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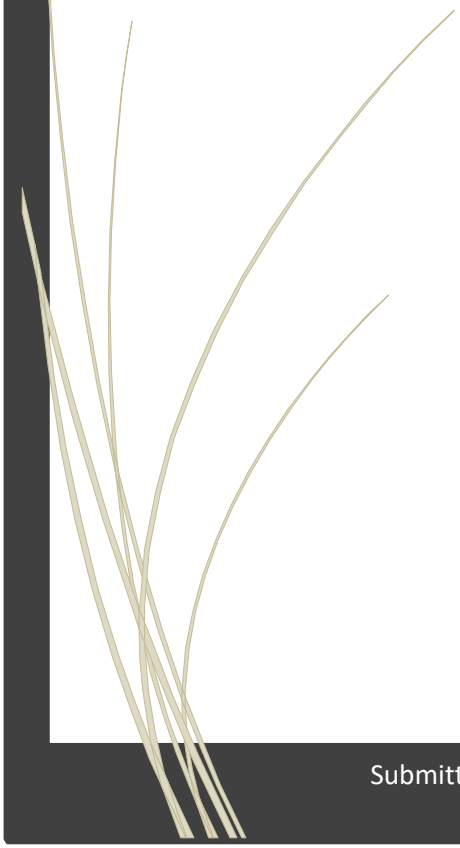
City of Savannah, Georgia

# Stormwater Management Plan

Phase I Medium Municipal Separate Storm Sewer System (MS4)
Permit No. GAS000205 (2022)
National Pollutant Discharge Elimination System (NPDES)



Submitted June 2024 to the Georgia Department of Natural Resources
(DNR) Environmental Protection Division (EPD)

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8) Sanitary Sewer Spill Response Procedures
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12) Capital Improvement Project (CIP) Stormwater Impact Assessment
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**Appendix E** Illicit Discharge Detection & Elimination (IDDE) Plan

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# Acronyms/Definitions

| | |
|---|---|
| BMPs | Best Management Practices |
| CIP | Capital Improvement Project |
| CSS | Coastal Stormwater Supplement |
| DoA | Georgia Department of Agriculture |
| DWS | Dry Weather Screening |
| E&S | Erosion & Sedimentation |
| EPD | Georgia Environmental Protection Division |
| ESCP | Erosion & Sedimentation Control Plan |
| FS | Field Screening |
| GESA | Georgia Erosion & Sedimentation Act |
| GI/LID | Green Infrastructure/Low Impact Development |
| GIS | Geographic Information System |
| GSMM | Georgia Stormwater Management Manual |
| GSWCC | Georgia Soil & Water Conservation Commission |
| HazMat | Hazardous Materials |
| HVPS | Highly Visible Pollutant Sources |
| IDDE | Illicit Discharge Detection & Elimination |
| IGP | Industrial General Permit |
| LDA | Land Disturbing Activities |
| LEED | Leadership in Energy and Environmental Design |
| LID | Low Impact Development |
| MS4 | Municipal Separate Storm Sewer System |
| NPDES | National Pollutant Discharge Elimination System |
| ORI | Outfall Reconnaissance Inventory |
| ROW | Right-of-Way |
| SWMP | Stormwater Management Plan |
| SWPPP | Stormwater Pollution Prevention Plan |

# Executive Summary

The City of Savannah received authorization to discharge under the National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit No. GAS000205 on April 12, 2022, in compliance with the provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the permit is included in Appendix A. This permit requires the development of a Stormwater Management Plan (SWMP) to address the following program elements, as stipulated in CFR 122.26(d)(2)(iv)(A) through 122.26(d)(2)(iv)(D):

- Structural & Source Control Measures
- Illicit Discharge Detection & Elimination
- Industrial Facility Stormwater Runoff Control
- Construction Site Runoff Management

The Georgia Environmental Protection Division (EPD) has also required the City of Savannah to expand its SWMP to include Best Management Practices (BMPs) to address the following required modifications:

- Highly Visible Pollutant Sources
- Enforcement Response
- Impaired Waters Monitoring & Implementation
- Public Education
- Public Involvement
- Post-Construction
- Green Infrastructure

The stormwater management program described within this document demonstrates the commitment of the City of Savannah to regulatory compliance and water resources protection.

# 1. Structural & Source Control Measures

*Permit Section 3.3.1: Structural & Source Control Measures, Table 3.3.1*

## 1.1. MS4 Control Structure Inventory & Map

### 1.1.1. Description

The City of Savannah's MS4 is made up of the structures and facilities that are used for collecting, conveying, storing and/or treating stormwater from the source drainage area to the point of final outlet. The City's NPDES Phase I Medium MS4 Permit defines the MS4 as follows:

"Municipal Separate Storm Sewer System or an MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying storm water runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."

The City of Savannah has completed a Geographic Information System (GIS) inventory and map of the MS4. The Stormwater Management Division maintains the inventory, and a map and table of the current MS4 inventory is included in Appendix C. The inventory is updated following new development/record drawings submittal, annexation as inventories can be surveyed/assessed, and/or new MS4 components are identified. Components are removed from the inventory if information becomes available justifying removal.

### 1.1.2. Measurable Goals:

- Maintain an inventory and map of MS4 control structures.
- Update the inventory and map as necessary and provide the number of MS4 structures added/removed during the reporting period in subsequent Annual Reports.

