols; MS4 maintenance tracking; HVPS and Industrial site inspections; site plan review; green infrastructure; etc.	9 employees	GMC	In person meeting; BMP compliance matrix
2/28/24	HVPS & Industrial Site Inspection Training	1 employee	GMC	In person meeting & field training (2 site inspections-SRM Concrete and Savannah Truck and Repair, LLC)
Feb and March 2024	Stormwater Program training (green infrastructure; IDDE; municipal housekeeping; field issues and reminders)	16 employees	PPT	PowerPoint and related videos shown to Public Works & Planning staff



2. The permittee must provide documentation of the training provided, such as through sign-in sheets, photographs, or other. Is documentation attached?

Yes ☒ No ☐

*Training materials (PowerPoint presentation; meeting agendas; sign-in sheets, etc.) are provided in Appendix 8.*

B. Public Education Program

1. Did you implement a public education program? Yes ☒ No ☐
2. Describe any SWMP educational activities undertaken during the reporting period, (include details as to the nature of the activity, date, number of people attending, etc.), and provide documentation of each activity:

a. Activity #1:

- i. Describe the public education activity: *Water Bill Inserts*
- ii. Provide the measurable goal for the activity: *Include applicable and relevant educational messages in the City's Water Bills for all of the utility customers.*
- iii. Did you comply with the measurable goal: Yes ☒ No ☐
- iv. If no, describe the reason: *N/A*
- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☒ No ☐

*In order to reach the widest audience possible, the City provided an educational insert titled "Stormwater- Only Rain Down the Drain" with the June 19, 2023 water bill sent to all residents that have a utility account through the City (approximately 5,000 account holders). A copy of the educational insert is provided in Appendix 9.1.*

b. Activity #2:

- i. Describe the public education activity: *Public Education Outreach*
- ii. Provide the measurable goal for the activity: *Publish educational insert in local newspaper*
- iii. Did you comply with the measurable goal: Yes ☒ No ☐
- iv. If no, describe the reason: *N/A*
- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☒ No ☒

*The City provided an educational insert titled "How Prepared Are You? A Guide to Keep Above Flood Waters" in an October 2023 edition of the local newspaper sent to all residents that have a subscription. A copy of the educational insert is contained in Appendix 9.2.*

c. Activity #3:

- i. Describe the public education activity: *Stormwater Webpage*



- ii. Provide the measurable goal for the activity: *The City will update at least one of its stormwater webpages each reporting period to provide new stormwater-related information and links as necessary. The City will also monitor “hits” to determine how many people visit the webpages each year. The stormwater webpages may be accessed from <https://www.gardencity-ga.gov/city-government/public-works/departments-of-public-works>.*
- iii. Did you comply with the measurable goal: Yes ☒ No ☐
- iv. If no, describe the reason: *N/A*
- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☒ No ☐

*The City maintains a website for disseminating information to the public. The City currently has three stormwater webpages that are linked to the City’s main website. Stormwater webpages include: 1) The Basics of Stormwater 2) Citizen Stormwater Information and 3) Stormwater Program Elements. The stormwater webpages may be accessed from <https://www.gardencity-ga.gov/city-government/public-works/departments-of-public-works>.*

*The Stormwater Program Elements webpages were updated during the 23-24 reporting period to provide contact information and encourage residents to become involved with the City’s stormwater program. In addition, the 22-23 Annual Report was uploaded to the site to encourage citizen feedback. Screenshots showing the webpage before and after edits are provided in Appendix 9.3.*

*Garden City’s current software for hosting its City website does not allow tracking of website/webpage views. The City attempted to generate analytics to track website views for the 23-24 reporting period using Google Analytics, but there were software compatibility issues and Google Analytics is not functioning correctly. However, to help advertise the stormwater webpages, the City provided an educational insert titled “Stormwater- Only Rain Down the Drain” with the June 19, 2023 water bill sent to all residents that have a utility account through the City (approximately 5,000 account holders). In addition, the City posted a message to the City’s Facebook page on April 5, 2024 about the City’s stormwater webpage. A copy of the educational insert and screenshot of the Facebook posting is provided in Appendix 9.3.*

