



City of Burlington

Phase II Stormwater Management Program

Revised 2018

I. Introduction

The City of Burlington is located along the shores of Lake Champlain, in the northwest section of Vermont. With a total land area of 15.48 square miles and a population of approximately 40,000 residents, it is the most populated city in the state.

The Stormwater Management Program (SWMP) documented here outlines the City's plan and measurable goals for the development and implementation of the six minimum control measures described in Part 6 of General Permit 3-9014 (2018). Additionally, it outlines our intent to comply and a schedule for compliance with requirements related to discharges to stormwater impaired waters, and the Lake Champlain TMDL.

Please note that this SWMP is not an exhaustive list of the programs and practices that the City intends to implement and/or continue over the course of the next five years. Annual reports will document additional efforts and enhancements undertaken by the City in addition to compliance reporting related to the measures and requirements laid out herein.

II. Notice of Intent

A Notice of Intent (NOI) has been included with this SWMP on a form provided by the Secretary, along with all applicable attachments. Stormwater from the City of Burlington discharges to the following named waterbodies, some of which are impaired for the prescribed pollutants:

Waterbody	Impairment
Lake Champlain	Phosphorous
Englesby Brook	Stormwater, E.Coli
Centennial Brook	Stormwater, E.Coli
Potash Brook	Stormwater, E. Coli
Winooski River	N/A

The best management practices detailed in the Minimum Control Measures section of this SWMP apply to all of the discharges from the City of Burlington. Additional measures related to discharges to the impaired watersheds are detailed in **Section VI**.

III. Responsibility for Implementation of the SWMP

The City of Burlington operates a dedicated stormwater utility, which was established in 2009 under the City's Chapter 26 Ordinance¹. The utility establishes a user-fee funded Stormwater Program, in addition to additional regulatory controls related to construction and post-construction stormwater management. Revenue generated from the user-fee is reserved for expenditure on stormwater infrastructure repair, maintenance and improvement, implementation of this SWMP, and administration of the local stormwater regulatory review program.

The Burlington Stormwater Program (BSP) is housed within the Department of Public Works under the Water Resources Division. The BSP currently has one full-time staff person, with dedicated support from the Water Resources engineering and billing workgroups and the Division of Street Maintenance. The majority of elements contained in this SWMP will be implemented by the BSP.

The contact person for correspondence related to this SWMP shall be:

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IV. Minimum Control Measures

The following section outlines how Burlington will meet the six (6) minimum control measures, as outlined in Part 6 of General Permit 3-9014 (2018). The measures outlined below incorporate practices continued from previous permit cycles, in addition to enhancements currently underway or planned for this permit cycle.

Minimum Control Measure 1:
Public Education and Outreach

The City of Burlington will continue to partner with other area MS4 communities under a Memorandum of Understanding (MOU) for the period July 1, 2017 through June 30, 2022 to operate a regional stormwater education program, known as Rethink Runoff. A copy of the most recently executed MOU with Burlington's signature is provided in *Appendix A*.

¹ <https://www.codepublishing.com/VT/Burlington/>

BMP #1: Maintain a website with locally relevant stormwater information.

Measureable Goal:

- Maintain basic information about stormwater on a dedicated page on our website, describing its stormwater related programming, including links for visitors to learn more.
- Track the annual number of visits to the website.

Rationale:

Municipal websites are often the place where residents first go to obtain information on stormwater issues. Provision of basic information on such websites will help form a strong initial form of engagement to site visitors.

Responsible Party:

- Burlington Stormwater Program
- Burlington Water Resources, Customer Service Team
- Burlington DPW Public Information Manager

BMP #2: Maintain a program to identify opportunities and provide technical assistance on green stormwater infrastructure.

Measureable Goal:

- The permittee will provide links on a dedicated stormwater page within its website with links to relevant non-profits and government resource sites which can provide technical assistance.

Rationale:

There are several organizations and agencies operating in the Chittenden County MS4 region. By providing such links, the visitor can figure out which entity is best suited to provide technical assistance.

Responsible Party:

- Burlington Stormwater Program
- Burlington Water Resources, Customer Service Team

BMP #3: Participate in a regional stormwater education strategy.

Measureable Goal:

- Participate in and provide financial support for operation of the regional Rethink Runoff campaign consisting generally of periodic advertising throughout each year
- Survey of residents every 5 years to track reported behavior with regards to residential stormwater BMPs.
- Document the annual number of site visits to www.rethinkrunoff.org as well as provide other metrics.