### 1.1.3. Schedule:

- Annually, 2022 – 2027

### 1.1.4. Items to be included in Annual Report:

- A current inventory and map of the MS4
- Number of MS4 structures added/removed during the reporting period

## 1.2. MS4 Inspection & Maintenance Program

### 1.2.1. Description

#### *1.2.1.A. MS4 Inspection Procedures*

The City of Savannah will visually inspect the MS4 on a routine basis such that 100% of the MS4 will be inspected over the 5-year permit period. Inspections will include both the closed and open drainage systems. MS4 Inspection procedures are as follows:

- Inspections of the closed system, including catch basins and inlets, shall include a visual assessment of the various system elements where the presence of structural conditions/pollutants will be noted.
- Storm drain lines will be visually inspected during routine maintenance where they outfall into a catch basin or open drainage way.
    - City jet-vac crews will lift the manhole and visually inspect the lines.
    - If the line is blocked, City crews will remove the debris via the jet-vac.
- Upon completion of an inspection, City staff shall make a determination of the need for maintenance based on the results of the inspection and the maintenance criteria listed herein.
- If maintenance is required, the City staff shall determine if the maintenance need is structural, i.e., the structure needs to be repaired or replaced; or if the maintenance need is routine, i.e. sediment needs to be cleared, debris removed, or vegetation trimmed back.
- The City staff person shall complete a work order through the City's **"Dial 311" One View** system for City crews to address the maintenance need.
- The City will maintain records of the inspections and a summary of these records shall be included in the Annual Report.

#### *1.2.1.B. MS4 Maintenance Procedures*

The City will perform maintenance of the various MS4 components based upon the need identified during inspection findings. During inspection, the City will assess the condition of the MS4 and determine if maintenance of the various elements is needed. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in accordance with following procedures:

- Catch Basins: Catch basins are cleaned using a jet-vac truck. Material removed is taken to the City's Sycamore facility, where trash and debris are separated and disposed of at a licensed landfill.
- Storm Sewer Lines: Storm sewer lines are flushed using a jet-vac truck. Any material removed from the lines is taken to the City's Sycamore facility, where trash and debris are separated and disposed of at a licensed landfill. If there is a structural failure, Stormwater Management crews or contractor will work to replace or repair the line immediately.

- Ditches and Canals: Maintenance can consist of mowing; removal of debris, litter, and excess vegetation; regrading; and application of herbicides. Mowing is accomplished with a line trimmer, sling blade, or tractor and must not "scalp" the ground as it encourages erosion. All material removed is either used for ditch regrading or disposed of at a licensed landfill the same day as removal. During ditch cleaning, Stormwater Management staff check the ditch for proper grade and alignment and cut the ditch or slope sides as is determined necessary. Culverts are cleaned, and all excess sediment and debris are removed. If debris cannot be removed by hand, the culvert will be flushed using the jet-vac truck.
- Tide Gates: There are approximately 16 operational tide gates on canals in the City of Savannah. Trash and debris are removed as needed based on inspection, and the gate function is maintained/serviced as needed.
- Pump Stations: The City of Savannah has seven pump stations that are inspected on a daily basis (Monday through Friday). The pump stations are also monitored through the remote monitoring system 24 hours per day. An alarm will sound, and Stormwater Management staff will be notified if there are problems. Six of these pump stations have debris screens to filter trash from the system before it reaches local waterways. Pump stations and debris screens are maintained through mechanical maintenance and removal of debris. Upon inspection, Stormwater Management staff will determine if maintenance is needed and notify the appropriate City crews. Pump stations and debris screens maintained by the City include: Lathrop Road*, Gwinnett Street, South Street, Fell Street*, Springfield Canal*, Kayton Canal*, DeRenne Avenue*, and Montgomery Cross Road* (*also has a debris screen).
- City-owned Detention Ponds: There are currently six known detention ponds on City-owned property (Betty Drive, Fernwood, Clinch Street, Williams Ward, Magnolia, and Clearview). These ponds will be inspected by Stormwater Management staff annually and routinely maintained by City Greenscapes. Maintenance activities may include litter debris removal, bank stabilization, inlet/outlet repair, regrading, or erosion control.
- All material removed during maintenance activities will be handled in the following manner: sediment is collected and reused when possible; debris and litter is disposed of at a local landfill. As new controls are acquired or built on City-owned property, they will be included in the inspection/maintenance program.

### 1.2.2. Measurable Goals:

- Conduct inspections of the MS4 structures each year such that 100% of the structures are inspected within the five-year period.
- Document MS4 structure inspections. This may include completion of a paper checklist and/or via a Database Management System.
- Conduct maintenance on MS4 structures as needed.

### 1.2.3. Schedule:

- Inspections - Annually, 2022 – 2027: Inspect MS4 structures each year such that 100% of the MS4 is inspected over a 5-year period with at least 5% inspected in any given year.
- Maintenance - Ongoing, 2022 – 2027: As needed based on inspections

### 1.2.4. Items to be included in Annual Report:

- Summary of MS4 Inspections including the number and percentage of total structures inspected/maintained during the reporting period
- Table of individual inspection reports with a record for each structure inspected/maintained, and the findings of that inspection and/or copies of completed inspection checklists
- Summary table of 311 (OneView System) work orders created and completed for MS4 maintenance

## 1.3. Planning Procedures

### 1.3.1. Description

#### *1.3.1.A. Comprehensive Plan*

The City of Savannah's Comprehensive Plan: *Plan 2040* outlines goals and specific policies that are designed to protect the local quality of life. The Comprehensive Plan guides future land use, provides the framework for the City's zoning code, addresses natural resource protection, and recommends stormwater infrastructure improvements. The City adopted the Comprehensive Plan in 2020, and it can be viewed at the following weblink:

https://www.thempc.org/docs/lit/CompPlan/2021/Plan2040.pdf

The following goals and policies of the Comprehensive Plan impact the City's stormwater program and envision a "green infrastructure" approach to stormwater management.

*Natural Resources Vision:* Chatham County and Savannah are enhanced by the protection and maintenance of natural resources and ecosystems.

*Goals:*

- Incorporate natural resources into appropriate development standards and review procedures
- Expand the preservation of natural areas and open spaces to provide for wildlife habitat, the continuation of ecosystem services, and public recreational opportunities
- Maintain adequate and open floodplains to prevent property damage from floodwaters and natural shoreline migration due to sea level rise
- Develop a time-based and spatial context for climate adaptation and sea-level rise adaptation planning
- Preserve existing trees and accelerate the planting of new trees.
- Improve and expand solid waste management to include additional opportunities for recycling and composting
- Protect and improve the air quality in Chatham County
- Protect the quality and supply of drinking water in Chatham County to include both surface and groundwater sources
- Factor sea level rise into land use and transportation & infrastructure planning
- Establish transparent processes and procedures for the delivery of effective and efficient natural resources policies.

