Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of ENVIRONMENTAL QUALITY

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

This form is to be completed by each permittee or co-permittee authorized to discharge storm water under the *General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4)*. All authorized permittees or co-permittees are required to complete this Annual Report Form for each calendar year the facility is authorized as required in Part IV.I. of the General Permit and to submit it (postmarked) no later than March 1st following the respective calendar year reporting period. For co-permittees authorized under one permit authorization and for co-permittees with multiple permit authorizations, you are required to complete this form and all items on it exclusively for your particular Small MS4 and Storm Water Management Program (SWMP) within your respective regulated Small MS4 area. The Department has attached instructions for this form in order to help with the completion of item responses. **If additional space is needed for item responses, you may include attachments noting the section and item number.**

Section A - Permit Authorization Number for Facility MTR04 0 0 0 3

MS4 Annual Report for Calendar Year 2 0 1 5

What size population does your MS4 serve? 28,190

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name City of Helena

Zip Code 59601 County Lewis and Clark

Latitude N 46.5991 Degrees Longitude W 112.0303 Degrees

Small MS4 Type: Federal ☐ State ☐ County ☐ City/Town ☑ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Kevin Hart Title Utility Maintenance Superintendent

Owner or Operator City of Helena

Mailing Address 2218 East Custer

City, State, and Zip Code Helena, MT, 59601

Phone Number (406) 457-8567

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

2. If yes, identify each impaired water, the impairment, whether a TMDL has been approved by EPA for each, and whether the TMDL assigns a wasteload allocation to your MS4. Use a new line for each impairment, and attach additional pages as necessary.

Impaired Water	Impairment	Approved TMDL	TMDL assigns WLA to MS4
Prickly Pear Creek	See Section L Below	☑ Yes ☐ No	☐ Yes ☑ No
Tenmile Creek	See Section L Below	☑ Yes ☐ No	☐ Yes ☑ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No

3. What specific sources contributing to the impairment(s) are you targeting in your Storm Water Management Program?

Runoff from construction, ex. development, and city facilities and streets primarily for sediment and illicit discharges.

4. Do you discharge to any "high-quality waters" (as defined in 75-5-103, MCA)? ☑ Yes ☐ No

5. Are you implementing additional specific provisions to ensure their continued integrity? ☑ Yes ☐ No

If yes, what are they?

See Section L, D.5

Section E - Public Education and Public Participation

1. Is your public education program targeting specific pollutants and sources of those pollutants? ☑ Yes ☐ No

2. If yes, what are the specific sources and/or pollutants addressed by your public education program?

See Section L, E.2. Brochures which the City distributes are available on the City's stormwater website.

3. Note specific successful outcome(s) (e.g., quantified reduction in fertilizer use; Do Not List tasks, events, publications) fully or partially attributable to your public education program during this reporting period.

See Section L, E.3

4. Do you have an advisory committee or other body comprised of the public and other stakeholders that provides regular input on your SWMP? ☑ Yes ☐ No

Section F - Construction

1. Do you have an ordinance or other regulatory mechanism stipulating:
   - Erosion and sediment control requirements? ☑ Yes ☐ No
   - Other construction waste control requirements? ☑ Yes ☐ No
   - Requirement to submit construction plans for review? ☑ Yes ☐ No
   - MS4 enforcement authority? ☑ Yes ☐ No
2. Do you have written procedures for:
   - Reviewing construction plans? ☑ Yes ☐ No
   - Performing inspections? ☑ Yes ☐ No
   - Responding to violations? ☑ Yes ☐ No

3. Identify the number of active construction sites, greater than or equal to 1 acre, in operation in your jurisdiction at any time during the reporting period. 19. See Section L, F.3-4

4. How many of the sites identified in F.3. did you inspect during this reporting period? See Section L, F.3-4

5. Describe, on average, the frequency with which your SWMP conducts construction site inspections.
See Section L, F.5

6. Do you prioritize certain construction sites for more frequent inspections? ☑ Yes ☐ No

If yes, based on what criteria?
Project size, public complaints, violation follow up, inspector concerns/drive-bys and construction duration.

7. Identify which of the following types of enforcement actions you used during the reporting period for construction activities, indicate the number of actions, or note those for which you do not have authority:

☐ Yes	Notice of violation	#0	No Authority ☐
☐ Yes	Administrative fines	#0	No Authority ☐
☐ Yes	Stop Work Orders	#0	No Authority ☐
☐ Yes	Civil penalties	#0	No Authority ☐
☐ Yes	Criminal actions	#0	No Authority ☐
☐ Yes	Administrative orders	#0	No Authority ☐
☐ Yes	Other _____	#0	See Section L, F.7

8. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track the locations, inspection results, and enforcement actions of active construction sites in your jurisdiction? ☑ Yes ☐ No

9. What are the 3 most common types of violations documented during this reporting period?
Vehicle tracking, lack of any and improper installation of BMP's, and general site housekeeping issues.

10. How often do municipal employees receive training on the construction program?
The City Stormwater Engineer attended 2 DEQ sponsored BMP training classes in 2015.

Section G - Illicit Discharge Elimination

1. Have you completed a map of all outfalls and receiving waters of your storm sewer system? ☑ Yes ☐ No

2. Have you completed a map of all storm drain pipes and other conveyances in the storm sewer system? ☑ Yes ☐ No

3. Identify the number of outfalls in your storm sewer system. 27

Number of Major outfalls 8 Number of Minor Outfalls 19

Are these numbers estimated or measured? Measured

4. Do you have documented procedures, including frequency, for screening outfalls? ☑ Yes ☐ No

5. Of the outfalls identified in G.3., how many were screened for dry weather discharges during this reporting period? 10. See Section L, G.5&7

6. Of the outfalls identified in G.3., how many have been screened for dry weather discharges at any time since you obtained MS4 permit coverage? 27

7. What is your frequency for screening outfalls for illicit discharges? Describe any variation based on size/type.
See Section L, G.5&7

8. Do you have an ordinance or other regulatory mechanism that effectively prohibits illicit discharges? ☑ Yes ☐ No

9. Do you have an ordinance or other regulatory mechanism that provides authority for you to take enforcement action and/or recover costs for addressing illicit discharges? ☑ Yes ☐ No

10. During this reporting period, how many illicit discharges/illegal connections have you discovered?

4. See Section L, G.10

11. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? 4

12. How often do municipal employees receive training on the illicit discharge program?

See Section L, G.12

Section H - Storm Water Management for Municipal Operations

1. Have storm water pollution prevention plans (or an equivalent plan) been developed for:

All public parks, ball fields, other recreational facilities and other open spaces?	☑ Yes	☐ No
All municipal construction activities, including those disturbing less than 1 acre?	☑ Yes	☐ No
All municipal turf grass/landscape management activities?	☐ Yes	☑ No
All municipal vehicle fueling, operation and maintenance activities?	☐ Yes	☑ No
All municipal maintenance yards?	☐ Yes	☑ No
All municipal waste handling and disposal areas?	☐ Yes	☑ No

Other

Draft plans have been developed for the WWTP and Utility Maintenance Division complex

2. Are storm water inspections conducted at these facilities? ☑ Yes ☐ No

3. If yes, at what frequency are inspections conducted? See Section L Comment H.3

4. List activities for which operating procedures or management practices specific to storm water management have been developed (e.g., road repairs, catch basin cleaning).

A general O&M manual exists for all city facilities.

5. Do you prioritize certain municipal activities and/or facilities for more frequent inspection? ☑ Yes ☐ No

6. If yes, which activities and/or facilities receive most frequent inspections?

See Section L, H.6.

7. Do all municipal employees and contractors overseeing planning and implementation of storm water-related activities receive comprehensive training on storm water management? See Section L, H.7 ☑ Yes ☐ No

8. If yes, do you also provide regular updates and refreshers? ☑ Yes ☐ No

9. If so, how frequently and/or under what circumstances?

See Section L, H.7&9

Section I - Long-term (Post-Construction) Storm Water Measures

1. Do you have an ordinance or other regulatory mechanism to require:

   Site plan reviews for storm water/water quality of all new and re-development projects? ☑ Yes ☐ No

   Long-term operation and maintenance of storm water management controls? ☑ Yes ☐ No

   Retrofitting to incorporate long-term storm water management controls? ☑ Yes ☐ No

2. If you have retrofit requirements, what are the circumstances/criteria?

   See Section L Comment I.2

3. What are your criteria for determining which new/re-development storm water plans you will review (e.g., all projects, projects disturbing greater than one acre, etc.)

   >1 Acre disturbed or >5,000 sq ft of impervious surface or <1 ac if part of a larger development plan

4. Do you require water quality or quantity design standards or performance standards, either directly or by reference to a Montana or other standard, be met for new development and re-development? ☑ Yes ☐ No

5. Do these performance or design standards require that pre-development hydrology be met for:

   Flow volumes? ☑ Yes ☐ No

   Peak discharge rates? ☑ Yes ☐ No

   Discharge frequency? ☑ Yes ☐ No

   Flow duration? ☑ Yes ☐ No

6. Please provide the URL/reference where all post-construction storm water management standards can be found.

   http://www.helenamt.gov/public-works/engineering/engineering-standards.html

7. How many development and redevelopment project plans were reviewed during the reporting period to assess impacts to water quality and receiving stream protection? 4

8. How many of the plans identified in I.7. were approved? 2

9. How many privately owned permanent storm water management practices/facilities were inspected during the reporting period? 4 - See Section L, I.9

10. How many of the practices/facilities identified in I.9. were found to have inadequate maintenance?

    Zero

11. How long do you give operators to remedy any operation and maintenance deficiencies identified during inspections?

    Depends on level of severity; however, the typical is 1 week for less severe deficiencies. See Section L, I.11.

12. Do you have authority to take enforcement action for failure to properly operate and maintain storm water practices/facilities? ☑ Yes ☐ No

    If yes, what authority?

    Authority under Ordinance No. 3120 found at Title 6, Chapter 6 of the City Code

13. How many formal enforcement actions (i.e., more than a verbal or written warning) were taken for failure to adequately operate and/or maintain storm water management practices? Zero

14. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections, and maintenance? ☑ Yes ☐ No

15. Do all municipal departments and/or staff (as relevant) have access to this tracking system? ☑ Yes ☐ No

16. How often do municipal employees receive training on the post-construction program? See Section L, I.16

Section J - Storm Water Management Program Resources

1. What was the annual expenditure to implement MS4 permit requirements this reporting period?
   See Section L, J.1-3

2. What is next year's budget for implementing the requirements of your MS4 MPDES permit? Section L,J.1-3

3. This year what is/are your source(s) of funding for the MS4 SWMP, and annual revenue (amount or percentage) derived from each?

   Source: Storm Water Utility Assessments Amount $ _____ OR % 75

   Source: WQPD Assessments Amount $ _____ OR % 25

   Source: General Fund (portions of stormwater Engineer's salary) Amount $ _____ OR % ____

4. How many FTEs does your municipality devote to the Storm Water Management Program (specifically for implementing the Storm Water Management Program; not municipal employees with other primary responsibilities)? 3.0 FTE: Section L, J.4

5. Do you share Storm Water Management Program implementation responsibilities with any other entities? ☑ Yes ☐ No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism
Lewis & Clark County WQPD	MCMs 1 & 2	See Compliance Documentation

Section K - Evaluating/Measuring Progress

1. What indicators do you use to evaluate the overall effectiveness of your Storm Water Management Program, how long have you been tracking them, and at what frequency? These are not measurable goals for individual management practices or tasks, but large-scale or long-term metrics for the overall Storm Water Management Program, such as macro-invertebrate community indices, measures of effective impervious cover in the watershed, indicators of in-stream hydrologic stability, etc.

Indicator	Began Tracking (year)	Frequency	Number of Locations
Water Quality Samples	2007	Minimum of Semi-Annually	2
Nature Park Sample	2010	Twice	1
K-Mart Pond Sample	2010	Annual	1-inlet
Henderson Ponds Sample	2012	Twice	1
Hunters Pointe/K-Mart Pond Outlet Sampl	2011	Annual	1
3 additional sample locations	2014	See Table M-1	See Table M-1

2. What environmental quality trends have you documented over the duration of your Storm Water Management Program? Reports or summaries can be attached electronically, or provide the URL to where they may be found on the Web. See Section L Comment K.2 & Section M

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

General - The City developed a document entitled "Helena MS4 Stormwater Compliance Documentation" based on the requirements established in the draft 2010 General Permit. This Documentation also included recommendations based on the EPA's "MS4 Program Evaluation Guidance" document. The Compliance Documentation was completed in February 2010 and in conjunction with Ordinance #3120, City Engineering Standards, Master Plan, and other pertinent documents was meant to assist the City in adhering to the requirements established in the MS4 General Permit and begin to anticipate future potential requirements and recommendations. An updated Storm Water Management Plan is planned as part of the Permit renewal. .
Specific activities and outcomes with regard to the City's SWMP are discussed throughout the various sections of the Annual Report. A few highlights are as follows:
- The City hired a full time Stormwater Engineer in 2015. One of the primary objectives of this position is to oversee Helena's MS4 Program, focusing on program administration, development reviews, and construction inspections.
- The City has been an active participant in the MS4 Working Group and Technical Subgroup to discuss the future of the State's MS4 Program.
- City staff, MDEQ, and US EPA participated in a tour of the City's stormwater facilities. The tour helped provide understanding and clarity regarding concerns, issues, and questions for all parties involved.
- The City has budgeted for and advertised a Request for Proposals to update the Storm Water Master Plan.
- The City has budgeted for a Storm Water Monitoring Plan.
- The WQPD, in coordination with the City, has prepared a Lake Helena Watershed Restoration Plan update.

D.2 - Prickly Pear Creek Impairment Causes (as listed on the CWAIC website): Alteration in stream-side or littoral vegetative covers (No TMDL), Ammonia (Un-ionized) (No TMDL), Arsenic (TMDL Completed), Cadmium (TMDL Completed), Copper (TMDL Completed), Lead (TMDL Completed), Low flow alterations (No TMDL), Nitrate/Nitrite (TMDL Completed), Total Nitrogen (TMDL Completed), Total Phosphorus (TMDL Completed), Physical substrate habitat alterations (No TMDL), Sedimentation/Siltation (TMDL Completed), Water Temperature (No TMDL), Zinc (TMDL Completed).

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

D.2 (continued)
Tenmile Creek Impairment Causes (as listed on the CWAIC website): Alteration in stream-side or littoral vegetative covers (No TMDL), Arsenic (TMDL Completed), Cadmium (TMDL Completed), Copper (TMDL Completed), Lead (TMDL Completed), Low flow alterations (No TMDL), Total Nitrogen (TMDL Completed), Nutrient/Eutrophication Biological Indicators (TMDL Completed), Total Phosphorus (TMDL Completed), Sedimentation/Siltation (TMDL Completed), Zinc (TMDL Completed).
It should be noted that the Helena MS4 does not typically discharge to surface water but rather infiltrates to ground water. A capacity evaluation of the City regional storm water ponds' ability to infiltrate runoff from the water quality event and potentially greater is planned to be part of an update to the Storm Water Master Plan.

D.5 - Both Prickly Pear Creek and Tenmile Creek watersheds receive focused attention from the Lewis and Clark County Water Quality Protection District (WQPD) and through the upper and lower Tenmile and Lake Helena Watershed Groups. The WQPD published the Lake Helena Watershed Restoration Plan in December 2015. The plan lays out watershed restoration priorities which will impact both Prickly Pear Creek and Tenmile Creek and specifically identifies restoration strategies within Crystal Springs Creek, a tributary to Ten Mile Creek originating within the City of Helena, for monitoring and potential natural resource improvements. A stream stabilization and restoration project was completed on Prickly Pear Creek.

E.2 - Sources of pollutants from residential, commercial, and construction activities are addressed. Some of the pollutants which are targeted include automotive chemicals, sediment, litter and debris, fertilizers, household chemicals and pet waste.

E.3 - Home schooled students volunteered to stencil 19 manholes and 13 inlets. Over 1,500 students in 4th and 5th grade participated in the Water Watchers Program. Additional public education was conducted through three Lake Helena Watershed Group meetings. Quantitative effectiveness is difficult to evaluate, but it is assumed that reaching both students and adults with educational information will raise awareness to stormwater issues and water quality concerns.

F.3-4 - Helena requires a state construction storm water permit for areas one acre or larger and accepts the State construction permit as the city permit. 19 such construction permits were active within the Helena MS4 during 2015, 5 of which were terminated by DEQ during the time period. All construction sites are inspected at various intervals which includes interim acceptance and final acceptance inspections.

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

F.5 - Construction site inspections can vary by the nature of the project: for example, city sponsored construction typically has an on-site inspector daily; while with private development inspections are more sporadic and tend to be complaint driven or combined with other visits such as new infrastructure or service connections. Drive by inspections are done during and after precipitation events.

F.7 – No violations or issues were encountered which could not be remedied by informal responses.

G.5&7 - 10 outfalls were screened during dry weather in 2015. No illicit discharges were found. Base flow in the drainage to K-Mart Pond was sampled and analyzed with the results shown in Section M. All 27 outfalls (both major and minor) leaving Helena's MS4 were screened during dry weather in calendar year 2013 and no illicit discharges were discovered.

G.10 - No evidence of illicit discharges or illicit connections were detected during dry weather screening surveys. Four spills were reported and cleaned up; the spills included oil, paint, concrete, and diesel.

G.12 - Helena aims to train annually; however, no training occurred in 2015 for utilities maintenance employees as efforts were directed at maintenance related work. The City Stormwater Engineer attended 2 DEQ sponsored BMP training classes in 2015.

H.1 - Appendix E of the Storm water Management Plan Document provides an Operations and Maintenance Program for Municipal Operations in support of MCM 6. General O&M of BMPs was performed for office buildings, vehicle maintenance facilities, parks, golf courses, open spaces, and Central Park maintenance, solid waste facilities, City streets, City owned and operated utilities including storm and wastewater collection, municipal development (construction) projects and water, wastewater and storm treatment facilities. These practices remain in place as Helena continues to develop site specific storm water management plans for sites. A new position has been created and filled to assist with this progress. The storm water coordinator attended two DEQ BMP classes. A meeting was held with supervisors of Utility Maintenance and Waste Water Treatment to discuss storm water training practices.

H.3 – Inspections at the City and County building, Waste Water Treatment Plant, Utility Maintenance Facility, and Centennial Park were performed at least once during 2015.

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

H.6 - Municipal sponsored construction and infrastructure maintenance activities continue to receive the most inspection attention currently. Routine and regular inspections of pipe systems, inlets, and ponds are done throughout the year during both dry weather and following notable storm events. This information is used to set maintenance priorities in a given year. Storm water system operation and maintenance in line with established best management practices continues to be the emphasis for Helena.

H.7&9 - The storm water coordinator attended two DEQ BMP classes. A meeting was held with supervisors of Utility Maintenance and Waste Water Treatment to discuss storm water training practices. Training of other municipal staff was not accomplished this year due to other priorities related to O&M of City Facilities including the storm water utility.

I.2 - Retrofit requirements within the Helena MS4 generally mirror those for new construction, including permit coverage, requirements for onsite detention and treatment and plan reviews and approvals where triggered by the size of the disturbance or impervious area coverage. These requirements are found in the Helena city code Title 6, Chapter 6, Section 15.

I.7&8 - The Engineering Division reviewed 4 infrastructure development plans involving areas larger than one acre and approved 2 of them. In total 110 plans, including single family dwellings (of less than 5,000 sq. ft. of impervious area) with grading and drainage plans were reviewed and approved.

I.9 - Post construction stormwater control facilities were inspected at Montana Eye Care, Hobby Lobby, Lewis and Clark County Fairgrounds, Our Redeemers, and Walgreens.

I.11 - For storm water construction non-compliance issues, operators are typically given one week to repair deficiencies with a follow up inspection conducted to determine compliance. This has worked well in most cases. Helena addresses repeat or difficult non-compliance issues on a case by case basis. Time given to address IDDE violations often depend on the nature of the discharge to the MS4 and potential for ongoing impairments to storm water quality. Spills and serious pollutant sources require immediate cleanup. Less significant non-compliance problems are addressed on a case-by-case basis with periods of time for correction that depend on the nature of the problem and available solutions. Helena's ordinance provides a mechanism to conduct this work and to bill the operator/owner. Helena has used this mechanism for IDDE violations and is developing a process for doing so with construction and other non-compliance actions that directly affect the storm system.

I.16 - Helena trains appropriate and relevant municipal utility employees on an as-needed basis for post-construction operation and maintenance requirements.

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

J.1-3 - FY 2015 expenditures which include the period July 1, 2014 to June 30, 2015 were $765,398 for the storm water utility; this includes operational expenses of $475,353 and capital outlay of $290,045. Total revenues from assessments were $1,003,600.
FY 2016 expenditures which include the period July 1, 2015 to June 30, 2016 are projected to be $2,715,564 which includes $1,880,139 in capital expenditures and carryover of unspent capital project monies, along with projected expenditures of $835,425. Projected revenue from assessments for the period is $1,095,290.
The WQPD spent $387,307 in FY 15. Projections for FY 16 are for expenditures of $354,863.

J.4 - Helena funds 3.0 FTE from its storm water utility for the purpose of implementing the storm water management program and conducting operations and maintenance of the utility. Additional MS4 compliance resources are provided by the WQPD through contributions made in the general protection of water quality within Helena and Lewis and Clark County. Helena remains an active member of the District Board. Contributions to the function and maintenance of the storm water system are also made by the Street Division for activities such as street sweeping.

K.2 - Very few consistencies are present between the water quality samples. Several analytes consistently exceed the NURP median concentration including: TSS, phosphorus, zinc, copper, and Nitrogen. Oil and grease concentrations have consistently declined at both of the designated sample locations. The City is looking at ways to modify facilities such as the DNRC Ponds and Helena High pond to improve stormwater quality prior to discharge from the MS4.

Sections N, O, and P – Helena intends to operate over the next two year cycle under its current 5-year permit management plan framework that was adopted in 2010 as the current MS4 Working Group collaborative addresses issues raised by Helena and other MS4's regarding the program and its future direction. In this report Helena includes those activities successfully completed and notes those that that were not completed in 2015. Helena's FY 2016 budget, which became effective July 1, 2015, includes provisions to begin the process of updating its 2003 Stormwater Master Plan and revisiting its 2010 to 2014 Storm water Management Plan. The initial planning which has been conducted with reference to these updates has considered the progress and direction of the collaborative MS4 Working Group efforts.

Section M - Additional Detailed Information: Storm Water Discharge Monitoring

In the space below, please provide the "Evaluation of Storm Water Quality Monitoring Test Results" based on the requirements in Part IV.A.6. of the General Permit. Please also use this space to describe and evaluate any other storm water discharge monitoring which may have occurred during this reporting period.

