

The Watershed Approach to Stream Health Project

A partnership of communities in the Boulder and St. Vrain watersheds -
working together to protect our water quality



Annual Report for 2004

Boulder County • City of Boulder • City of Longmont • City of Louisville • Town of Erie • Town of Superior



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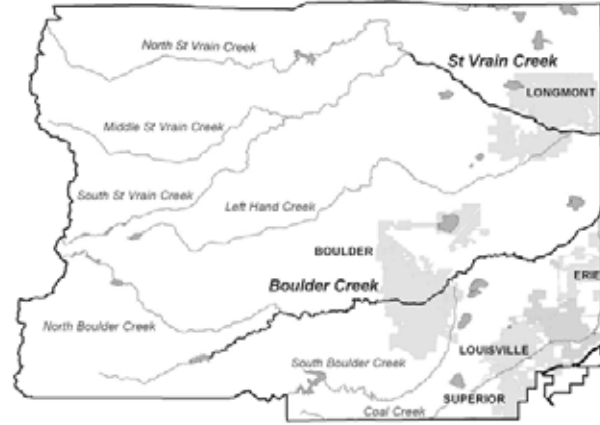
WASH ANNUAL REPORT for 2004

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Executive Summary for WASH Project 2004 Annual Report

The Watershed Approach to Stream Health (WASH) Project is a regional stormwater quality management program serving the communities of Boulder, Longmont, Louisville, Erie, Superior, and Boulder County. This innovative, award-winning program is leading Colorado in addressing water quality issues through watershed management. The WASH Project participants (Partners) developed the WASH Plan in 2002, which outlines the goals and programs to address water quality protection in the Boulder and St. Vrain watersheds.



The primary objective of the WASH Plan is compliance with federal Phase II stormwater regulations. These regulations require communities with urban populations of over 100,000 to obtain a discharge permit for their storm sewer systems. The Colorado Department of Public Health and Environment (CDPHE) administers the Phase II regulations.

WASH Goal
To use a collaborative approach in creating cost-effective solutions to implement a regional stormwater management program, not only to comply with Phase II regulations, but also to address broader water quality and watershed issues.

Leveraged Resources and Cost Savings



The WASH Plan places significant emphasis on cost-effectiveness by sharing programs and by using common strategies. In addition, the Plan calls for the use of existing programs where possible. Examples include expanding the Partners for a Clean Environment (PACE) Program and the City of Boulder's education programs.

The combination of shared programs and use of existing programs has provided WASH Partners with a comprehensive stormwater management program at a cost 30 - 50% less than implementing an individual community program.

In 2004, the WASH budget was \$390,000, of which \$90,000 (23%) was proportionately reimbursed to each of the Partners. The unspent funds represent a savings of \$49,000 from reducing program implementation costs (grants, use of in-house resources, cooperative projects, effective project management). The remaining half of the cost savings represents unspent contingency and overhead funds. The contingency and overhead funds are required by the WASH intergovernmental agreement (IGA).

The WASH Project has continued to effectively leverage resources through grant funding and staff expertise. Since its inception in 2001, the WASH Project has received \$137,000 in grant funds; \$115,000 of those funds were received in 2004. These grants were the result of the WASH Project's demonstrated success in piloting new regional programs.

In addition, WASH Partners benefit from the combined expertise of WASH workgroup members. These workgroups consist of staff from Partner communities and are responsible for developing and managing the products used in implementing the WASH Plan. Workgroup members include experts in the fields of drainage and environmental engineering, education and outreach, chemistry, geology, biology, and planning. This expertise would be difficult for any individual community to assemble.

Performance

A summary of major WASH Plan tasks completed in 2004 include the following:

Permit Compliance

- ◆ Full regulatory compliance was achieved for each Partner's state municipal stormwater discharge permit.

Community Outreach and School Education Programs

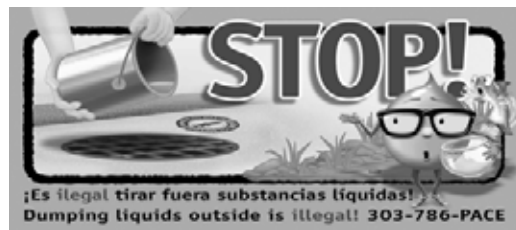
- ◆ Distributed 10,000 brochures.
- ◆ Reached 4,879 kindergarten through 12th grade students.
- ◆ Expanded education programs into St. Vrain Valley School District.
- ◆ Marked 748 storm drains with the message, "Dispose no Waste, Drains to Creek".
- ◆ Installed 60 new tributary signs in Partner communities.



Tributary Sign

Stormwater Pollution Prevention Programs for Private and Public Sectors

- ◆ Evaluated 199 restaurants, 128 commercial vehicle service facilities, and over 55 municipal facilities for stormwater pollution prevention certification.
- ◆ Provided stormwater pollution prevention training to 168 municipal employees.
- ◆ Coordinated the development of a municipal stormwater pollution prevention video with other Colorado communities.
- ◆ Developed outreach materials for rental stores, golf courses, and do-it-yourself automobile maintenance.



Erosion Control, Permanent Water Quality Structures, and Illicit Discharge Prevention

- ◆ Adopted ordinances in most WASH communities¹ to regulate potential stormwater pollutants from commercial and residential sources and construction activity.

¹ Boulder County deferred adoption of regulation to 2005, with prior approval by CDPHE.



tracking.

- ◆ Developed materials to implement ordinances. These included: erosion control field guide and brochure, municipal outreach materials, illicit discharge detection and elimination plan template, residential illicit discharge door hangers, and other commercial and residential outreach materials.
- ◆ Certified over 100 participants in construction erosion control training.
- ◆ Developed a shared database for illicit discharge

Excellence and Innovation

This year WASH received a \$98,000 grant from the Colorado 319 Non-Point Source grant funds to develop a pilot stormwater marketing campaign. The campaign included the creation of a water quality “spokesman” or mascot: H₂O Jo and his assistant Flo. The state’s Non-point Source Council was so impressed with the campaign, they asked that it be available to the rest of Colorado to be used in other communities’ water quality outreach efforts. H₂O Jo and Flo are now the state’s water quality mascots.



Meet H₂O Jo and Flo

In 2004, the WASH Project was recognized for its innovation and excellence, receiving two prestigious awards: the Denver Regional Council of Governments (DRCOG) Annual Award for Cooperative Service Delivery and the Colorado Alliance for Environmental Education Award for Best New Program.

In addition, WASH is leading other Colorado permitted communities in the development of a shared, statewide municipal operations training video, at a significant cost savings for all participants.



The Future

The WASH Plan outlines tasks required to fulfill regulatory compliance with each Partners’ stormwater discharge permit for 2005. The WASH Project will continue to implement the shared and common programs for the benefit of all the communities. In 2005, each Partner will be responsible for:

- ◆ Implementing the individual ordinances adopted in 2004 and related procedures, such as:
 - Reviewing erosion control plans and proposed permanent water quality structures
 - Conducting and tracking construction and post-construction site inspections
 - Responding, enforcing, and tracking for all illicit discharges.
- ◆ Finalizing storm drainage outfall maps.
- ◆ Ensuring all municipal operations meet the PACE stormwater pollution prevention certification criteria.

Background and Project Overview

The Watershed Approach to Stream Health (WASH) Project grew out of a stormwater round table discussion in April 1999 and a subsequent watershed management focus group in August 1999. Water quality and stormwater professionals representing various communities in the Boulder Creek and St. Vrain watersheds participated in those meetings to help develop the goals, objectives, and project focus that are now incorporated into the WASH Project mission.

The WASH Project uses a unique, collaborative approach to involve various levels of government in creating cost-effective solutions to stormwater problems. The WASH Project embodies the spirit of the watershed approach envisioned in the federal Clean Water Act and encouraged by the Boulder Valley Comprehensive Plan.

The primary goal of the WASH Project is to implement a regional stormwater management program, not only to comply with federal Phase II stormwater regulations, but also to address broader water quality watershed issues.

WASH Partners include Boulder County; the cities of Boulder, Longmont, and Louisville; and the towns of Superior and Erie. In 2001, WASH Partners entered into a Memorandum of Understanding (MOU), which outlined the desire to address stormwater quality issues on a regional basis.

The WASH Plan

In 2002, the WASH Partners began developing the five-year WASH Plan, which outlines the WASH programs and their associated budgets. Emphasis was placed on developing programs that meet the Phase II stormwater regulations using existing, successful programs; addressing community water quality goals; and allowing for flexibility within jurisdictional oversight.

Implementation of the WASH Plan is governed by the five-year intergovernmental agreement (IGA) and supporting bylaws, which were executed on January 23, 2003. The IGA identifies the Steering Committee as the managing entity, made up of one voting representative from each Partner community. The Steering Committee directs the WASH Project Coordinator, who provides administrative and management services to implement the WASH Plan and the supporting WASH budget. The IGA identifies Boulder County Public Health (BCPH) as the contracting/fiscal agent. BCPH is also the employer of the WASH Project Coordinator. The WASH Partners participate in workgroups, which direct implementation of the WASH Plan.

The WASH Plan is divided into two main categories: Priority One activities are those required to comply with Phase II stormwater regulations, and Priority Two activities are those that address broader stormwater and water quality management issues. The Priority One activities were submitted in each Partner's application for a Phase II municipal stormwater permit with the Colorado Department of Public Health and Environment (CDPHE) in March 2003; permits were issued in April 2003.

The Phase II regulations call for the implementation of six minimum control measures (MCMs) to address the impact of stormwater runoff on water quality and stream health. These programs are described in detail in the WASH Plan.

Implementation of the WASH Plan

The WASH Plan approaches the implementation of each of these required programs with various amounts of responsibility:

- **Common Elements:** Program elements that have common themes and common implementation procedures. An example is the development of common ordinance language.
- **Individual Programs:** Program elements that are exclusively the responsibility of individual Partners to implement. An example is the adoption and enforcement of an erosion control ordinance.
- **Shared Programs:** Program elements that are shared by all Partners. The following two contracts are examples:
 - The City of Boulder Water Education Program, servicing the participating communities' schools and organizing public outreach.
 - Boulder County's Partners for a Clean Environment (PACE) Program, outreaching to both the business community and municipal operations.

The six minimum control measures required in the Municipal Stormwater Discharge Permit are outlined below and are included in the WASH Plan:

1) MCM 1 - Public Education and Outreach

- School-Based Education Program (water quality curriculum and classroom programs)
- Business Education Program (see MCM 3)

Note: Shared Program - WASH contracts with the City of Boulder's existing water education program to provide these services.