### 1.3.2. Measurable Goals:

- Review and update the Comprehensive Plan as needed.

### 1.3.3. Schedule:

- Annually, 2022 – 2027: Review planning procedures

### 1.3.4. Items to be included in the Annual Report:

- A description of any changes made to stormwater portion of the Comprehensive Plan

## 1.4. Street Maintenance

### 1.4.1. Description

#### *1.4.1.A. Street Sweeping Program*

The Street Sweeping Department coordinates an extensive street sweeping program that involves both scheduled street sweeping and front-end loader cleaning within City limits. Street sweepers are operated on a continuous day/night basis. The City sweeps its 600 miles of curb and guttered streets on a routine basis as described below, totaling over 20,000 miles of streets being swept annually. Street sweeping is performed on a scheduled basis, ranging from weekly to quarterly. In zoned areas, street sweeping is conducted at the same time and day each week, so that residents are aware of when the streets will be cleaned. In areas that are not accessible by the street sweepers, front-end loaders are used to clean. All material collected is separated and landfilled.

#### *1.4.1.B. Roadside Ditch Maintenance*

There are approximately 150 miles of canals and ditches in the City of Savannah that are inspected and maintained annually. Ditches are proactively maintained, as needed, through the following activities:

- Mowing and litter removal
- Cleaning/debris removal
- Herbicide application
- Regrading

Mowing is accomplished with a line trimmer, sling blade, or tractor mower and must not "scalp" the ground as it encourages erosion. All material removed from the canal is disposed of at a licensed landfill the same day as removal. During ditch cleaning, City staff check the ditch for proper grade and alignment and cut the ditch or slope the sides as is determined necessary. Small erosion problems are repaired during regular maintenance. Large scale erosion problems may require the use of sandbags or other revetment methods and are addressed as soon as possible. Culverts are cleaned and all excess sand and debris are removed. If debris cannot be removed by hand, the culvert will be flushed using the jet-vac truck.

#### *1.4.1.C. De-icing Procedures*

Due to the climate in coastal Georgia, de-icing is not a regular activity. Therefore, the City no longer maintains a stockpile of material for de-icing purposes. If de-icing is needed in the future, the City will purchase only the amount needed at that time, and the City will remove de-icing material from the road using a street sweeper after a freeze event. Material removed will be reused if possible, or disposed of at a landfill, depending on the type of material.

#### *1.4.1.D. City Roadway Construction and Repair*

Road maintenance projects that involve complete removal of pavement subgrade and landscaping are reviewed and inspected by the Stormwater Management Division for adequate sediment control.

### 1.4.2. Measurable Goals:

- Perform routine street sweeping activities for 600 miles of curb and gutter roads.
- Maintain ditches annually through mowing and litter removal activities.

### 1.4.3. Schedule:

- Ongoing, 2022 – 2027

### 1.4.4. Items to be included in Annual Report:

- Provide documentation of street sweeping activities.

## 1.5. Flood Management Projects

### 1.5.1. Description

#### *1.5.1.A. Flood Management Capital Improvement Project Water Quality Impact Assessment for Proposed Structures*

The City of Savannah currently requires developers to comply with the stormwater management ordinances, which detail the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require developers to submit a stormwater site plan for all developments that are not specifically exempted within the ordinance. Site stormwater management plans must address water quality and water quantity issues in accordance with the requirements of the NPDES Phase I Medium MS4 Permit, the Coastal Stormwater Supplement, and applicable local development regulations.

The stormwater site plan is reviewed by a Georgia-registered Professional Engineer (contracted or City staff) and approved by the Development Services Department before a land disturbing activities (LDA) Permit is issued and construction can begin.

#### *1.5.1.B. Flood Management Capital Improvement Project Water Quality Impact Assessment for Existing Structures*

The City of Savannah operates a Capital Improvement Program to address structural flood management and drainage issues associated with public systems within the right-of-way (ROW). As part of this program, the City identifies the various drainage and flooding problems within the City and develops a proposed engineered solution to the problem in the form of a Capital Improvement Project (CIP). CIPs may include the installation of a new structure or the retrofit, upgrade, or replacement of an existing inadequate structure.

The City of Savannah or a contracted consultant will conduct a water quality impact assessment during the design phase for drainage and flooding related CIPs as funding becomes available for their implementation. This assessment will be integrated with the City's current Capital Improvement Program such that as identified CIPs are funded for implementation, and assessment will be performed during the design phase. The assessment must be completed before the design of drainage CIP has been completed. The assessment will ensure that the drainage or flood-related CIP addresses the following:

- A description of how the proposed CIP will improve water quality.
- A description of potential water quality impacts from the proposed CIP and recommendation for mitigation of any impacts.
- The feasibility and/or cost of incorporating water quality enhancements in the CIP.
- Identification of the regulatory permits needed to construct the project including, but not limited to, an NPDES Construction General Permit and a Section 404 Permit.
- A statement stating that the project adheres to the City's design criteria and CSS, or an explanation as to why a particular project may be exempt from local requirements.

The City will use the Capital Improvement Project Assessment worksheet to perform this assessment, and a copy of this worksheet is included in Appendix D. This assessment for each CIP design will become a permanent part of the CIP file, and will be provided to EPD in the Annual Report.

### 1.5.2. Measurable Goals:

- Ensure proposed flood management projects are assessed for water quality impacts in accordance with the City's Stormwater Management Ordinance.
- Evaluate existing flood control devices (e.g. detention and retention ponds) as part of the City's Capital Improvement Program to determine if retrofitting the devices for additional pollutant removal is feasible.
- 100% of structures are to be assessed within the 5 year permit term, with at least one structure assessed each reporting period.