*For the 24-25 reporting period, if the City cannot track the number of webpage views through the use of software, the City will advertise the stormwater webpages on social media and/or through other means to ensure City residents are informed about the website and it is widely-viewed.*

## C. Public Involvement

- 1. Did you implement a public involvement program?  
Yes ☒ No ☐



2. Describe any SWMP activities performed during the reporting period to involve the public in the program (e.g. Adopt-A-Stream, Adopt-A-Road, storm drain stenciling, Rivers Alive). Provide details such as the nature of the activity, the date(s), the number of volunteers, etc.:

a. Activity #1:

- i. Describe the public involvement activity: *Citizen Hotline*
- ii. Provide the measurable goal for the activity: *Maintain a citizen hotline, investigate 100% of all water quality complaints received and take appropriate action, and record IDDE complaints and actions taken in the City's work order database.*
- iii. Did you comply with the measurable goal: Yes ☒ No ☐
- iv. If no, describe the reason: [Click here to enter text.](#)
- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☒ No ☐

*The City's main website has a link to the Service Request Page for reporting "Issues or Concerns" at <http://www.gardencity-ga.gov/i-want-to/submit-service-request>. Illicit Discharges and other stormwater concerns can also be reported via a link on the Citizen Stormwater Information page at <http://www.gardencity-ga.gov/city-government/public-works/citizen-stormwater-information>. Screenshots of these pages are provided in Appendix 10.1.*

*Every time a request for Public Works service (including illicit discharge complaints) is made by phone call, written request, email request, or an actual one-on-one request to a PW employee, a service request, and if needed, a work order, are generated to track and document how and when the complaint/request was investigated, addressed, and completed. The City summarizes this information in Monthly Reports that are presented to Council and also in a separate database. Documentation of these activities is provided in Appendix 10.1. See the file titled "Stormwater Complaint Tracking" for specific information about complaints received and how the complaints were addressed.*

b. Activity #2:

- i. Describe the public involvement activity: *Public Education Outreach*
- ii. Provide the measurable goal for the activity: *There are multiple measurable goals listed in the City's SWMP for this BMP b/c the City listed several different types of Public Involvement Outreach events to fulfill this BMP. Please see BMP 10.2 (pg. 58) of the City's SWMP.*
- iii. Did you comply with the measurable goal: Yes ☒ No ☐
- iv. If no, describe the reason: [Click here to enter text.](#)



- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☒ No ☐

*The City performed several educational activities to fulfill BMP #2 – Public Involvement Outreach:*

1. *A native plant sale was held at the Coastal Georgia Botanical Gardens on March 30, 2024. This event was advertised to all residents of Chatham County through various county-wide social media outlets such as facebook groups and a press release; and Garden City also encouraged its residents to attend the event by posting an event advertisement on its City Facebook page on March 19<sup>th</sup> (1.5K followers) and on its City website on March 25, 2024. Garden City staff also volunteered at the event.*

*The Chatham County Native Plant Sale & Tree Giveaway was a collaborative effort between the Coastal Georgia Botanical Gardens; Savannah Tree Foundation; UGA Extension; Chatham County; and City of Savannah. Other local municipalities, including Garden City; local businesses; and community organizations were invited to join. This was the third year the Coastal Georgia Botanical Gardens hosted this event. The purpose of this event was to offer coastal Georgia native plants to Chatham County residents and emphasize the importance of planting native plants for stormwater quality. Educational booths and materials were also available. More than 2,000 people attended the event. Documentation of the event, including photos and event advertisements (press release and copy of postings to the City's facebook page and website) is provided in Appendix 10.2.*

2. *The City provides information about hard-to-recycle wastes and encourages citizens to actively participate in waste recycling on its stormwater webpage located at <https://www.gardencity-ga.gov/city-government/public-works/stormwater-program-elements>. A screenshot of the webpage is provided in Appendix 10.2.*

c. Activity #3:

- i. Describe the public involvement activity: *Clean Up Event*
- ii. Provide the measurable goal for the activity: *Hold one clean up event per year within the City of Garden City*
- iii. Did you comply with the measurable goal: Yes ☐ No ☒
- iv. If no, describe the reason: *The City discontinued the clean-up events. Due to staffing changes (i.e., loss of the City Manager and other management staff), the City was not been able to implement a new public involvement activity. The City will evaluate whether to re-instate the City cleanup events for the 24-25 reporting year or whether the City needs to select a new Public Involvement BMP, notify the Georgia EPD, and update the SWMP accordingly.*



- v. You must attach documentation of activity implementation. Is documentation attached? Yes ☐ No ☒



**Part 7- Post-Construction (Section 3.3.11(b)(2))**

A. Legal Authority (Table 3.3.11(b)(2), Item 1)

1. Provide the date when the MS4 post-construction ordinance(s) was adopted or updated: *The City's post-construction requirements are contained within the City's Stormwater management ordinance, which was adopted on August 15, 2011. The City evaluated this Ordinance on March 25, 2024, and determined no changes need to be made. Documentation of this review is provided in Appendix 11.1.*
2. If required, provide the date the 2019 Metropolitan North Georgia Water Planning District post-construction ordinance was adopted: *N/A*
3. If an ordinance was updated during this reporting period, then a copy of the adopted ordinance must be attached. Is a copy of the ordinance attached?  
Yes ☒ No ☐

*The Ordinance was not updated; however, a copy is provided in Appendix 11.1 for reference.*

4. Does the ordinance include the adoption and implementation of the Georgia Stormwater Management Manual, the Coastal Supplement, and/or an equivalent local design manual?  
Yes ☒ No ☐
5. Provide either the date the design manual was adopted and the Stormwater Runoff Quality/Reduction performance standard was implemented: *The City adopted the required performance standards in August 2011 through its adoption of the Coastal Stormwater Supplement (CSS) and also developed a Local Design Manual (LDM). The City's LDM was updated in 2023, and a copy is provided in Appendix 11.1.*
6. If the permittee has not implemented the Stormwater Runoff Quality/Reduction performance standard, then explain why and provide the status: *N/A*
7. The permittee is required to continue to evaluate its ordinances, building codes, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices.
  - a. Was an evaluation performed during the reporting period? Yes ☒ No ☐
  - b. If yes, then describe the method used to conduct the evaluation (Attach documentation of the evaluation performed)

*The City utilized the 2017 Code and Ordinance (COW) developed by the Center for Watershed Protection (CWP) to evaluate its ordinances to determine if any ordinances impeded the use of green infrastructure. A summary memorandum,*



*suggested recommendations, and a copy of the completed COW worksheet (see Appendix A of the memo) are provided in Appendix 11.2.1.*

c. If no, explain the reason: *N/A*

8. Were any revisions to the ordinances or regulations completed during this reporting period?

Yes ☐ No ☒

9. If any ordinances or regulations were revised to remove obstacles to GI/LID during this reporting period, then a copy of the adopted document(s) must be attached to this report. Provide a list, table, or chart of the GI/LID changes. Include the document name and section affected in the list, table, or chart. Is a copy of any modified ordinance or regulation attached?

Yes ☐ No ☐

*N/A* ☒

If yes, then is a list, table or chart of the GI/LID changes attached?

Yes ☐ No ☐ *N/A* ☒

B. GI/LID Program (Table 3. 3.11(b)(2), Item 2)

1. The permittee was required to develop a program for implementing GI/LID practices. Has the program been submitted to EPD?