2) MCM 2 - Public Participation and Involvement

- Storm Drain Stenciling Program
- Illicit Discharge Hotline (see MCM 3)
- Annual Public Meetings to Solicit Input on WASH Programs

Note: Shared Program - WASH contracts with the City of Boulder's existing water education program to provide these services.

3) MCM 3 - Illicit Discharge Detection and Elimination

- Legal Prohibition of Illicit Discharges (ordinances and other code development)
- Illicit Discharge Enforcement (spill response plan, inspections, and enforcement)
- Community-Based Education Program (brochures, fact sheets, and other materials)
- Business Education *Note: Shared Program – PACE Program performs this outreach.*
- Storm Sewer System Mapping

4) MCM 4 - Construction Site Stormwater Runoff Control

- Training and Education for Construction Site Operators and Inspectors
- Erosion Control Ordinance (required erosion control for construction sites)
- Erosion Control Standard Operating Procedures (SOP) (outlines application and approval procedures for construction site stormwater management plan submittals)
- Erosion Control Inspection and Enforcement (implementation of erosion control ordinance)
- Public Input

5) MCM 5 - Post-Construction Stormwater Management

- Post-Construction Ordinance (required treatment of stormwater runoff)
- Design Criteria and Standards (outlines type of stormwater treatment or best management practice [BMP] required)
- Development Review (ensures appropriate design of BMPs)
- BMP Operation and Maintenance (requires long-term maintenance of BMPs)

6) MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

- Training and Certification for Municipal Employees (site-specific water pollution prevention activities)

Note: Shared Program - WASH contracts with PACE Program to inspect and certify the Partners' municipal operations, in order to ensure that stormwater quality is protected.

The Partner communities fund the common and shared program costs. Cost allocation is based on each Partner's urbanized population, as outlined in the WASH IGA. Costs to implement the individual community programs are the responsibility of each individual community. The total annual average cost to implement the shared and common elements of the WASH Plan is approximately \$380,000. This includes 3.25 full-time employees (FTEs) at a cost of \$220,000. The staff currently includes 1.50 FTE education positions, 0.75 FTE WASH coordinator position, and 1.00 FTE to support the PACE Program.

2004 Highlights

Through the implementation of WASH Plan elements, all WASH Partners achieved compliance with their Stormwater Discharge Permits. A summary of major tasks follows:

Community Outreach and School Education Programs

WASH Partners contract with the City of Boulder's Education Program to implement these tasks, including:

- Distributed 10,000 *After the Storm* brochures.
- Translated the *After the Storm* brochure into Spanish and printed 10,000 copies.
- Marked 748 storm drains with the message, "Dispose no Waste, Drains to Creek".
- Installed 60 new tributary signs and held a public unveiling of the signs on September 29, 2004, in Niwot.
- Reached 4,879 kindergarten through 12th grade students with water quality materials.
- Developed the H₂O Jo and Flo statewide 'Keep it Clean' water quality mascot campaign and incorporated the mascots into WASH publications.
- Posted 54 'Keep it Clean' bus advertisements.
- Featured 'Keep it Clean' movie advertisements in three movie theaters during the months of May-July 2004. Over 106,000 people visited the theater during this time.
- Began development of a special events booth. Received grant funding from the State Non-Point Source Program to support the development.
- Held a public meeting with PACE to inform businesses of future illicit discharge regulations.

Stormwater Pollution Prevention Programs for Private and Public Sectors

WASH contracted with Boulder County Public Health's PACE Program to implement the following work items:

- Evaluated 199 restaurants and 128 vehicle services facilities for certification with stormwater pollution prevention criteria.
- Sent letters outlining stormwater pollution prevention to all the restaurant and vehicle service facilities identified in the WASH communities.
- Developed a stormwater campaign look incorporating H₂O Jo.
- Developed outreach materials for the do-it-yourselfer auto mechanic, rental store customer, private golf course manager, vehicle service facility manager, restaurant employee, and municipal operations employee.
- Evaluated 55 municipal operations for certification with stormwater pollution prevention criteria.
- Trained 168 municipal employees on stormwater pollution prevention.
- Determined second-tier municipal operations for stormwater pollution prevention outreach in 2005.
- Coordinated with other Colorado Phase I and II communities on development of a training video for municipal operations stormwater pollution prevention.

Erosion Control, Permanent Water Quality Structures and Illicit Discharge Prevention

WASH Partners spent a significant amount of time working within their individual communities to adopt the regulatory mechanisms needed to manage illicit discharges, and construction and post-construction stormwater runoff, and included the following tasks:

- Each Partner community, with the exception of Boulder County, adopted ordinances to regulate potential stormwater pollutants from commercial and residential sources and construction activity.
- Held open houses to inform the public and receive input on ordinances.
- Drafted a template Illicit Discharge Detection and Elimination Plan.
- Produced door hangers to inform residents of illicit discharge situations and remedies.
- Continued the distribution of erosion control training materials and implementation of a certification program for public employees and private contractors. Certified more than 80 participants. Developed a construction brochure for projects over 1 acre. Developed an Erosion Control Field Guide that included diagrams of best management practices and photographs of good and bad field examples.
- Developed a template maintenance agreement for permanent water quality structures.
- Developed a shared database for illicit discharge tracking.

Presentations and Awards

WASH Partners made a number of presentations throughout the State and received two notable awards in 2004 including:

- Stormwater Quality 101 to the Rocky Mountain Land Use Institute; Water Conservation and Stormwater to the local chapter of American Water Works Association and the Colorado Water Wise Council; Coordinated Compliance with Stormwater Permit Requirements to the Colorado Association of Stormwater and Floodplain Managers; Construction Ordinance Overview in Longmont and Boulder and to the Denver Metro Homebuilders Association; WASH and PACE presented information on the impact of the illicit discharge ordinance to commercial businesses.
- The Denver Regional Council of Governments 2004 Award for Cooperative Service Delivery.
- The Colorado Alliance for Environmental Education (CAEE) Award for Best New Program. (See www.caee.org.)

Grants

The WASH Project also uses the strength of previous successes and the watershed approach to secure additional outside grant funding. In 2004, the WASH Project secured and completed several grants totaling \$115,000:

- \$12,000 (2002-2004) US EPA Consolidated Funding Process for the development of a WASH Erosion Control Training and Certification Program.
- \$98,000 (2003-2004) State of Colorado 319 Non-point Source Grant for the Message, Mascot, Marketing and Evaluation (3ME) Project to develop a universally recognized pollution prevention message and mascot.
- \$5,000 (2004) Non-point Source mini grant for the development of a state-of –the-art WASH special events’ booth.

Budget

In 2004, the WASH budget was \$390,000, of which \$90,000 (23%) was proportionately reimbursed to each of the Partners. The unspent funds represent savings of \$49,000 from reducing program

implementation costs (grants, use of in-house resources, cooperative projects, effective project management). The remaining half of the cost savings represents unspent contingency and overhead funds. The contingency and overhead funds are required by the WASH intergovernmental agreement (IGA).

Future

In 2005, the primary responsibility for the individual Partners will be implementing the ordinances adopted in 2004 through the development of associated Standard Operating Procedures (SOPs). The SOPs outline the implementation requirements for reviewing erosion control plans, developing plan inspections, and BMP selection guidance, as well as response and enforcement for illicit discharges to the storm drainage system. The Partners will finalize their individual communities' storm drainage outfall maps. The WASH Project will continue to implement the shared and common programs for the benefit of all the communities.

2004 Activities

MINIMUM CONTROL MEASURES

The following is a comprehensive summary
of
Priority One and Priority Two activities
implemented under
the WASH Plan
for each of the
Six Minimum Control Measures

MCM 1 - Public Education and Outreach

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure (MCM), the following is required: (A) *Public education and outreach on stormwater impacts. The permittee must implement a public education program to include the following:*

- (I) *Distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff; and*
- (II) *Inform businesses and the general public of impacts associated with illegal discharges and improper disposal of waste.*

Program Objective

Getting the Word Out - Public Education - Individuals play a key role in reducing stormwater impacts in their day-to-day activities. To successfully achieve water quality goals, a public education program must first educate the public on the extent and nature of the problems associated with urban runoff. Next, the public must be instructed on what they can do to help solve the problem, and finally, a successful program must provide opportunities for hands-on activities.

The WASH Education Program uses a variety of methods to “get the word out.” The program is an expansion of the City of Boulder’s award-winning stormwater public outreach program.

2004 Accomplishments

WASH Education Program

The WASH Partners contracted with the City of Boulder’s Stormwater Education Program to provide education programs required under MCM 1 and MCM 2 for all WASH Partner communities. The WASH education staff, with direction from the WASH education workgroup and input from PACE staff, implemented the 2004 Priority One and Two activities outlined in the WASH Plan. Individual Partners were responsible for certain program elements, including the continued distribution of brochures and directing their citizens to the WASH web site. The City of Boulder’s Stormwater Education Program’s annual report is available at www.BASIN.org/WASH. Text from the report has been referenced to produce the summaries that follow.

PRIORITY ONE ACTIVITIES

Brochures or Fact Sheets

2004 Measurable Goal - distribution continued.

The WASH *After the Storm* brochure was created in 2003 and targeted the general public. The brochure included information on the impacts of illicit discharges and other water quality issues. In 2004, the brochure was translated into Spanish, and over 10,000 of these brochures were distributed in WASH community schools and through other WASH community and business outreach programs. In 2005, the brochure will be revised to include ‘Keep it Clean’ campaign images and will be printed and distributed in all WASH communities.

Each WASH Partner is responsible for distributing a number of brochures approximate to 100% of the number of their equivalent households over the permit term. A summary of distribution methods follows:

Partner	Distribution means	Number of households	Number distributed by Partners in 2003	Number distributed by Partners in 2004	% of total households
Boulder County	via Boulder Valley School District Schools/community events	8,900	0	7,700	87
Boulder	utility bill insert/community events	39,596	37,000	1,733	98
Longmont	independent mailing/community events	26,667	21,500	850	84
Louisville	utility bill insert/community events	7,216	8,100	14	112
Superior	newsletter insert/community events	4,500	4,800	0	106
Erie	utility bill insert/community events	3,750	3,750	250	107
TOTAL		90,629	75,150	10,547	95

Water Quality Curriculum

2004 Measurable Goal - will be expanded into the St. Vrain Valley School District (SVVSD). Watershed curriculum and associated materials and training will be made available and advertised to all 20 fifth grade classroom teachers in the SVVSD.