### 1.5.3. Schedule:

- Annually, 2022 – 2027: Ensure proposed Flood Management Projects are assessed for water quality impacts.
- Annually, 2022 – 2027: Review existing flood management facilities for potential water quality retrofitting through the City's CIP program during the reporting period.

### 1.5.4. Items to be included in the Annual Report:

- The number of plans that included new flood management projects that were reviewed during the reporting period.
- A summary of all water quality assessments of existing flood management control structures that occurred during the reporting period and prior. A table is provided listing existing structures, the date assessed, results of assessment, and status of any retrofitting activities.

## 1.6. Municipal Facilities

### 1.6.1. Description

This program element will address the following 18 municipally owned facilities with the potential to cause pollution that are not addressed in Section 3.3.3, which will be referred to collectively as "Municipal Facilities." This list constitutes the City's inventory of municipal facilities with the potential to cause pollution. This inventory will be updated annually as new facilities are constructed or existing facilities change use. City staff will inspect 100% of these facilities over the 5-year permit period.

Stormwater Management staff will document any deficiencies found during the inspection process. If deficiencies are found, the department head is notified, and provided with a copy of the inspection report. The inspection report will list the problem, the necessary remedial actions, and a reasonable time frame for remediation. Stormwater Management staff will then re-inspect the sites to ensure that the necessary actions have been taken. If the City builds or acquires new facilities that could potentially contribute pollutants to the MS4, those sites will be added to the inventory below and inspected in concordance with the requirements specified by the Phase I Medium MS4 NPDES Permit.

| Facility Name | Facility Location | Department/ Bureau | On-site Activities | Agencies for On-site Stormwater Inspections |
|---|---|---|---|---|
| City of Savannah Administrative Complex | 14, 16, & 20 Interchange Court | Water Resources, Water/Sewer Planning & Engineering, Water Conveyance/Distribution, Traffic Engineering, Street Maintenance, Stormwater Management, Real Estate Services, Planning & Urban Design, Greenscapes, Development Services, Central Warehouse, & Capital Projects | Administrative, pesticides/herbicides storage, fertilizer storage, metals, debris, automotive fluids, maintenance & storage of vehicles & equipment | Stormwater Management Division, Department of Agriculture |
| Sallie Mood Vehicle Maintenance Facility | 6900 Sallie Mood Rd | Fleet Maintenance | Auto maintenance & storage | Stormwater Management Division |
| Laurel Grove Cemetery - South | End of Kollock & 36th St | Cemetery Department | Storage of cemetery maintenance equipment; power | Stormwater Management Division |
| Laurel Grove Cemetery - North | 802 W Anderson St | Cemetery Department | Storage of cemetery maintenance equipment | Stormwater Management Division |
| Greenwich Cemetery | 330 Greenwich Rd | Cemetery Department | Storage of pesticides | Stormwater Management Division |

| Facility Name | Facility Location | Department/ Bureau | On-site Activities | Agencies for On-site Stormwater Inspections |
|---|---|---|---|---|
| Bacon Park Transfer Station | Skidaway Rd | Sanitation | Temporary storage of waste | Stormwater Management Division, EPD |
| Sycamore Material Holding Facility | May St | Street Maintenance | Storage of inert materials and herbicides | Stormwater Management Division |
| WW Law Community Center-Library-Pool | 909 E Bolton St | Leisure Services Building & Grounds | Administrative chlorine storage for swimming pool | Stormwater Management Division |
| Bowles C. Ford Swimming Pool Building | 1100 Stiles Ave | Leisure Services Building & Grounds | Chlorine storage | Stormwater Management Division |
| Daffin Park/Grayson Stadium | 1401 E Victory Dr | Leisure Services Building & Grounds | Storage of chlorine/fertilizer herbicides/pesticides | Stormwater Management Division |
| COS I & D Plant Complex | 6183 N Highway 21 | Water Resources | Water Treatment Plant Operation | Stormwater Management Division, EPD |
| Georgetown WWTP | 14 Beaver Run Dr | Water Resources | Water Treatment Plant Operation | Stormwater Management Division, EPD |
| Dean Forest Road Landfill | 1327 Dean Forest Rd | Sanitation | Landfill Operation | Stormwater Management Division, EPD |
| President Street WWTP | 1400 E President St | Water Resources | Wastewater Plant Operation | Stormwater Management Division, EPD |
| Crossroads WWTP | 125 Gulfstream Rd | Water Resources | Wastewater Plant Operation | Stormwater Management Division, EPD |
| Travis Field WWTP | 195 Mikell Ave | Water Resources | Wastewater Plant Operation | Stormwater Management Division, EPD |
| Wilshire WWTP | 11011 Largo Dr | Water Resources | Wastewater Plant Operation | Stormwater Management Division, EPD |
| Tompkins Community Center-Swimming Pool | 2319 Ogeechee Rd | Leisure Services Building & Grounds | Administrative chlorine storage for swimming pool | Stormwater Management Division |

### 1.6.2. Measurable Goals:

- The City will update the municipal facilities inventory annually with each Annual Report.
- The City will annually inspect the municipal facilities on the inventory list such that 100% of all the inventories facilities are inspected over the 5-year permit period.

### 1.6.3. Schedule:

- 2022 – 2027: Inspect 100% of municipal facilities with at least 5% inspected in any given year.

### 1.6.4. Items to be included in the Annual Report:

- The Municipal Facilities Inventory
- A copy of the completed inspection checklist for each municipal facility inspected during the reporting period.
- A summary of any activities conducted to address issues found during inspection, if necessary. Including documentation such as reinspection forms, letters to the owner/operators, documentation of corrections made to identified issues, documentation of follow-up actions, etc.

## 1.7. Pesticide, Fertilizer, & Herbicide Application

### 1.7.1. Description

#### *1.7.1.A. Pesticide Applicator Certification Program*

The City of Savannah relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of pesticides (herbicides and insecticides) to obtain and retain a "Commercial Pesticide Applicators License." The DoA also requires that distributors of restricted pesticides obtain and retain "Distributor Licenses."