See Table M-1 Summary of Helena Storm Water Sample Results and associated data graphs.

2015 Results:
Exceedances above the median concentrations were recorded for 5 of the 9 sampling parameters during the course of 2015 and spring samples were generally higher than the fall samples for most parameters. This trend has been noticed several times since sampling began; however, it is not true for every year in which samples have been conducted (i.e. 2011 & 2012).

Long-Term Trend Analysis:
As documented in previous years there is a very slight trend towards lower concentrations of pollutants when higher flows are documented; however, the correlations are weak and therefore assuming a consistent trend exists would likely be a poor assumption. In addition, the sample trends do not show a continual downward or upward trend over time (with the exception of Oil & Grease and Nitrogen, which show a downward trend over time).

The sampling locations required and approved by DEQ are intended to meet the requirements of the permit for monitoring at commercial and residential areas respectively and were designed to collect raw storm water quality data. Additional sampling more useful for the management of the system has been conducted at several locations throughout the City in recent years (this monitoring does not appear to be required by the permit). Results of these samples are provided within Table M-1.
The City of Helena is continuing to evaluate the stormwater sample results to determine appropriate measures to improve stormwater quality, where applicable.

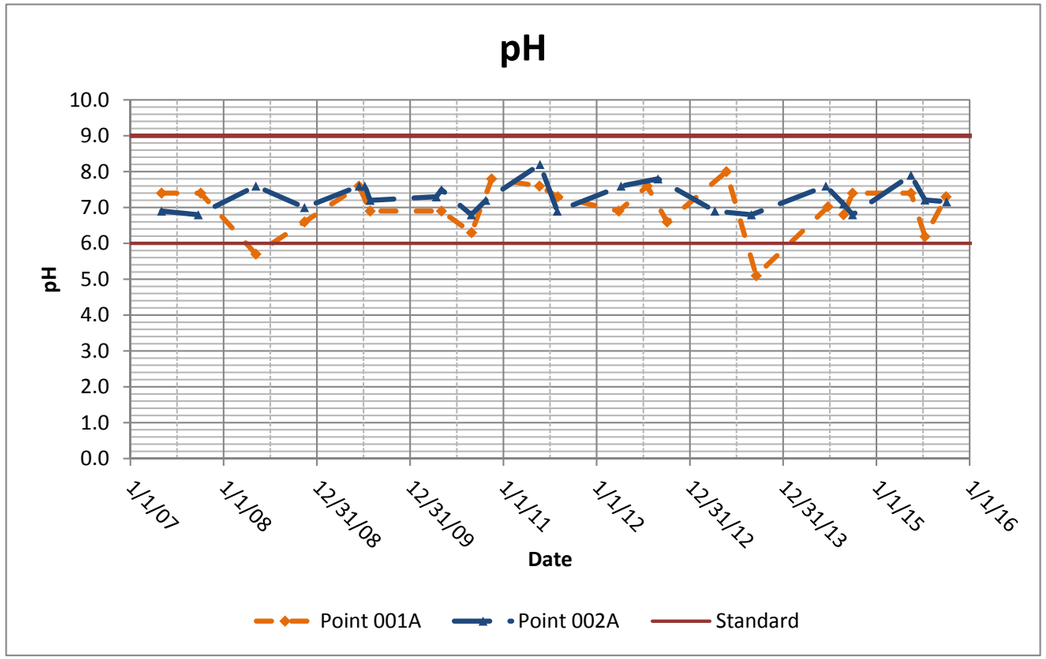
Table M-1 Summary of Helena Storm Water Sample Results

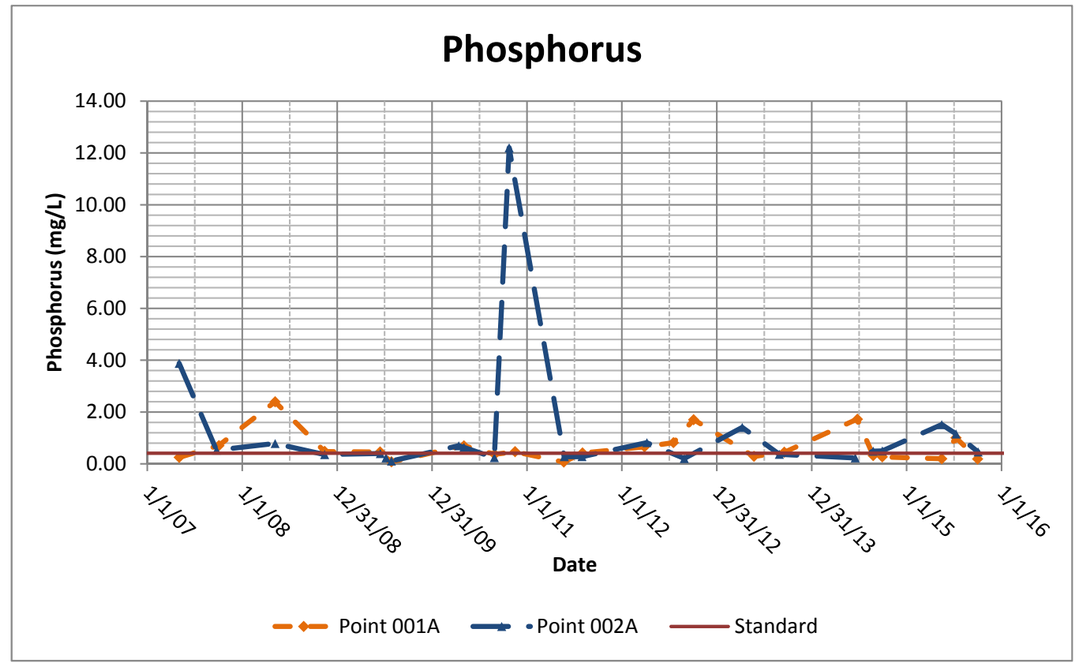
Sample Location	Discharge Number	Date	Parameter (mg/L unless shown)									
			Flow Rate (gal/min)	pH (s.u.)	TSS	Oil & Grease	Nitrogen	Phosphorus	Zinc	Lead	Copper	COD
Industrial/ Commercial Area	**001A**	5/3/2007	14	7.4	88	**19**	0.15	0.25	0.09	0.02	0.02	29
		10/3/2007	98	7.4	68	4.9	1.02	**0.71**	0.14	0.01	0.03	**330**
		5/6/2008	87	**5.7**	**384**	9	**2.69**	**2.40**	**2.15**	**0.44**	**0.33**	**900**
		11/13/2008	39	6.6	**140**	8.8	0.86	**0.48**	**0.30**	0.05	**0.07**	**410**
		6/14/2009	50	7.6	112	9.3	1.31	**0.46**	**0.38**	0.03	**0.06**	**390**
		7/28/2009	1400	6.9	44	4.1	0.46	0.08	0.07	ND	0.03	**130**
		5/3/2010	350	6.9	**390**	7.3	0.92	**0.70**	**0.52**	0.06	**0.10**	**490**
		8/29/2010	225	6.3	**368**	**14**	0.05	0.37	**0.83**	0.08	**0.11**	**320**
		11/16/2010	91	7.8	**244**	9	0.64	**0.47**	**0.26**	0.03	0.04	**65**
		5/22/2011		7.6	38	6.5	0.43	0.07	0.11	0.01	0.03	**130**
		8/2/2011	350	7.3	**349**	8.4	0.49	**0.42**	**0.28**	0.05	**0.05**	75
		3/28/2012		6.9	**1260**	5	0.39	**0.66**	**0.74**	**0.17**	**0.14**	**130**
		7/17/2012	550	7.6	**442**	5	1.46	**0.82**	**0.79**	0.07	**0.13**	**92**
		10/3/2012	180	6.6	50	5	**2.52**	**1.71**	**0.92**	0.03	**0.12**	**1300**
		5/23/2013	269	8.0	60	<1	0.15	0.29	0.15	0.03	0.03	22
		9/17/2013	314	**5.1**	**196**	4	0.04	**0.45**	0.07	0.00	0.01	**470**
		6/25/2014	283	7.0	**604**	2	0.19	**1.73**	**0.31**	0.13	**0.07**	**298**
		8/25/2014	426	6.8	**188**	<1	<0.01	0.32	0.16	0.02	0.01	**145**
		9/29/2014	247	7.4	**189**	1	0.1	0.27	0.12	0.02	0.01	58
		5/16/2015	202	7.4	**1500**	5	1.01	0.20	**0.71**	0.14	**0.14**	**180**
		7/10/2015	404	6.2	**380**	<1	0.21	**1.01**	**0.35**	0.04	**0.09**	**338**
		10/1/2015	539	7.3	53	1	0.17	0.19	0.06	0.01	0.02	17
Residential Area	**002A**	5/3/2007	6.46	6.9	**160**	**12**	**2.23**	**3.88**	0.10	0.02	0.04	**350**
		9/24/2007	85	6.8	76	**13**	0.76	**0.53**	0.15	ND	0.03	**340**
		5/6/2008	215	7.6	**2970**	**25**	1.17	**0.79**	**0.59**	0.12	**0.13**	**240**
		11/13/2008	51.34	7.0	124	6.1	0.35	0.36	0.13	0.02	0.04	**190**
		6/15/2009	5400	7.6	56	3.4	0.88	0.40	0.12	ND	0.04	**330**
		7/7/2009	400	7.6	**610**	5.3	0.53	0.23	0.14	0.02	**0.05**	**310**
		7/28/2009	3000	7.2	**ND**	4.1	0.50	0.11	0.05	ND	0.01	80
		4/13/2010	30	7.3	**520**	5.1	1.58	**0.70**	**0.31**	0.05	**0.09**	**250**
		5/3/2010	1250	7.5	**485**	7.2	0.41	**0.64**	**0.34**	0.05	**0.09**	**180**
		8/28/2010	115	6.8	**134**	7.8	0.89	0.24	0.16	0.02	0.04	**140**
		10/24/2010	19	7.2	56	4.8	0.52	**12.20**	0.17	ND	**0.05**	**260**
		5/24/2011	1000	8.2	**386**	5.1	0.31	0.28	**0.22**	0.04	**0.05**	36
		7/31/2011	3500	6.9	50	7.1	0.61	0.28	**1.10**	0.15	**0.19**	**250**
		4/6/2012	100	7.6	**908**	5	1.14	**0.82**	**0.30**	0.04	**0.06**	**170**
		8/28/2012	21	7.8	**201**	4	0.33	0.21	**0.33**	0.04	**0.06**	26
		4/8/2013	1122	6.9	**1670**	6	**2.20**	**1.41**	**0.73**	0.15	**0.19**	**450**
		8/29/2013	358	6.8	**484**	3	0.17	0.37	**0.40**	0.07	**0.08**	**130**
		6/17/2014	359	7.6	70	<1	0.08	0.23	0.04	<0.01	**0.08**	33
		8/25/2014	673	7.1	**276**	<1	0.58	**0.49**	0.08	**0.02**	<0.01	**87**
		9/29/2014	112	6.8	121	1	<0.01	**0.50**	0.09	0.01	0.04	**224**
		5/16/2015	76	7.9	**956**	3	1.42	**1.52**	**0.33**	0.05	**0.07**	**230**
		7/10/2015	22	7.2	**772**	3	0.41	**1.16**	**0.25**	0.03	**0.08**	**258**
		10/3/2015	49	7.2	85	1	0.01	**0.46**	0.07	0.01	0.02	**128**
Kmart Pond Inlet	NA	1/14/2010	NA	7.5	**944**	**20**	**2.72**	**0.65**	**0.52**	0.10	**0.09**	**200**
		2/22/2012	NA	8.2	**578**	4	0.43	**0.70**	**0.31**	0.12	**0.07**	47
		7/16/2013	NA	8.2	<10	<1	**6.64**	0.04	<0.01	<0.001	<0.005	11
		3/10/2014	NA	8.1	**250**	2	0.62	**0.69**	0.07	0.03	0.04	**92**
Hunters Pointe	NA	5/24/2011	NA	8.0	58	1.5	0.86	0.09	0.04	ND	ND	34
		2/22/2012	NA	8.0	78	6	0.33	0.33	0.04	0.01	0.01	77
		7/16/2013	NA	8.3	<10	<1	0.01	0.07	<0.01	<0.001	<0.005	30
		3/10/2014	NA	7.9	72	<1	0.44	**0.45**	0.03	0.01	0.03	39
Henderson Pond	NA	2/22/2012	NA	8.3	**490**	4	0.20	**0.74**	**0.29**	0.06	**0.06**	44
		3/10/2014	NA	7.8	6	<1	**2.51**	0.20	0.01	<0.01	0.02	29
Nature Park	NA	1/14/2010	NA	7.7	**432**	**13**	1.35	**0.45**	**0.33**	0.06	**0.07**	**82**
		2/22/2012	NA	7.9	**387**	4	0.40	**0.70**	0.18	0.05	**0.05**	32
Custer Wetland near Fairgrounds	NA	3/10/2014	NA	7.8	34	<1	0.22	0.37	0.03	0.01	0.03	43
I-15 Crossing to Regional Pond	NA	3/10/2014	NA	7.9	96	<1	0.42	**0.44**	0.04	0.01	0.03	48
Custer Regional Pond 6 Overflow	NA	3/10/2014	NA	7.7	49	<1	0.70	0.32	0.02	0.01	0.03	41
Receiving Water Standards/EPA NURP Median Concentration				6 to 9	125	10	2.00	0.41	0.210	0.165	0.040	80

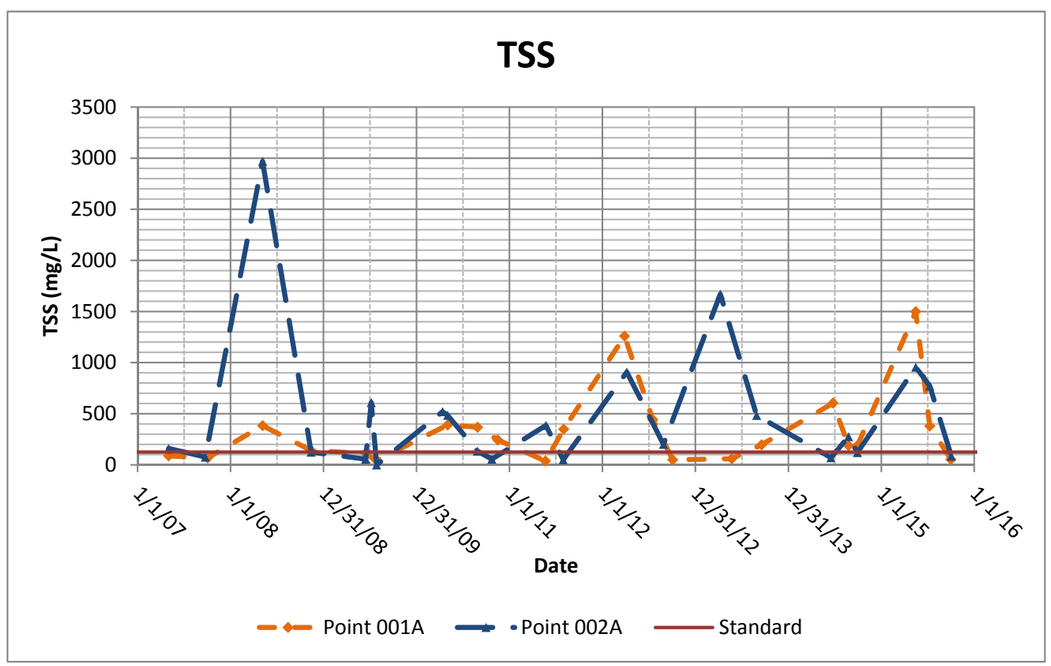
Notes:

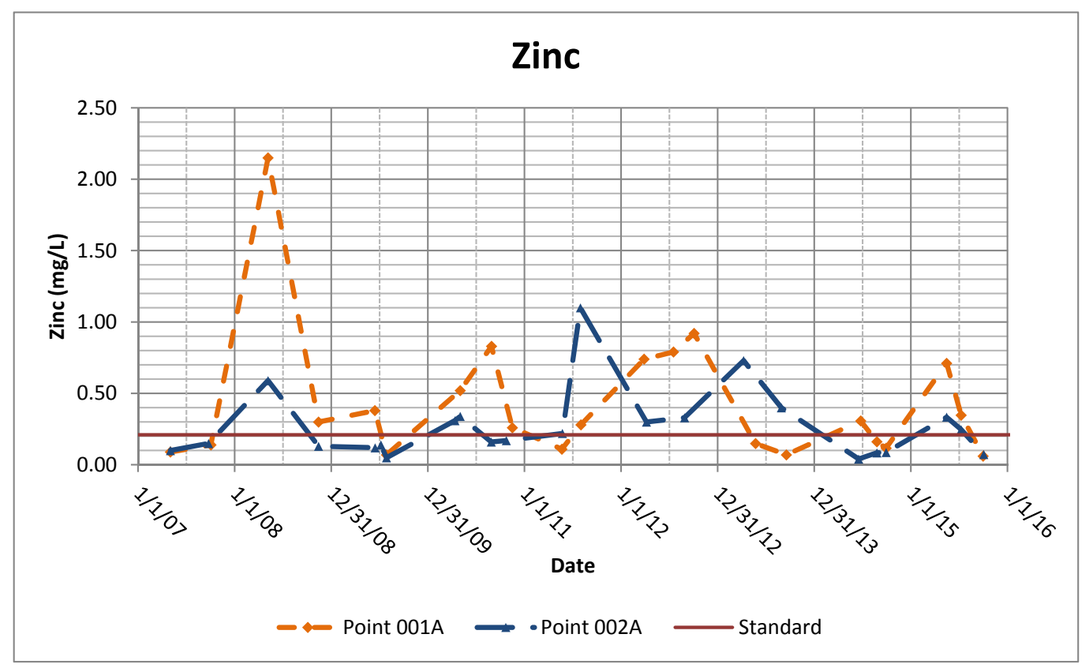
Bold = Measured parameter exceeds receiving water standards or 1992 EPA NURP median concentration.