Rationale:

Support of the campaign will educate the general public in the MS4 area about key storm water quality issues by using TV, radio, online media placements/advertising to drive viewers to the www.rethinkrunoff.org website

Responsible Party:

- Burlington Stormwater Program

BMP #4: Maintain presence on Burlington DPW's social media accounts.

Measurable Goal:

- Provide regular updates on Stormwater Program activities on DPW's social media accounts
- New likes, follows, and general engagement statistics for social media accounts

Rationale:

Social media is an increasingly popular way for residents to obtain information on what is happening in their community. Maintaining regular updates and information on BSP activities will help form a strong form of engagement.

Responsible Party:

- Burlington Water Resources – Stormwater Program
- Burlington DPW – Public Information Manager

Minimum Control Measure 2:
Public Involvement & Participation

The City of Burlington will continue to partner with other area MS4 communities under a Memorandum of Understanding (MOU) for the period July 1, 2017 through June 30, 2022 for operational support of the Chittenden County Stream Team.

BMP #1: Participate in a regional stormwater public involvement & participation strategy

Measurable Goal:

- Participate in and provide financial support for operation of the Rethink Runoff Stream Team consisting generally of both outreach and hands-on participation events in various MS4 towns on a rotating annual basis.
- Via an annual report provided by the Chittenden County RPC's subcontractor, the permittee will document on an annual basis the number of participants and/or persons contacted by outreach events and hands-on activities through the Rethink Runoff Stream Team.

Rationale:

Through support of the Stream Team, the regional campaign's "action arm", the permittee will support the engagement of local residents in the MS4 area via outreach events and via hands-on participation events.

Responsible Party:

- Burlington Stormwater Program
- Chittenden County Stream Team Partner Organization

BMP #2: Maintain an Adopt-A-Drain Program for residents.

Measurable Goal:

- Annual number of new sign-ups

Rationale:

This program is an important opportunity to engage residents and bring attention to Burlington's stormwater infrastructure. It also helps the City add capacity to ensure drains are kept clear of debris.

Responsible Party:

- Burlington Water Resources – Stormwater Program

Minimum Control Measure 3:
Illicit Discharge Detection & Elimination (IDDE)

During the last permit cycle, the City procured a contractor to develop an improved IDDE Standard Operating Procedure (SOP) for staff to use moving forward. A copy of this SOP may be located in *Appendix B*. The City has further developed an extensive GIS tool of its infrastructure, and therefore has a far more comprehensive data set for conducting ongoing monitoring work.

In addition to development of a Standard Operating Procedure, the City's contractor also conducted an IDDE investigation across Burlington during the last permit term. Results of this work will be incorporated into our MS4 Annual Report for Calendar Year 2018.

BMP #1: Conduct annual monitoring activities per the City's Standard Operating Procedure for IDDE.

Measurable Goal:

- Notify the Secretary as soon as possible following confirmation of an illicit discharge.
- Provide results of annual IDDE assessments in the MS4 Annual Report.

Rationale:

The Standard Operating Procedure was developed for the City during the last permit term, and contains a myriad of enhanced field procedures to detect suspected illicit discharges. This will allow BSP staff to

conduct relatively simple field tests that will help us narrow down where potential discharges may exist. These tests can also help refine the source of a discharge, should advance investigation be necessary.

Responsible Party:

- Burlington Water Resources – Stormwater Program

BMP #2: Continue CCTV inventory work on stormwater collection system.

Measurable Goal:

- Total percentage of stormwater collection system filmed

Rationale:

Having a visual assessment of the stormwater collection system allows us to identify and correct potential structural defects early. Although defects in storm lines are not always prone to an illicit discharge (i.e. there is not always a sewer line adjacent) this can sometimes prevent an illicit discharge from occurring where lines are in close proximity.

Responsible Party:

- Burlington Water Resources - Asset Manager

BMP #3: Maintain an updated, publicly accessible GIS database of all City stormwater infrastructure.

Measurable Goal:

- Maintain updated map, available on the BSP website.

Rationale:

The City developed both public-facing and internally-facing GIS mapping tools of its stormwater, wastewater, and combined collection systems during the previous permit term. Having a visual assessment of the stormwater collection system allows us to identify and correct potential structural defects early – in some cases before an illicit discharge can occur.