In Savannah, public outreach and education is directed primarily at commercial/private applicators through the Chatham County Cooperative Extension Service. The Service assists the Coastal Landscape & Turf Professional Association (CLTPA) with meetings and training materials.

#### *1.7.1.B. Municipal Pesticide Use Standard Operating Procedures*

The table below lists the departments that utilize herbicide and/or pesticide as part of their operations. The departmental staff responsible for overseeing City employees involved in the application, mixing or storage of herbicides/pesticides are required to receive appropriate training and certification from the Georgia Department of Agriculture.

| Department/Bureau | Hazardous Materials | Training Program | |
|---|---|---|---|
| | | Training | Organization |
| Cemeteries | Diatomaceous Earth | Initial Certification, Annual Continuing Education | GA Dept. of Agriculture |
| Parks and Recreation | Pesticide/Herbicide | Initial Certification, Annual Continuing Education | GA Dept. of Agriculture |
| Street Maintenance | Pesticide/Herbicide | Initial Certification, Annual Continuing Education | GA Dept. of Agriculture |
| Greenscapes | Pesticide/Herbicide | Initial Certification, Annual Continuing Education | GA Dept. of Agriculture |

### 1.7.2. Measurable Goals:

- Continue to utilize DoA Program to certify commercial applicators within the City.
- Continue to ensure that staff performing any landscape chemical application within the City are properly trained through the DoA.

### 1.7.3. Schedule:

- Ongoing, 2022 – 2027: Continue to require DoA Program Certification for commercial applicators within the City.
- Ongoing, 2022 – 2027: Continue to ensure staff are appropriately trained.

### 1.7.4. Items to be Included in the Annual Report:

- Documentation of any program activities during the reporting period

# 2. Illicit Discharge Detection & Elimination Program (IDDE)

*Permit Section 3.3.2: Illicit Discharge Detection & Elimination Program (IDDE), Table 3.3.2*

## 2.1. Legal Authority

### 2.1.1. Description

The City of Savannah has established adequate legal authority through Article 16: Stormwater Management Ordinance of the Savannah Land Development Code, last updated in November 2018 to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. This ordinance prohibits illicit discharges to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance. The ordinance is included in Appendix B.

### 2.1.2. Measurable Goals:

- Each year, the City will evaluate the illicit discharge requirements of the Stormwater Management Ordinance to determine if revisions are required.

### 2.1.3. Schedule:

- Annually, 2022 – 2027: Annual Review of illicit discharge requirements of the Stormwater Management Ordinance

### 2.1.4. Items to be included in the Annual Report:

- If revisions are required, submit a copy of the revised ordinance to EPD in the Annual Report.

## 2.2. Outfall Inventory & Map

### 2.2.1. Description

The City of Savannah has developed an MS4 outfall inventory and a map showing the location of outfalls from the MS4 and the names and location of waters of the State that receive discharges from those outfalls. In addition, the City is continuing to identify field screening (FS) locations for those outfalls that are continuously "wet" due to tidal activity, groundwater surcharge, or are in an area that is inaccessible to staff. A "wet" designation means that the invert of the outfall is below the mean high tide or static water level causing the drainage system to be flooded daily.

To view the map and inventory of the MS4 Outfalls, please see the Illicit Discharge Detection & Elimination (IDDE) Plan included in Appendix E. Each year, the City will update the map to reflect the addition of outfalls from new infrastructure projects or developments. In subsequent Annual Reports, the City will remove from the inventory any outfalls that have been reclassified or removed.

### 2.2.2. Measurable Goals:

- The City will update an inventory and a map showing the location of outfalls from the MS4, the FS locations if different from the MS4 outfall, and the names and location of all waters of the State that receive discharges from those outfalls in the City's Annual Report.
- The City will maintain the number of MS4 outfalls added during the reporting period and the total number of MS4 outfalls with the City.

### 2.2.3. Schedule:

- Annually, 2022-2027: Update MS4 Outfall Map and Inventory

### 2.2.4. Items to be included in the Annual Report:

- An updated inventory and map of the MS4 outfalls, FS location where it differs from the MS4 outfall, and the names and locations of waters of the State that receive discharges from those outfalls
- The number of MS4 outfalls added during the reporting period and the total number of MS4 outfalls

## 2.3. IDDE Plan

### 2.3.1. Description

The City of Savannah's IDDE Plan consists of inspecting MS4 outfalls and sampling any abnormal dry weather flow to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and eliminate all identified illicit discharges. The IDDE Plan is included in Appendix E.

The City will perform dry weather screening of the MS4 outfalls or field screening locations within its current inventory in accordance with the procedures outlined in the IDDE Plan. The City will investigate any potential illicit discharges in accordance with the procedures in the IDDE Plan. Suspect or obvious illicit discharges require follow-up actions and activities, as specified in the IDDE Plan to determine the specific source(s) of contamination. Should the City positively identify any illicit discharges, the City will perform enforcement actions as dictated by the Stormwater Ordinance and the IDDE Plan to remove positively identified illicit discharges.

The City will complete the screening inspections on 100% of the total MS4 outfalls within the 5-year permit term with a minimum of 5% of the outfalls screening annually. A copy of the City's dry weather screening (DWS) outfall map and list is included in the IDDE Plan in Appendix E.

### 2.3.2. Measurable Goals:

- Dry weather screen 100% of all MS4 outfalls over a five-year period with at least 5% inspected in any given year.
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the illicit discharge prohibitions in the Stormwater Ordinance and ERP for 100% of positively identified illicit discharges.

### 2.3.3. Schedule:

- Annually, 2022 – 2027: Complete dry weather screening on 100% of all MS4 outfalls over a five-year period with at least 5% inspected in any given year.