Section M: Sample Results Based on Date

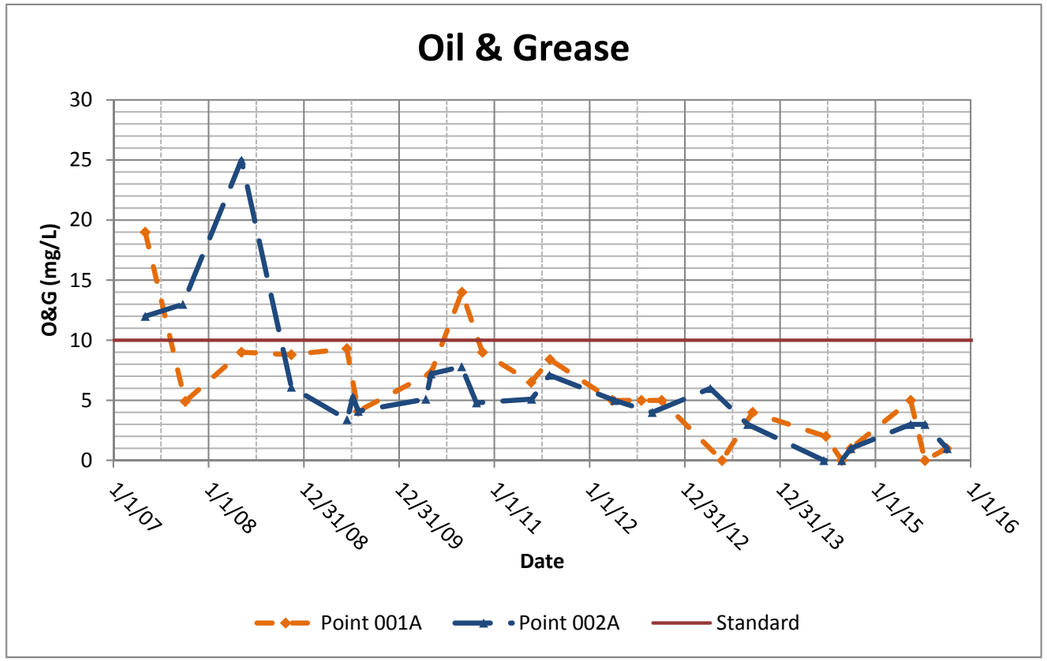


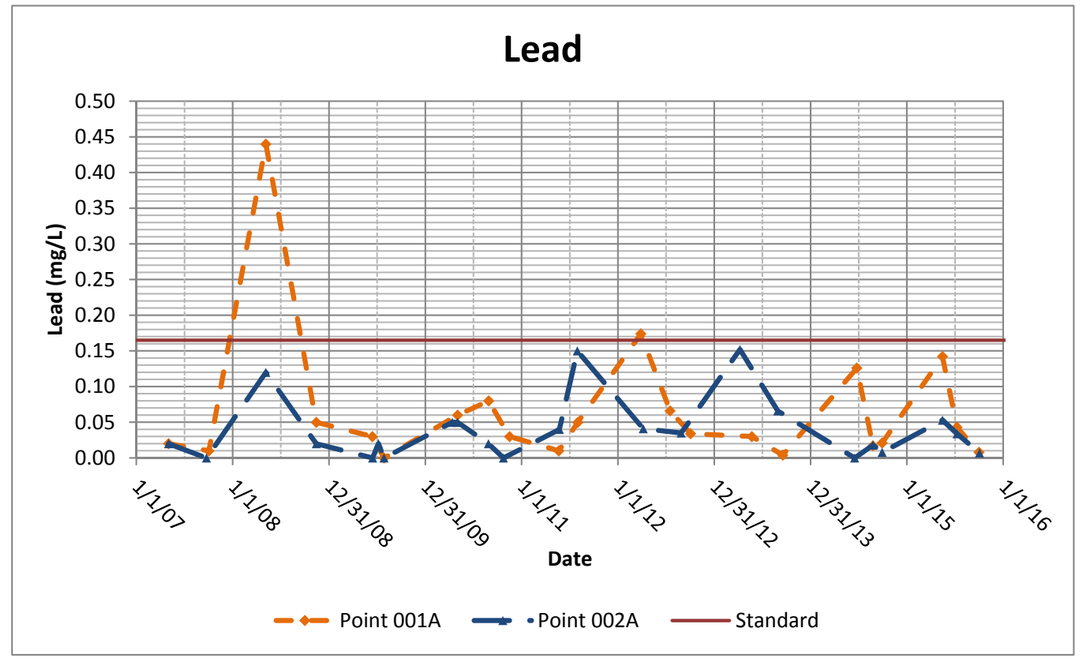


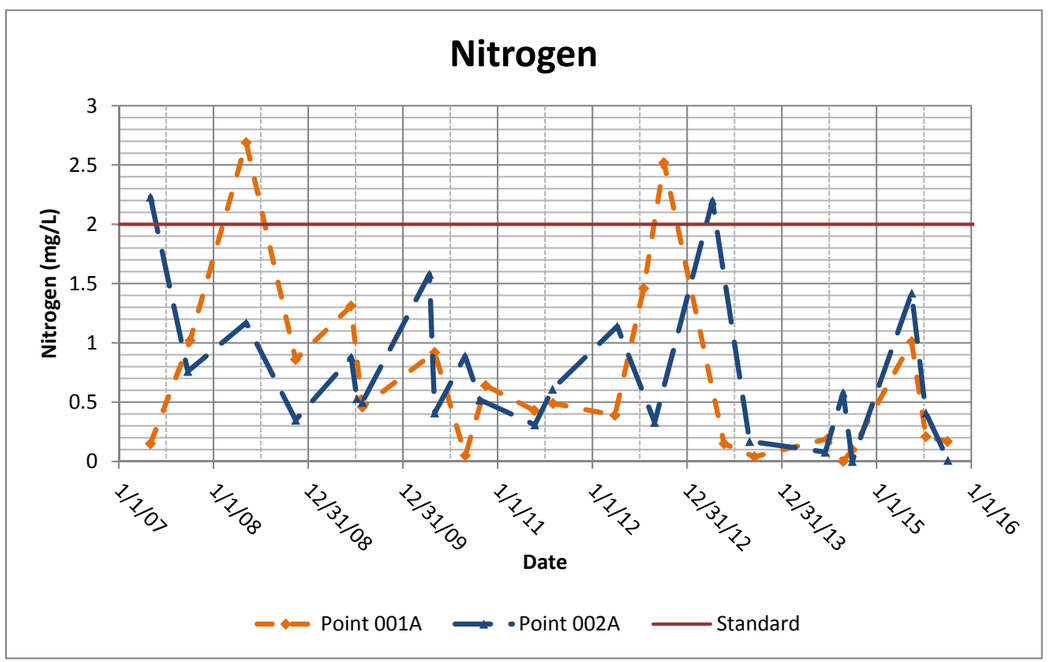


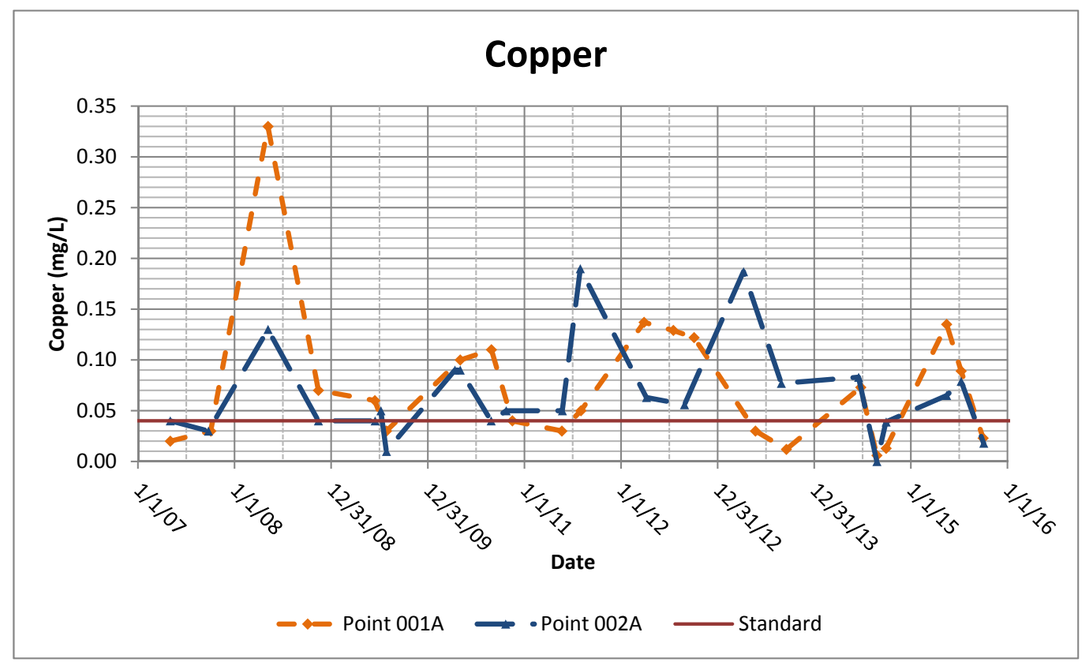


Section M: Sample Results Based on Date (Cont)

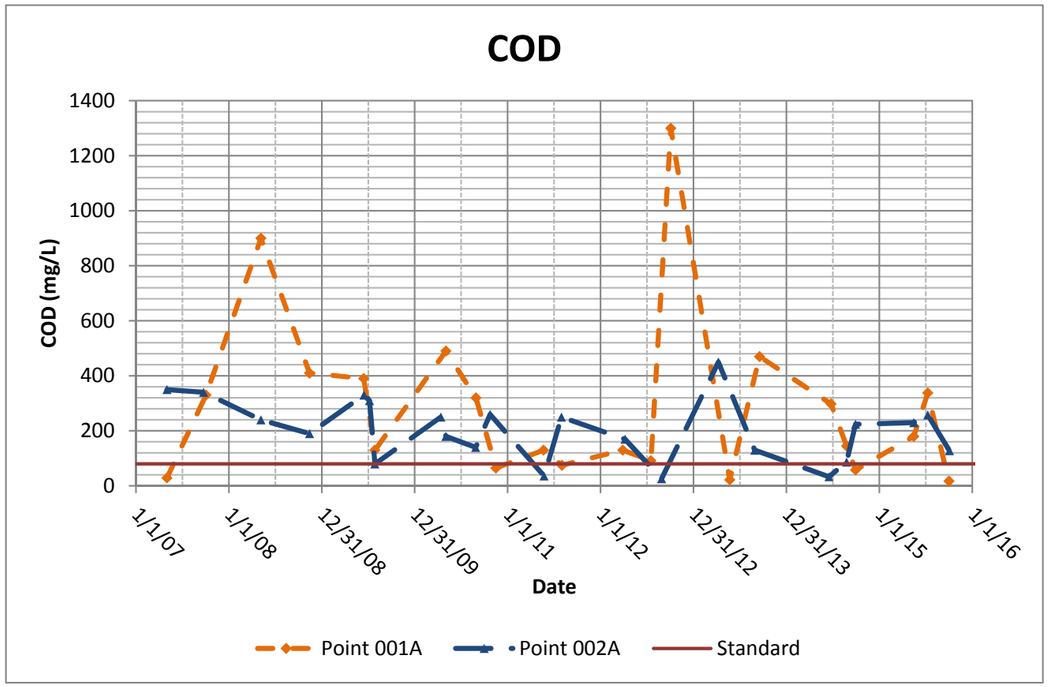




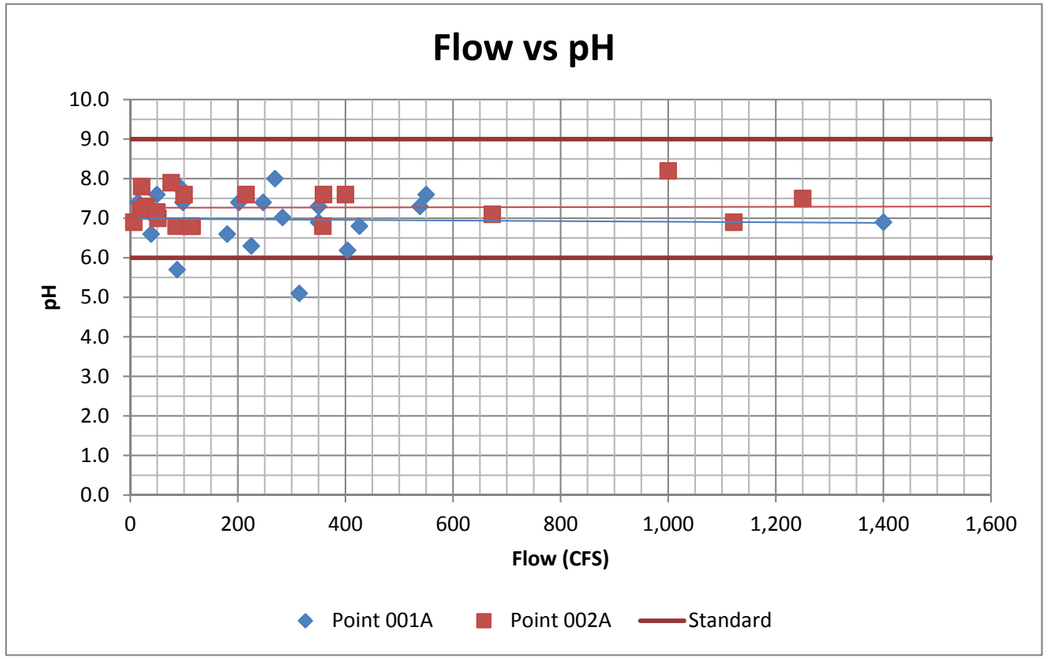


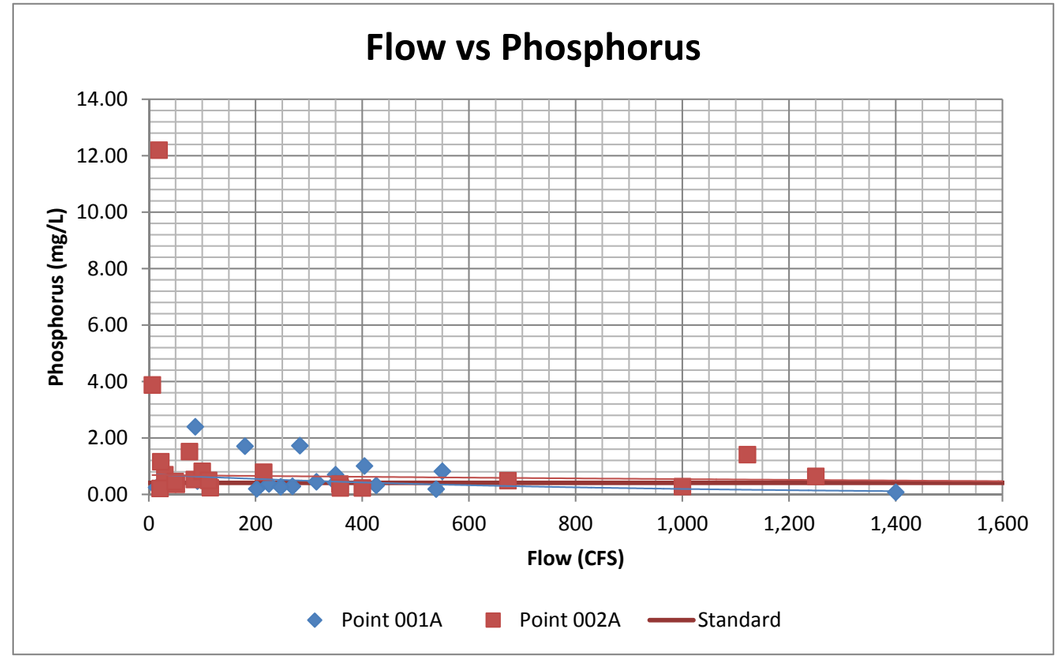


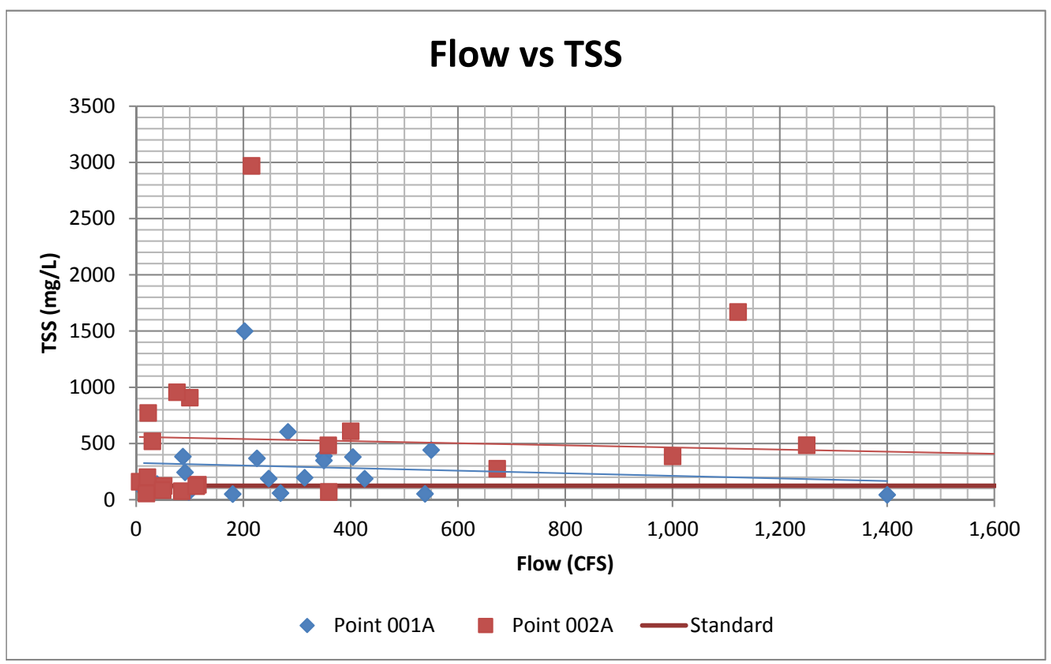
Section M: Sample Results Based on Date (Cont)