Responsible Party:

- Burlington Water Resources - Asset Manager

BMP #4: Enforcement of the provisions in the City's Chapter 26 Ordinance related to illicit connections and illegal discharges.

Measurable Goal:

- Reporting of any enforcement actions taken.

Rationale:

To prohibit, through ordinance, non-stormwater discharges into the City's regulated small MS4 system.

Responsible Party:

- Burlington Water Resources – Stormwater Program

Minimum Control Measure 4:
Construction Site Stormwater Runoff Control

The City has adopted stringent stormwater review requirements under Article III of its Chapter 26 Ordinance. These provisions include comprehensive requirements for the reduction of pollutants from construction activities, and require that all projects which result in the disturbance of more than 400 s.f. submit an erosion and sediment control plan for review by the BSP.

Chapter 26, Article III, details the requirements of this small project plan, as well requirements for EPSC plans for larger projects, and provides BSP with the authority to inspect the site during construction. It also clearly states that no project shall be granted a zoning permit, building permit, excavation permit or any other approval for land disturbance regulated under this article without the approval of an EPSC plan. Projects require inspection prior to issuance of a final certificate of occupancy to ensure that the site is stabilized appropriately.

BMP #1: Continue implementation of construction stormwater requirements per the City's Chapter 26 Ordinance.

Measurable Goal:

- Number of general site inspections

Rationale:

The City is able to oversee construction sites at a much smaller scale than the State currently has authority to regulate, ensuring that even the smallest construction projects are adhering to proper EPSC measures.

Responsible Party:

- Burlington Stormwater Program
- Burlington Dept. of Planning & Zoning

Minimum Control Measure 5:
Post-Construction Stormwater Management for New Development &
Redevelopment

The City has adopted stringent stormwater review requirements under Article III of its Chapter 26 Ordinance. Residential properties (single family and duplex) with a total resulting impervious area of

greater than 2500 sq. ft. are required to submit a residential stormwater management form in which the project evaluates what the increase in connected impervious surface will be and proposes methods of disconnecting the impervious surface. They receive technical assistance to assist them in filling out the form and mitigating connected impervious.

Commercial projects and major impact, subdivision or planned unit development projects are required to submit a stormwater management plan. In addition to managing any new impervious surface, projects in the commercial category are strongly encouraged to address runoff from 25-50% of the existing impervious within the project limits based on feasibility evaluations. Projects are required to develop a maintenance plan, and the City has the authority to require filing of a maintenance and access easement with the land records to ensure long term maintenance as well as perform/require annual inspections.

The City encourages the use of alternative management practices and technology (green infrastructure) over the traditional “grey” practices. Lastly, projects are required either request an inspection or submit an initial certification of compliance that the stormwater management plan has been implemented prior to the issuance of a certificate of occupancy by the zoning office.

BMP #1: Continue implementation of post-construction stormwater requirements per the City’s Chapter 26 Ordinance.

Measurable Goal:

- Number of applications reviewed
- Number of post-construction stormwater inspections completed

Rationale:

The requirements of the City’s Chapter 26 Ordinance allow us to require stormwater management practices on sites far below the current state threshold for permit coverage.

Responsible Party:

- Burlington Water Resources - Stormwater Program
- Burlington Dept. of Planning & Zoning

BMP #2: Develop & implement technical standards under Chapter 26.

Measurable Goal:

- Technical standards document

Rationale:

Although the requirements of the Chapter 26 Ordinance provide us with the authority to require projects meet a certain set of stormwater standards, having those standards formally outlined and approved under the Ordinance will establish the baseline for review and provide some streamlining of the City’s stormwater review process.

Responsible Party:

- Burlington Water Resources - Stormwater Program
- Burlington Dept. of Planning & Zoning

BMP #3: Pursue options to update the Chapter 26 Credit Manual to allow residential customers to apply for credits when they implement stormwater management on their properties.

Measurable Goal:

- Updated Chapter 26 Credit Manual

Rationale:

At present, only “directly assessed” customers are eligible for credits under Chapter 26. However, single family, duplex, and triplex properties make up a substantial portion of the annual applications for post-construction stormwater review. Offering credits for more creative stormwater management practices will provide a financial incentive for those customers.

Responsible Party:

- Burlington Water Resources - Stormwater Program
- Burlington Dept. of Planning & Zoning

BMP #4: Continue development and implementation of a residential retrofit incentive program.