In 2004, the Watershed Resource Guide was updated to include St. Vrain watershed information. This guide is used as the basis for the Watershed curriculum which teachers implement in their classrooms. The curriculum is distributed through the annual Watershed teacher training sessions. In May, Boulder Valley School District (BVSD) and SVVSD 4th-5th grade teachers and 6th-12th grade science teachers were invited to attend a free two-day training. In June, 14 teachers and 6 local naturalists attended the training, and WASH received positive remarks from all in attendance. Evaluation form responses reported that training materials were useful, the training increased their knowledge of water and water quality, and they would recommend the training to other teachers.

Together, the educators that attended the training will reach over 1,450 students in the 2004-2005 school year.

Other WASH Education and Outreach Activities:

- Conducted 133 stormwater education programs reaching a total of 4,879 BVSD and SVVSD students.
- Developed a comprehensive brochure listing all K-12 programs available through the WASH Education Program. The collective school program was re-named the “Get to Know your H₂O” to better market products and services to teachers. The brochure was distributed to all K-5 teachers and 6-12 science teachers in the BVSD and SVVSD.
- Partnered with the *Daily Camera* Newspaper to create the “Get to Know Your H₂O” educational insert. The 16-page insert featured H₂O Jo and Flo and a series of water

protection and conservation activities. Approximately 1,815 papers were distributed to teachers in the two school districts, and the remaining 2,125 papers have been and continue to be distributed to groups through the WASH education program.

- Initiated the 'Keep it Clean' campaign in April 2004. A large, inflatable H₂O Jo mascot was created and served as the host at 6 water festivals and appeared at 15 community events throughout the state of Colorado.

Web Site

2004 Measurable Goal – continue to develop stormwater materials for web site.

Background information on the WASH Project, including the six MCMs, along with specific information promoting the stormwater education program, storm drain stenciling program, training opportunities, informational brochures, and annual reports are provided on the BASIN web site (www.BASIN.org/WASH). This web site is updated frequently to include the most current WASH Project information.

'Keep it Clean' campaign graphics are posted on the BASIN web site. With the posting of these materials, the web site experienced a 500% increase in average monthly page requests and a 216% increase in average monthly distinct hosts served. It is important to note that the web site was advertised in all WASH outreach materials distributed during this period. In addition, all WASH Partners list the BASIN/WASH web site on their own communities' web site and include:

Boulder County: web site is <http://www.bouldercountywater.org/>

Boulder: web site is www.boulderutilities.net

Longmont: web site is <http://www.ci.longmont.co.us>

Louisville: web site is <http://www.ci.louisville.co.us>

Superior: web site is www.townofsuperior.com

Erie: web site is <http://www.ci.erie.co.us/>

PRIORITY TWO ACTIVITIES

Children's Water Festival

2004 Measurable Goal – continue hosting Children's Water Festival for Boulder Valley School District (BVSD) students. Extend participation of Children's Water Festival for St. Vrain School District (SVVSD) students.

Approximately 900 BVSD 5th grade students and their teachers attended the 12th annual Children's Water Festival held at the University of Colorado campus on May 17, 2004.

Approximately 850 SVVSD 5th grade students and their teachers attended Longmont's Children's Water Festival held at the Raintree Center in Longmont on May 18, 2004.

Over 75% of classes attending the BVSD Children's Water Festival participated in the Water Ambassador Program, which provided students and teachers with six weeks of pre-festival educational activities and a take-home component. Longmont plans to incorporate the Ambassador program into their Water Festival in 2005.

The WASH Education Coordinator presented a session titled "Water Festivals: Kick it Up a Notch" at the Colorado Foundation for Water Education Educator's Conference in Glenwood Springs, Colorado, on April 6, 2004. Over 60 people from around the state attended this session to hear how

the WASH Education Program uses the Water Ambassador Program to turn a one-day Children's Water Festival Event into a six-week water learning experience.

Tributary Signage

2003 Measurable Goal – will be designed, produced, and installed along major intersections in the county and in municipalities marking significant waterways.

The signs are intended to increase public awareness of local water resources. Each sign includes the information "Keep it clean, 'cause we're all downstream!" and feature the specific creek name for the site. The tributary signs were designed in 2003. In 2004, 60 tributary signs were produced and installed along major intersections in Boulder County and in WASH communities marking significant waterways. WASH Partners, WASH education staff and community members, and H₂O Jo attended an unveiling event on September 29, 2004, in Niwot, Colorado. County Commissioner Mayer provided remarks on the importance of watershed approaches to water quality protection. A short story announcing the unveiling event and describing the tributary signs appeared in the *Daily Camera* on September 27, 2004.

Alternative Information

2005 Measurable Goal – develop specific campaigns to target various pollutant sources.

Though this Priority Two measurable goal appears in the WASH Plan in 2005, WASH identified an opportunity and budgeted funds to support this in 2004. WASH contributed funds for the creation, production, and placement of the "Keep it clean, 'cause we're all downstream!" movie ad featuring H₂O Jo and Flo and the message, "Look for us around town for important water information." The movie slide played in three WASH community movie theaters May-July 2004. Over 106,000 people visited the theaters during this time.

Program Element Changes

None

Budget

Proposed: \$111,229

Actual: \$107,029

Unexpended funds: \$4,200

Savings are due primarily to unexpended labor.

Members of Workgroup

Wendi Palmer, Town of Erie

Denise Grimm, Boulder County

Donna Scott, City of Boulder

MCM 2 - Public Involvement and Participation

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required: (B) *Public involvement/participation. The permittee, must at a minimum, comply with State and local public notice requirements when implementing the stormwater management programs required under this permit. Notice of all public hearings should be published in a community publication or newspaper of general circulation, to provide opportunities for public involvement that reach a majority of citizens through the notification process.*

Program Objective

Promoting Public Participation - To ensure buy-in and support from the public, participation is critical. This includes providing information and seeking public input on stormwater management issues.

The WASH programs include participatory programs, such as neighborhood storm drain stenciling, illicit discharge reporting, and annual public meetings.

2004 Accomplishments

WASH Education Program

The WASH Project contracted with the City of Boulder's Stormwater Education Program to develop programs for MCM 2, which included the annual public meeting presentation and the storm drain stenciling program. The Stormwater Education Program's annual report is available at BASIN.org/WASH. Text from the report has been referenced to produce the summaries that follow.

The individual Partners were responsible for scheduling and hosting an annual public meeting in each of their communities. In 2004, the annual meetings took place during the adoption of each Partner's regulatory mechanism to control stormwater pollution. In addition, Partners were responsible for ensuring that a minimum of 5% of the storm drains were stenciled in their communities.

PRIORITY ONE ACTIVITIES

Annual Public Meetings

2004 Measurable Goal - An alternative annual meeting format will be developed. This may include special events, presentation of WASH Program updates to councils, commissioners, citizen advisory boards and/or public forums; distribution of feedback forms; or other means to solicit public input into the WASH and individual Partner community stormwater programs.

In 2003, each WASH Partner hosted a public meeting to solicit input on WASH programs. Only a handful of citizens attended these meetings. To increase participation, WASH Partners requested and received approval to change this measurable goal to include the alternative annual meeting format outlined above. In 2004, this format included a number of public meetings.

WASH, in conjunction with the PACE Program, the individual WASH Partners, and the Boulder County Chamber of Commerce, publicly announced a meeting to discuss the adoption of an illicit discharge ordinance in all of the WASH communities. The meeting was held on September 30, 2004, and resulted in two follow-up newspaper articles; one in the Boulder County *Business Report* and one in the Longmont *Daily Times-Call*. WASH also participated in a panel discussion sponsored by the Denver Metro Homebuilders on October 21, 2004, at the Boulder County Fairgrounds.

The WASH communities had individual public meetings surrounding the adoption of their ordinances. A table of those meetings follows.

Partner	Date of Meeting	Meeting Description
Boulder County	September 30, 2004 October 21, 2004	Chamber of Commerce-Illicit Discharge Ordinance Denver Metro Homebuilders
Boulder	August 2004 September 30, 2004 October 13, 2004 October 21, 2004 October 21, 2004 November 16, 2004 December 6, 2004	Open House on Construction/Post-Con Ordinance Chamber of Commerce-Illicit Discharge Ordinance Water Resources Advisory Board Denver Metro Homebuilders Planning Board First Reading of Ordinance Second Reading of Ordinance
Longmont	July 10, 2004 September 22, 2004 September 30, 2004 October 21, 2004 December 28, 2004 January 11, 2005	Rhythm on the River Longmont Homebuilders Chamber of Commerce-Illicit Discharge Ordinance Denver Metro Homebuilders First Reading of Ordinance Second Reading of Ordinance
Louisville	September 30, 2004 October 21, 2004 December 7, 2004 December 21, 2004	Chamber of Commerce-Illicit Discharge Ordinance Denver Metro Homebuilders First Reading of Ordinance Second Reading of Ordinance
Superior	September 30, 2004 October 12, 2004 October 19, 2004 October 21, 2004 December 13, 2004	Chamber of Commerce-Illicit Discharge Ordinance First Reading of Ordinance Planning Commission Denver Metro Homebuilders Second Reading of Ordinance
Erie	September 30, 2004 October 21, 2004 October 26, 2004 November 9, 2004	Chamber of Commerce-Illicit Discharge Ordinance Denver Metro Homebuilders First Reading of Ordinance Ordinance Approved

For 2005, WASH public meeting format will be in the form of an outreach booth. This booth will be provided at community events and will create an interactive outreach opportunity. The booth will also utilize the 'Keep it Clean' campaign information and graphics. The outreach booth will be finalized when WASH and grant funds are available in 2005.

Storm Drain Stenciling Program

2004 Measurable Goal - will continue to be initiated and incorporated into MCM 1 Public Education Program. A minimum of 5% of the storm drains will be stenciled per year.

WASH education staff provided stormwater education programs and facilitated storm drain stenciling activities to over 208 youth and citizens in WASH communities. In 2004, WASH education staff ordered and began to use curb markers. When applied correctly, markers have a 15 -year life span, as compared to the one-year life span of the spray paint stencil.

The 5% minimum requirement for stenciling storm drains was met by all of the Partners. The following table is a summary of the number of storm drains that were stenciled in each Partner's community in 2004.

Partner	Total Storm Drains	Stenciled In 2003	Stenciled in 2004	Percent of Total Stenciled in 2004	Percent of Total Stenciled
Boulder County	225	82	40	17.8	54
Boulder	4,180	209	439	10.5	16
Longmont	1,820	99	95	5.2	11
Louisville	600	43	137	22.8	30
Superior	300	22	20	6.7	8
Erie	320	62	17	5.3	25
Total	7,445	517	748	10	17

PRIORITY TWO ACTIVITIES

Speakers Program

2004 Measurable Goal - Speakers Program will be initiated by developing a list of speakers and provide the list to the public.