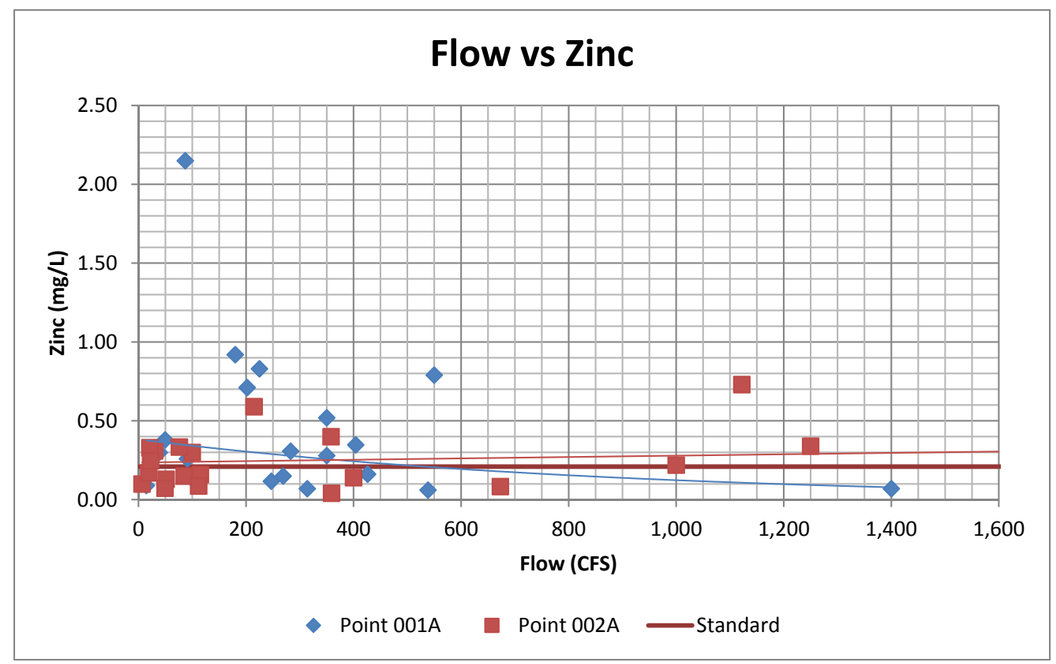


Section M: Sample Results Based on Flow

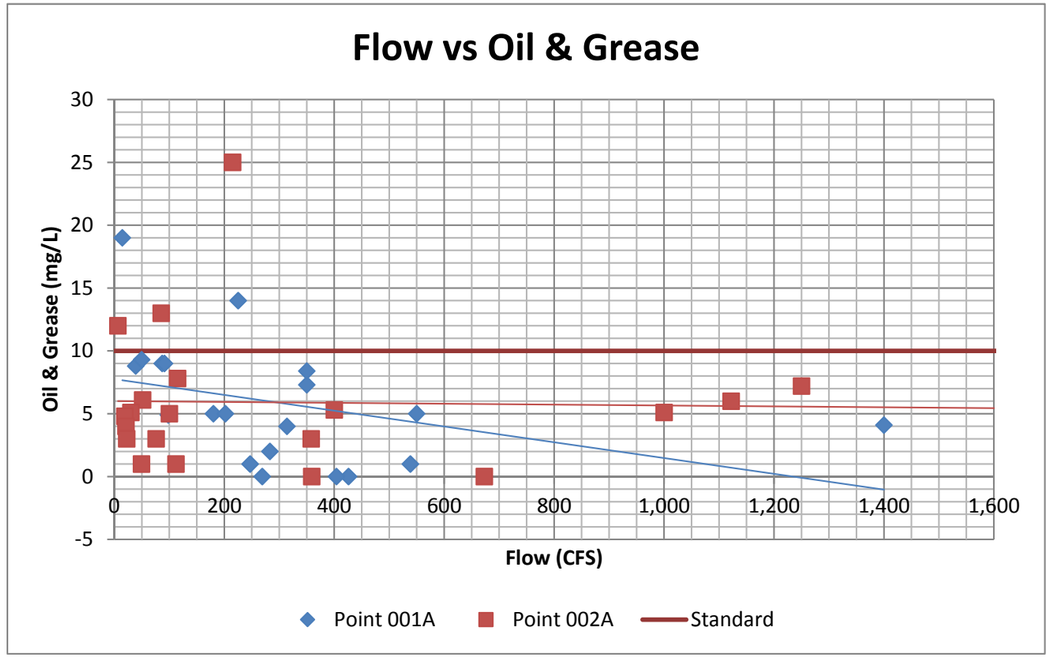


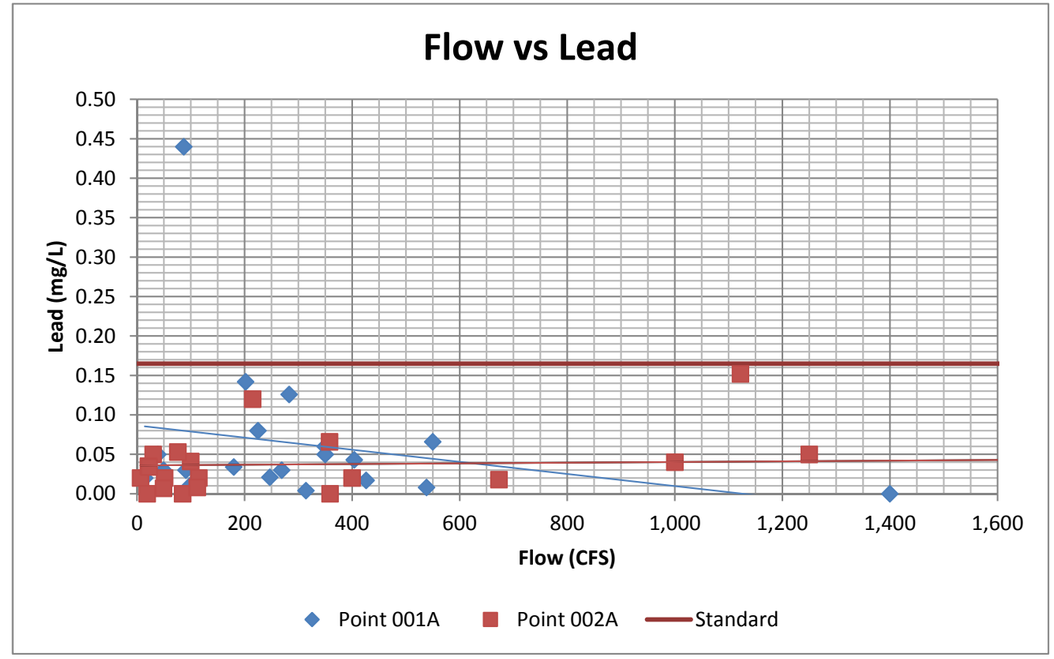


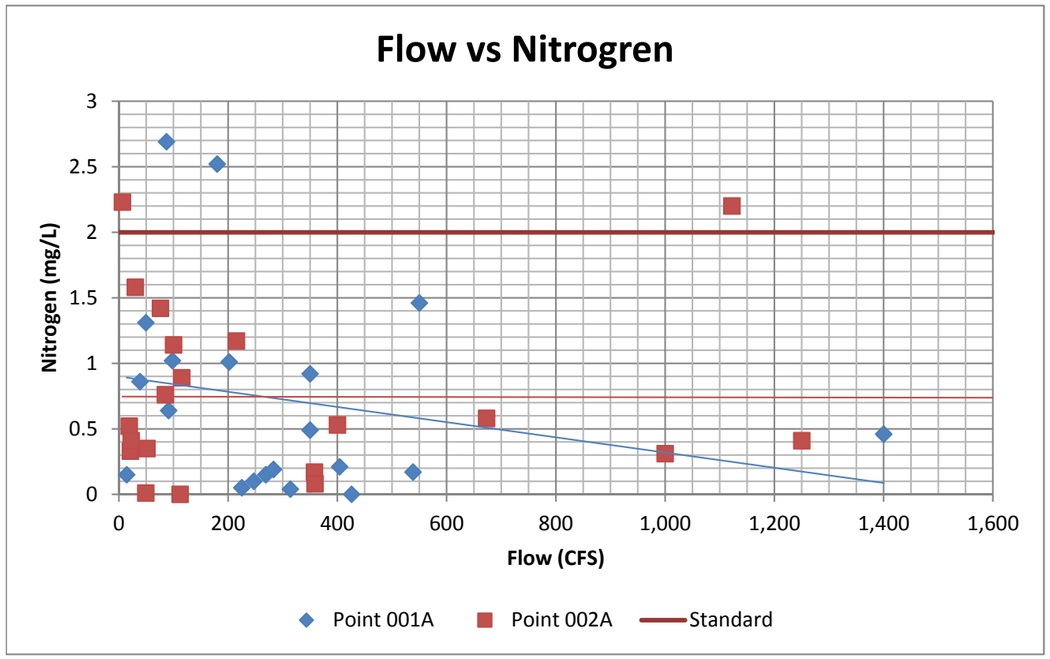


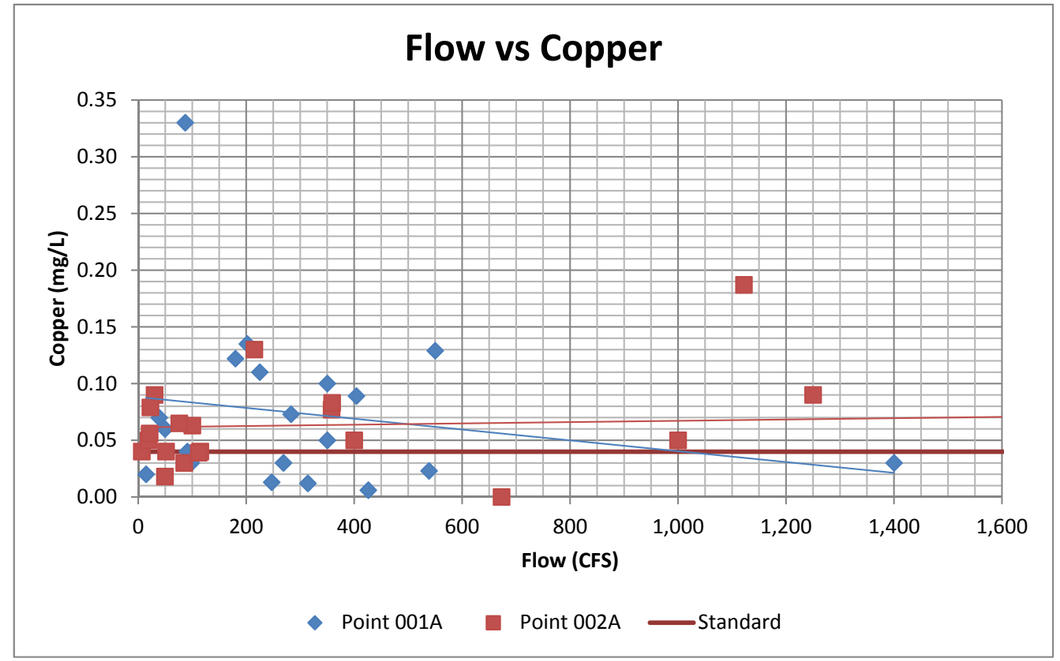


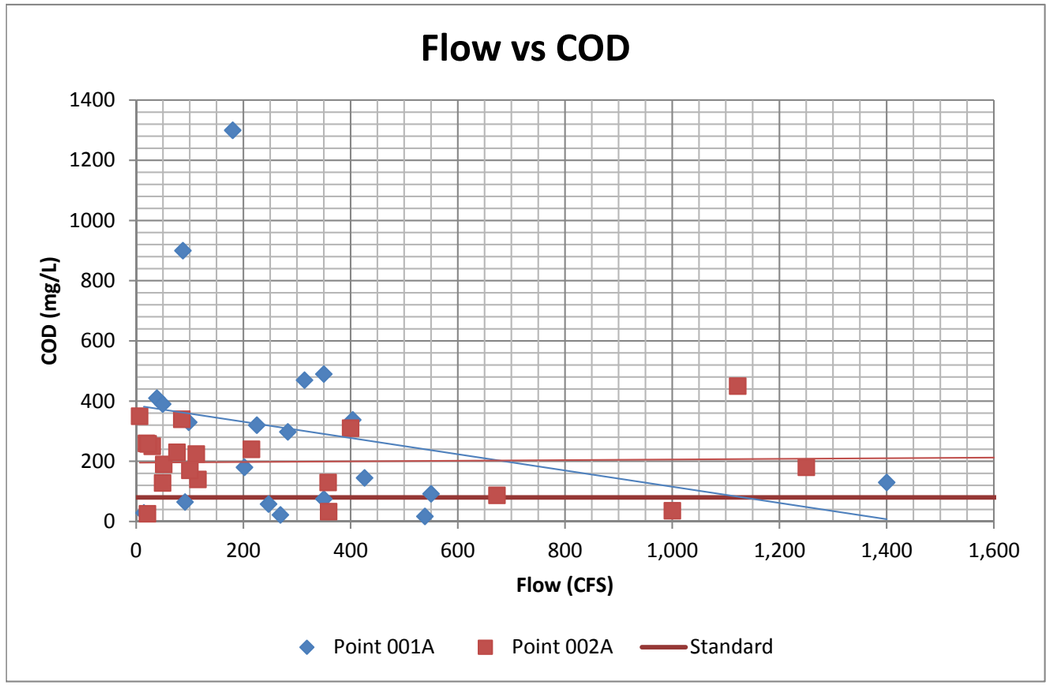
Section M: Sample Results Based on Flow (Cont)










Flow vs COD
COD (mg/L)
1400
1200
1000
800
600
400
200
0
0
200
400
600
800
1,000
1,200
1,400
1,600
Flow (CFS)
Point 001A
Point 002A
Standard

Annual Report Section N - MCM 1

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Education and Outreach	Part II.B.1.a	Public outreach program	Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff;	City/WQPD	Yes. Program was established during completion of the Stormwater Master Plan in 2004.	BMPs for this MCM were evaluated and revised in 2010. The revisions are discussed in Sections O and P of this Annual Report.
Public Education and Outreach	Part II.B.1.b	Documentation upkeep	Maintain documentation with respect to the development of a storm water public education and outreach program. This documentation must address both the overall public education program and the individual BMPs, measurable goals and responsible persons/positions for the program.	City/WQPD	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Public Education and Outreach	Part II.B.1.b.i	Inform residents of steps to reduce SW pollution	Identify how the MS4 plans to inform individuals and households about the steps they can take to reduce storm water pollution.	WQPD/City	Yes, brochure was developed and is currently in place. The City plans to update the brochure in the future.	Brochure was developed during previous permit cycle and was revised in 2014.
Public Education and Outreach	Part II.B.1.b.ii	Inform residents of involvement opportunity	Identify how the MS4 plans to inform individuals and groups on how to become involved with the SWMP (with activities such as local stream and beach restoration activities).	WQPD/City	Scheduled events are advertised using various media outlets.	Press releases were utilized during the previous permit cycle. The City and WQPD currently use various media outlets such as online websites and Facebook to inform the public.

Annual Report Section N - MCM 1

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Education and Outreach	Part II.B.1.b.iii	Identify target audiences	Identify the target audiences for the education program which are likely to have significant storm water impacts (including commercial, industrial, and institutional entities) and why those target audiences were selected.	City/WQPD	Yes. Target audiences were identified during program development. Audiences were evaluated and reprioritized in 2010.	Target Audiences 1. Homeowners – Targeted to attempt to control pesticide, herbicide, and lawn fertilizer application. Homeowners are considered the leading cause of elevated nutrients in stormwater and a smaller contributor of sediment, metals and other substances. 2. Construction contractors – Targeted due to the high sediment loads contributed to the storm sewer system by construction activities. 3. Policy makers – Targeted due to control of how stormwater issues are addressed. The City and WQPD will present as needed information to the City and County Commissions, the planning board, etc. with a minimum of one presentation per year to the City Commission and the Planning Board. 4. Commercial and Industrial facilities – Targeting primarily those sites with chemicals stored on site to discuss the need to contain chemicals on site.
Public Education and Outreach	Part II.B.1.b.iv	Identify target pollutants	Identify the target pollutant sources the public education program is designed to address.	City/WQPD	Yes, the target pollutant sources were identified in the 2004 Stormwater Master Plan. The three primary target pollutants are heavy metals, nutrients, and sediments.	The BMPs provided in the Compliance Documentation outline the target pollutants for each target audience.
Public Education and Outreach	Part II.B.1.b.v	Identify outreach strategy and mechanism	Identify the outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) to be used to reach the target audiences, and how many people are expected to be reached by the outreach strategy over the initial five-year permit term.	City/WQPD	Yes, the outreach mechanisms were identified in the 2004 Stormwater Master Plan. The methods were reevaluated in 2010 and changes are suggested.	The BMPs provided in the Compliance Documentation outline the outreach strategy for each target audience.
Public Education and Outreach	Part II.B.1.b.vi	Identify responsible party for this task	Identify who is responsible for overall management and implementation of the storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.	City/WQPD	Yes, this MCM is headed by the WQPD. The City works to provide information and support for the WQPD.	The BMPs provided in the Compliance Documentation outline the agency responsible for the BMPs identified.

Annual Report Section N - MCM 1

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Education and Outreach	Part II.B.1.b.vii	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measureable goals for each of the BMPs were selected.	City/WQPD	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	The WQPD currently utilizes a form that is completed at the end of each presentation, allowing the presenter to document the topics covered. The WQPD will also include the approximate attendance at each presentation. A tracking spreadsheet will be utilized by the WQPD to maintain these records in a central location. The City will track the number of contractors present at the stormwater training presentations. The ultimate evaluation tool to determine how effective this outreach tool is will be the sediment present on City streets. The sediment quantity may not be measurable, but the City should be able to determine whether or not the program is working just by how much sediment is present on the streets. Outreach to the regulators will be evaluated by meeting minutes from the regulation meetings. Regulators response to the presenters/subject material should be documented in the minutes (i.e. additional information required, passed legislation, etc.). Public outreach effectiveness will be evaluated biannually by the City of Helena and the WQPD. Necessary changes will be implemented within one year following the biannual evaluation meeting, or as deemed appropriate. Measurable goals are further outlined in the Compliance Documentation.

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.1 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.1 for a summary of planned activities and changes for 2016

Annual Report Section N - MCM 2

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Involvement/ Participation	Part II.B.2.a	Public involvement program	Comply with State, Tribal, and local public notice requirements when implementing a public involvement/participation program.	City/WQPD	Yes. The City follows public notice requirements.	BMPs for this MCM were evaluated and revised in 2010. The revisions are discussed in Sections O and P of this Annual Report.
Public Involvement/ Participation	Part II.B.2.b	Documentation upkeep	Maintain documentation with respect to the development of a stormwater public involvement/participation program. This documentation must address both the overall public involvement/participation program and the individual BMPs, measureable goals, and responsible persons/positions for this program	City/WQPD	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Public Involvement/ Participation	Part II.B.2.b.i	Public involvement of SWMP program.	Identify how the public was involved in the development and submittal of the permit application and the SWMP.	WQPD/City	The City's stormwater page is located at: http://www.helenamt.gov/public - works/utility- maintenance/stormwater.html	The BMPs provided in the Compliance Documentation outline the public involvement strategy, including City and County Commission meetings and planning board meetings, which are open to the public. In addition, presentations are given to public watershed groups as well as community groups which provide feedback and concerns to the presenters.
Public Involvement/ Participation	Part II.B.2.b.ii	Public involvement of SWMP program.	Identify plans to actively involve the public in the development and implementation of the SWMP.	WQPD/City	Yes, the WQPD and City will continue to present at City and County Commission meetings and Planning Board meetings, which are open to the public. In addition, presentations are given to public watershed groups as well as community groups which provide feedback and concerns to the presenters.	See Part II.B.2.b.i above.

Annual Report Section N - MCM 2

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Involvement/ Participation	Part II.B.2.b.iii	Identify target audiences	Identify the target audiences for the public involvement program, including a description of the types of ethnic and economic groups engaged. The MS4 is encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.	WQPD/City	Yes. Target audiences were identified during program development. Audiences were evaluated and reprioritized in 2010.	Target audiences for this measure are similar to II.B.1.b.iii above. The City under its cooperation with the WQPD and its Board address stormwater issues in the broader context of water quality and members of the public are included on the board. The Lake Helena Watershed Group discusses water and/or water quality-related issues for the Lower Ten Mile and Prickly Pear Creeks. The Upper Ten Mile Watershed group discusses water and/or water quality-related issues for Upper Ten Mile Creek. The WQPD continues to meet with and engage these groups and other potential groups. The WQPD discusses water related issues, including stormwater, with a minimum of four community groups annually. Stormwater issues will included the ordinance, brochures, illicit discharge, habit changes, etc. Target audiences for each BMP under this MCM are identified in the Compliance Documentation.
Public Involvement/ Participation	Part II.B.2.b.iv	Identify public involvement activities	Identify the types of public involvement activities included in this program. Where appropriate, consider the following types of public involvement activities: (a) Citizen representatives on a stormwater management panel; (b) Public hearings; (c) Working with citizen volunteers willing to educate others about the program; and (d) Volunteer monitoring or stream/beach clean-up activities.	WQPD/City	Yes, public involvement opportunities were identified in the 2004 Stormwater Master Plan. These events were reevaluated in 2010 and changes are suggested.	Public organizations currently assist the City with the storm drain stenciling program. This effort and activity will continue. The City will develop the new transfer station interpretive sign with the assistance of the public.
Public Involvement/ Participation	Part II.B.2.b.v	Identify responsible agency	Identify who is responsible for the overall management and implementation of the stormwater public involvement/ participation program and, if different, who is responsible for each of the BMPs identified for this program.	City/WQPD	Yes, this MCM is headed by the WQPD. The City works to provide information and support for the WQPD.	The BMPs provided in the Compliance Documentation outline the agency responsible for the BMPs identified.

Annual Report Section N - MCM 2

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Public Involvement/ Participation	Part II.B.2.b.vi	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measurable goals for each of the BMPs were selected.	City/WQPD	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	MCM 2 items have distinct measurement criteria, allowing for completeness evaluation. Outreach to the regulators will be evaluated by meeting minutes from the regulatory meetings. Regulators response to the presenters/subject material should be documented in the minutes (i.e. additional information required, passed legislation, etc.). Records will be kept to determine event attendance, discussion topics, and perceived effectiveness; the event records will be used to evaluate public involvement. Effectiveness of this MCM will be evaluated biannually by the City of Helena and the WQPD. Necessary changes will be implemented within one year following the biannual evaluation meeting, or as deemed appropriate. Measurable goals are further outlined in the Compliance Documentation.

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.2 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.2 for a summary of planned activities and changes for 2016

Annual Report Section N - MCM 3

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Illicit Discharge Detection and Elimination	Part II.B.3.a.i	Program development	Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in ARM 17.30.1102(7)) into the permitted MS4.	City	Yes. Program was established during completion of the Stormwater Master Plan in 2004.	Program has been formalized since 2004. An ordinance addressing IDDE became effective January 21, 2010.
Illicit Discharge Detection and Elimination	Part II.B.3.a.ii	System Map	Develop, and keep updated, a storm sewer system map, showing the location and number of all outfalls (as defined in ARM 17.30.1102(14) and Part VI of this General Permit), and the names and location of all surface waters that receive discharges from those outfalls.	City	Yes, system was mapped in conjunction with the 2004 Stormwater Master Plan. Map is updated as needed.	Updated/current conditions map is presented as an attachment to this Annual Report.
Illicit Discharge Detection and Elimination	Part II.B.3.a.iii	Ordinance	Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the permitted storm sewer system and implement appropriate enforcement procedures and actions.	City	Yes, Ordinance 3120 was adopted by the City Commission on December 21, 2009.	The City will continue to enforce the ordinance as it regards to illicit discharge.
Illicit Discharge Detection and Elimination	Part II.B.3.a.iv	Detection Plan	Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the permitted system.	City	Yes, a detection plan is in place.	See Part II.B.3.b.iv below.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Illicit Discharge Detection and Elimination	Part II.B.3.a.v	Public information plan	Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste	City/WQPD	Yes, BMPs were identified for inclusion under MCM 1	BMPs identified under MCM 1 detail how businesses and the general public will be informed about the hazards of illegal discharges and improper disposal of waste.
Illicit Discharge Detection and Elimination	Part II.B.3.a.vi	Address non-stormwater discharge categories	Address the categories of non-storm water discharges or flows (i.e., illicit discharges) only if the MS4 identifies them as significant contributors of pollutants to the Small MS4.	City	Yes, the City developed a policy for these categories in 2010. This policy is present in the Compliance Documentation package.	Residential and uncontaminated discharges are regulated per Ordinance 3120. Currently unregulated discharges may become regulated in the future if a particular site or general discharge category is deemed detrimental to the receiving water body by the City. Exemptions are detailed in the Compliance Documentation.
Illicit Discharge Detection and Elimination	Part II.B.3.a.vii	Address non-stormwater discharge	Develop a list of occasional incidental non-storm water discharges that will not be addressed as illicit discharges.	City	Yes, the City developed a policy for these categories in 2010. This policy is present in the Compliance Documentation package.	Allowable non-stormwater discharges are identified in the Ordinance and in the Compliance Documentation. Disinfected water discharges to the stormwater system are controlled by NPDES discharge permit.
Illicit Discharge Detection and Elimination	Part II.B.3.b	Document maintenance	Maintain documentation with respect to the development of a storm water IDDE program. This documentation must address both the overall IDDE program and the individual BMPs, measurable goals, and responsible persons/positions for this program.	City	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Illicit Discharge Detection and Elimination	Part II.B.3.b.i	Stormwater Map	Identify how a storm sewer map was developed. Describe the sources of information used for the maps, and how verifying the outfall locations and storm sewer system components with field surveys was performed. Also, describe how the map will be regularly updated.	City	Yes, system was mapped in conjunction with the 2004 Stormwater Master Plan. Map is updated as needed.	The map, along with system data (i.e. diameter, pipe type, invert elevation, etc.) is available through the City/County geographic information system (GIS). Each year, as new pipe is added to the storm drain system or the existing infrastructure is modified, the new infrastructure is surveyed, approved, and the map is revised. In addition, 20% of the existing system, open channels and pipe systems, will be investigated per year. Pipe systems will be evaluated with TV cameras for pipes 12" diameter or larger. Open channels greater than 12" top width or greater than 1 square mile drainage area will be field surveyed with GPS.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Illicit Discharge Detection and Elimination	Part II.B.3.b.ii	Ordinance	Identify the mechanism (ordinance or other regulatory mechanism) used to effectively prohibit illicit discharges into the Small MS4 and why that mechanism was chosen.	City	Yes, Ordinance 3120 was adopted by the City Commission on December 21, 2009 and became effective on January 21, 2010.	The City will continue to enforce the ordinance as it regards to illicit discharge.
Illicit Discharge Detection and Elimination	Part II.B.3.b.iii	IDDE enforcement	Identify the appropriate enforcement procedures and actions which are used to ensure the illicit discharge ordinance (or other regulatory mechanism) is implemented.	City	Yes, Illicit discharges are reported to the City via website or public or City calls to Utilities Maintenance. The complaint is logged by Utilities Maintenance and emailed to enforcement personnel. The enforcement personnel investigate and evaluate the complaint. Once the complaint is rectified, the enforcement personnel document the issue as complete/resolved.	Once an illicit discharge or illegal dumping has been detected, the property owner will be issued a written notification. If abatement or restoration is required, the notice will set a deadline within such remediation or restoration must be completed. If work is not completed within the established deadline, the work may be completed by the City and the expense levied against the property owner. Violations may be subject to a maximum fine of five hundred dollars and/or up to thirty (30) days imprisonment in the county jail. The City may recover all fees, costs, and expenses associated with enforcement, including sampling and monitoring expenses. In extremely severe conditions, the City may clean or pay to have an illicit source terminated and cleaned. Under these circumstances, the City will seek reimbursement of the cleanup costs from the source/owner.
Illicit Discharge Detection and Elimination	Part II.B.3.b.iv	Detect and address illicit discharges	Identify the plan to detect and address illicit discharges to the system, including discharges from illegal dumping and spills.	City	Yes, the City developed a detection procedure for both screening and complaints. The procedure was developed in 2010 in conjunction with the Compliance Documentation.	Routine screening will occur once per 5 years, with a goal of 20% of the system screened annually. Procedures are further outlined in the Compliance Documentation. Procedures for complaints are outlined in the Compliance Documentation.
Illicit Discharge Detection and Elimination	Part II.B.3.b.iv.(a)	Detect and address illicit discharges	Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines, for example) and/or ambient sampling to locate impacted reaches.	City	Yes, the City developed a prioritization plan for screening in 2010.	Prioritization was completed according to the Center for Watershed Protection's "Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments". The subbasins are as follows: Last Chance Gulch, Davis Gulch, Bull Run, West Side, East Side and Airport. These basins are evaluated annually to determine what data is necessary to fulfill other MCM objectives such as mapping
Illicit Discharge Detection and Elimination	Part II.B.3.b.iv.(b)	Detect and address illicit discharges	Procedures for tracing the source of an illicit discharge, including the specific techniques the MS4 will use to detect the location of the source.	City	Yes, the City developed a procedure for tracing an illicit discharge in 2010.	The procedure is outlined in the Compliance Documentation.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Illicit Discharge Detection and Elimination	Part II.B.3.b.iv.(c)	Detect and address illicit discharges	Procedures for removing the source of the illicit discharge.	City	Yes, the City developed a procedure for removing an illicit discharge in 2010.	The procedure is outlined in the Compliance Documentation. Once the illicit discharge location has been identified, the source will need to be terminated. Illicit connections are subject to regulations outlined in the City Ordinance.
Illicit Discharge Detection and Elimination	Part II.B.3.b.iv.(d)	Detect and address illicit discharges	Procedures for program evaluation and assessment.	City	Yes, the City developed a procedure for removing an illicit discharge in 2010.	Illicit discharge evaluation will primarily be through the number of located and terminated illicit connections. In addition, outfall samples will allow for evaluation upon future follow-up field surveys/inspections. A lack of located illicit connections can be due to no connections or lack of effort; therefore, the City will also track the number of hours or length of system surveyed annually. An increase of pollutants in subsequent samples will require reevaluation of the programs effectiveness and potential redevelopment.
Illicit Discharge Detection and Elimination	Part II.B.3.b.v	Inform public and municipal employees on IDDE	Identify the plan to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.	WQPD/City	Yes, informing the required demographics are outlined in MCMs 1, 2, and 6.	Commercial and industrial businesses, regulators, construction contractors, and the general public will be informed of illicit discharges/illegal dumping through public outreach and public involvement methods outlined in MCMs 1 and 2 (Part II.B.1 above). Public employees will be educated through methods outlined in MCM 6 (Part II.B.6 below and Table 6 attached). Additional information is also presented in the Compliance Documentation.
Illicit Discharge Detection and Elimination	Part II.B.3.b.vi	Identify responsible agency	Identify who is responsible for overall management and implementation of the storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.	City/WQPD	Yes, The Utilities Maintenance Superintendent will continue to be the primary contact for activities in this minimum control measure.	The Utilities Maintenance Superintendent will coordinate with the City Engineer, Public Works Director, and the Plumbing Inspector to ensure that all proposed activities are implemented and documented for annual permit reporting. BMPs associated with this MCM and the responsible agency are identified in the Compliance Documentation.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Illicit Discharge Detection and Elimination	Part II.B.3.b.vii	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measurable goals for each of the BMPs were selected.	City	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	MCM 3 items have distinct measurement criteria, allowing for completeness evaluation. Measurable goals are further outlined in the Compliance Documentation.