Measurable Goal:

- Number of people applying for incentives annually

Rationale:

The City of Burlington began implementation of a residential incentive program in the previous permit cycle. This program was highly successful, resulting in the disconnection of nearly 13,000 square feet of impervious surface. The program provided a clear incentive for homeowners to install stormwater management practices on their property, and further provided some education to residents on stormwater management.

Responsible Party:

- Burlington Water Resources – Stormwater Program
- Partner Organization, TBD

Minimum Control Measure 6:

Pollution Prevention & Good Housekeeping for Municipal Operations

The City will continue to evaluate and minimize the impacts associated with municipal activities, including: wastewater facilities, vehicle maintenance areas, public construction activities, material storage areas, recreational facilities, storm drain management, street maintenance, parking facilities management and emergency operations.

Vehicle maintenance and material storage is co-located at Burlington DPW’s central facility at 645 Pine Street. This facility has implemented a number of pollution prevention measures associated with industrial operations. Management practices include:

- Covered sand & salt storage sheds
- Covered fueling station
- Oil & grit separators in maintenance areas
- Chemical containment

The City of Burlington owns, operates, and maintains the following facilities which are covered by “No Exposure” (NOX) certifications under Multi-Sector General Permit 3-9003:

NOX Number	Facility
4420-9003.R	Riverside Wastewater Treatment Plant
4418-9003.R	Burlington Main Wastewater Treatment Plant
4417-9003.R	Burlington North Wastewater Treatment Plant
5528-9003.R	McNeil Electric Generating Facility

There are approximately 30 sites throughout Burlington designated as parks or open spaces, maintained by the Burlington Department of Parks, Recreation, and Waterfront (DPRW). The City will continue the following best management practices for these facilities during the next permit term:

- Ongoing review and update of pesticide and herbicide use / application
- Ongoing review and update of landscape chemical storage areas (beyond existing compliance with OSHA and USDA requirements)
- Prohibition of the use of fertilizers containing Phosphorous
- Maintenance of dog waste bag stations, in addition to education and outreach practices captured under Minimum Control Measure 1
- Ongoing training for DPRW staff in Erosion Prevention and Sediment Control practices during construction, as well as proper handling and disposal of landscaping waste.

BMP #1: Conduct routine annual maintenance on stormwater infrastructure.

Measurable Goal:

- Number of MS4 catch basins cleaned and inspected annually.
- Number of basins repaired or replaced annually.

Rationale:

Ensuring that stormwater infrastructure is in good working condition can prevent damage to the system. Further, providing regular cleaning of sediments and other debris that has collected in the basins has shown to be an effective way to reduce the nutrient load from those structures.

Responsible Party:

- Burlington DPW – Streets Maintenance Division

- Burlington Water Resources – Stormwater Program

BMP #2: Continue ongoing outfall repair assessment, prioritization, and repair efforts.

Measurable Goal:

- Number of outfall assessments /reassessments conducted
- Number of outfall repairs completed, or actively under design / construction

Rationale:

The City has more than 100 stormwater outfalls, with widely variable conditions. These structures can cause damage to receiving waters through excessive erosion, and may put upslope structures at risk when erosion starts to undercut the bank. Further, repair of these structures will be necessary to comply with the Municipal Roads requirements discussed further in Section VI of this SWMP.

Responsible Party:

- Burlington Water Resources – Asset Manager
- Burlington Water Resources – Stormwater Program

BMP #3: Provide annual EPSC trainings for City construction crews.

Measurable Goal:

- Document attendance to trainings and include that in our Annual Report.

Rationale:

Ensuring our DPW crews are educated about EPSC and why it's important allows the City to demonstrate good housekeeping on our own projects. It further provides our crews with the information about EPSC they need to communicate to external contractors working on City projects.

Responsible Party:

- Burlington Stormwater Program

BMP #4: Conduct an MCAP or equivalent audit of the City's Central Maintenance Facility at 645 Pine Street at least once during the permit cycle.

Measurable Goal:

- Document audit & any outcomes of said audit in Annual Report.

Rationale:

To meet this requirement of the 2018 MS4 General Permit 3-9014.

Responsible Party:

- Burlington Stormwater Program

BMP #5: Assess options for a chloride reduction plan for winter maintenance activities.