### 2.3.4. Items to be Included in the Annual Report:

- Provide the number of MS4 outfalls screened during the reporting period.
- Provide a map and completed dry weather screening/Outfall Reconnaissance Inventory (ORI) forms for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of the dry weather screening activities

## 2.4. Spill Response Procedures

### 2.4.1. Description

#### *2.4.1.A. Savannah Fire Emergency Services Hazardous Material Team (HazMat)*

The Hazardous Materials Response Team is responsible for preparing for and mitigating emergency situations that involve all chemical accidents, releases, or spills in the City of Savannah, unincorporated Chatham County, and all the local municipalities. Some of the preparations include preplanning at industrial sites, training Savannah Fire Emergency Services personnel for all levels of response capabilities and maintaining equipment and information databases. HazMat is the countywide first response team that has the support of all local governments and industries. The following hazardous spill response procedures are detailed in the Chatham Emergency Management Agency's Emergency Operations Plan:

*A. Primary Agency: The Savannah Fire Department HazMat team has the lead role in hazardous material spill response. Team membership includes responsibilities from the Sheriff's Office, EMS, and municipal fire departments.*

#### *2.4.1.B. Sanitary Sewer Spill Response Plan*

The Water Resources Bureau has developed procedures to contain and report major and minor sanitary sewage spills. The procedures include an Environmental Assessment Team, sampling procedures, notification procedures, and a who-to-call list. The City's Conveyance & Distribution Department Policy on Sanitary Sewage Spills from City System is included in Appendix D.

### 2.4.2. Measurable Goals:

- Maintain documentation on any spill occurrences and cleanup performed.

### 2.4.3. Schedule:

- Annually, 2022 - 2027: Maintain documentation of any spills and cleanup activities.

### 2.4.4. Items to be included in the Annual Report

- Documentation on any spill occurrences and cleanup performed

## 2.5. Public Reporting Procedures

### 2.5.1. Description

The City of Savannah has a well-developed and efficient system for responding to citizen complaints. During business hours, Customer Service in the 311 Call Center receives citizen complaint calls related to water quality, stormwater, wastewater, and water supply. Reports of illicit discharges or illicit connections can also be made through the 311 tab on the City's website homepage. These calls are entered into the electronic work order database and coded according to the type of complaint. The individual department is then notified, and a work order is generated with information regarding the nature of the complaint and all actions taken by the City in response to the complaint. Work order progression is recorded within the work order system. The Stormwater Management Department is responsible for receiving and responding to citizen complaints related to the stormwater drainage system.

An initial assessment of the problem is made by the City Stormwater Department when the 311 Call is sent to the Department. A description and priority are established either from the citizen's problem description or from a supervisor's field determination.

After hours, all citizens can call the Water Resources Bureau's hotline to report complaints related to drainage. The Water Resources Department will immediately respond to emergencies and forward all other calls to the Stormwater Department for attention on the next business day. Contact numbers for lodging complaints with these departments are listed on the City's website:

http://www.savannahga.gov/index.aspx?nid=505

### 2.5.2. Measurable Goals:

- Maintain the website posting on the City's webpage for the 311 Call Center.
- Investigate and take appropriate action for 100% of all water quality complaints received.
- Take appropriate action for 100% of complaints requiring action.

### 2.5.3. Schedule:

- Ongoing, 2022 – 2027: Take action for complaints received, as appropriate.
- Annually, 2022 – 2027: Maintain website with promotional information regarding the 311 Call Center.

### 2.5.4. Items to be included in the Annual Report:

- Summary of the Work Order Database, to include documentation of citizen complaints, investigations, and actions taken and status of complaints related to IDDE during the reporting period.
- Activities conducted during the reporting period related to notifying the public of available methods of reporting should be documented.

## 2.6. Proper Management & Disposal of Used Oil & Toxic Materials

### 2.6.1. Description

The Chatham County Resource Conservation Education Center (CCRCEC) maintains information on its website to help citizens of the County, including those in the City of Savannah, to dispose of hazardous household waste properly. The website includes a listing of facilities and businesses that will accept waste oil, other toxic wastes, and recyclables from the general public. The City of Savannah will maintain a link on the City's website to this information to direct citizens how to properly manage and dispose of used oil and toxic materials. The link can be found at the following web address:

https://recycling.chathamcountyga.gov/RecyclingDropOff/HardMaterials

### 2.6.2. Measurable Goals:

- Promote proper management and disposal of used oil and toxic materials by maintaining a web link to the CCRCEC website on the City's website.

### 2.6.3. Schedule:

- Ongoing, 2022 – 2027: Maintain link to CCRCEC website on City's stormwater webpage

### 2.6.4. Items to be included in the Annual Report:

- Screenshot of the City's website showing the link to the CCRCEC website

## 2.7. Sanitary Sewer Infiltration Controls

### 2.7.1. Description

#### *2.7.1.A. Sanitary Sewer Inspection Program*

The City of Savannah, as part of its program of proactive work in sanitary sewer line inspection, is utilizing the process of television inspections to videotape approximately eight miles of lines per year. The purpose of television inspection is to visually determine the status of lines, extent of failures, and the need for rehabilitation. The television inspection program is managed by the Water Quality Control Division of the Water Resources Department. Televising is used to determine what parts of the system may need repair. With televising, repairs and rehabilitations can be performed on a timelier basis and only where and when necessary. The most beneficial aspect of this program is that limited resources available to the City for rehabilitation can be used in the most effective and efficient manner. A copy of the City's Televising Procedures Manual is provided in Appendix D.

It is the policy of the Water Resources Department that once a cross connection is found, Sewer Maintenance immediately begins separation of the lines. Since most of this work is done on private property, the City will normally contract with a private plumber to correct the problem on the property while Sewer Maintenance will work at the main. Sewer Maintenance also coordinates these separations with the Stormwater Management Department. If sewage has entered into a storm line from an overflow, the storm line is plugged, and the contaminated water is removed from the pipe or canal and the site is mitigated and cleaned. If an overflow has reached waters of the State, a spill notification is sent to the EPD and the proper media and public notifications are done as per the State Spill Regulations.