The Speakers Program, including an overview and list of speakers, is available on www.BASIN.org/WASH. To date, three presentation options are listed. In 2004, WASH staff provided the following presentations:

- WASH and the ‘Keep it Clean’ campaign: Urban Drainage Group, May 10, 2004. Presentation by Curry Rosato.
- WASH and the ‘Keep it Clean’ campaign: Big Thompson Watershed Forum Board Meeting, September 16, 2004. Presentation by Curry Rosato.
- WASH Get to Know Your H₂O Education Program: EPA Phase II MS4 Education and Outreach workshop, August 5, 2004. Presentation by Curry Rosato.
- Boulder Creek Watershed Virtual Tour: East Boulder Optimists Club, November 16, 2004. Presentation by Jennelle Freeston.

GRANTS

WASH received a \$5,000 Colorado 319 Non-point Source mini grant to partially cover outreach booth development costs.

Program Element Changes

None

Budget

Proposed: \$16,761

Actual: \$15,679

Unexpended funds: \$1,082

Savings are due primarily to unexpended labor.

Members of Workgroup

Wendi Palmer, Town of Erie
Denise Grimm, Boulder County
Donna Scott, City of Boulder

MCM 3 - Illicit Discharge Detection and Elimination

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

- (C) *The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 61.2) into the permittee's MS4. The permittee must:*
- (a) *Develop, if not already completed, a storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and location of all state waters that receive discharges from those outfalls;*
 - (b) *To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the storm sewer system, and implement appropriate enforcement procedures and actions; and*
 - (c) *Develop and implement a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.*

Program Objective

Detecting and Eliminating Improper or Illegal Connections and Discharges - A cost-effective way to reduce some of the worst stormwater pollutants is to identify and eliminate illicit connections and discharges.

The WASH Plan includes public and municipal employee education training, spill response, and regulatory language to control illegal discharges. In addition, public information material will discuss the impacts of spills on water quality and a hotline for reporting illicit discharges will be advertised.

2004 Accomplishments

PRIORITY ONE ACTIVITIES

Municipal Separate Storm Sewer System (MS4) Mapping

2004 Measurable Goal - MS4 system mapping continued

Each individual community, as required, has begun developing a storm sewer map, which will show the locations of municipal storm sewer outfalls and the names and locations of state waters that receive discharges from these outfalls.

Ordinance Development and Spill and Enforcement Response Plan

2004 Measurable Goal - Complete development of common illicit discharge ordinance language and illicit discharge response plan. Illicit discharge ordinance adopted by individual Partners. Illicit discharge hotline and tracking system researched.

January 2004, the WASH workgroup completed a template Illicit Discharge Ordinance and Spill and Enforcement Response Plan. The WASH Partners, with the exception of Boulder County, spent 2004 modifying these templates to meet the needs of their individual jurisdictions. All of the Partners had their ordinances close to adoption or deferred by the state by the end of 2004. The following table includes web links to the Partners' ordinances.

Partner	Ordinance Adopted	Web link
Boulder County	Deferred until 2005	
Boulder	December 6, 2004	http://www.ci.boulder.co.us/clerk/agenda/2004/120604/31.pdf
Longmont	January 12, 2004	http://www.ci.longmont.co.us/city_council/2005_packets/0111/122804_6h.pdf
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, water/sewer, chapter 13.36
Superior	December 13, 2004	http://www.townofsuperior.com/publications.htm
Erie	November 9, 2004	http://66.113.195/CO/Erie/index.htm

To implement the illicit discharge ordinances and the associated Standard Operating Procedures (SOPs), Boulder County Emergency Communications agreed to publicize a “Spill Hotline” (303-441-4444) to be shared by all Partners. Calls to the Spill Hotline are received by the Boulder County Communications Center and are dispatched to the appropriate response agency and/or jurisdiction.

In addition to the Spill Hotline, the WASH Partners will share an illicit discharge incident database, hosted on the BASIN web site. The Boulder County Environmental Emergency Response Team data will be captured on the BASIN database as well.

Business Education Program

2004 Measurable Goal – initiated outreach materials will be mailed to 80% of restaurants and vehicle service facilities in each Partner’s permitted area.

The WASH Partners contracted with the Boulder County Partners for a Clean Environment (PACE) Program to provide stormwater pollution prevention education and/or materials to the commercial sectors identified as potentially significant contributors of pollutants to the storm drain system. These sources include restaurants and vehicle service facilities. Major work elements performed by PACE in 2004 are outlined below. For more details, the complete PACE Annual Report is available online at www.pacepartners.com.

New Business Sector Outreach Program

PACE developed stormwater pollution prevention for businesses which are currently not included in the PACE certification program. These business sectors included pressure washers, golf courses, do-it-yourself auto parts stores, and equipment rental stores. Rental stores were identified later in the year as a potentially significant, new sector that requires PACE assistance. Work with these new businesses sectors included:

- Contacted businesses to discuss the upcoming ordinances and stormwater impacts and to gather feedback on effective messages for outreach material.
- Researched, developed, and reviewed appropriate best management practices (BMPs) and an outreach strategy that will achieve WASH goals.
- Initiated discussions with state and regional parties on the differing perspectives of what pressure washer BMPs would be required and enforced outside the WASH area.
- Created a design format for outreach materials to be used for non-PACE business sectors. Incorporated outreach content and printed material for distribution in 2005.

WASH/PACE Site Visits to Existing PACE Sectors

In 2004, PACE expanded its existing program and added stormwater assessments to all businesses likely to have stormwater impacts (i.e., restaurant, auto body, and auto repair). Site visits provided one-on-one technical assistance to educate businesses, identify stormwater impacts, and identify low-cost solutions.

- Reviewed stormwater criteria during site visits.
- All businesses contacted or recertified in 2004 were given the stormwater criteria and were required to adopt the BMPs in order to be certified.
- Twenty-seven (27) new businesses were WASH/PACE-certified in 2004 in the vehicle repair, auto body, and restaurant sectors. Eighty-six (86) businesses were recertified with the WASH/PACE criteria in 2004.
- PACE has provided one-on-one compliance assistance on the new stormwater program requirements to approximately 42% of all the businesses in these sectors.
- In addition to the vehicle repair, auto body, and restaurant sectors, nine (9) retail site visits were conducted in Boulder and Superior (8 in Boulder and 1 in Superior).
- Refer to the table below for visits completed.

Jurisdiction	Vehicle Repair and Auto Body		Restaurants	
	Total Businesses ¹	WASH Contacts	Total Businesses ¹	WASH Contacts
Boulder County (Gunbarrel, Hygiene, Niwot)	3	1	18	9
City of Boulder	131	65 ²	268	92 ²
City of Longmont	82	52 ²	188	78 ²
City of Louisville	8	7	50	6
Town of Erie	4	2	10	8
Town of Superior	1	1	9	6
Total WASH Area	229	128	543	199
¹ We have not identified all businesses in Boulder County unincorporated areas. We will identify businesses in the field using the WASH map showing urbanized unincorporated areas. ² The cities of Boulder and Longmont have contracted with PACE for pollution prevention business outreach. As a result, a larger proportion of businesses in these municipalities received WASH information along with their PACE contacts.				

Business Outreach Materials

PACE worked with WASH Education Program to develop a number of outreach materials, including:

- Door stickers for restaurants, grocery stores, and auto facilities. Door stickers alert employees not to dump wastes down storm drains. Stickers were distributed by PACE and Boulder County Food Safety Program staff during site visits.
- Distributed *After the Storm* brochure to businesses. Future reprints of this brochure will focus on stormwater concerns of the general public (lawn care, pet waste, septic systems, and what they should expect from businesses). WASH/PACE brochures and resource sheets will be used to address stormwater BMPs for businesses managers.
- Provided input on H₂O Jo and Flo, tributary sign design, and other educational concepts.

- Created WASH / PACE “look” for PowerPoint presentations and web page design.
- Featured stormwater issues in the 2004 PACE newsletter. Used H₂O Jo and Flo to improve brand recognition and provided an overview of the program with special focus on restaurant and auto repair/body.
- Asked businesses to use storm drain markers on nearest storm drains.
- Mailed WASH/PACE-specific letters to restaurants, auto body, and auto repair establishments explaining the new stormwater ordinance.
- Developed a brochure to introduce the program to existing PACE business customers and the general public.

General Program Enhancement and Outreach

- Prepared and presented the WASH/PACE Program during the stormwater session of the National Pollution Prevention Roundtable held in Baltimore in April.
- Aligned changes to the strategy of the PACE Program with WASH/PACE activities.
- Contributed content to and participated in the presentation describing the WASH and PACE program efforts for the public meeting held September 30th.
- Closely coordinated with WASH Project Coordinator to evaluate goals and measure progress.
- Created PACE logo design to better capture WASH Partner participation and emphasize PACE as the one brand to be used for all outreach to businesses.
- Updated the WASH/PACE database to include stormwater criteria and improve data entry and query functions.

2005 WASH/PACE Goals

- Distribute the educational materials for the four new business sectors developed in 2004. The focus will be on ensuring the BMPs are being adopted and are effective.
- Further develop commercial facilities and rental store outreach materials.
- Continue WASH/PACE site visits to provide stormwater education and certification information to vehicle repair, auto body, restaurant, and retail businesses.
- Utilize new database to track site visits and WASH/PACE certification.
- Provide in-depth guidance to businesses in need of specific stormwater compliance assistance.
- Incorporate municipal Tier 2 operations educational materials into private/commercial sector (ex. Facilities Management).

Illicit Discharge Detection Plan

2004 Measurable Goal - Develop common Illicit Discharge Detection Plan; Training of public employees by PACE (as part of the pollution prevention and good housekeeping program).

A contractor was hired to develop the template Illicit Discharge Detection and Elimination (IDDE) Plan. The Plan was completed and delivered to the Partners in November of 2004 to be modified to meet their jurisdictions’ needs. The individual plans will be completed in early 2005.

Training was held on IDDE Plan for all Partner staff responsible for spill response in their community in October of 2004.

A door hanger was developed to notify potential illicit discharge violators. The door hanger outlines the possible violations and solutions and serves as a warning of potential fines. The door hanger will be distributed in early 2005 to municipal employees to use in enforcing illicit discharge regulations.

PRIORITY TWO ACTIVITIES

Household Hazardous Waste (HHW) Disposal Program

2004 Measurable Goal – Continue support of county-wide HHW Disposal Program.

All WASH Partners signed a five-year intergovernmental agreement to participate in the County-wide Household Hazardous Waste Program.