Measurable Goal:

- Documentation of current chloride-application procedures and rates
- Documentation of any measures taken to reduce application, or otherwise improve the efficiency of application measures that may result in the reduction of chloride use.

Rationale:

Chloride has been incorporated into the Vermont Water Quality Standards, and is a clear pollutant of concern for urban water bodies. The City has a vested interest in reducing chloride use to protect the health of its receiving waters.

Responsible Party:

- Burlington DPW – Streets Maintenance Division
- Burlington Stormwater Program

V. Assumption of Responsibility for Previously Permitted Stormwater Systems

The City has included complete Incorporation Forms for the following State Stormwater Permit authorizations, for which the City of Burlington DPW is the sole permittee:

Permit Number	Project Name	Expiration Date
4380-9010	Alexis Drive Subdivision	12/20/2022
4273-9010.R	Grey Meadows Subdivision	3/15/2021
3741-9010.R	Lori Lane	12/20/2020
3731-9010.R	Van Patten Parkway	12/9/2020
3368-9010	Southern Connector	7/8/2020
3032-9010	Lake Street Extension	12/19/2022
5704-9010	Burlington Waterfront (College Street)	7/12/2022
6589-9010	Moran Plant / Waterfront North	10/18/2021
6756-INDS.R	Shelburne Roundabout	10/3/2022

In addition to the permits above, the City of Burlington’s Department of Parks, Recreation, and Waterfront holds the following additional authorizations:

Permit Number	Project Name	Expiration Date
3786-9010.R	North Beach Parking Area	10/9/2020
4206-9010	Lakeview Cemetery	5/31/2022
7213-9015	Waterfront Park / Bike Path	9/9/2024
7213-INDS	Bike Path – Phase 1B	8/9/2019
7213-INDS.1	Bike Path – Phase 2	6/13/2022

Beginning with this permit term, the City would like to incorporate all of the above-referenced authorizations currently issued to DPW and the Department of Parks, Recreation, and Waterfront, into its MS4 authorization.

VI. TMDL Implementation

The City of Burlington's MS4 discharges to three (3) stormwater-impaired streams, as well as one (1) Phosphorous-impaired lake. As of the date of this report, all of the impaired waterbodies that the City discharges to have approved TMDLs.

Flow Restoration Plans

During the last permit term, the City developed and began implementation of Flow Restoration Plans (FRPs) for the three stormwater-impaired watersheds for which it is a contributor. These streams experience excess peak flow and reduced base flow typical of urbanized areas, resulting in excessive sedimentation and poor biological indicators. There are three (3) State designated 303(d) impacted streams that flow through Burlington's city limits:

Englesby Brook provides drainage to roughly 570 acres of developed land primarily in Burlington with a part within South Burlington and flows directly into Lake Champlain. Englesby has an EPA approved Total Maximum Daily Load (TMDL VT05-10) that utilizes sediment with stormwater runoff volume as its surrogate for the pollutant of concern.

Centennial Brook, with a watershed area of approximately 915 acres, provides drainage primarily for South Burlington and the UVM/FAHC campus, draining into the Winooski River. Centennial also has an EPA approved Total Maximum Daily Load (TMDL VT08-02) that utilizes sediment with stormwater runoff volume as its surrogate for the pollutant of concern.

Potash Brook has a watershed area of over 4,500 acres located nearly entirely in South Burlington with two small segments within our city limits. Potash has an EPA approved Total Maximum Daily Load (TMDL VT05-11) that utilizes sediment with stormwater runoff volume as its surrogate for the pollutant of concern.

Both Englesby and a section of Potash have also been designated as having E. Coli impairments. They are listed in Appendix 8 and 10 respectively of the Statewide TMDL for Bacteria-Impaired Waters (September 2011).

The Minimum Control Measures provide compliance with several of the Implementation measures listed in the TMDL, including providing post-construction structural and non-structural BMPs that can reduce bacteria concentrations, the various elements of our IDDE program, and education and measures related to reducing pet waste.

We will describe efforts related to implementation of control measures which have been or are planned to be implemented in our annual reports.

The city has completed and received final approval of the FRPs for these streams during the previous permit term. Those FRPs can be found in *Appendix C*. The City continues to manage implementation of the requirements related to the stormwater impaired watersheds for this permit cycle, but is actively undergoing development of a long-term, holistic water quality improvement framework as part of its Integrated Planning Program. Any updates necessary to this Stormwater Management Program related to the FRPs as a result of that Integrated Planning work will be made during the permit term.