#### *2.7.1.B. New Construction Line Televising*

The City of Savannah requires that new sanitary sewer lines (larger than 8") and new storm sewer lines connected to the City's MS4 be videoed before the lines are dedicated to/accepted by the City for maintenance and operation. The program is designed to assure all new construction conforms to City specifications and that no cross-connections exist. The Water Resources Department offers this service to private developers on a fee per linear foot basis.

#### *2.7.1.C. Grease Campaign & Sewer Lateral Education*

Sanitary sewer blockages and overflows related to grease buildup and poorly maintained sewer laterals have been a recurrent issue for the Water Resources Department. In order to address the issue through education, the Water Resources Department has teamed with the Public Information office to educate citizens about proper disposal of Fats, Oil, and Grease (FOG) as well as sewer lateral inspections and maintenance on private property. Billboards, funnels and magnets have been created with the education messages related to proper disposal of FOG. These items are distributed at outreach events with the City. The City runs a public service announcement (on all cable channels) on how to properly discard FOG. As part of this campaign, City staff are keeping records of the grease blockages and trying to target areas that have stoppages. Educational door hangers were created and are distributed in areas where stoppages have occurred.

### 2.7.2. Measurable Goals:

- Inspect 100% of suspected sanitary sewer sewage cross connections or discharges reported to or found by Savannah staff.
- Resolve 100% sanitary sewer cross connections or discharges.
- Provide community outreach on proper disposal of FOG.

### 2.7.3. Schedule:

- Ongoing, 2022 – 2027: Investigate and address suspected sewer discharges or discharges
- Ongoing, 2022 – 2027: Provide community outreach on proper disposal of FOG.

### 2.7.4. Items to be Included in the Annual Report:

- Details and documentation on activities performed during the reporting period including FOG program outreach materials and resolution of sanitary sewer cross connections or discharges

# 3. Industrial Facility Stormwater Discharge Control

*Permit Section 3.3.3: Industrial Facility Stormwater Discharge Control, Table 3.3.3*

## 3.1. Industrial Facility Inventory

### 3.1.1. Description

The City of Savannah currently maintains an inventory of industrial facilities that potentially discharge to the City's MS4. This list is based on the EPD's Industrial Storm Water General Permit (IGP), Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. The City of Savannah will continue to modify and update this list on an annual basis in accordance with the informational sources listed above. The City will include any changes to the inventory in the Annual Report.

### 3.1.2. Measurable Goals:

- Annual update of Industrial Facility Inventory

### 3.1.3. Schedule:

- Annually, 2022 – 2027: Update Industrial Facility Inventory

### 3.1.4. Items to be Included in the Annual Report:

- Updated Industrial Facility Inventory

## 3.2. Inspection Program

The City of Savannah will conduct on-site stormwater inspections for 100% of facilities on the industrial inventory list over the course of the five-year permit period (2022 – 2027).

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it shall be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a Notice of Intent or No Exposure Exclusion to be covered under the NPDES Industrial General Permit (IGP) if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated Stormwater Pollution Prevention Plan (SWPPP).
- The City will perform an inspection of the facility utilizing the inspection checklist included in Appendix D or generated from a tablet.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection to ensure that all necessary corrections were made.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Stormwater Ordinance and Enforcement Response Plan.
- If the violation is still not corrected, EPD will be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to waters of the State. If EPD intervention does not ensure a resolution to the problem, the City of Savannah may elect to perform water quality monitoring at the facility outfall. In addition, the City may, during the investigation of a violation of the City's Stormwater Ordinance, complete or require monitoring of a suspected industrial facility in order to secure evidence to support the alleged violation.
- The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report.

### 3.2.1. Measurable Goals:

- Inspect 100% of industrial facilities in the City's inventory over the 5-year permit period and inspect at least 5% of the industrial facilities in the inventory annually.
- Obtain water quality monitoring results if monitoring is conducted.

### 3.2.2. Schedule

- Annually, 2022 – 2027: Inspect at least 5% of industrial facilities per year.

### 3.2.3. Items to be Included in the Annual Report

- Copy of completed inspection checklist for each industrial facility inspected during the reporting period
- Provide the results of available water quality monitoring

## 3.3. Enforcement Procedures

### 3.3.1. Description

If upon inspection, an industrial site is found to have issues that would be considered an illicit discharge that warrant a Notice of Violation, then the City will proceed to an enforcement action as outlined in the Enforcement Response Plan. If an illicit discharge has not taken place but practices on site indicate a high probability that such a discharge could occur and/or the City determines that a Notice of Violation is not warranted, the City will notify the industry or business, provide them with a copy of the inspection checklist, and may elect to perform a re-inspection to ensure that all necessary corrections were made. The City will also notify the EPD if assistance is needed for enforcement or if there is a threat to waters of the State. The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report.

### 3.3.2. Measurable Goals:

- Implement enforcement procedures in ERP when violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log.

### 3.3.3. Schedule:

- Ongoing, 2022 – 2027: Document enforcement actions.

### 3.3.4. Items to be Included in Annual Report:

- Documentation of enforcement action taken during the reporting period

## 3.4. Educational Activities

### 3.4.1. Description

The City will distribute the EPD's informational handout on the requirements of the NPDES IGP or other industrial stormwater best practices educational information to industrial facilities during industrial stormwater site inspections.

### 3.4.2. Measurable Goals:

- Provide educational information to industrial facilities on the City's inventory during inspections.

### 3.4.3. Schedule:

- Annually, 2022 – 2027: Provide education information to industrial facilities during inspections.

### 3.4.4. Items to be included in the Annual Report:

- Copy of educational information distributed to industrial facilities.

# 4. Construction Site Management

*Permit Section 3.3.4: Construction Site Management, Table 3.3.4*

## 4.1. Legal Authority

The City has adopted the most current model Soil Erosion, Sedimentation, & Pollution Control Ordinance (E&S Ordinance), as written and distributed by EPD, and it is included in Appendix B. This ordinance meets the requirements of the NPDES Phase I Medium MS4 Permit and the requirements of the Georgia Erosion & Sedimentation Act (GESA).