Program Element Changes

None

Budget

Proposed: \$65,179

Actual: \$55,595

Unexpended funds: \$9,584

Savings are due primarily to drafting the illicit discharge detection and elimination (IDDE) plan template \$7,000 below budget, as well as unexpended labor.

Members of Workgroup

Ken Mason, City of Louisville

David Hollingsworth, City of Longmont

Donna Scott, City of Boulder

MCM 4 - Construction Site Stormwater Runoff Control

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(D) Construction site stormwater runoff control.

- (I) The permittee must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B), the permittee is not required to develop, implement, and/or enforce its program to reduce pollutant discharges from such a site.*
- (II) The program must be developed and implemented to assure adequate design, implementation, and maintenance of BMPs at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include the development and implementation of, at a minimum:
 - (a) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law;*
 - (b) Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;*
 - (c) Requirements for construction site operators to control waste, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste, at the construction site that may cause adverse impacts to water quality;*
 - (d) Procedures for site plan review which incorporate consideration of potential water quality impacts;*
 - (e) Procedures for receipt and consideration of information submitted by the public, and*
 - (f) Procedures for site inspection and enforcement of control measures.**

Program Objective

Controlling Construction Site Runoff - Effective construction site pollution prevention can dramatically reduce sediment loading to stream ecosystems. An effective erosion control program must include adequate ordinance language, effective inspection and enforcement, and appropriate development and construction standards.

The WASH Plan includes all of these components. In addition, the WASH Plan includes contractor training and a certification program. These program elements will ensure consistent county-wide education and minimum standards.

2004 Accomplishments

PRIORITY ONE ACTIVITIES

Erosion Control Ordinance

2004 Measurable Goal - Complete development of ordinance language. CDPHE review proposed ordinance language. Individual communities adopt erosion control ordinance or other regulatory mechanism.

In 2003, the WASH workgroup develop a template ordinance addressing erosion control for construction sites. To meet their individual jurisdiction's needs, the WASH Partners, with the exception of Boulder County, spent 2004 adapting the template Construction and Post-Construction Ordinance. The following table includes web links to the Partners' ordinances.

Partner	Ordinance Adopted	Web link
Boulder County	Deferred until 2005	
Boulder	December 6, 2004	http://www.ci.boulder.co.us/clerk/agenda/2004/120604/3I.pdf
Longmont	January 12, 2004	http://www.ci.longmont.co.us/city_council/2005_packets/0111/122804_6h.pdf
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, water/sewer, chapter 13.36
Superior	December 13, 2004	http://www.townofsuperior.com/publications.htm
Erie	November 9, 2004	http://66.113.195/CO/Erie/index.htm

Erosion Control Standard Operating Procedures

2004 Measurable Goal - Individual communities will develop Standard Operating Procedures (SOP) to outline requirements for erosion control plans.

WASH workgroup developed a template Standard Operating Procedures, which is currently being adapted by WASH Partners to meet the individual jurisdictions' needs.

PRIORITY TWO ACTIVITIES

Contractor Certification Program

2004 Measurable Goal – Adoption of ordinance or other regulatory mechanism to require contractor certification.

The WASH eight-hour erosion control training and certification continued to be available for both public and private inspectors and contractors. This year, approximately 80 individuals were trained during four sessions. All Partner communities' regulatory mechanism, with the exception of Boulder County, includes a requirement for contractor certification. These training sessions were conducted in March, April, September, and October of 2004 and will be continued in 2005.

GRANTS

In 2002, Boulder County received a \$12,000 grant from the Environmental Protection Agency (EPA) to develop training material and certification criteria for the construction industry. In 2004, the grant funded a brochure for general construction requirements for sites over an acre and an erosion control field guide containing diagrams and photographs of proper and improper installation of erosion control measures. The final report, required by the grant, was submitted to EPA in September of 2004.

Program Element Changes

None

Budget

Proposed: \$21,550

Actual: \$17,505

Unexpended funds: \$4,045

Savings are due to not conducting one of the five erosion control training sessions budgeted in 2004 and efficient use of staff time.

Members of Workgroup

Betty Solek, City of Boulder

Jim Stout, City of Boulder

Scott Kuhna, City of Boulder

Tomasita Damian, City of Longmont

Gary Bolken, City of Longmont

Dave Moratelli, Town of Erie

Jorge Riveros, Boulder County

MCM 5 - Post-Construction Stormwater Management

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(E) Post-construction stormwater management in new development and redevelopment.

(I) The permittee must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the small MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.

(II) The permittee must:

- (a) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community;*
- (b) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law;*
- (c) and Ensure adequate long-term operation and maintenance of BMPs.*

Program Objective

Addressing Stormwater in New Development and Redevelopment. It is estimated that when a tributary drainage basin reaches 10–20 percent impervious, there are significant ecological stresses on the aquatic ecosystem. Therefore, the most important strategy for addressing stormwater is to focus on land use and development. One of the best strategies is to address the aggregate amount of new impervious surfaces and disconnecting impervious areas. Other strategies include implementing effective best management practices (BMPs) for the control and treatment of site runoff, such as stormwater detention or grass swales.

The WASH Plan for post-construction includes the development of programs and ordinances that address runoff from new development and redevelopment. WASH will use a successful, existing program by adopting Urban Drainage and Flood Control District's Best Management Practices Manual.

2004 Accomplishments

PRIORITY ONE ACTIVITIES

Post-Construction Ordinance

2004 Measurable Goal - Complete development of ordinance language. Individual communities adopt post-construction ordinance, including inspection of proper installation and maintenance of BMP's and reporting and enforcement standards.

In 2003, a template Construction and Post-Construction Ordinance was developed by the WASH workgroup. In 2004, the WASH Partners, with the exception of Boulder County, adapted the template to meet each individual jurisdiction's needs. The following table includes web links to the Partners' ordinances.

Partner	Ordinance Adopted	Web link
Boulder County	Deferred until 2005	
Boulder	December 6, 2004	http://www.ci.boulder.co.us/clerk/agenda/2004/120604/31.pdf
Longmont	January 12, 2004	http://www.ci.longmont.co.us/city_council/2005_packets/0111/122804_6h.pdf
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, water/sewer, chapter 13.36
Superior	December 13, 2004	http://www.townofsuperior.com/publications.htm
Erie	November 9, 2004	http://66.113.195/CO/Erie/index.htm

Development Review

2004 Measurable Goal - Individual communities will develop specific standard operating procedures for site plan review and inspection.

Template Standard Operating Procedures were developed and the Partners are modifying them to meet the individual jurisdiction's needs.

Design Criteria and Standards

2004 Measurable Goal - Individual communities will develop SOP's for BMP selection guidance appropriate for each community.

Template Standard Operating Procedures (SOPs) were developed and the Partners are modifying them to meet each individual jurisdiction's needs.

Program Element Changes

None

Budget

Proposed: \$19,050

Actual: \$13,059

Unexpended Funds: \$5,991

Savings were realized by having the template maintenance agreement for permanent water quality structures drafted below budget. In addition, the training budget was not expended.

Members of Workgroup

Betty Solek, City of Boulder
 Jim Stout, City of Boulder
 Scott Kuhna, City of Boulder
 Tomasita Damian, City of Longmont
 Gary Bolken, City of Longmont
 Dave Moratelli, Town of Erie
 Jorge Riveros, Boulder County

MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(F) Pollution prevention/good housekeeping for municipal operations.

(I) The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable.

Program Objective

Implementing Pollution Prevention for Municipal Operations. A surprising number of municipal operations can affect water quality and quantity. These activities range from the storage and handling of harmful chemicals to the maintenance of municipal properties, vehicles, roads, and storm sewer systems. Activities such as integrated pest management, water conservation, recycling, and education programs can prove to be very effective in addressing these pollutant sources.

The WASH Program will provide an education and certification program through the Boulder County Partners for a Clean Environment (PACE) Program for municipal operations.

2004 Accomplishments

PRIORITY ONE ACTIVITIES

Partners for a Clean Environment (PACE) Municipal Program

2004 Measurable Goal - PACE Program to begin certifying 1/3 of municipal operations. Training to begin.

The WASH Partners entered into a contract with the Boulder County Partners for a Clean Environment (PACE) Program to develop a certification program for municipal operations. The PACE Annual Report is available online at www.pacepartners.com. An excerpt of the PACE annual report focusing on the work performed to fulfill contract requirements follows:

PACE developed stormwater pollution prevention certification criteria in 2003. Criteria include implementation of both structural and non-structural BMPs for various municipal operations. The municipal operations were then categorized into two tiers, based on an operation's potential stormwater pollution threat. In 2004, PACE conducted site visits of the first-tier operations, which included vehicle, street and storm drainage maintenance and parks/golf courses. A total of 55 municipal facilities were inspected. As part of the site visit, PACE provided each operation with a Stormwater Pollution Prevention binder containing the applicable BMPs, WASH/PACE criteria, a template spill response plan, and a training log. PACE also trained over 168 municipal employees on stormwater pollution prevention.

PACE distributed a follow-up notification letter for all inspected facilities. The letter identified activities which met certification criteria and a list of deficiencies. In December 2004, each Partner

was notified of certification status of the first-tier operations and asked to submit a plan to PACE to resolve any deficiencies by April 2005.