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.3 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.3 for a summary of planned activities and changes for 2016

Annual Report Section N - MCM 4

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Construction Site Stormwater Runoff Control	Part II.B.4.a	Program development	Develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the permitted Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre.	City	Yes. Program was established during completion of the Stormwater Master Plan in 2004.	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Construction Site Stormwater Runoff Control	Part II.B.4.a.i	Ordinance	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, Tribal, or local law;	City	Yes. Ordinance 3120 was adopted by the City Commission on December 21, 2009.	The City will continue to enforce the ordinance as it regards construction stormwater runoff controls.
Construction Site Stormwater Runoff Control	Part II.B.4.a.ii	Erosion and sediment BMPs	Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;	City	Yes, permits are required, depending on the size of the construction site. Problems may also be addressed under the illicit discharge portion of the ordinance if necessary.	**Small Sites (less than 1 acre disturbed)** – The City prefers that all stormwater is kept on site during construction, if practical. The City may issue citations under illicit discharge elimination requirements as construction sites under 1 acre are not required to obtain a permit. **Phased Development and Development Greater than 1 Acre** – The City prefers that all stormwater is kept on site during construction, if practical. The City of Helena Engineering Standards detail the appropriate construction BMPs by referring to the Field Manual on Sediment and Erosion Control Best Management Practices for Contractors and Inspectors (SEC Field Manual).
Construction Site Stormwater Runoff Control	Part II.B.4.a.iii	Construction site waste control	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;	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	Proper construction site waste disposal is detailed in the Compliance Documentation. A brochure/handout was developed in 2014 specific to this control measure detailing permit requirements, the ordinance, sediment and erosion control requirements, stormwater BMPs, etc. The brochure will continue to be supplied to contractors, builders, and homeowners.
Construction Site Stormwater Runoff Control	Part II.B.4.a.iv	Construction site plan review	Procedures for the MS4 to perform site plan review (i.e. the Storm Water Pollution Prevention Plan (SWPPP)) for consistency with state and local requirements, and which incorporates consideration of potential water quality impacts including storm water pollution prevention through appropriate erosion, sediment and waste control BMPs;	City	Yes, the City developed a plan review procedure in 2004. Improvements were evaluated and implemented in 2010.	Two sets of methods were developed, one for sites less than 1 acre and one for sites larger than 1 acre. These methods are included in the Compliance Documentation. Sites disturbing less than one acre will not be reviewed as a permit will not be required; however, these sites are still subject to illicit discharge requirements. A Stormwater Construction Inspection Report form is also included in the Compliance Documentation package.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Construction Site Stormwater Runoff Control	Part II.B.4.a.v	Public information plan	Procedures for receipt and consideration of information submitted by the public;	City/WQPD	Yes, Construction BMP complaints are handled similarly to illicit discharge complaints.	Complaints are reported to the City via website or public or City calls to Utilities Maintenance. The complaint is logged by Utilities Maintenance and emailed to enforcement personnel. The enforcement personnel investigate and evaluate the complaint. Once the complaint is rectified, the enforcement personnel document the issue as complete/resolved.
Construction Site Stormwater Runoff Control	Part II.B.4.a.vi	Construction site inspections and enforcement	Procedures for the MS4 to perform site inspection and enforcement, in part based upon the site plan in Part II.B.4.a.iv., of erosion, sediment, and waste control BMPs.	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	A Stormwater Construction Inspection Report form is included in the Compliance Documentation. Enforcement will be per the ordinance, with additional procedures presented in Part II.B.4.b.ii below.
Construction Site Stormwater Runoff Control	Part II.B.4.b	Document maintenance	Maintain documentation with respect to the development of a construction site storm water control program. This documentation must address both the overall construction site storm water control program, and the individual BMPs, measurable goals, and responsible persons/positions for the program.	City	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Construction Site Stormwater Runoff Control	Part II.B.4.b.i	Ordinance	Identify the mechanism (ordinance or other regulatory mechanism) which will be used to require erosion and sediment controls at construction sites and why this mechanism was chosen.	City	Yes, Ordinance 3120 was adopted by the City Commission on December 21, 2009 and became effective on January 21, 2010.	The City will continue to enforce the ordinance as it regards to illicit discharge.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Construction Site Stormwater Runoff Control	Part II.B.4.b.ii	Construction BMP enforcement	Identify the plan to ensure compliance with the erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms to be used to ensure compliance. Describe the procedures for when certain sanctions will be used.	City	Yes, enforcement procedures are outlined in Ordinance 3120. Additional details are located in the Compliance Documentation.	Upon issuance of a construction BMP violation, enforcement personnel will issue a written warning stating that a violation is occurring and require the offender to rectify the violation. The enforcement officer will return to the site within one week to verify if the violation was rectified. If the violation persists upon the return visit, the contractor will be issued a citation. Citations and enforcement actions may vary depending on the severity of the violation or discharge, as determined by enforcement personnel. Additional citations may be issued for similar violations during any return site inspection without a written warning. If a blatant or severe violation is discovered, enforcement personnel may require the contractor to stop work until the violation is rectified. Multiple severe or blatant violations by a single contractor may result in decertification and the in ability to operate within the City limit boundary.
Construction Site Stormwater Runoff Control	Part II.B.4.b.iii	Construction BMPs	Identify the requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality.	City	Yes, the requirement for BMPs are outlined in Ordinance 3120. Additional details are located in the Compliance Documentation.	Proper construction site waste disposal is detailed in the Compliance Documentation. The erosion and sediment control BMPs were adopted from the EPAs BMPs for construction sites: http://water.epa.gov/polwaste/npdes/swbmp/Construction-Site-Stormwater-Run-Off-Control.cfm
Construction Site Stormwater Runoff Control	Part II.B.4.b.iv	Construction plan review	Identify the procedures for site plan review, including the review of pre-construction site plans, which incorporate considerations of potential water quality impacts and appropriate storm water pollution prevention BMPs. Describe procedures and the rationale for how certain sites for site plan review will be determined, if not all plans are to be reviewed. Describe the estimated number and percentage of sites which will have pre-construction site plans reviewed.	City	Yes, the City outlined their site tracking and plan review procedures in their Compliance Documentation.	A construction project tracking table and plan review procedures are presented in the Compliance Documentation. The plan review procedures discuss rationale for determining which sites will be reviewed in the event that not all sites are reviewed.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Construction Site Stormwater Runoff Control	Part II.B.4.b.v	Public information plan	Identify the procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with the public education program.	City	Yes, Construction BMP complaints are handled similarly to illicit discharge complaints.	A brochure/handout was developed in 2014 specific to this control measure detailing permit requirements, the ordinance, sediment and erosion control requirements, stormwater BMPs, etc. The brochure will be supplied to contractors, builders, and homeowners.
Construction Site Stormwater Runoff Control	Part II.B.4.b.vi	Construction site inspections	Identify procedures for site inspection and enforcement of control measures, including how sites for inspection will be selected and prioritized.	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	A Stormwater Construction Inspection Report form is included in the Compliance Documentation package. Enforcement will be per the ordinance, with additional procedures presented in Part II.B.4.b.ii above.
Construction Site Stormwater Runoff Control	Part II.B.4.b.vii	Identify responsible agency	Identify who is responsible for overall management and implementation of the construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program.	City/WQPD	Yes, The Utilities Maintenance Superintendent will continue to be the primary contact for activities in this minimum control measure.	The Utilities Maintenance Superintendent will coordinate with the City Engineer, Public Works Director, and the Plumbing Inspector to ensure that all proposed activities are implemented and documented for annual permit reporting. BMPs associated with this MCM and the responsible agency are identified in the Compliance Documentation.
Construction Site Stormwater Runoff Control	Part II.B.4.b.viii	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measurable goals for each of the BMPs were selected.	City	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	MCM 4 items have distinct measurement criteria, allowing for completeness evaluation. Measurable goals are further outlined in the Compliance Documentation.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Construction Site Stormwater Runoff Control	Part II.B.4.b.ix	Employee training	Identify measures to train pertinent municipal employees on the construction program.	City	Yes, the City trains personnel for inspection and enforcement when new employees or new procedures warrant additional training	City inspection and enforcement personnel are trained annually for site inspection and enforcement. A training sign in form is included in the Compliance Documentation. The form will be utilized to document when the training was conducted and who was present.

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.4 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.4 for a summary of planned activities and changes for 2016

Annual Report Section N - MCM 5

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.a.i	Program development	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.	City	Yes. The program was established during the completion of the Stormwater Master Plan in 2004. The program was enhanced in 2006 with the adoption of the Engineering Standards.	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Post-Construction Management	Part II.B.5.a.ii	Post-construction BMP strategies	Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community.	City	Yes. The City completed the Storm Water Management Plan in 2004 to address some of these issues. In addition, the City completed and adopted Engineering Standards in 2006.	The Stormwater Management Plan and the Engineering Standards document the strategies for structural and non-structural BMPs within the City. The City targets to implement master plan amendments every 5 years and complete revisions every 10 years. The City incorporated LID techniques into the Engineering Standards in 2013.
Post-Construction Management	Part II.B.5.a.iii	Ordinance	Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects	City	Yes, Ordinance 3120 was adopted by the City Commission on December 21, 2009 and became effective on January 21, 2010.	The City will continue to enforce the ordinance as it regards construction stormwater runoff controls.
Post-Construction Management	Part II.B.5.a.iv	Post-construction BMP O&M	Ensure adequate long-term operation and maintenance of BMPs.	City	Yes, City owned BMPs are maintained by the City Utilities Maintenance staff. Non City-owned BMPs are required to be properly maintained by the property owner per Ordinance 3120. Inspections of private facilities allow the City to ensure that these facilities are properly maintained.	The City cleans catch basins and stormwater facilities annually, in the spring before runoff occurs. Additional cleaning is performed when sediment, trash, or other pollutant accumulation is observed. The City currently employs a GIS-centric asset management software (InfoSWMM). Non City-owned BMPs are required to be properly maintained by the property owner. Inspections of such facilities will allow the City to ensure that these facilities are properly maintained.
Post-Construction Management	Part II.B.5.a.v	Post-construction site plan review	Develop and implement procedures for the Small MS4 permittee to perform site plan review which incorporates consideration of potential water quality impacts including appropriate post-construction BMPs	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	Post-construction BMP plan review procedures are presented in the Compliance Documentation. A Stormwater Post-Construction BMP Plan Review checklist is also presented in the Compliance Documentation.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.a.vi	Post-construction BMP inspections and enforcement	Develop and implement procedures for the Small MS4 permittee to perform site inspections and enforcement of post-construction BMPs.	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	Post-construction BMP inspection procedures are presented in the Compliance Documentation. A Stormwater Post-Construction BMP Inspection Report is also presented in the Compliance Documentation.
Post-Construction Management	Part II.B.5.a.vii	LID requirements	For new developments or redevelopment projects greater than 1 acre, the program shall include a process, where such practices are practicable, to require the implementation of low impact development practices This process must be in place by January 1, 2012.	City	This activity has been completed and was adopted in 2013 within the Engineering Standards update.	The City reviewed and approved 114 plans in 2015, including developments and projects with less than 5000 square feet of impervious. Review for LID requirements was conducted where applicable.
Post-Construction Management	Part II.B.5.b	Document maintenance	Maintain documentation with respect to the decision process used for the development of a post-construction storm water program. This documentation must address both the overall post-construction storm water program and the individual BMPs, measureable goals, and responsible persons/positions for the program.	City	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Post-Construction Management	Part II.B.5.b.i	Post-construction Program Development	Identify how the program to address storm water runoff from new development and redevelopment projects was developed. Include in this description any specific priority areas for this program.	City	Yes, The program was developed by the City through the completion of a Stormwater Master Plan as well as City Engineering Standards.	The Master Plan was completed with the assistance of HDR Engineering, Inc. in 2004. The Engineering Standards were completed with the assistance of HDR Engineering, Inc. and Morrison-Maierle, Inc. and was adopted by the City Commission in June 2006. Amendments are scheduled to be made to the master plan every 5 years with master plan revisions every 10 years. An update to the City's Engineering Standards was adopted in 2013.

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MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.b.ii	LID Implementation	Identify how the program will be specifically tailored to the local community, to minimize water quality impacts, and to attempt to maintain pre-development runoff conditions and hydrology. This includes the process, where such practices are practicable, to implement low impact development practices.	City	This activity has been completed and was adopted in 2013 within the Engineering Standards update.	Hydrology design standards were developed using rainfall data specific to Helena. The Engineering Standards reference or modify federal guidelines such as HEC-22, other state and municipal storm manuals such as the City of Boise, Eastern Washington, and King County, and state guidelines such as Montana Public Works Standard Specifications and the Montana Department of Transportation Model Drainage Manual to comply with federal and state guidelines while tailoring to the needs and situations specific to the City of Helena.
Post-Construction Management	Part II.B.5.b.iii	Post-construction BMPs	Identify any non-structural BMPs in the program, including as appropriate:	City	Yes, Policies for zoning and development are found in Helena City Code – Title 11.	The City will consider additions to this policy to address stormwater measures as they are revised in the future.
Post-Construction Management	Part II.B.5.b.iii.(a)	Post-construction BMPs	Policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space, provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation.	City	Yes, The Engineering Standards address buffers, impervious area, and soil disturbance. The Community Planning Department administers the appropriate City ordinances to preserve neighborhood character and enhance the City's quality of life within the context of the Helena Growth Policy and serves as a professional planning and development resource.	The Planning Department will continue to direct growth per the Helena Growth Policy.
Post-Construction Management	Part II.B.5.b.iii.(b)	Post-construction BMPs	Policies or ordinances that encourage infill development in higher density urban areas and areas with existing storm sewer infrastructure.	City	Yes, Infill development is directed by the Community Planning Department	The Planning Department will continue to direct infill per the Helena Growth Policy. Development and redevelopment projects involving 5,000 square feet or more impervious area will require stormwater drainage plan and infrastructure review.

Annual Report Section N - MCM 5

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.b.iii.(c)	Post-construction BMPs	Education programs for developers and the public about project designs that minimize water quality impacts.	City/WQPD	Yes, Education programs consist of brochures and the City website.	The brochures are available from the WQPD, the City Utilities Maintenance department, and on the City stormwater website.
Post-Construction Management	Part II.B.5.b.iii.(d)	Post-construction BMPs	Other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly-connected impervious areas, and source control measures often thought of as good housekeeping, preventative maintenance, and spill prevention.	City	Yes, Development and redevelopment projects with 5,000 square feet or more impervious area require storm drainage plan and infrastructure review to minimize post-development flows to match pre-development conditions.	The building and planning departments will review development plans for development adding more than 5,000 square feet of impervious area to ensure flow condition design and BMPs are appropriate.
Post-Construction Management	Part II.B.5.b.iv	Post-construction BMPs	Identify any structural BMPs in the program, including, as appropriate:	City	Storage, filtration, infiltration practices are addressed in the Engineering Standards.	Plan review will ensure adequate BMPs are in place.
Post-Construction Management	Part II.B.5.b.iv.(a)	Post-construction BMPs	Storage practices such as wet ponds and extended-detention outlet structures.	City	Yes, storage practices are addressed in the Engineering Standards.	Plan review will ensure adequate BMPs are in place.

Annual Report Section N - MCM 5

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.b.iv.(b)	Post-construction BMPs	Filtration practices such as grassed swales, bioretention cells, sand filters and filter strips.	City	Yes, filtration practices are addressed in the Engineering Standards	Filtration practices are addressed in the Engineering Standards adopted in June 2013. The City may further evaluate filtration practices prior to the next upgrade to the Engineering Standards.
Post-Construction Management	Part II.B.5.b.iv.(c)	Post-construction BMPs	Infiltration practices such as infiltration basins and infiltration trenches.	City	Yes, infiltration practices are addressed in the Engineering Standards.	Plan review will ensure adequate BMPs are in place.
Post-Construction Management	Part II.B.5.b.v	Ordinance	Identify the mechanisms which will be used to address post-construction runoff from new developments and redevelopments and why that mechanism was chosen.	City	Yes, Ordinance 3120 was adopted by the City Commission on December 21, 2009 and became effective on January 21, 2010.	The City will continue to enforce the ordinance as it regards to illicit discharge.
Post-Construction Management	Part II.B.5.b.vi	Post-construction BMP O&M	Identify how the long-term operation and maintenance (O&M) of the selected BMPs will be ensured. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between the MS4 and another party such as the post-development landowners or regional authorities.	City	Yes, these requirements are covered under Ordinance 3120 with additional documentation provided in the Compliance Documentation.	City owned and operated catch basins and stormwater facilities are monitored annually and cleaned as required. The City maintains a GIS-centric software to track maintenance activities. Under authority of the new ordinance, O&M of non-City owned BMPs will be regulated. The minimum O&M requirements are presented in the Compliance Documentation.
Post-Construction Management	Part II.B.5.b.vii	Identify responsible agency	Identify who is responsible for the overall management and implementation of the post-construction storm water program and, if different, who is responsible for each of the BMPs identified for this program.	City/WQPD	Yes, The Utilities Maintenance Superintendent will continue to be the primary contact for activities in this minimum control measure.	The Utilities Maintenance division will continue to manage and implement the post-construction stormwater program.

Annual Report Section N - MCM 5

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Post-Construction Management	Part II.B.5.b.viii	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measurable goals for each of the BMPs were selected.	City	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	MCM 5 items have distinct measurement criteria, allowing for completeness evaluation. Measurable goals are further outlined in the Compliance Documentation.
Post-Construction Management	Part II.B.5.b.ix	Post-construction BMP site plan review	Identify the procedures for site plan review of post-construction storm water management BMPs which incorporate considerations of potential water quality impacts. Describe procedures and the rationale for how certain sites for site plan review will be determined, if not all plans are to be reviewed. Describe the estimated number and percentage of site plan reviews to be performed.	City	Yes, the City evaluated the plan review in 2010 and developed procedures which are included in the Compliance Documentation.	The plan review procedures, outlined in the Compliance Documentation, discuss rationale for determining which sites will be reviewed in the event that not all sites are reviewed. In addition to the City owned and operated BMPs, the City will inspect a percentage (up to 10%) of privately owned and maintained systems annually, based on available resources. Ordinance 3120 places responsibility for private BMP maintenance on the Landowner with mechanisms on the landowner with mechanisms for City intervention when necessary.
Post-Construction Management	Part II.B.5.b.x	Post-construction BMP site inspection and enforcement	Identify procedures for site inspection and enforcement of post-construction storm water management BMPs, including how sites for inspection will be selected and prioritized. Inspections must include an evaluation of whether BMPs were built properly and are being maintained properly.	City	Yes, Post-construction BMP inspection procedures are presented in the Compliance Documentation.	In addition to the inspection procedures, a post-construction BMP inspection report is also presented in the Compliance Documentation.

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.5 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.5 for a summary of planned activities and changes for 2016

Annual Report Section N - MCM 6

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Municipal Operations	Part II.B.6.a.i	Program development	Develop and implement an operation and maintenance program which includes a training component, and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations	City	Yes. The program was established during the completion of the Stormwater Master Plan in 2004.	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Municipal Operations	Part II.B.6.a.ii	Employee training	Include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, vehicle fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.	City	Yes. The training program is outlined in the Compliance Documentation.	This outline discusses who receives training and at what frequency. In addition, the location of typical training material is also presented. This material may or may not be used during all training sessions.
Municipal Operations	Part II.B.6.b	Document maintenance	Maintain documentation with respect to the decision process for the development of a pollution prevention/good housekeeping program for municipal operations. This documentation must address both the overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons/positions for the program.	City	Yes, measurable goals were reevaluated in 2010 and new BMPs were established by the City. These BMPs, along with additional supporting data were compiled into a document entitled "City of Helena MS4 Stormwater Compliance Documentation"	Implementation measures are discussed below. Revised BMPs for each MCM are identified in the Compliance Documentation paperwork.
Municipal Operations	Part II.B.6.b.i	Municipal O&M program	Identify the operation and maintenance program to prevent or reduce pollutant runoff from municipal operations. The program must specifically list the municipal operations which are impacted by this operation and maintenance program. The MS4 shall also include a list of facilities or activities (excluding construction) which are owned or operated by the MS4 that are subject to the Department's other MPDES storm water discharge permits, and which discharge into the permitted Small MS4.	City	Yes, a broad-based operations and maintenance plan is included in the Compliance Documentation. The City will continue to work to develop O&M plans for each individual location.	A broad-based operations and maintenance plan is included in the Compliance Documentation to address municipal operations. The City plans to develop an O&M plan for one individual location/operation each year throughout this permit cycle. The City has no other MPDES storm water discharge permits located within the MS4.

Annual Report Section N - MCM 6

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Municipal Operations	Part II.B.6.b.ii	Municipal employee training program	Identify the municipal government employee training program, including frequency, which will be used to prevent and reduce storm water pollution from activities such as park and open space maintenance, vehicle fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.	City	Yes, a training program is outlined in the Compliance Documentation.	The training program is outlined in the Compliance Documentation.
Municipal Operations	Part II.B.6.b.iii	Municipal program development	The program description must specifically address the following areas:	City	Yes, the program is outlined in the Compliance Documentation.	Implementation measures are discussed below.
Municipal Operations	Part II.B.6.b.iii.(a)	Municipal maintenance	Maintenance activities, maintenance schedules, and long-term inspection procedures (including frequency) for controls to reduce floatables and other pollutants to the permitted Small MS4.	City	Yes, maintenance schedules and activities are detailed in the Utilities Maintenance O&M schedule.	Inspection procedures and street sweeping requirements are detailed in the Compliance Documentation.
Municipal Operations	Part II.B.6.b.iii.(b)	Municipal maintenance	Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste handling and disposal areas, vehicle fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, and snow disposal areas operated by the MS4.	City	Yes, Controls are discussed in the Compliance Documentation.	Controls are discussed in the Compliance Documentation.

Annual Report Section N - MCM 6

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)
Municipal Operations	Part II.B.6.b.iii.(c)	Municipal maintenance	Procedures for the proper disposal of waste removed from the permitted Small MS4 through the MS4's municipal operations, including dredge spoil, accumulated sediments, floatables, catch basin cleaning, and other debris.	City	Yes, Proper disposal procedures are presented in the Compliance Documentation.	In summary, suspected materials should be tested to determine disposal method. Clean material may be disposed of at the landfill or fill area, while contaminated material must be disposed of according to proper regulations. Stockpile areas should be covered to prevent erosion and runoff. Silt fence or other appropriate BMPs should be installed around stockpiles or exposed surfaces to reduce erosion and runoff. Material should be disposed of in a manner that will not negatively affect the storm drain system in the future.
Municipal Operations	Part II.B.6.b.iii.(d)	Municipal maintenance	Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.	City	Yes, Flood management procedures are in place.	Floodplain planning is permitted at the County level. The City will work with the County Floodplain Coordinator to address water quality affects during such projects. The City Public Works department occasionally undertakes projects to reduce flooding of city streets and other problem areas. These projects often require installation or expansion of existing detention basins. These basins generally allow sediment to settle and reduce further transport downstream. Other City flooding mitigation projects may involve increasing pipe or ditch size which reduce flow velocities and decrease erosion. The City also conducts flood management projects following city annexations or when reviewing existing facilities for regulatory compliance. The City will review the illicit discharge, construction BMP, and post-construction BMP methods outlined in the appendices when evaluating potential future flood management projects.
Municipal Operations	Part II.B.6.b.iv	Identify responsible agency	Identify who is responsible for overall management and implementation of the pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.	City	Yes, The Helena Public Works Department is responsible for the management and implementation of the post-construction storm water program.	Public Works will continue to manage and implement the program.
Municipal Operations	Part II.B.6.b.v	Identify successful implementation	Identify how the success of this minimum control measure will be evaluated, including how the measurable goals for each of the BMPs were selected.	City	Yes, the City and WQPD evaluated the program in 2010 and prepared additional BMPs for the SWMP.	MCM 6 items have distinct measurement criteria, allowing for completeness evaluation. Measurable goals are further outlined in the Compliance Documentation.