Phosphorous Control Plan

This iteration of the Phase II MS4 Permit requires specific measures related to the development and implementation of a Phosphorous Control Plan (PCP). The City has been undergoing an Integrated Planning process over the last several years, a significant component of which is the identification and planning of stormwater retrofits and non-structural BMPs to meet TMDL goals.

During this permit term, in coordination with our ongoing Integrated Planning efforts, the City shall develop and implement a PCP for approval by the Secretary, for developed lands consistent with the Lake Champlain TMDL (2016).

The City shall develop its PCP in accordance with the following schedule:

Date	Task
April 1, 2019	Submit first annual PCP Report
April 1, 2020	Submit Annual PCP Report
	Submit Implementation Table with results of the Road Erosion Control Inventory (REI)
April 1, 2021	Submit completed PCP to ANR for approval
	Submit Annual PCP Report
April 1, 2036	Complete implementation of the approved PCP

Municipal Road Requirements

Road Erosion Control Inventory

Beginning in 2017, the Chittenden County Regional Planning Commission (CCRPC) began the process of conducting a Road Erosion Control Inventory for several municipalities, including Burlington. Since the onset of that process, the City has worked closely with CCRPC to refine DEC’s original data set for road segments that are Hydrologically Connected, per the definition found in Municipal Roads General Permit 3-9040.

Burlington’s road infrastructure is almost exclusively classified as “paved with catch basins.” The City is further divided into distinct sewersheds, some of which drain via combined sewers, and others draining directly to surface waterbodies. Due to the variation in Burlington’s drainage infrastructure, several corrections were made to the original dataset DEC provided for hydrologically-connected segments.

An interactive summary of this initial inventory effort can be found here: <http://arcg.is/1GaHK>

The following table includes a breakdown of the current compliance rate of Burlington’s hydrologically-connected municipal roads:

	Total	# Fully Meets	# Partially Meets	# Does Not Meet	Need to Assess
Paved – Curbed	774	568	99	48	59
Paved – Not Curbed	113	40	1	1	71
Total Segments	887	608	100	49	130
		68.5%	11.3%	5.5%	14.7%

Implementation

As part of our ongoing Asset Management initiative, the City has been conducting inspections and assessments of its stormwater outfalls since 2015.

In late 2017, the City contracted with Stantec Consulting to conduct a more comprehensive assessment, and to further score and then prioritize outfalls in need of repair based on a number of factors. The assessment framework established as part of this effort can be found in *Appendix D*. This dataset further includes a complete list of the City’s stormwater outfalls, and their current ‘score’ based on Stantec’s assessment framework.

As part of Burlington’s 2018 bond approval, we will be completing repairs on the outfalls with the highest risk of failure over the next five years. The table below includes the outfall repairs that are planned during this permit term, assuming Clean Water State Revolving Fund loan financing remains available.

Outfall ID’s	# of Associated Segments	Receiving Water	Goal Date for Completion
IV7.0 BURLO43 IV8.0 BURLO16	39	Wetland tributary of Lake Champlain	2019-2020

IV9.0 BURL098 IV10.0 BURL099			
WR7.0 BURL015 WR11.0 BURL022	7	Winooski River	2020-2021
LC14.0 BURL176 LC48.0 BURL173	4	Lake Champlain – Direct	2021-2022

Completion of these outfall repairs will bring 50 additional road segments into full compliance with MRGP standards.

VII. Annual Reporting

Annual reports will be submitted to Vermont DEC by April 1 of each year. The report shall, at a minimum, include:

1. Status of compliance with permit conditions,
2. Measurable outcome reporting,
3. Status of compliance with PCP implementation, including:
 - Extent of implementation of the Municipal Roads Standards and any necessary updates to the Implementation Table,
 - Extent of catch basin cleaning and street sweeping activities,
 - Extent of stormwater BMP implementation,
 - An estimate of the extent of remaining items for completion,
 - An assessment of the ability to meet outstanding schedule items, and
 - A written statement, signed by a designer acceptable to the Secretary, which states that any structural BMP built or implemented within the preceding six-month period was constructed in accordance with the approved plans.
4. A summary of activities planned during the next reporting cycle,
5. Any changes proposed to the stormwater management plan,

VIII. Certification

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

 Jenna M. Olson, CPESC
 Stormwater Program Manager

January 11, 2019

 Date