Tier 1 Operations Program Implementation

Number of Tier 1 Site Visits per Municipality

Municipality	# Site Visits
Boulder County	12
Boulder	16
Erie	4
Longmont	13
Louisville	6
Superior	4
TOTAL	55

Type and Number of Tier 1 Site Visits in each Municipality

Tier 1 Operations	Municipality	Number of Operations
Vehicle Repair or Fleet Maintenance	Boulder County	4
	Boulder	1
	Erie	1
	Longmont	3
	Louisville	1
	Superior	0
Street/Road Maintenance	Boulder County	4
	Boulder	1
	Erie	1
	Longmont	2
	Louisville	1
	Superior	1
Storm Drain System Maintenance	Boulder County	0
	Boulder	1
	Erie	1
	Longmont	1
	Louisville	1
	Superior	1
Parks Maintenance	Boulder County	4
	Boulder	11
	Erie	1
	Longmont	4
	Louisville	2
	Superior	2
Golf Course Maintenance	Boulder County	0
	Boulder	1
	Erie	0
	Longmont	3
	Louisville	1
	Superior	0
	TOTAL	55

Designed and Distributed Stormwater Pollution Prevention Plan Binders to all Tier 1 operations

- Contents of the Stormwater Pollution Prevention Plan Binder
 - a) Required data tracking (metrics)
 - i) Pounds of fertilizer or pesticides applied
 - ii) Capital expenditures for BMPs
 - iii) Number of spills/leaks/discharges greater than 1 quart and corrective actions taken
 - iv) Number of catch basins cleaned
 - v) Number of curb miles swept
 - vi) Tons or cubic yards of debris collected (street sweeping and storm drain cleaning)
 - b) Spill Prevention and Response Plan
 - c) Spill logs
 - d) Map of facility
 - e) BMPs, PACE Resource Sheets, PACE Criteria Checklists
 - f) Tracking of inspections (copies of site-visit checklists, follow-up letters, etc.)
 - g) Employee training plan and logs

Conducted Stormwater Training for Municipal Operations

- Developed *PowerPoint* presentation and distributed PACE Resource Sheets

Stormwater Training for Municipal Operations

Training	Date	# Employees
Focus Group for Golf Course Operations	February 2	6
Stormwater Messages for all Operations	March 3	13
Stormwater BMPs for Park Maintenance City of Boulder	July 22	42
Stormwater BMPs for Park Maintenance City of Longmont	August 12	25
Stormwater BMPs for Park Maintenance Boulder County	August 25	32
Stormwater BMPs for Park Maintenance City of Louisville	August 19	8
Stormwater BMPs for Park Maintenance Town of Erie	September 2	10
Stormwater BMPs for Street Maintenance Town of Superior	November 4	4
Stormwater BMPs for Fleet Maintenance (held at City of Boulder Fleet Maint.)	October 12	13
Stormwater BMPs for Fleet Maintenance (held at City of Longmont Fleet Maint.)	October 28	15
TOTAL		168

Follow-up Letters and Deficiencies

Follow-up letters were sent to each operation after the site visit, noting the practices that were already in place to protect stormwater and the potential stormwater impacts (BMPs/PACE Criteria not followed) that need to be corrected to achieve PACE/WASH certification. At the end of the year, a second follow-up letter was sent, reminding operations of the deficiencies identified and requesting that they submit an action plan detailing how they plan to address the deficiency by 2006. WASH Steering Committee members received copies of all correspondence and a summary of the deficiencies identified in their areas.

Most Common Deficiencies Observed (BMPs not followed):

- ✦ Vehicle washing area not plumbed to sanitary sewer
- ✦ Lack of Spill Prevention and Control Plans
- ✦ Uncontained storage of salt/sand
- ✦ Spills at fueling area and no spill kits at fueling islands
- ✦ Uncovered outside containers and materials storage

Tier 2 Operations Program Development

- Reviewed 2003 inventories of municipal stormwater sources, separated out the Tier 1 or Priority Operations, and created inventories of Tier 2 operations.
- WASH Steering Committee members reviewed these inventories and returned them to PACE staff to update.
- PACE staff used the inventory to prioritize the Tier 2 municipal operations based on the number of facilities, number of stormwater polluting activities identified, acreage, distance to surface water, and the percentage of impervious surface on-site.
- The Prioritized Tier 2 Municipal Operations are:
 - ✦ Fire Departments
 - ✦ Buildings & Facilities Maintenance
 - ✦ Recreation Centers
 - ✦ Swimming Pools (not within a rec. center)
 - ✦ Solid Waste Transfer/Recycling Centers

Number of Tier 2 Operations per Municipality

Municipality	Number of Tier 2
Boulder County	5
City of Boulder	14
Erie	10
Longmont	13
Louisville	5
Superior	4
TOTAL	51

Note: All municipal buildings and facilities were combined into one operation called "Facilities Management"

Identified strategies for PACE Certification Program for Tier 2 Operations

- Focus Groups – Fire Stations, Facilities Maintenance
- Site Visits – Fire Stations, Rec. Centers, Pools, Transfer Centers
- Mail resources – Transfer Centers, Facilities Maintenance

Presentations

- Urban Drainage Stormwater Task Force - May 10
- Video review meetings – March 10, September 10, November 29
- WASH Steering Committee - March 9, September 14, October 14
- WASH MCM #3 & #6 Workgroup – September 21, December 13
- WASH Partner Public Meeting on Illicit Discharge Ordinance - September 29
- WASH Partner IDDE for First Responders – October 19
- Monthly WASH PACE Coordination Meetings with WASH Coordinator

Training Video

Participated in script development of a training video incorporating key messages and BMPs for municipal operations and reviewed first and final editions of the video. The video will be provided to

all priority operations employees in 2005 to use as part of their newemployee or regularly scheduled employee training sessions.

2005 WASH/PACE Goals

- Conduct follow-up site visits or phone visits of Tier 1 operations based on pre-determined criteria.
- Distribute municipal video to Tier 1 operations with reminder letter of criteria requirements.
- Conduct training sessions/follow-up meetings to selected Tier 1 operations (this may coincide with IDDE training for each municipality).
- Conduct focus groups for Tier 2 operations and determine final PACE certification criteria/BMPs.
- Develop educational materials and PACE certification criteria for Tier 2 operations.
- Conduct initial site visits for Tier 2 operations (fire stations, facilities maintenance departments, rec. centers, pools, and transfer/recycling centers).

Program Element Changes

None

Budget

Proposed: \$74,019

Actual: \$49,418

Unexpended Funds: \$24,601

Savings are due to a deferring \$20,000 payment of municipal training video to 2005 budget as well as unexpended labor.

Members of Workgroup

Ken Mason, City of Louisville

David Hollingsworth, City of Longmont

Donna Scott, City of Boulder

Permit Annual Report Table

The following are the 2004 permit activities
for the Six Minimum Control Measures
submitted
to the State Water Quality Control Division

2004 Permit Annual Report Table

MCM 1. Public Education and Outreach

GENERAL SUMMARY: The WASH Project contracted with the City of Boulder's Stormwater Education Program to provide programs required for MCM 1 and MCM 2, which included producing brochures, the water quality education program, and the WASH web site.

Individual Partners were responsible for distributing brochures and directing their citizens to the WASH web site.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 1 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?																																								
<p>Brochures or fact sheets distribution continued.</p>	<p><u>WASH ACTIVITIES</u> The WASH <i>After the Storm</i> brochure was created in 2003 for general public audiences and includes information on the impacts of illicit discharges and other water quality issues.</p> <p>In 2004, the brochure was translated into Spanish. Over 2,400 English brochures and nearly 2,000 Spanish brochures were distributed in 2004 throughout WASH communities at schools and community and business outreach programs. Brochures were also distributed by the PACE Program to the commercial sector during site visits.</p> <p><u>INDIVIDUAL ACTIVITIES</u> The total number of brochures distributed in 2004 is listed below:</p> <table border="1" data-bbox="488 1304 1230 1654"> <thead> <tr> <th>Partner</th> <th>Number of house-holds</th> <th>Number distributed by Partners in 2003</th> <th>Number distributed by Partners in 2004</th> <th>% of total house-holds</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>8,900</td> <td>0</td> <td>7,700</td> <td>87</td> </tr> <tr> <td>Boulder</td> <td>39,596</td> <td>37,000</td> <td>27,000</td> <td>98</td> </tr> <tr> <td>Longmont</td> <td>26,667</td> <td>21,500</td> <td>850</td> <td>84</td> </tr> <tr> <td>Louisville</td> <td>7,216</td> <td>8,100</td> <td>14</td> <td>112</td> </tr> <tr> <td>Superior</td> <td>4,500</td> <td>4,800</td> <td>0</td> <td>106</td> </tr> <tr> <td>Erie</td> <td>3,750</td> <td>3,750</td> <td>250</td> <td>107</td> </tr> <tr> <td>TOTAL</td> <td>90,629</td> <td>75,150</td> <td>10,547</td> <td>95</td> </tr> </tbody> </table> <p>General Community Outreach WASH and INDIVIDUAL ACTIVITIES Brochures and other outreach materials were presented at the following events in 2004:</p> <ul style="list-style-type: none"> • Boulder's Fall Festival, September 25-26, 2004 • Boulder's Lights of December Parade 	Partner	Number of house-holds	Number distributed by Partners in 2003	Number distributed by Partners in 2004	% of total house-holds	Boulder County	8,900	0	7,700	87	Boulder	39,596	37,000	27,000	98	Longmont	26,667	21,500	850	84	Louisville	7,216	8,100	14	112	Superior	4,500	4,800	0	106	Erie	3,750	3,750	250	107	TOTAL	90,629	75,150	10,547	95	<p>No</p>
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2004 MCM 1 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
	<ul style="list-style-type: none"> • Movie slide in 3 movie theaters May-July 2004; 106,000 people visited the theaters during this time. • 60 tributary signs were produced and installed along major intersections • H₂O Jo and Flo and the ‘Keep it Clean’ message appeared on 500 water bottles and 3,500 T-shirts for Boulder Race Series participants. • Keep it Clean’ ads were featured on 54 internal bus boards from April–September 2004. Over 74,000 people rode the buses during the six months the ads were posted. Buses travel through the city of Boulder and out to Louisville, Lafayette, and Erie. • Print ads appeared in the <i>Boulder Magazine</i>, a regional magazine, over the summer 2004, and in the <i>Daily Camera</i>, a regional newspaper, 3 times per week in May and June. • Over 87,200 campaign materials featuring H₂O Jo and Flo and/or the ‘Keep it Clean’ campaign message were distributed. Materials included stickers, tattoos, notepads, magnets, brochures, and newspaper ads. • The inflatable H₂O Jo appeared at 15 community events in 12 Colorado communities and reached 5,750 people. 	
<p>Water Quality Curriculum will be expanded into the St. Vrain Valley School District (SVVSD). Watershed curriculum and associated materials and training will be made available and advertised to all 20, fifth grade classroom teachers in the SVVSD.</p>	<p><u>WASH PROGRAMS</u></p> <p><u>Watershed Curriculum Guide Update:</u> WASH education staff updated the Watershed Resource Guide to include St. Vrain Watershed information. This guide is used as the basis for the annual Watershed teacher training, which 14 classroom teachers and 6 local naturalists attended on June 2004.</p> <p><u>Teacher Training:</u> Trainings were made available to all Boulder Valley School District (BVSD) and SVVSD 4th - 5th grade teachers and all 6th -12th grade science teachers. This year, 14 classroom teachers and 6 local naturalists participated on June 2004. These educators will reach over 1,450 students.</p> <p><u>School-Based Programs:</u> Conducted 133 stormwater education programs, reaching a total of 4,879 BVSD and SVVSD students.</p> <p>Partnered with the <i>Daily Camera</i> newspaper to create the “Get to Know Your H₂O” educational insert. This 16-page insert features H₂O Jo and Flo and a series of water protection and conservation activities. Approximately 1,815 papers were distributed to teachers in the 2 school districts, and the remaining 2,125 papers have been and continue to be distributed to groups through the WASH education program.</p>	<p>No</p>

2004 MCM 1 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
Web Site: continue to develop stormwater materials for web site	<p><u>WASH PROGRAMS</u></p> <p>Background information on the WASH Project, including the six MCMs, along with specific information promoting the stormwater education program, storm drain marking program, teacher training opportunities, informational brochures, and annual reports are provided on the web site www.BASIN.org/WASH. This web site is updated frequently to include the most current WASH Project information.</p> <p>‘Keep it Clean’ campaign graphics are posted on the BASIN.org/WASH web site. From the time the campaign materials were included on the web site, reports show a 500% increase in average monthly page requests and a 216% increase in average monthly distinct hosts served. It is important to note that materials including the web site were also distributed on a CD to other municipalities throughout the state during this time.</p> <p><u>INDIVIDUAL PROGRAMS</u></p> <p>Each Partner references the WASH web site on their own communities’ web sites as listed below:</p> <p>Boulder County: www.bouldercountywater.org Boulder: www.boulderutilities.net Longmont: www.ci.longmont.co.us Louisville: www.ci.louisville.co.us Superior: www.townofsuperior.com Erie: www.ci.erie.co.us</p>	No

2. **RESULTS OF INFORMATION COLLECTED:** No data required.
3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM.
4. **PROPOSED CHANGES:** None
5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2005 are as listed below.