Annual Report Section N - MCM 6

MCM Name	General Permit Condition Item	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency[1]	Development of SWMP Item Completed and/or in Effect	Measurable Goal or Performance Standard Utilized (General Planning)

1 - WQPD refers to the Lewis and Clark County Water Quality Protection District staff. These tasks will be conducted under the direction of Jim Wilbur, Coordinator. City refers to the City of Helena Utility Maintenance and Engineering staff. These tasks will be conducted under the direction of Kevin Hart, Utilities Maintenance Superintendent.

NOTES: See Table O.6 for a summary of activities and description of SWMP effectiveness during 2015 and Table P.6 for a summary of planned activities and changes for 2016

2015 MS4 Annual Report – Section O

Minimum Control Measure BMPs (2015-2016 permit cycle)

Table O.1 - Requirement #1: Public Education & Outreach

BMP #	SWMP Element Description (II.B.1.b. v)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.1.b. vii)	Responsible Party (II.B.1.b. vi)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
1.1	Educational Brochure	Raise public awareness about storm water.	Revise current brochure and begin distributing in 2010.	WQPD	Brochure distribution.	The stormwater brochure revisions were finalized in 2014. The brochure is posted on the City's stormwater website and was distributed by the WQPD at the Watershed Festival in 2015. They are also available in the City/County building for pick up.	Raises public awareness. Actual impact unknown although it likely helps to limit pollutants in stormwater runoff.
1.2	Classroom Education	Raise awareness in children.	Present to 20 classrooms per year to discuss water quality and storm water.	WQPD	Number of classrooms visited.	The Water Watchers Program presented information in 64 4th and 5th grade classes in 2015. The WQPD presented to 10 students through Access to Success (high school) and 15 students through Exploration Works (middle school).	Approximately 1,570 students attended the in-school visits.
1.3	Storm drain Stenciling	Raise awareness in general public and in children.	Conduct a storm drain stenciling program each year with an area community group.	WQPD	Number of storm drain stenciling sessions.	Home-schooled students volunteered to stencil 19 manholes and 13 inlets.	Raises public awareness. Actual impact unknown.
1.4	Wetland Signage	Raise awareness	The City added two signs at area wetlands that handle storm water prior to 2007 (Kmart ponds and Henderson ponds). City will continue to maintain signs and WQPD will continue discussing during public tours.	City/WQPD	Sign condition and number of public discussions per year.	Existing signs were maintained in 2015.	Raises public awareness. Actual impact unknown.
1.5	Construction Brochure	Raise construction awareness about storm water	Develop construction brochure in 2010 to describe the ordinance, plan review and inspections, certification, etc. Distribute throughout permit cycle.	WQPD/City	Development of Brochure Number of brochures distributed.	Construction brochure development was completed in 2014. Several brochures were distributed by the WQPD in 2015. Additional copies are available at various locations throughout the City/County building.	No public complaints or significant violations (with regard to stormwater) were issued at construction sites in 2015. This could be attributed in part to the success of the construction brochure.

Table O.1 - Requirement #1: Public Education & Outreach

BMP #	SWMP Element Description (II.B.1.b. v)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.1.b. vii)	Responsible Party (II.B.1.b. vi)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
1.6	Raise Contractor Awareness	Raise construction awareness about storm water	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Number of meeting occurrences.	The requirements in the Ordinance are part of the Engineering standards. Four sites of greater than or equal to one acre land disturbance were reviewed, two of which were permitted in 2015. The Engineering Standards related to the Ordinance were incorporated into the plans and relayed to the contractors.	Raises awareness of storm water regulations and requirements among contractors.
1.7	Raise contractor awareness	Raise construction awareness about storm water	Begin informing developers, engineers, architects, contractors, etc. of upcoming rule regarding LID techniques required for all new and redevelopment beginning in 2012.	WQPD/City	Number of developers, engineers, architects, contractors etc. informed.	Stormwater requirements were discussed throughout the year on several occasions through the development review and plan approval processes adopted by the City of Helena	Raises awareness of LID requirements and techniques among contractors.
1.8	Revise storm water website	Raise awareness	Revise existing website in 2010. Include location for complaints.	City	Location for complaints on website.	Minor changes were made to the website in 2015, including adding a reference bar for links on the left hand side of the page and adding in the 2014 Annual Report.	Impact not known because the City's server does not allow for a "hit" counter on the website.
1.9	Utility bill inserts	Raise awareness in general public	Develop insert and include in utility bills annually.	City	Presence of insert in utility bills.	No storm water brochures were included in utility bills in 2015. A short stuffer regarding waste water practices was included in approximately 11,200 water bills as an insert (this insert is attached).	Raises public awareness. Actual impact unknown although it likely helps to limit pollutants in stormwater runoff.
1.10	Regulator Outreach	Inform regulators of SW issues	Meet with City Commission annually.	City	Number of meeting occurrences.	Capital improvement plan and budget meetings were held in 2015. These meetings included discussions on stormwater management.	Regulators can make informed decisions regarding legislation that will affect storm water issues.
1.11	Regulator Outreach	Inform regulators of SW issues	Meet with County Commission, City/County Planning Board, and Helena Area Citizens Council when program opportunities require regarding storm water information dissemination of the storm water ordinance, best management practices, and other storm water related information.	WQPD/City	Number of meetings held.	Several meetings with the WQPD were held to discuss the Lake Helena Watershed Restoration Plan, Prickly Pear Creek restoration, water quality monitoring, and public outreach.	Meeting with appropriate groups raises awareness and helps to gather opinions so that informed decisions can be made by the WQPD/City and the groups and unite their efforts to protect water quality.
1.12	Public Group Outreach	Meet with local watershed groups	Continual membership role in the Lake Helena Watershed Planning Group.	WQPD/City	Number of attendees at group meetings.	There were 3 Lake Helena Watershed Group meetings in 2015.	Approximately 30 people attended the watershed meetings. Raising public awareness can help to change behaviors and lead to a reduction in pollution.

Table O.1 - Requirement #1: Public Education & Outreach

BMP #	SWMP Element Description (II.B.1.b. v)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.1.b. vii)	Responsible Party (II.B.1.b. vi)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
1.13	Interpretive Sign	Install interpretive signs at potential following sites: transfer station, airport pond, DNRC pond, nature park, recycling facility	Develop and install 2 signs prior to 2015.	WQPD/City	Development and installation of signs.	Two signs have been installed and are being maintained. The proposed sign at Sanders Street pond was not able to be completed in conjunction with DEQ's non-point source program. This remains a possible location for future efforts.	The signs will raise public awareness and educate the public on water quality concerns. Actual impact unknown.
1.14	Press Releases/Paid Advertisements	Raise public awareness about storm water.	Publish up to two press releases or advertisements annually.	City/WQPD	Number of press releases and/or advertisements per year.	An official press release was not published in 2015; however, the WQPD routinely posted educational information and event notifications on its Facebook page.	Raise public awareness and educate the public about storm water and the effects of pollution.

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table O.2 - Requirement # 2: Public Participation and Involvement

BMP #	SWMP Element Description (II.B.2.b. i)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.2.b. vi)	Responsible Party (II.B.2.b.v)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
2.1	Public Meetings	Raise public awareness about storm water.	Speak to community groups 4 times per year.	WQPD	Number of meeting occurrences.	Separate events in 2015 included three Lake Helena Watershed Group meetings, Watershed Wednesday at the Capitol, and the Lake Helena Watershed Festival.	Many adults and students were educated through public events in 2015. Watershed Wednesday educated legislators which can help shape public policy.
2.2	Regulator Meetings	Raise storm water awareness among regulators and interested public.	Meet with City Commission annually.	WQPD/City	Number of meeting occurrences.	Capital improvement plan and budget meetings were held in 2015. These meetings included discussions on stormwater management and LID projects.	Regulators can make informed decisions regarding legislation that will affect storm water issues.
2.3	Regulator Meetings	Raise storm water awareness among regulators and interested public.	Meet with County Commission and Helena Area Citizens Council when program opportunities require regarding storm water information dissemination of the storm water ordinance, best management practices, and other storm water related information	WQPD/City	Number of meetings held.	Several meetings with the WQPD were held to discuss the Lake Helena Watershed Restoration Plan, Prickly Pear Creek restoration, water quality monitoring, and public outreach.	Meeting with appropriate groups raises awareness and helps to gather opinions so that informed decisions can be made by the WQPD/City.
2.4	Public Meetings	Promote a sense of ownership in water resources.	Facilitate 3 to 4 Lake Helena Watershed Group Meetings annually. City to participate in watershed group including periodic meetings dedicated to storm water.	WQPD/City	Number of meetings facilitated.	There were 3 Lake Helena Watershed Group meetings in 2015.	Approximately 30 people attended the watershed meetings. Raising public awareness can help to change behaviors and lead to a reduction in pollution.
2.5	Storm drain Stenciling	Raise awareness in general public and in children.	Conduct a storm drain stenciling program each year with an area community group.	WQPD	Number of storm drain stenciling sessions.	Home-schooled students volunteered to stencil 19 manholes and 13 inlets.	Raises public awareness. Actual impact unknown.
2.6	Public Meeting	Raise storm water awareness regarding City Ordinance	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Number of meeting occurrences.	No public meetings were held on the ordinance but several preconstruction and construction meetings were held on individual building permits and infrastructure plans where storm water requirements were discussed.	Increases contractor awareness of stormwater requirements.
2.7	Public Meeting	Inform public about storm water ordinance	Conduct one to two administrative meetings with City Commission, Helena Citizens Council, and City staff once during annual budget development and rate discussions.	WQPD/City	Number of meetings held.	Administrative meetings with the respective groups in attendance were completed for 2015. In addition, consultant meetings and multiple internal review meetings were held in furtherance of this requirement.	Meeting with appropriate groups raises awareness and helps to gather opinions so that informed decisions can be made by the WQPD/City.
2.8	Regulator Meeting	Inform public through WQPD meeting	City presents annually to the WQPD regarding City approach to storm water.	City/WQPD	Annual presentation by City.	Discussions occurred between the City and the WQPD in 2015 regarding the collaborative efforts and stormwater management issues.	Informing the public and WQPD regarding the City's approach to storm water helps to create a united effort to implement the SWMP and protect water quality.

Table O.2 - Requirement # 2: Public Participation and Involvement

BMP #	SWMP Element Description (II.B.2.b. i)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.2.b. vi)	Responsible Party (II.B.2.b.v)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
2.9	Develop Display	Raise storm water awareness among public	Develop a display in 2010 for public events such as Helena Citizens Council, Lake Helena Watershed Festival, etc.	WQPD/City	Number of public events at which displays were present.	The display was not present at public events; however, the newly revised stormwater brochures were distributed by WQPD at the Watershed Festival in 2015 and design of the display began. (A draft of the display is attached).	The brochure is intended to increase awareness of the requirements among the public and the regulated communities. It is viewed as an important step in getting the public to join in the efforts to protect water quality.
2.10	Public Awareness	Raise storm water awareness among public	Participate in or sponsor one meeting annually to raise storm water quality awareness with groups such as Helena Citizens Council, Lake Helena Watershed Festival, contractors, etc. to focus on storm water quality.	WQPD/City	Participation in meeting and discussion of storm water quality.	Storm water was discussed in 3 Lake Helena Watershed Planning Group meetings, the Water Watchers Program, and at the Lake Helena Watershed Festival.	Many adults and over 1,500 students were educated through public events and in-school programs in 2015.
	~~Public Meetings~~	~~Raise awareness in general public.~~	~~Conduct one public meeting to discuss Storm water master plan by end of 2004.~~	~~City~~			
	~~Public Meetings~~	~~Promote a sense of ownership in water resources.~~	~~Facilitate Upper Tenmile Watershed Group Meetings, 2 meetings per year.~~	~~WQPD~~			

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table O.3 - Requirement # 3: Illicit Discharge Detection and Elimination

BMP #	SWMP Element Description	Justification	Measurable Commitments & Implementation Schedule (II.B.3.b.vii)	Responsible Party (II.B.3.b.vi)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
3.1	Map	Specifically required by the rule (II.B.3.a.ii).	Update map annually with newly constructed Storm water systems.	City	Addition of newly constructed systems to Helena's Storm Basins Map.	384 feet of new storm drain were added to the system and mapped in 2015.	The Storm Basins Map is used to track maintenance and implement the planning initiatives set forth within the SWMP. A comprehensive storm drain map is also useful when conducting illicit discharge investigations.
3.2	Implement Ordinance	Specifically required by rule (II.B.3.a.iii).	Implement ordinance to prohibit non-storm water discharges as well as implement enforcement procedures beginning in 2010.	City	Implementation of ordinance and enforcement procedures.	The City continues to implement the ordinance in regards to IDDE. No evidence of illicit discharges or illicit connections was detected during dry weather screening surveys.	No illicit discharges were discovered in 2015 (aside from spills which were cleaned up). This indicates that efforts to detect and eliminate illicit discharges in previous years has had a positive impact throughout the City.
3.3	System Inspection	Meets requirement to develop a plan to detect non-storm discharges (II.B.3.a.ii).	Inspect 100% of new storm drains system before they are connected to City system each year.	City	Inspection of new storm drains.	384 feet of new storm drain were added to the system and mapped in 2015.	System inspection helps to identify and eliminate illicit discharges and other pollutants.
3.4	System Inspection	Meet requirements to develop a plan to detect non-storm water discharges (II.B.3.a.ii).	Target inspection of up to 20% of existing storm sewer pipe system each year, 12" or greater. Report outfall conditions using approved written documentation.	City	Linear feet of existing storm sewer inspected	Television inspection was conducted on approximately 5% of existing storm sewer system. Helena aims to inspect 100% of city owned storm system inlets and manholes annually.	System inspection helps to identify and eliminate illicit discharges and other pollutants.
3.5	System Inspection	Meet requirements to develop a plan to detect non-storm water discharges (II.B.3.a.ii).	Target inspection of up to 20% of existing storm sewer open ditches each year, 1 square mile or less drainage area or ditches 12" deep or greater. Inventory, record, and report unauthorized/illicit connections for follow up action.	City	Linear feet of existing open ditches inspected.	Approximately 50% of the open drainage-ways in the Bull Run basin were inspected in 2014 and the remaining 50% were inspected in 2015. Mapping was also verified during these inspections.	System inspection helps to identify and eliminate illicit discharges and other pollutants. No illicit discharges were detected during this inspection.

Table O.3 - Requirement # 3: Illicit Discharge Detection and Elimination

BMP #	SWMP Element Description	Justification	Measurable Commitments & Implementation Schedule (II.B.3.b.vii)	Responsible Party (II.B.3.b.vi)	Quantitative Indicators Used	Results	Impact on SWMP Effectiveness
3.6	System Inspection	Inspect sanitary system	Inspect 20% of sanitary sewer system annually to investigate whether sewage is impacting storm system.	City	Linear feet of existing sanitary sewer inspected.	Approximately 5% of the City's wastewater mains were inspected in 2015.	System inspection helps to identify and eliminate illicit discharges and other pollutants. No illicit discharges were detected during this inspection.
3.7	Detection Plan	Specifically required by the rule (II.B.3.a.iv).	Detection Plan shown in Phase II NPDES Program Documentation with support through ordinance. Evaluate effectiveness annually.	City	Documentation of annual effectiveness evaluation.	IDDE procedures identified in the Program Documentation were followed in 2015 and inspections. Results are discussed in sections above.	The system remains effective and no improvements are planned during this permit cycle; however, improvements will likely be developed and implemented during the next permit cycle.
3.8	Employee training	Inform public employees (II.B.3.b.v)	Provide training opportunities as warranted to ensure City inspection personnel have the tools and resources to identify illicit discharges, spills, and dumping as well as hazards, notification, and potential methods to prevent/limit spread. Additional details in MCM 6.	City	Number of employees trained annually.	The City Stormwater Engineer attended a DEQ sponsored training which addressed illicit discharges.	Training helps to provide guidance on how to efficiently identify and eliminate illicit discharges.
3.9	Enforcement Plan	Meet requirement to develop a plan to terminate illicit discharges (II.B.3.b.iii)	Enforcement Plan shown in Phase II NPDES Program Documentation with support through ordinance. Evaluate effectiveness annually.	City	System inspection and elimination of illicit discharges.	No evidence of illicit discharges or illicit connections was detected in 2015.	Enforcement actions, when needed, facilitate the elimination of illicit discharges. Enforcement actions were not needed in 2015.
3.10	Spill Response	Meets an existing City need to ensure proper response to hazardous spills.	The documentation is detailed in Appendix B. The City will continue to respond to spills according to the documented procedure.	City	Number of spills responded to.	4 incidents of spills posing a potential threat to the storm system were responded to in 2015.	The spills were cleaned up, which reduces pollutants in stormwater runoff.
	~~System Inspection (added to permit)~~	~~Meets requirement to develop a plan to detect non-storm discharges.~~	~~Bought a later launch TV camera to more completely inspect the new pipes. Cost $40,000.~~	~~City~~			
	~~System Inspection~~	~~Meets requirement to develop a plan to detect non-storm discharges.~~	~~Complete TV inspection of 100% of major storm pipes (>12") by end of 2006.~~	~~City~~			

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table O.4 - Requirement # 4: Construction Site Runoff Control							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.4.b.viii)**	**Responsible Party (II.B.4.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
4.1	Implement Ordinance	Specifically required by rule (II.B.4.a.i).	Implement local ordinance to address and enforce construction site runoff issues as well as implement enforcement procedures beginning in 2010.	City	Number of violations discovered and addressed.	No significant violations were discovered or reported in 2015.	The lack of violations discovered shows that previous education and compliance actions are having a positive impact as the City implements it SWMP.
4.2	Tracking System	Construction permit tracking	Maintain permit status monthly according to the ordinance.	City	Track number of active permits annually.	Helena relies on the ICIS database for tracking permits issued and active within the MS4 boundary. 19 such construction permits were active within the Helena MS4 during 2015, 5 of which were terminated by DEQ during the time period.	Permit tracking helps to identify and prioritize which sites for inspections. This allows for more efficient use of time as Helena implements its SWMP.
4.3	Plan Review	Specifically required by the rule. (II.B.4.b.iv)	Review construction plans for all construction projects with 1 acre or greater land disturbance or new or redevelopment projects that include greater than 5,000 square feet of impervious area. Review all construction plans for smaller projects according to the ordinance for BMP compliance.	City	Number of plans reviewed each year.	Four sites of greater than or equal to one acre land disturbance were reviewed, two of which were permitted in 2015. 110 site plans for building permits were reviewed 2015.	Review of development plans allows the City to insure that the proper BMPs are scheduled to be implemented at each site.
4.4	Site Inspection	Specifically required by the rule. (II.B.4.b.v)	Investigate all public complaints related to construction sites once ordinance has been adopted.	City	Number of sites inspected following public complaint.	No public complaints regarding stormwater at constructions sites were received in 2015.	None (for 2015)
4.5	Site Inspection	Specifically required by the rule. (II.B.4.b.vi)	Perform minimum of 1 inspection per construction site for any construction site reviewed and approved under BMP 4.3.	City	Number of inspections per permitted site.	Typically, all construction sites are inspected at various intervals which include interim acceptance and final acceptance inspections. Construction site inspections can vary by the nature of the project: for example, city sponsored construction which typically has an on-site inspector daily; while with private development inspections are more sporadic and tend to be complaint driven or combined with other visits such as new infrastructure or service connections. Drive by inspections are done during and after precipitation events.	No violations or issues that could not be remedied by informal responses occurred in 2015.

Table O.4 - Requirement # 4: Construction Site Runoff Control							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.4.b.viii)**	**Responsible Party (II.B.4.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
4.6	Revise storm water Website	Provide avenue for public comment/complaints (II.B.4.b.v)	Revise existing website in 2010. Include location for complaints. To be completed in conjunction with MCM 1.	City	Revision of website and location for complaints.	Minor changes were made to the website in 2015, including adding a reference bar for links on the left hand side of the page.	The City's server does not allow for a "hit" counter on the website or for logging of complaints. Telephone numbers and email address to report problems has been updated and clarified. City believes the goal of awareness is furthered with this effort although measures of effectiveness are difficult to assign.
4.7	Construction Guidance	Distribute message (II.B.4.b.v)	Develop brochure/handout in 2010 detailing proper construction waste disposal, the ordinance, sediment and erosion control requirements, inspections, violations, etc. Supply to contractors, builders, and homeowners beginning in 2011.	WQPD/City	Brochure development and distributions.	The construction storm water brochure is available on the City's stormwater website, was placed at various locations in the City/County building, and was distributed at events by the WQPD. The City does not have an accurate estimate of the number of brochures handed out.	Distribution of brochures provides proper guidance on storm water topics for those involved in construction practices. No known impact from new brochures at this time.
4.8	Contractor Awareness Meeting	Uniform contractor expectations	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Occurrence of meeting.	This meeting was conducted in a previous year. Stormwater and water quality was discussed at various meetings with contractors in 2015.	Raises awareness of storm water regulations and requirements among contractors.
4.9	Employee Training	Inform public employees (II.B.4.b.ix)	Provide training opportunities as warranted to ensure City inspection personnel have the tools and resources to properly inspect and enforce ordinance requirements for construction site runoff control. Additional details in MCM 6.	City	Number of employees trained annually.	The City Stormwater Engineer attended 2 DEQ sponsored BMP training classes in 2015.	Training helps to provide guidance on how to efficiently review SWPPPs, inspect sites, educate contractors, and identify violations which ultimately leads to improved water quality within stormwater discharges from construction sites.
	~~Public Comments~~	~~Specifically required by the rule.~~	~~Establish a procedure for receiving information from the public by end of 2005.~~	~~City~~			

Table O.4 - Requirement # 4: Construction Site Runoff Control							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.4.b.viii)**	**Responsible Party (II.B.4.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
	~~Construction Guidance~~	~~Document a set of standards for Storm water design of new developments to replace current informal standards.~~	~~Complete engineering standards manual to address construction and post-construction design by end of 2003. Manual will include discussion on proper waste handling.~~	~~City~~			

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be complete.