Yes ☒ No ☐

If yes, has the program been approved by EPD? Yes ☐ No ☒

*The City revised its GI/LID program in March 2023 and it was approved by the EPD on May 15, 2023. A copy of the City's approved GI/LID plan is provided in Appendix 11.2.2.*

2. Was a Linear Transportation Feasibility Program developed? Yes ☐ No ☒

If yes, has the program been approved by EPD? Yes ☐ No ☐ *N/A* ☒

3. Were any revisions made to the GI/LID program during the reporting period?

Yes ☐ No ☒ (*only inventory update*)

If yes, then the revised program must be submitted to EPD for review. Is the revised GI/LID program attached? Yes ☒ No ☐

*The City's GI/LID program was revised in March 2023 and approved by the EPD on May 15, 2023. Based on information provided by the EPD in the May 15<sup>th</sup> comment letter, the City subsequently elected to update the GI/LID inventory and remove older*



*structures that were constructed before the effective date of the 2022-2027 MS4 Permit. The City sent the revised inventory to the EPD on June 12, 2024. The GI/LID Plan was not updated in any other way.*

C. GI/LID Structure Inventory (Table 3.3.11(b)(2), Item 3)

1. The permittee must maintain an inventory of permittee-owned, publicly-owned by other entities, and privately-owned non-residential water quality-related GI/LID structures, within the permittee's jurisdiction. Is an updated inventory attached to this report?

Yes ☒ No ☐

*A copy of the most recent GI/LID inventory is included in Appendix 11.2.3.*

2. Provide the total number of GI/LID structures included on the inventory:

Permittee-owned: 0

Publicly-owned by other entities: 0

Privately-owned non-residential: 0

D. GI/LID Structure Inspection and Maintenance (Table 3.3.11(b)(2), Item 4)

1. Were any inspections of GI/LID structures conducted during the reporting period?

Yes ☐ No ☐ NA ☒

2. If inspections of GI/LID structures were performed, then a copy of each completed inspection form must be attached to this report. Are any GI/LID structure inspection forms attached? Yes ☐ No ☐

3. Provide the number and percentage of the total number of GI/LID structures inspected during the reporting period:

**Permittee-Owned Structures**

Year	Total Number GI/LID Structures	Number Inspected	% Inspected
2022-2023	0	0	0
2023-2024	0	0	0
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	0	0	0



**Publicly-Owned By Other Entities Structures**

Year	Total Number GI/LID Structures	Number Inspected	% Inspected
2022-2023	0	0	0
2023-2024	0	0	0
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	0	0	0

**Privately-Owned Non-Residential Structures**

Year	Total Number GI/LID Structures	Number Inspected	% Inspected
2022-2023	3	3	100
2023-2024	0(a)	0	0
2024-2025			
2025-2026			
2026-2027			
<b>TOTAL</b>	0	3	N/A

*a/Per May 15, 2023 correspondence with the Georgia EPD, the City elected to update the GI/LID inventory for the 23-24 reporting period and remove older structures that were constructed before the effective date of the 2022-2027 MS4 Permit.*

4. How many permittee-owned GI/LID structures were maintained during the reporting period? Attach documentation of the activities: *N/A*
5. Describe any activities performed to ensure publicly-owned by other entities and privately-owned non-residential GI/LID structures were maintained. Provide the summary list of maintenance agreements and documentation of any activities taken to ensure these structures were maintained: *N/A*

**Part 8 - Assessment of Controls/Fiscal Analysis (Section 4.1)****A. Assessment of Controls**

1. Are revisions to the assessment of controls included in the approved SWMP necessary?  
Yes ☐ No ☒
2. If yes, describe the necessary revisions: *N/A*



B. Fiscal Analysis

1. Reporting Period Expenditures

- a. What was the funding source(s) for this reporting period's expenditures?  
*Stormwater Utility Enterprise Fund and General Fund.*
- b. A summary of the expenditures for the SWMP during the reporting period must be attached as an addendum to this report. Is a copy of the reporting period's expenditures attached? Yes ☒ No ☐  
*Please see Appendix 12 for a copy of the City's FY2023 and FY2024 budgets.*

2. Next Reporting Period's Budget

- a. What will be the funding source for the next reporting period's budget?  
*Stormwater Utility Enterprise Fund and General Fund.*
- b. A summary of the proposed budget for the SWMP for the next reporting period must be attached as an addendum to this report. Is a copy of the proposed budget for the next reporting period attached? Yes ☒ No ☐ *Please see Appendix 12 for a copy of the FY2023 and FY2024 budgets. The City is in the process of developing the FY2025 budget; a copy of the proposed budget is not yet available.*