Brochure or fact sheets: will be developed for targeted activities as necessary. The remaining 20% of brochures equivalent to the number of households in each Partner’s permitted area will be produced. Each WASH Partner is responsible for distributing the materials by 12/31/05.

Water Quality Curriculum: continue outreach to both BVSD and SVVSD by 12/31/05.
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Web Site: Stormwater information will continue to be posted on the WASH web site by 12/31/05.
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6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** Per the original applications, the WASH Project is performing the Shared and Common Programs for public education and outreach.

MCM 2. Public Participation and Involvement

GENERAL SUMMARY: The WASH Project contracted with the City of Boulder’s Stormwater Education Program to develop programs for MCM 2, which included the annual public meeting presentation and the storm drain stenciling program.

Individual Partners were responsible for scheduling and hosting an annual public meeting in each of their communities. In addition, communities were responsible for ensuring that a minimum of 5% of their storm drains were stenciled.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 2 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?																																									
<p>Annual Public Meetings will be conducted to provide citizens the opportunity to discuss various viewpoints and provide input concerning stormwater quality issues.</p> <p>Meetings will be publicized in accordance with public notification requirements in each jurisdiction, such as a local newspaper or appropriate publication of wide circulation.</p> <p>An alternative annual meeting format will be developed. This may include special events, presentation of WASH Program updates to councils, commissioners, citizen advisory boards and/or public forums; distribution of feedback forms; or other means to solicit public input into the WASH</p>	<p><u>WASH PROGRAMS</u> WASH, in conjunction with the PACE program, the WASH Partners, and the Boulder County Chamber of Commerce, held a public meeting to discuss the WASH regional stormwater management program and the adoption of illicit discharge ordinances in each of the WASH communities. The meeting, held on September 30, 2004, resulted in follow-up newspaper articles in the <i>Boulder County Business Report</i> and the <i>Longmont Daily Times-Call</i>. WASH also participated in a panel discussion sponsored by the Denver Metro Homebuilders on October 21, 2004, at the Boulder County Fairgrounds.</p> <p><u>INDIVIDUAL PROGRAMS</u> Each Partner held several public meetings to discuss stormwater management and adoption of related ordinances. These meetings met the requirements of each community’s public notification criteria.</p> <table border="1" data-bbox="511 1325 1242 1911"> <thead> <tr> <th>Partner</th> <th>Date of Meeting</th> <th>Meeting Description</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Boulder County</td> <td>9/30/04</td> <td>Chamber of Commerce</td> </tr> <tr> <td>10/21/04</td> <td>Denver Metro Homebuilders</td> </tr> <tr> <td rowspan="7">Boulder</td> <td>08/04</td> <td>Open House</td> </tr> <tr> <td>09/30/04</td> <td>Chamber of Commerce</td> </tr> <tr> <td>10/13/04</td> <td>Water Resources Advisory Board</td> </tr> <tr> <td>10/21/04</td> <td>Denver Metro Homebuilders</td> </tr> <tr> <td>10/21/04</td> <td>Planning Board</td> </tr> <tr> <td>11/16/04</td> <td>1st Reading of Ordinance</td> </tr> <tr> <td>12/6/04</td> <td>2nd Reading of Ordinance</td> </tr> <tr> <td rowspan="6">Longmont</td> <td>7/10/04</td> <td>Rhythm on the River</td> </tr> <tr> <td>9/22/04</td> <td>Longmont Homebuilders</td> </tr> <tr> <td>9/30/04</td> <td>Chamber of Commerce</td> </tr> <tr> <td>10/21/04</td> <td>Denver Metro Homebuilders</td> </tr> <tr> <td>12/28/04</td> <td>1st Reading of Ordinance</td> </tr> <tr> <td>1/11/05</td> <td>2nd Reading of Ordinance</td> </tr> <tr> <td rowspan="2">Louisville</td> <td>9/30/04</td> <td>Chamber of Commerce</td> </tr> <tr> <td>10/21/04</td> <td>Denver Metro Homebuilders</td> </tr> </tbody> </table>	Partner	Date of Meeting	Meeting Description	Boulder County	9/30/04	Chamber of Commerce	10/21/04	Denver Metro Homebuilders	Boulder	08/04	Open House	09/30/04	Chamber of Commerce	10/13/04	Water Resources Advisory Board	10/21/04	Denver Metro Homebuilders	10/21/04	Planning Board	11/16/04	1 st Reading of Ordinance	12/6/04	2 nd Reading of Ordinance	Longmont	7/10/04	Rhythm on the River	9/22/04	Longmont Homebuilders	9/30/04	Chamber of Commerce	10/21/04	Denver Metro Homebuilders	12/28/04	1 st Reading of Ordinance	1/11/05	2 nd Reading of Ordinance	Louisville	9/30/04	Chamber of Commerce	10/21/04	Denver Metro Homebuilders	<p>No</p>
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2004 MCM 2 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>			Changes Proposed?																																																
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Storm Drain Stenciling Program will continue with target of 5% of storm drains.	<p><u>WASH PROGRAMS</u> Storm Drain Stenciling Program WASH education staff provided stormwater education programs and facilitated storm drain stenciling activities to over 208 youth and citizens in WASH communities.</p> <p><u>INDIVIDUAL PROGRAMS</u> All of the Partners exceeded the goal of stenciling 5% of their storm drains in 2004.</p> <table border="1"> <thead> <tr> <th>Partner</th> <th>Total Storm Drains</th> <th>2003</th> <th>2004</th> <th>Percent of Total in 2004</th> <th>Percent of Total</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>225</td> <td>82</td> <td>40</td> <td>17.8</td> <td>54</td> </tr> <tr> <td>Boulder</td> <td>4,180</td> <td>209</td> <td>439</td> <td>10.5</td> <td>16</td> </tr> <tr> <td>Longmont</td> <td>1,820</td> <td>99</td> <td>95</td> <td>5.2</td> <td>11</td> </tr> <tr> <td>Louisville</td> <td>600</td> <td>43</td> <td>137</td> <td>22.8</td> <td>30</td> </tr> <tr> <td>Superior</td> <td>300</td> <td>22</td> <td>20</td> <td>6.7</td> <td>8</td> </tr> <tr> <td>Erie</td> <td>320</td> <td>62</td> <td>17</td> <td>5.3</td> <td>25</td> </tr> <tr> <td>Total</td> <td>7445</td> <td>517</td> <td>748</td> <td>10</td> <td>17</td> </tr> </tbody> </table>			Partner	Total Storm Drains	2003	2004	Percent of Total in 2004	Percent of Total	Boulder County	225	82	40	17.8	54	Boulder	4,180	209	439	10.5	16	Longmont	1,820	99	95	5.2	11	Louisville	600	43	137	22.8	30	Superior	300	22	20	6.7	8	Erie	320	62	17	5.3	25	Total	7445	517	748	10	17	No
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2. **RESULTS OF INFORMATION COLLECTED:** No data required.
3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM.
4. **PROPOSED CHANGES:** None
5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2005 are as listed below.

Annual public meetings will be conducted in all Partner communities by 12/31/05. An alternative annual meeting format will be developed. This may include special events, presentation of WASH Program updates to councils, commissioners, citizen advisory boards and/or public forums; distribution of feedback forms; or other means to solicit public input into the WASH and individual Partner community stormwater programs.

Storm Drain Stenciling Program will continue with target of 5% of storm drains by 12/31/05.

6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** Per the original applications, the WASH Project is performing the shared and common programs for public participation and involvement.

MCM 3. Illicit Discharge Detection and Elimination

GENERAL SUMMARY: The WASH Partners developed a template Illicit Discharge Ordinance and a draft Spill and Enforcement Response Plan. Each of the WASH Partners adapted and adopted the ordinances, with the exception of Boulder County (see compliance table below.)

The WASH Project contracted with the Boulder County Partners for a Clean Environment (PACE) Program to provide stormwater pollution prevention materials to commercial businesses identified as potential significant contributors of pollutants to the MS4 (this was done in conjunction with MCM 1). These businesses include restaurants and vehicle service facilities.