Table O.5 - Requirement # 5: Post-Construction Storm Water Management							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
5.1	Planning	Adequate funding	Target master plan amendments every 5 years and complete revisions every 10 years.	City	Date of last amendment/revision and plans for next amendment/revision.	Helena's FY 2016 budget, which became effective July 1, 2015, includes provisions to begin the process of updating its 2003 Stormwater Master Plan and revisiting its 2010 to 2014 Storm water Management Plan. The initial planning which has been conducted with reference to these updates has considered the progress and direction of the collaborative MS4 Working Group efforts.	Updates to the Stormwater Master Plan and SWMP will increase overall program effectiveness through helping to provide a better understanding of the City's existing stormwater system capabilities and to plan/prioritize future program activities.
5.2	Implement Ordinance	Specifically required by the rule (II.B.5.a.iii)	Implement local ordinance to address and enforce post-construction storm water management issues as well as implement enforcement procedures beginning in 2010.	City	Number of violations discovered and addressed.	No violations were issued for post-construction BMPs in 2015. Helena continues to inventory private storm water facilities, does informal inspections of them to assess issues, and is implementing a work order management and tracking system to be used on non-city owned assets.	The Ordinance requires sites down to 5000 square feet of imperviousness to implement on-site stormwater management BMPs which translates to improved water quality.
5.3	Long Term Monitoring	Specifically required by the rule. (II.B.5.a.iv)	Monitor and maintain City owned BMPs per maintenance schedule.	City	Status of City owned BMPs	The following list of projects was completed in 2015: The Kmart Ponds control gates were modified, a regional pond was constructed for a portion of the Legion Field area, and 1 pond was cleaned of 8 yards of accumulated sediment.	Maintenance activities and system improvements increase the systems ability to function properly and reduce pollutants within the City's stormwater.
5.4	Long Term Monitoring	Specifically required by the rule. (II.B.5.a.iv)	Inspect up to 10% of privately owned and maintained BMPs annually.	City	Percentage of privately owned BMPs inspected.	5 privately owned permanent storm water management facilities were inspected in 2015. Helena continues to inventory private storm water facilities and does informal inspections of them.	Inspections are an effective means of finding problems related to the function of BMPs. The potential to address BMPs needing maintenance through an inspection program improves the effectiveness of the SWMP.

Table O.5 - Requirement # 5: Post-Construction Storm Water Management							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
5.5	Plan Review	Specifically required by the rule. (II.B.5.a.v)	Conduct a site plan review and evaluation for post-construction BMPs for all new storm water facilities requiring approval under the ordinance.	City	Number of site plan reviews conducted for post-construction BMPs.	The Engineering Division reviewed 4 infrastructure development plans involving areas larger than one acre and approved 2 of them. In total 110 plans, including single family dwellings (of less than 5000 sq. ft. of impervious area) with grading and drainage plans were reviewed and approved.	Plan review leads to subsequent BMP implementation.
5.6	Site Inspections	Specifically required by the rule. (II.B.5.a.vi)	Inspect and evaluate post-construction BMPs prior to final acceptance to City system, final plat, annexation, and removal of temporary construction BMPs.	City	Number of inspections conducted.	384 feet of new storm pipe was inspected and mapped prior to acceptance into the city system.	Inspections ensured the infrastructure was cleaned and properly installed prior to being accepted the by City, which helps reduce pollution within stormwater discharges.

Table O.5 - Requirement # 5: Post-Construction Storm Water Management							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
5.7	Rate Evaluation	Adequate funding	Annually review rate changes in light of operations and maintenance obligations, capital improvement planning, and present changes for commission consideration.	City	Documentation of annual review of items listed.	Helena's stormwater utility assessment rate was increased for tax year 2015. Storm water Utility assessments are based on impervious area fees collected through tax bills. FY 15 expenditures which include the period July 1, 2014 to June 30, 2015 were $765,398 for the storm water utility; this includes operational expenses of $475,353 and capital outlay of $290,045. Total revenues from assessments were $1,003,600. FY 16 expenditures which include the period July 1, 2015 to June 30, 2016 are projected to be $2,715,564 which includes $1,880,139 in capital expenditures and carryover of unspent capital project monies, along with projected expenditures of $835,425. Projected revenue from assessments for the period is $1,095,290. WQPD fees are derived from tax assessment about half of which come from City of Helena residents. The WQPD spent $387,307 in FY 15. Projections for FY 16 are for expenditures of $354,863.	The current level of activity in the stormwater utility program is adequately funded. Funding needs will be evaluated further during budgeting for 2016 and in the collaborative permit review process now underway.
5.8	LID Practices	Inform building community of upcoming rule	Begin informing developers, engineers, architects, contractors, etc. of upcoming rule regarding LID techniques required for all new and redevelopment beginning in 2012.	City/WQPD	The new LID techniques and requirements are provided within the 2013 Engineering Standards. This item is has been completed. See BMP #5.9 for additional information.		
5.9	LID Practices	Prepare to require LID	Develop approved LID techniques for City of Helena. Incorporate into Engineering Standards prior to 2012.	City	Incorporation of LID techniques into Engineering Standards.	LID techniques and requirements are contained within the Engineering Standards approved by the City Commission in June of 2013.	Projects developed under the new standards were constructed in 2015, it is expected that the new standards will reduce pollutants in the storm water because of a decrease in the size of a development that would require

Table O.5 - Requirement # 5: Post-Construction Storm Water Management							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
							storm water controls.
	~~Planning~~	~~Meets the requirement to develop and to implement structural and non-structural BMPs.~~	~~Complete the Master Plan by end of 2003.~~	~~City~~			
	~~Raised Rates~~	~~More funds are needed to handle post-construction runoff in the City~~	~~Old rate: minimum charge is $20 plus $.009 per square foot of impervious area in excess of 2,222 sq. ft.~~ ~~New rate: minimum charge is $22.12 plus $.00995 per square foot of impervious area in excess of 2,222 sq. ft. (effective July 31, 2006).~~	~~City~~			

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table O.6 - Requirement # 6: Pollution Prevention/Good Housekeeping for Municipal Operations							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.6.b.v)**	**Responsible Party (II.B.6.b.iv)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
6.1	Street Sweeping	Reduce solids in runoff from City streets. (II.B.6.b.iii)	The City will sweep streets for a minimum of 2,200 hours per year.	City	Hours spent sweeping streets each year.	4,320.75 hours were spent on street sweeping in 2015.	4,211 cubic yards of sand material were placed on Helena streets in 2015. Sweeping operations during the year removed 2,480 cubic yards of material from City streets which reduces sediment and other pollutants in stormwater runoff.
6.2	Facility Maintenance	Provide City with information to track current maintenance activities. (II.B.6.b.i)	Continue monitoring catch basins and storm water facilities minimum of annually. Clean facilities as necessary. Include all maintenance activities in GIS-centric asset management software (City Works).	City	Maintenance activities tracked in City Works annually.	The following maintenance activities occurred in 2015: - 8 yards of material were removed from 1 pond - Focused on maintaining ditches in the Westside basin - Removed 140 yards of material in Westside basin and reestablished ditch toe	During annual storm inlet and manhole cleaning the City removed 13 yards of sediment, which reduces sediment and other pollutants in stormwater runoff.
6.3	Training	Specifically required by the rule. (II.B.6.a.ii)	Provide training opportunities as warranted to ensure City inspection personnel have the tools and resources for illicit discharge, construction BMP, and post-construction BMP inspections.	City	Number of trainings provided annually.	Helena aims to train annually; however, no training occurred in 2015 for utilities maintenance employees as efforts were directed at maintenance related work. The City Stormwater Engineer attended 2 DEQ sponsored BMP training classes in 2015.	Training helps to provide guidance on how to limit the potential for pollutants within stormwater discharging from the City's facilities.
6.4	Training	Specifically required by the rule. (II.B.6.a.ii)	Provide initial training for all field maintenance personnel with a potential to impact storm water quality. Provide refresher training as needed.	City	Number of initial and refresher trainings conducted annually.	Helena aims to train annually; however, no training occurred in 2015 for utilities maintenance employees as efforts were directed at maintenance related work. The City Stormwater Engineer attended 2 DEQ sponsored BMP training classes in 2015.	Training helps to provide guidance on how to limit the potential for pollutants within stormwater discharging from the City's facilities.

Table O.6 - Requirement # 6: Pollution Prevention/Good Housekeeping for Municipal Operations							
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.6.b.v)**	**Responsible Party (II.B.6.b.iv)**	**Quantitative Indicators Used**	**Results**	**Impact on SWMP Effectiveness**
6.5	Evaluate staffing requirements	To assist in maintaining the storm system	Annually review program staffing during budget review. Recommend staff adjustments as necessary for commission consideration.	City	Documentation of annual program staffing review.	A full-time storm water engineer/MS4 coordinator was added in 2015. The position description is included as an attachment.	Annual program staffing reviews helps to ensure that the budget is being efficiently utilized to implement the SWMP each year.
6.6	Henderson Pond Monitoring	Evaluate past projects to determine potential use in future	Monitor improvements with intent to reduce storm water flows and increase retention in West Side basin to improve water quality. Evaluate effectiveness of improvements.	City	Documentation of Henderson pond flows and retention volumes.	Quantitative assessments, while anecdotal, of the Henderson pond improvements and those on an earlier project on this same system (railroad pond) have met objectives of detaining storm flows which formerly bypassed the system and discharged directly to Crystal Spring Creek wetlands.	Staff determined that improvements have resulted in the majority of storm flow in this drainage basin are now being routed through BMPs located in this pond system. This reduces the potential for discharge of pollutants and for erosion within receiving waters.
6.7	Storm water Pollution Prevention Plan	Improve operating and maintenance plan (II.B.6.b.i)	Develop individual pollution prevention plan for minimum of one municipal facility annually. Municipal facilities will include transfer station, vehicle maintenance shop, parks department shop, utilities maintenance shop, and street department shop.	City	Development of SWPPP for any given facility.	Helena has developed BMPs within its SWMP documentation for various municipal activities that have potential to discharge to the MS4. In 2015, draft SWPP plans were created for the WWTP and UMD complex.	Implementation of BMPs identified within the SWMP and SWPP plans for specific facilities will help to reduce pollutants within stormwater runoff through use of both structural and non-structural BMPs.
6.8	Tramp collection	Reduce lawn wastes in storm system	Continue operation of tramp trash collection vehicle. The tramp collector picks up residential lawn waste and other debris separate from scheduled collection.	City	Continued operation and amount of debris collected annually.	The tramp collection system, landfill, and recycling facilities continued to operate in 2015.	During FY 2015 the City recycled 6,120.8 tons of waste, including 118.2 tons of automotive wastes. The City also composted over 3957.2 tons of leaves, woodchips and tree waste. Approximately 650 gallons of latex paint were solidified and landfilled. These items may have otherwise ended up in the stormwater collection system.
	~~Street Sweeping~~	~~New sweeper will use less wash water and increase particle~~	~~Two new sweepers were purchased in 2009. No additional street sweeping requirements are scheduled at this time.~~	~~City~~			
	~~Park Street Relining~~	~~Repair 1,000 feet of failing storm pipe~~	~~Spent $500,000 relining the pipe~~	~~City~~			

2015 MS4 Annual Report – Section P

Minimum Control Measure BMPs (2015-2016 permit cycle)

Table P.1 - Requirement #1: Public Education & Outreach

BMP #	SWMP Element Description (II.B.1.b. v)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.1.b. vii)	Responsible Party (II.B.1.b. vi)	Quantitative Indicators Used	Brief Description of Planned Actions for 2016
1.1	Educational Brochure	Raise public awareness about storm water.	Revise current brochure and begin distributing in 2010.	WQPD	Brochure distribution.	(The brochure was finalized in 2014) Maintain the general storm water brochure on the City stormwater webpage and distribute within utility bills. Distribute the storm water construction requirements brochure to contractors with building permits and place for public pickup at the City/County building and other engineering and public works offices in 2016.
1.2	Classroom Education	Raise awareness in children.	Present to 20 classrooms per year to discuss water quality and storm water.	WQPD	Number of classrooms visited.	Present to at least 20 classrooms per year to discuss water quality and storm water, primarily through the Water Watchers Program.
1.3	Storm drain Stenciling	Raise awareness in general public and in children.	Conduct a storm drain stenciling program each year with an area community group.	WQPD	Number of storm drain stenciling sessions.	Conduct an annual storm drain stenciling session.
1.4	Wetland Signage	Raise awareness	The City added two signs at area wetlands that handle storm water prior to 2007 (Kmart ponds and Henderson ponds). City will continue to maintain signs and WQPD will continue discussing during public tours.	City/WQPD	Sign condition and number of public discussions per year.	Continue to maintain signs.
1.5	Construction Brochure	Raise construction awareness about storm water	Develop construction brochure in 2010 to describe the ordinance, plan review and inspections, certification, etc. Distribute throughout permit cycle.	WQPD/City	Development of Brochure Number of brochures distributed.	The construction brochure has been developed and will be placed in the building division (where building permits are obtained), in the City Engineering office (where infrastructure plans are received and reviewed), and will be available for public pick up at the city county building and our offices throughout 2016.
1.6	Raise Contractor Awareness	Raise construction awareness about storm water	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Number of meeting occurrences.	Meeting has already occurred. The City will continue to target discussions with contractors to ensure awareness of construction BMP requirements.
1.7	Raise contractor awareness	Raise construction awareness about storm water	Begin informing developers, engineers, architects, contractors, etc. of upcoming rule regarding LID techniques required for all new and redevelopment beginning in 2012.	WQPD/City	Number of developers, engineers, architects, contractors etc. informed.	Many developers are aware of the Engineering Standards update. The City will continue to inform developers, et al regarding the changes to the Engineering Standards and LID techniques.
1.8	Revise storm water website	Raise awareness	Revise existing website in 2010. Include location for complaints.	City	Location for complaints on website.	The City's server does not allow for logging of complaints. Telephone numbers and email address to report problems will be maintained. Annual updates will be done as needed in future years.
1.9	Utility bill inserts	Raise awareness in general public	Develop insert and include in utility bills annually.	City	Presence of insert in utility bills.	Include a storm water related brochure as an insert in one utility bill in 2016.

Table P.1 - Requirement #1: Public Education & Outreach

BMP #	SWMP Element Description (II.B.1.b. v)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.1.b. vii)	Responsible Party (II.B.1.b. vi)	Quantitative Indicators Used	Brief Description of Planned Actions for 2016
1.10	Regulator Outreach	Inform regulators of SW issues	Meet with City Commission annually.	WQPD	Number of meeting occurrences.	Meet with City Commission during capital improvement planning and budgeting meetings.
1.11	Regulator Outreach	Inform regulators of SW issues	Meet with County Commission, City/County Planning Board, and Helena Area Citizens Council when program opportunities require regarding storm water information dissemination of the storm water ordinance, best management practices, and other storm water related information.	WQPD/City	Number of meetings held.	The City will continue to strive to hold a minimum of one meeting with the County Commission, Planning Board, or Citizens Council to discuss stormwater.
1.12	Public Group Outreach	Meet with local watershed groups	Continual membership role in the Lake Helena Watershed Planning Group.	WQPD/City	Number of attendees at group meetings.	Attend 3 meetings with members from the WQPD or Lake Helena Watershed Group in 2016.
1.13	Interpretive Sign	Install interpretive signs at potential following sites: transfer station, airport pond, DNRC pond, nature park, recycling facility	Develop and install 2 signs prior to 2015.	WQPD/City	Development and installation of signs.	Continue water quality improvement at DNRC and Helena High Ponds and install interpretive sign when completed..
1.14	Press Releases/Paid Advertisements	Raise public awareness about storm water.	Publish up to two press releases or advertisements annually.	City/WQPD	Number of press releases and/or advertisements per year.	The Lake Helena Watershed Group meetings and Watershed Festival will be advertised on the county website and by email for interested parties.

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table P.2 - Requirement # 2: Public Participation and Involvement

BMP #	SWMP Element Description (II.B.2.b.i)	Justification/Permit Requirement	Measurable Commitments & Implementation Schedule (II.B.2.b.vi)	Responsible Party (II.B.2.b.v)	Quantitative Indicators Used	Brief Description of Planned Actions for 2016
2.1	Public Meetings	Raise public awareness about storm water.	Speak to community groups 4 times per year.	WQPD	Number of meeting occurrences.	Reach community groups through participation in the Neighborhood and Business development groups, Water Watchers Program, Lake Helena Watershed Group meetings, the annual Watershed Festival, and Flood Awareness Day. Continue to target a minimum of four events in 2016.
2.2	Regulator Meetings	Raise storm water awareness among regulators and interested public.	Meet with City Commission annually.	WQPD/City	Number of meeting occurrences.	Meet with City Commission during capital improvement planning and budgeting meetings.
2.3	Regulator Meetings	Raise storm water awareness among regulators and interested public.	Meet with County Commission and Helena Area Citizens Council when program opportunities require regarding storm water information dissemination of the storm water ordinance, best management practices, and other storm water related information	WQPD/City	Number of meetings held.	The City will continue to strive to hold a minimum of one meeting with the County Commission, Planning Board, or Citizens Council to discuss stormwater.
2.4	Public Meetings	Promote a sense of ownership in water resources.	Facilitate 3 to 4 Lake Helena Watershed Group Meetings annually. City to participate in watershed group including periodic meetings dedicated to storm water.	WQPD/City	Number of meetings facilitated.	Attend 3 meetings with members from the WQPD or Lake Helena Watershed Group in 2016.
2.5	Storm drain Stenciling	Raise awareness in general public and in children.	Conduct a storm drain stenciling program each year with an area community group.	WQPD	Number of storm drain stenciling sessions conducted.	Conduct an annual storm drain stenciling session.
2.6	Public Meeting	Raise storm water awareness regarding City Ordinance	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Number of meeting occurrences.	This item has already been completed. No additional work will be completed for this item.
2.7	Public Meeting	Inform public about storm water ordinance	Conduct one to two administrative meetings with City Commission, Helena Citizens Council, and City staff once during annual budget development and rate discussions.	WQPD/City	Number of meetings held.	Meet with City Commission during capital improvement planning and budgeting meetings.
2.8	Regulator Meeting	Inform public through WQPD meeting	City presents annually to the WQPD regarding City approach to storm water.	City/WQPD	Annual presentation by City.	Continue on-going collaborative and stormwater management discussions with the WQPD.
2.9	Develop Display	Raise storm water awareness among public	Develop a display in 2010 for public events such as Helena Citizens Council, Lake Helena Watershed Festival, etc.	WQPD/City	Number of public events at which displays were present.	Coordinate development of a display for the Lake Helena Watershed Festival and any other relevant events.
2.10	Public Awareness	Raise storm water awareness among public	Participate in or sponsor one meeting annually to raise storm water quality awareness with groups such as Helena Citizens Council, Lake Helena Watershed Festival, contractors, etc. to focus on storm water quality.	WQPD/City	Participation in meeting and discussion of storm water quality.	Participate in a minimum of one public meeting with regarding storm water quality.

Table P.2 - Requirement # 2: Public Participation and Involvement						
BMP #	**SWMP Element Description (II.B.2.b.i)**	**Justification/Permit Requirement**	**Measurable Commitments & Implementation Schedule (II.B.2.b.vi)**	**Responsible Party (II.B.2.b.v)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
	~~Public Meetings~~	~~Raise awareness in general public.~~	~~Conduct one public meeting to discuss Storm water master plan by end of 2004.~~	~~City~~		
	~~Public Meetings~~	~~Promote a sense of ownership in water resources.~~	~~Facilitate Upper Tenmile Watershed Group Meetings, 2 meetings per year.~~	~~WQPD~~		

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table P.3 - Requirement # 3: Illicit Discharge Detection and Elimination

BMP #	SWMP Element Description	Justification	Measurable Commitments & Implementation Schedule (II.B.3.b.vii)	Responsible Party (II.B.3.b.vi)	Quantitative Indicators Used	Brief Description of Planned Actions for 2016
3.1	Map	Specifically required by the rule (II.B.3.a.ii).	Update map annually with newly constructed Storm water systems.	City	Addition of newly constructed systems to Helena's Storm Basins Map.	Conduct a GPS survey of all newly constructed storm water systems and add surveyed systems to Helena's Storm Basins Map.
3.2	Implement Ordinance	Specifically required by rule (II.B.3.a.iii).	Implement ordinance to prohibit non-storm water discharges as well as implement enforcement procedures beginning in 2010.	City	Implementation of ordinance and enforcement procedures.	Ordinance was implemented in 2009 and Engineering Standards were revised in 2013. Continued enforcement is planned for 2016.
3.3	System Inspection	Meets requirement to develop a plan to detect non-storm discharges (II.B.3.a.ii).	Inspect 100% of new storm drains system before they are connected to City system each year.	City	Inspection of new storm drains.	Inspect all additions to the storm drains system. Document any failed inspections and verify that any necessary repairs/corrections are completed prior to connection to the City system.
3.4	System Inspection	Meet requirements to develop a plan to detect non-storm water discharges (II.B.3.a.ii).	Target inspection of up to 20% of existing storm sewer pipe system each year, 12" or greater. Report outfall conditions using approved written documentation.	City	Linear feet of existing storm sewer inspected	Target inspection of 20% of existing storm sewer system pipe.
3.5	System Inspection	Meet requirements to develop a plan to detect non-storm water discharges (II.B.3.a.ii).	Target inspection of up to 20% of existing storm sewer open ditches each year, 1 square mile or less drainage area or ditches 12" deep or greater. Inventory, record, and report unauthorized/illicit connections for follow up action.	City	Linear feet of existing open ditches inspected.	Continue mapping and documentation of the open ditches and include the inventory in the City GIS.
3.6	System Inspection	Inspect sanitary system	Inspect 20% of sanitary sewer system annually to investigate whether sewage is impacting storm system.	City	Linear feet of existing sanitary sewer inspected.	Target inspection of 20% of existing sanitary sewer system.