Individual Partners were responsible for initiating the mapping of their MS4s' outfalls.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 3 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
<p>MS4 Mapping MS4 system mapping continued.</p>	<p><u>INDIVIDUAL PROGRAMS</u> Mapping of MS4 outfalls is the responsibility of the individual Partners. The status of this mapping is as follows: Boulder County: continued outfall mapping in Transportation Boulder: continued outfall mapping in Public Works Longmont: continued outfall mapping in Public Works Louisville: continued outfall mapping in Public Works Superior: continued outfall mapping in Public Works Erie: continued outfall mapping in Public Works</p>	<p>No</p>
<p>Legal Prohibition and Enforcement: Complete development of common illicit discharge ordinance language and illicit discharge response plan. Illicit discharge ordinance adopted by individual Partners. Illicit discharge hotline and tracking system researched.</p>	<p><u>WASH PROGRAMS</u> AWASH template Illicit Discharge Ordinance was complete in 2003. The WASH template for the Spill and Enforcement Response Plan was completed in January 2004. Illicit discharge hotline and tracking system was researched. The Boulder County Communications number 303-441-4444 was identified. The web site www.BASIN.org hosts the WASH spill response and tracking system. <u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their Illicit Discharge regulatory mechanisms: Boulder County: Attorney review of the WASH template ordinance took place in 2004. In December of 2004, Boulder County asked CDPHE if the text</p>	<p>No</p>

2004 MCM 3 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
	<p>amendments to the Land Use Code could be deferred until June 2005.</p> <p>Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p> <p>The Partners are modifying the Illicit Discharge Response Plan to meet each individual jurisdiction's needs.</p>	
<p>Business Education Program initiated and outreach materials will be mailed to 80% of restaurants and vehicle service facilities in each Partner's permitted area.</p>	<p><u>WASH PROGRAMS</u></p> <p>PACE developed stormwater pollution prevention criteria to be used during site visits to restaurants and vehicle service facilities.</p> <p>PACE provided information on stormwater pollution prevention during site visits to 199 restaurant facilities and 128 vehicle service facilities.</p> <p>PACE also mailed letters outlining stormwater pollution prevention to all of the restaurants and vehicle service facilities identified in the Partner's permitted area. This exceeded the required 80% outreach.</p> <p><u>INDIVIDUAL PROGRAMS</u></p> <p>The following facilities were inspected in each of the Partner's communities:</p> <p>Boulder County: 9 restaurants, 1 vehicle service facility Boulder: 92 restaurants, 65 vehicle service facilities Longmont: 78 restaurants, 52 vehicle service facilities Louisville: 6 restaurants, 7 vehicle service facilities Superior: 6 restaurants, 1 vehicle service facility Erie: 8 restaurants, 2 vehicle service facilities</p>	<p>No</p>

2004 MCM 3 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
<p>Illicit Discharge Detection Plan: Develop common illicit discharge detection plan; training of public employees by PACE (as part of the pollution prevention and good housekeeping program).</p>	<p><u>WASH PROGRAMS</u> The WASH template for the Illicit Discharge Detection Plan was drafted and then distributed to the Partners in November 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> Illicit discharge detection was incorporated into the general PACE municipal employee trainings and WASH communities' first responders received training on October 19, 2004.</p> <p>The Partners are modifying the plan to meet each individual jurisdiction's needs.</p>	

2. **RESULTS OF INFORMATION COLLECTED:** No data required.
3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM in 2004.
4. **PROPOSED CHANGES:** None.
5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** Per the permit application, the planned stormwater activities for 2005 are as listed below.

MS4 Mapping MS4 system mapping completed and updated by 12/31/05.
Legal Prohibition and Enforcement: Illicit discharge hotline and tracking system defined by 12/31/05.
Business Education Program: Component development completed and implementation continued by 12/31/05.
Illicit Discharge Detection Plan: Initiate implementation of illicit discharge detection plan by 12/31/05.

6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** In accordance with the original applications, the WASH Project is performing the shared and common programs for illicit discharge detection and elimination.

MCM 4. Construction Site Stormwater Runoff Control

GENERAL SUMMARY: The WASH Partners developed a template construction and post-construction ordinance in 2003. In 2004, the ordinance language was adapted by the individual Partners' attorneys and adopted by their councils and boards. Standard operating procedures were developed.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 3 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
<p>Erosion Control Ordinance: Complete development of ordinance language. CDPHE reviews proposed ordinance language. Individual communities adopt erosion control ordinance or other regulatory mechanism.</p>	<p><u>WASH PROGRAMS</u> A template construction and post-construction ordinance was drafted in 2003.</p> <p><u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their construction and post-construction regulatory mechanisms: Boulder County: Attorney review of the WASH template ordinance took place in 2004. In December of 2004, Boulder County requested deferment to the Land Use Code amendment until June 2005. Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p>	No
<p>Erosion Control Standard Operating Procedures Individual communities will develop standard operating procedures (SOP) to outline requirements for erosion control plans.</p>	<p><u>WASH PROGRAMS</u> A template was developed and approved by the WASH Partners for Construction and Post-Construction standard operating procedures outlining requirements for erosion control plans on May 24, 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> After the adoption of ordinances the SOPs are being adapted for implementation in 2005.</p>	

- 2. RESULTS OF INFORMATION COLLECTED:** No data required.
- 3. INSPECTION AND ENFORCEMENT:** Not applicable for this MCM for 2004.
- 4. PROPOSED CHANGES TO PROGRAM AREA:** None.
- 5. ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2005 are as listed below.

<p>Erosion Control Standard Operating Procedures: Individual communities implement plan review and approval and inspection procedures by 12/31/05.</p>
<p>Training and Education for Construction Site Operators and Inspectors: Identify WASH</p>

training program options by 12/31/05.

Public Input: Individual communities develop public concerns tracking system by 12/31/05.

6. NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY: In accordance with the original applications, the WASH Project is performing the shared and common programs for construction site stormwater runoff control.

MCM 5. Post-Construction Stormwater Management

GENERAL SUMMARY: The WASH Partners developed a template construction and post-construction ordinance in 2003. In 2004, the ordinance language was adapted by the individual Partners' attorneys and adopted by their councils and boards. Standard Operating Procedures were developed.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 5 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
<p>Post-Construction Ordinance: Complete development of ordinance language. Individual communities adopt post-construction ordinance, including inspection of proper installation and maintenance of BMP's, reporting and enforcement standards.</p>	<p><u>WASH PROGRAMS</u> A template construction and post-construction ordinance was drafted in 2003.</p> <p><u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their post-construction regulatory mechanisms: Boulder County: Attorney review of the WASH template ordinance took place in 2004. In December of 2004, Boulder County requested deferment to the Land Use Code amendment until June 2005. Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p>	<p>No</p>
<p>Development Review: Individual communities will develop specific standard operating procedures for site plan review and inspection.</p>	<p><u>WASH PROGRAMS</u> A template was developed and approved by the WASH Partners for construction and post-construction standard operating procedures outlining requirements for erosion control plans on May 24, 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> After the adoption of ordinances, the SOPs are being adapted for implementation in 2005.</p>	<p>No</p>
<p>Design Criteria and Standards: Individual communities will develop SOP's for BMP selection guidance appropriate for each community.</p>	<p><u>WASH PROGRAMS</u> A template was developed and approved by the WASH Partners for construction and post-construction standard operating procedures outlining requirements for erosion control plans procedures, including BMP selection guidance on May 24, 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> After the adoption of ordinances, the SOPs are being adapted for implementation in 2005.</p>	<p>No</p>

- 2. RESULTS OF INFORMATION COLLECTED:** No data required.
- 3. INSPECTION AND ENFORCEMENT:** Not applicable for this MCM in 2004.
- 4. PROPOSED CHANGES TO PROGRAM AREA:** None.
- 5. ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2005 are as listed below.

<p>Development Review: Post-construction ordinance will include reference to UDFCD Manual, Vol. 3. Individual communities approve BMP selection guidance appropriate for each community by 12/31/05.</p>

<p>Design Criteria and Standards: Individual communities approve SOP's for site plan review and inspection by 12/31/05.</p>
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- 6. NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** In accordance with the original applications, the WASH Project is performing the shared and common programs for post-construction stormwater management.

MCM 6. Pollution Prevention and Good Housekeeping for Municipal Operations

GENERAL SUMMARY: The WASH Project contracted with the Boulder County Partners for a Clean Environment (PACE) Program to develop a certification program for municipal operations.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2004 MCM 6 MEASURABLE GOALS	2004 STATUS <i>Completion Date: December 31, 2004</i>	Changes Proposed?
<p>PACE – Municipal Program PACE program to begin certifying 1/3 of municipal operations. Training to begin.</p>	<p><u>WASH PROGRAMS</u> PACE developed stormwater pollution prevention certification criteria in 2003. Criteria include implementation of both structural and non-structural BMPs for various municipal operations. The municipal operations were then categorized into two tiers, based on an operation’s potential stormwater pollution threat.</p> <p>In 2004, PACE conducted site visits of the first-tier operations, including vehicle, street, and storm drainage maintenance, and parks/golf courses. A total of 55 municipal facilities were inspected. As part of the site visit, PACE provided each operation with a Stormwater Pollution Prevention binder containing the applicable BMPs, WASH/PACE criteria, a template spill response plan, and a training log. The site visits also included the training of over 168 municipal employees on stormwater pollution prevention.</p> <p>PACE distributed a follow-up notification letter for all inspected facilities. The letter identified activities which met certification criteria and a list of deficiencies. In December 2004, each Partner was notified of certification status of the first-tier operations and asked to submit a plan to PACE to resolve any deficiencies by April 2005.</p> <p><u>INDIVIDUAL PROGRAMS</u> Individual Partners were responsible for working with PACE staff to ensure the PACE inspection and certification process would be implemented. The following numbers of municipal operations were visited in 2004. Boulder County: 12 municipal operations Boulder: 16 municipal operations Longmont: 13 municipal operations Louisville: 6 municipal operations Superior: 4 municipal operations Erie: 4 municipal operations</p>	<p>No</p>

2. **RESULTS OF INFORMATION COLLECTED:** No data required.
3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM for 2004.
4. **PROPOSED CHANGES TO PROGRAM AREA:** None.
5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2005 are as listed below.

<p>PACE – Municipal Program: Annual inspection program continues for 2/3 of municipal operations by 12/31/05. Training to continue.</p>
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6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** In accordance with the original applications, the WASH Project is performing the shared and common programs for pollution prevention and good housekeeping for municipal operations.

Project Working Agreement

WASH Project Partners Are:

- Dedicated to the stated goal and objectives of the project
- Active participants, attending meetings and voicing opinions equally
- Willing to share resources and data
- Clear about their agencies' needs and interest in participating in the project
- Completing the bulk of WASH Project work in subgroups

WASH Project Partners Will:

- Be prompt to meetings and participate to the highest level of their ability
- Maintain focus, prioritize all actions, and encourage involvement of all
- Understand that not all communities have the resources to attend every meeting
- Complete assigned tasks that are agreed upon in the group
- Stay informed about discussions and decisions that take place at WASH meetings in their absence

WASH Project Partners Are:

- Participating in good faith and working towards the identified common goal and objectives
- Committed to the protection of water quality within the Boulder Creek and St. Vrain River watersheds
- Committed to sharing information and resources with other WASH partners
- Committed to developing strategies and solution that benefit the general public and represent the shared goal and objectives of the WASH Project

WASH Project Decisions:

- Will be discussed in an organized manner and the process will be open to all
- Will be made by consensus, an approach to find an inclusive solution that everyone can support

WASH Project Partners:

- Understand compromise may be necessary to reach WASH common goals
- Show a commitment to mediate disagreement

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