Table P.3 - Requirement # 3: Illicit Discharge Detection and Elimination

BMP #	SWMP Element Description	Justification	Measurable Commitments & Implementation Schedule (II.B.3.b.vii)	Responsible Party (II.B.3.b.vi)	Quantitative Indicators Used	Brief Description of Planned Actions for 2016
3.7	Detection Plan	Specifically required by the rule (II.B.3.a.iv).	Detection Plan shown in Phase II NPDES Program Documentation with support through ordinance. Evaluate effectiveness annually.	City	Documentation of annual effectiveness evaluation.	Inspections will continue according to the Program Documentation, including dry weather screening and system inspections.
3.8	Employee training	Inform public employees (II.B.3.b.v)	Provide training opportunities as warranted to ensure City inspection personnel have the tools and resources to identify illicit discharges, spills, and dumping as well as hazards, notification, and potential methods to prevent/limit spread. Additional details in MCM 6.	City	Number of employees trained annually.	Target training of new personnel in one other department such as streets, park maintenance or solid waste in 2016.
3.9	Enforcement Plan	Meet requirement to develop a plan to terminate illicit discharges (II.B.3.b.iii)	Enforcement Plan shown in Phase II NPDES Program Documentation with support through ordinance. Evaluate effectiveness annually.	City	System inspection and elimination of illicit discharges.	The City will continue inspecting for illicit discharges, enforcing the ordinance, and eliminating such discharges in 2016.
3.10	Spill Response	Meets an existing City need to ensure proper response to hazardous spills.	The documentation is detailed in Appendix B of the Program Documentation. The City will continue to respond to spills according to the documented procedure.	City	Number of spills responded to.	Continue to respond to spills and document the nature of each spill.
	~~System Inspection (added to permit)~~	~~Meets requirement to develop a plan to detect non-storm discharges.~~	~~Bought a later launch TV camera to more completely inspect the new pipes. Cost $40,000.~~	~~City~~		
	~~System Inspection~~	~~Meets requirement to develop a plan to detect non-storm discharges.~~	~~Complete TV inspection of 100% of major storm pipes (>12") by end of 2006.~~	~~City~~		

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table P.4 - Requirement # 4: Construction Site Runoff Control						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.4.b.viii)**	**Responsible Party (II.B.4.b.vii)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
4.1	Implement Ordinance	Specifically required by rule (II.B.4.a.i).	Implement local ordinance to address and enforce construction site runoff issues as well as implement enforcement procedures beginning in 2010.	City	Implementation of ordinance and enforcement procedures.	Ordinance was implemented in 2009 and Engineering Standards were revised in 2013. Continued enforcement is planned for 2016.
4.2	Tracking System	Construction permit tracking	Maintain permit status monthly according to the ordinance.	City	Track number of active permits annually.	Continue to use the state storm water construction permit tracking system to follow permits for disturbance of 1 acre or larger.
4.3	Plan Review	Specifically required by the rule. (II.B.4.b.iv)	Review construction plans for all construction projects with 1 acre or greater land disturbance or new or redevelopment projects that include greater than 5000 square feet of impervious area. Review all construction plans for smaller projects according to the ordinance for BMP compliance.	City	Number of plans reviewed each year.	Continue to review plans as required and document the number of plans reviewed in 2016.
4.4	Site Inspection	Specifically required by the rule. (II.B.4.b.v)	Investigate all public complaints related to construction sites once ordinance has been adopted.	City	Number of sites inspected following public complaint.	Investigate all public complaints and require correction(s) if necessary. Document complaints, violations, and corrections.
4.5	Site Inspection	Specifically required by the rule. (II.B.4.b.vi)	Perform minimum of 1 inspection per construction site for any construction site reviewed and approved under BMP 4.3.	City	Number of inspections per permitted site.	Target a minimum of 1 inspection per construction site. Re-visit sites if BMP maintenance/issues were documented during initial inspection.
4.6	Revise storm water Website	Provide avenue for public comment/complaints (II.B.4.b.v)	Revise existing website in 2010. Include location for complaints. To be completed in conjunction with MCM 1.	City	Revision of website and location for complaints.	Continue to improve the storm water information and accessibility with updated and current information.
4.7	Construction Guidance	Distribute message (II.B.4.b.v)	Develop brochure/handout in 2010 detailing proper construction waste disposal, the ordinance, sediment and erosion control requirements, inspections, violations, etc. Supply to contractors, builders, and homeowners beginning in 2011.	WQPD/City	Brochure development and distributions.	Maintain brochure on website. Distribute construction requirements brochure to contractors and builders, particularly during construction building permit and plan approval processes.
4.8	Contractor Awareness Meeting	Uniform contractor expectations	Conduct one public meeting regarding implementation of the new ordinance. This meeting will primarily focus on Helena area contractors.	WQPD/City	Occurrence of meeting.	This item was previously completed. Helena will continue to meet with contractors but will not target a specific meeting to do so.
	~~Public Comments~~	~~Specifically required by the rule.~~	~~Establish a procedure for receiving information from the public by end of 2005.~~	~~City~~		

Table P.4 - Requirement # 4: Construction Site Runoff Control						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.4.b.viii)**	**Responsible Party (II.B.4.b.vii)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
	~~Construction Guidance~~	~~Document a set of standards for Storm water design of new developments to replace current informal standards.~~	~~Complete engineering standards manual to address construction and post-construction design by end of 2003. Manual will include discussion on proper waste handling.~~	~~City~~		

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be complete.

Table P.5 - Requirement # 5: Post-Construction Storm Water Management						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
5.1	Planning	Adequate funding	Target master plan amendments every 5 years and complete revisions every 10 years.	City	Date of last amendment/revision and plans for next amendment/revision.	Helena has budgeted and sent out a Request for Proposals to update the 2003 Storm Water Master Plan. Additionally, Helena has budgeted for the preparation of a Storm Water Monitoring Plan.
5.2	Implement Ordinance	Specifically required by the rule (II.B.5.a.iii)	Implement local ordinance to address and enforce post-construction storm water management issues as well as implement enforcement procedures beginning in 2010.	City	Implementation of ordinance and enforcement procedures.	Ordinance was implemented in 2009 and Engineering Standards were revised in 2013. Continued enforcement is planned for 2016.
5.3	Long Term Monitoring	Specifically required by the rule. (II.B.5.a.iv)	Monitor and maintain City owned BMPs per maintenance schedule.	City	Status of City owned BMPs	Continued maintenance of City owned BMPs. It is anticipated that similar measures will occur in 2016 as those that occurred in 2015 and that similar quantities of material will be removed from the storm system and disposed of properly.
5.4	Long Term Monitoring	Specifically required by the rule. (II.B.5.a.iv)	Inspect up to 10% of privately owned and maintained BMPs annually.	City	Percentage of privately owned BMPs inspected.	Helena will continue to inventory private storm water facilities, conduct informal inspections of them to assess issues. The City will continue to implement a GIS based work order management system that can be utilized on non-city owned assets.
5.5	Plan Review	Specifically required by the rule. (II.B.5.a.v)	Conduct a site plan review and evaluation for post-construction BMPs for all new storm water facilities requiring approval under the ordinance.	City	Number of site plan reviews conducted for post-construction BMPs.	Conduct site plan reviews as required and document the number of site plan reviews conducted.
5.6	Site Inspections	Specifically required by the rule. (II.B.5.a.vi)	Inspect and evaluate post-construction BMPs prior to final acceptance to City system, final plat, annexation, and removal of temporary construction BMPs.	City	Number of inspections conducted.	Inspect and evaluate post-construction BMPs as required. Require corrections as necessary prior to final acceptance.
5.7	Rate Evaluation	Adequate funding	Annually review rate changes in light of operations and maintenance obligations, capital improvement planning, and present changes for commission consideration.	City	Documentation of annual review of items listed.	Funding needs will be evaluated further during budgeting for FY 2016/2017.

Table P.5 - Requirement # 5: Post-Construction Storm Water Management						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.5.b.viii)**	**Responsible Party (II.B.5.b.vii)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
5.8	LID Practices	Inform building community of upcoming rule	Begin informing developers, engineers, architects, contractors, etc. of upcoming rule regarding LID techniques required for all new and redevelopment beginning in 2012.	City/WQPD	None	LID requirements and techniques are addressed within the Engineering Standards approved by the City Commission in June of 2013. LID will continue to be discussed with developers during the permitting and plan review process.
5.9	LID Practices	Prepare to require LID	Develop approved LID techniques for City of Helena. Incorporate into Engineering Standards prior to 2012.	City	Incorporation of LID techniques into Engineering Standards.	LID requirements and techniques are addressed and required within the Engineering Standards approved by the City Commission in June of 2013. LID will continue to be discussed with developers during the permitting and plan review process.
	~~Planning~~	~~Meets the requirement to develop and to implement structural and non-structural BMPs.~~	~~Complete the Master Plan by end of 2003.~~	~~City~~		
	~~Raised Rates~~	~~More funds are needed to handle post-construction runoff in the City~~	~~Old rate: minimum charge is $20 plus $.009 per square foot of impervious area in excess of 2,222 sq. ft.~~ ~~New rate: minimum charge is $22.12 plus $.00995 per square foot of impervious area in excess of 2,222 sq. ft. (effective July 31, 2006).~~	~~City~~		

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Table P.6 - Requirement # 6: Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.6.b.v)**	**Responsible Party (II.B.6.b.iv)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
6.1	Street Sweeping	Reduce solids in runoff from City streets.	The City will sweep streets for a minimum of 2,200 hours per year.	City	Hours spent sweeping streets each year.	The City will target street sweeping for a minimum of 2,200 hours. Actual hours spent sweeping will be recorded.
6.2	Facility Maintenance	Provide City with information to track current maintenance activities. (II.B.6.b.i)	Continue monitoring catch basins and storm water facilities minimum of annually. Clean facilities as necessary. Include all maintenance activities in GIS-centric asset management software (City Works).	City	Maintenance activities tracked in City Works annually.	Cityworks continues to be used to track City maintenance project. In summary, the City conducts television inspection on selected pipes within the system and storm inlets and manholes with the goal of 100% inspection on a 5 year cycle. Maintenance activities include cleaning inlets, manholes, pipes, and catch basins and storm water ponds as necessary. In addition, repairs are made to storm water facilities as necessary and on a priority basis for aging infrastructure.
6.3	Training	Specifically required by the rule. (II.B.6.a.ii)	Provide training opportunities as warranted to ensure City inspection personnel have the tools and resources for illicit discharge, construction BMP, and post-construction BMP inspections.	City	Number of trainings provided annually.	Applicable personnel will be trained annually. It is anticipated that nearly the same number of personnel as those trained in 2015 will be refreshed or trained in 2016.
6.4	Training	Specifically required by the rule. (II.B.6.a.ii)	Provide initial training for all field maintenance personnel with a potential to impact storm water quality. Provide refresher training as needed.	City	Number of initial and refresher trainings conducted annually.	Applicable personnel will be trained annually. It is anticipated that nearly the same number of personnel as those trained in 2015 will be refreshed or trained in 2016.
6.5	Evaluate staffing requirements	To assist in maintaining the storm system	Annually review program staffing during budget review. Recommend staff adjustments as necessary for commission consideration.	City	Documentation of annual program staffing review.	1 FTE was added to City Engineering Division to assist the City with the Storm Water Program. 0.75 FTE was added in 2014 and another in 2016 for city maintenance. Additionally, City staff in Utility Maintenance and Public Works Departments have a varying degree of primary responsibilities which include oversight, operation and maintenance of the storm water system.

Table P.6 - Requirement # 6: Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP #	**SWMP Element Description**	**Justification**	**Measurable Commitments & Implementation Schedule (II.B.6.b.v)**	**Responsible Party (II.B.6.b.iv)**	**Quantitative Indicators Used**	**Brief Description of Planned Actions for 2016**
6.6	Henderson Pond Monitoring	Evaluate past projects to determine potential use in future	Monitor improvements with intent to reduce storm water flows and increase retention in West Side basin to improve water quality. Evaluate effectiveness of improvements.	City	Documentation of Henderson pond flows and retention volumes.	Staff will continue to monitor and maintain this pond. Staff will continue to evaluate whether the previous improvements are adequate and whether additional improvements are required.
6.7	Storm water Pollution Prevention Plan	Improve operating and maintenance plan (II.B.6.b.i)	Develop individual pollution prevention plan for minimum of one municipal facility annually. Municipal facilities will include transfer station, vehicle maintenance shop, parks department shop, utilities maintenance shop, and street department shop.	City	Development of SWPPP for any given facility.	The City will target completion of one site-specific SWPPP, likely at the WWTP. The first SWPPP will be utilized as a template for additional site-specific SWPPPs in the future.
6.8	Tramp collection	Reduce lawn wastes in storm system	Continue operation of tramp trash collection vehicle. The tramp collector picks up residential lawn waste and other debris separate from scheduled collection.	City	Continued operation and amount of debris collected annually.	The trash tramp, landfill, transfer station, and recycling system will continue to operate and reduce waste and debris in 2016. It is anticipated that the trash collection system will recover a similar volume of waste as in previous years.
	~~Street Sweeping~~	~~New sweeper will use less wash water and increase particle capture~~	~~Two new sweepers were purchased in 2009. No additional street sweeping requirements are scheduled at this time.~~	~~City~~		
	~~Park Street Relining~~	~~Repair 1,000 feet of failing storm pipe~~	~~Spent $500,000 relining the pipe~~	~~City~~		

~~Strikethrough~~ – Item removed following evaluation from previous permit cycle. Item was deemed to be completed.

Section Q - CERTIFICATION

Applicant Information: This form must be completed, signed, and certified as follows (see Section V.K. of the General Permit):

- For a corporation, by a principal officer of at least the level of vice president;
- For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
- For a municipality, state, federal, or other public facility, by either a principal executive officer or ranking elected official.

All Applicants Must Complete the Following 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 gather and evaluate the information submitted. Based on my inquiry of the 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. [75-5-633, MCA]

A. Name (Type or Print) Ronald J. Alles	
B. Title (Type or Print) City Manager	**C. Phone No.** 406-447-8401
D. Signature Ronald J. Alles	**E. Date Signed** 02-24-14

The Department will not process this form until all of the requested information is supplied. Return this form to:

Department of Environmental Quality
Water Protection Bureau
PO Box 200901
Helena, MT 59620-0901
(406) 444-3080

Additional Attachments

Stormwater Engineer Position Description

2015 Utility Bill Insert

Draft Storm Water Pollution Poster/Display

CITY OF HELENA

Position Title: Storm Water Engineer
Department: Public Works **Division:** Engineering
Grade: 153
FLSA: Exempt

The City of Helena is an equal opportunity employer. The City shall, upon request, provide reasonable accommodations to otherwise qualified individuals with disabilities.

Job Purpose:
The purpose of this position is to, supervise, administer and coordinate the City of Helena storm water compliance activities under the regulated small municipal separate storm water system permit. The position oversees the coordination and implementation of the city of Helena storm water management program through: infrastructure plan reviews and approvals; storm water inspections; and development of and assessment of Best Management Practices (BMPs) to attain control runoff, infiltration, treatment, and system management of storm water under the maximum extent practicable standards. The incumbent will coordinate various program components with other city divisions and staff whose activities impact the municipal storm water system. The position performs a variety of leadership, program management and technical tasks relative to assigned area of responsibility and pursuant to and in support of the goals and objectives of the Division.

Essential Duties: *These job functions are the essential duties of the position and are not all-inclusive of all the duties the incumbent may be assigned.*

MS4 Storm Water Management Program: The position will be responsible for developing, revising, implementing and coordinating a storm water management program and related components on an annual basis to comply with the requirements of the City of Helena MPDES MS4 permit. The plan will consist of program management elements and activities to comply with six minimum control measures included in the permit such as: Public Education and Outreach; Public Involvement and Participation, Illicit Discharge Detection and Elimination; Construction Site Management, Post-construction storm water management for new Development and Redevelopment, and Pollution Prevention-Good Housekeeping for municipal operations. The position serves as the central point of contact for the program and the city's compliance with the applicable MPDES permit requirements.

New Infrastructure and Development Review: The position will be responsible for reviewing and approving new development and redevelopment plans to meet the requirements for storm water quality protection including provisions for storm infiltration and low impact development techniques, construction and post construction BMPs application, use to protect storm water quality and discharge and any other relative applicable codes. Direct and coordinate the development review process for the engineering department, which will include developer extensions to the existing water, sewer, drainage and street systems of the City to assure compliance with established engineering principles and comprehensive plan requirements. . The position advises, recommends and designs projects to be included in the Comprehensive Capital Improvement Program for Helena.

Construction Storm water Permitting, Inspection Program and Post Construction Storm water management: The position will develop and implement a construction storm water management and inspection program to ensure consistency with MS4 requirements and proper application of construction and post construction BMP's to protect the quality of the storm water entering and leaving the municipal storm water system. The position will oversee and develop engineering design standards and criteria to ensure orderly post-construction storm water control and management meets public safety, and overall storm water quality meets established storm water discharge objectives.

Engineering Design, Project Management and Support Services: Serve as Project Engineer in the design, planning, specification writing, bidding, construction management, contract administration, and review of a wide

range of Public Works projects; ensure construction complies with codes and specifications. Review public and private plans for conformance with Master Plan objectives. Create, develop and implement the design of major stormwater, water, sewer and street construction Capital Improvement Program projects for the health and safety of city residents; and administer and monitor capital improvement program budgets. Coordinate assigned services and activities with those of other divisions and outside agencies and organizations. Provide staff assistance to the City Engineer; prepare and present staff reports and other necessary correspondence. Develop and update comprehensive master plans for stormwater system to allow for orderly development. Develop and maintain design standards and criteria for city utilities. Identify opportunities for improving service delivery methods and procedures; review with appropriate management staff; implement improvements. Participate in budget preparation and administration; prepare cost estimates for budget recommendations; monitor and control expenditures. Participate in the initial planning of projects to be proposed and assist in establishing schedules and budgets.

Essential Knowledge, Skills and Abilities Related to this Position:

Knowledge of:

- Operational characteristics, services, and activities of a comprehensive engineering, surveying, mapping, design, construction and inspection program.
- Engineering, surveying, mapping, design, construction and inspection principles and practices.
- Equipment and materials used in engineering, surveying, mapping, design, construction and inspection.
- Civil engineering principles, concepts, standards, and practices associated with public works programs and projects.
- Principles, practices, and methods utilized in preparing designs, plans, specifications, estimates, reports, and recommendations relating to municipal utilities and proposed public works facilities.
- Occupational hazards and standard safety precautions necessary in the area of engineering construction.
- Principles of budget preparation and control.
- Principles of supervision, training, and performance evaluation.
- Pertinent Federal, State, and local laws, codes, and regulations.
- Modern office practices, methods, and computer equipment.
- Principles and procedures of record keeping and reporting.

Skill or ability to:

- Operate modern office equipment including computer equipment.
- Operate a motor vehicle safely.
- Manage and coordinate the work of professional and technical personnel and consultants involved in various engineering, surveying, mapping, design, and construction and inspection activities.
- Select, supervise, train, and evaluate staff.
- Analyze problems, identify alternative solutions, project consequences of proposed actions, and implement recommendations in support of goals.
- Interpret and apply the policies, procedures, laws, and regulations pertaining to assigned programs and functions.
- Read, interpret, and apply technical information from manuals, drawings, specifications, layouts, blueprints, and schematics.
- Prepare and maintain accurate and complete records; Prepare clear and concise reports; and Prepare and administer budgets.
- Respond to requests and inquiries from the general public.
- Communicate clearly and concisely, both orally and in writing.
- Establish, maintain, and foster positive and harmonious working relationships with those contacted in the course of work.

Physical Demands:

Ability to sit, stand, walk, kneel, crouch, stoop, squat, crawl, twist, climb, push, pull, and lift 50 lbs., distinguish color, and wear protective apparel; exposure to cold, heat, noise, outdoors, vibration, chemicals, explosive materials, mechanical hazards, electrical hazards, and traffic hazards; ability to travel to different sites and locations; availability for shift work, on-call, stand-by, and emergency call as assigned.

Minimum Qualifications (Education, Experience and Training):

This position requires a Bachelor's degree from an accredited college or university with major course work in civil engineering or a related field. This position requires **five** years of responsible civil engineering experience. Other relevant combinations of education and work experience may be evaluated on an individual basis.

License or Certificate:

Must possess a valid driver's license with acceptable driving record at the time of hire and have the ability to obtain a valid MT driver's license within six months of hire.

Possession of and ability to maintain, or the ability to obtain and maintain within 6 months by reciprocity, registration as a professional Civil Engineer in the State of Montana.

Will be required to attend MT DEQ courses BMP 101: Stormwater Management and MBP 201:SWPPP Administrator within 6 months of hire if not already attended.

Supervision Received:

Supervised by the City Engineer receives occasional program direction from the Public Works Director.

Supervision Exercised:

Exercises direct or indirect supervision of professional and technical engineering staff, other relative city staff and consultants.

The specific statements shown in each section of this position description are not intended to be all inclusive. They represent typical elements and criteria considered necessary to perform the job successfully.

SEWER BACKUPS AND HOW YOU CAN HELP

Sewer backups are not fun. Luckily, most sewer backups and overflows can be prevented with a maintenance program. Most sewer backups occur in the private service line between the house and the City's sewer main, where the property owner is responsible for correcting the problem. One of the most common causes is tree roots. These roots can do a lot of damage by causing debris to hang up in the line. It is suggested that you have the roots cut in your line semi-annually by a private contractor.

Other items such as cooking grease, paper towels, wet wipes, disposable diapers and feminine products can cause a problem in the property owner's line as well as in the main. These products should always be disposed of in the garbage can.

If you experience a sewer backup call the City of Helena Utility Maintenance Department immediately at 457-8567. Sewer personnel will be dispatched to determine if the City main is the source of the problem. For after hour calls, please call the non-emergency number at the police dispatch at 442-3233.

http://www.helenamt.gov/public-works/utility-maintenance.html

LAKE HELENA WATERSHED

Storm Water Runoff Pollution Prevention Information

Lewis and Clark County Water Quality Protection District

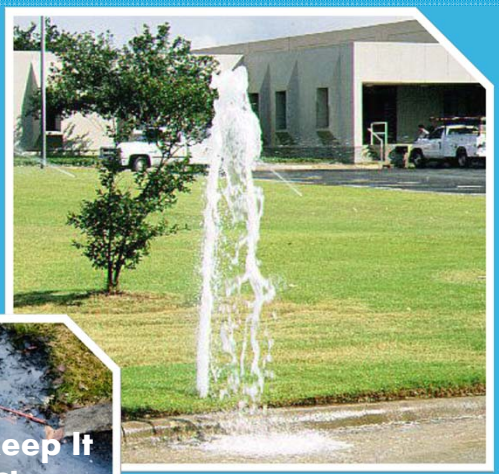
What is Storm Water Runoff?

- When it rains, storm water runs over yards, streets, highways, parking lots, parks, and playgrounds where it eventually enters into the ground or storm drains.
- Everything in its way, debris, chemical spills, dirt, and other pollutants will be carried away and end up in your lakes and streams.
- This water eventually becomes what we drink and recreate in.

Keep it Clean Save Your Stream

Why Is Storm Water Runoff Bad?

- Contaminates drinking water, lakes, streams, creeks, and recreational water areas.
- Harmful to people, plants, fish, and animals.



How Can You Prevent Storm Water Runoff?

- Properly dispose of hazardous waste.
- Pick up pet waste.
- Don't over water your lawns
- Reroute Roof water to lawns
- For more solutions find the Water Quality Protection District online, or stop by City Hall.