The City of Savannah is currently a local issuing authority for LDA permits as defined by GESA. The City administers the programs described below in accordance with the responsibilities related to being an issuing authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES Phase I MS4 program for Construction Site Structural & Non-Structural Control.

### 4.1.1. Measurable Goals:

- Annually evaluate the E&S Ordinance and Stormwater Management Ordinance to determine if revisions are required.

### 4.1.2. Schedule:

- Annually, 2022 – 2027: Annual Review of E&S Ordinance and Stormwater Management Ordinance

### 4.1.3. Items to be Included in the Annual Report:

- If revisions are required, submit a copy of the updated ordinance.

## 4.2. Site Plan Review Procedures

### 4.2.1. Description

All developers are required to comply with the Savannah E&S Ordinance and obtain an LDA Permit prior to the start of any land disturbing activities (LDA) that will either disturb one or more acres of land or are located within 200 feet of waters of the State within the City limits unless exempted by ordinance. Phased developments that disturb a total of one acre are also required to receive an LDA Permit. The local ordinance includes a requirement that a Georgia Soil & Water Conservation Commission (GSWCC) approved Erosion, Sedimentation, & Pollution Control Plan (ESPCP) and a City approved post-construction stormwater management plan is included with the LDA application. The City's Stormwater Management Site Development Plan Review Checklist is included in Appendix D.

GSWCC reviews ESPCPs for compliance with the requirements of Georgia Erosion & Sedimentation Control Manual. The GSWCC office notifies the City when plans are approved. The City will not issue an LDA Permit until the GSWCC office has issued notification of ESPCP approval, or the timeframe for GSWCC review has expired. City staff must also approve the ESPCP prior to issuance of an LDA Permit.

### 4.2.2. Measurable Goals:

- City staff will grant LDA permits only after ESPCP are approved by GSWCC 100% of the time.

### 4.2.3. Schedule:

- Ongoing, 2022 – 2027: Review ESPCPs as they are submitted.

### 4.2.4. Items to be Included in the Annual Report:

- A list of site plans received, and number of plans reviewed, approved, or denied during the reporting period
- Table of LDA permits issued during the reporting period.

## 4.3. Inspection Program

### 4.3.1. Description

The Savannah Development Services Department is responsible for overseeing the inspection program that targets all construction projects within City limits. Level IB GSWCC certified inspectors within the City of Savannah will participate in the inspections program. The inspections include checking all E&S control measures for compliance with the approved E&S plans and LDA Permit. The authority for such inspections follows the City's E&S Ordinance, as outlined in the City's Development Services Standard Operating Procedure (SOP). If, upon inspection, a construction site is found to be in non-compliance with its approved E&S plan, LDA Permit, or the minimum requirements of the E&S Ordinance, the Development Services Department is responsible for working with the City's code enforcement personnel to enforce the provisions of the E&S Ordinance. Enforcement measures can include notices of violation, stop work orders, and citations/fines.

Inspections shall be conducted before, during, and after land disturbance in accordance with the following procedure:

- City staff will conduct site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements.
- Once a site is under construction, it will be monitored through inspections on a regular basis until the site is stabilized. Inspections during the construction process should be prioritized as follows:
    - A significant rain event
    - Evidence of poor housekeeping
    - History of poor compliance
    - Evidence of absent or malfunctioning controls
    - Proximity to local waterways
- A final comprehensive site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that all excess materials have been removed.
- An E&S Inspection Checklist will be completed during each inspection. This checklist is important to document the inspection history and the record of compliance. Records of inspections, violations, and enforcement actions will be kept by the inspectors and reported to the Development Services Department.
- If enforcement measures are required, they shall be implemented in accordance with the SWMP, City's E&S Ordinance, and the Enforcement Response Plan.

### 4.3.2. Measurable Goals:

- Implement construction inspection program for 100% of active site with LDA permits to ensure that structural and non-structural BMPs are properly installed and maintained.
- Inspect sites in accordance with the protocol described in the Manual for Erosion and Sedimentation Control in Georgia.
- 100% of construction sites with LDA permits inspected at the close of land disturbing activities
- Maintain records of all inspection activities conducted during the reporting period.

### 4.3.3. Schedule:

- Ongoing, 2022 – 2027: Implement inspection program for every construction site with an LDA Permit.

### 4.3.4. Items to be Included in Annual Report:

- Table of active construction sites and number and dates of inspections conducted during the reporting period

## 4.4. Enforcement Procedures

### 4.4.1. Description

If a site shows evidence of violations during an inspection, a comprehensive site inspection will be conducted. If upon a comprehensive site inspection, the site is found to be in violation of the City's ordinance, the City will issue a written warning to the violator. The violator will then have up to five calendar days to correct said violation. After five calendar days, a follow-up inspection by City representatives will take place to verify that corrective measures have been taken for previously documented deficiencies.

For the third and each subsequent violation, an immediate stop work order shall be issued. No work shall be allowed on the site except to address those deficiencies identified in the inspection and subsequent re-inspections.

Stop work orders shall be issued immediately without prior warnings if any of the following are identified on a site:

- Regulated land disturbing activities are being undertaken without an LDA Permit
- Failure to maintain a stream buffer
- Significant amounts of sediment as determined by the local issuing authority or by the director or his or her designee, have been or are being discharged into waters of the State, and where best management practices have not been properly designed, installed, and maintained

For a more detailed description of enforcement procedures regarding E&S violations, the reader is directed to the enforcement procedures located in the E&S Ordinance included in Appendix B and the ERP included in Appendix F.

### 4.4.2. Measurable Goals:

- Follow enforcement procedures outlined in the City's E&S Ordinance and ERP for violations documented at construction sites.

### 4.4.3. Schedule:

- Ongoing, 2022 – 2027: Implement enforcement procedures as appropriate based on the results of E&S inspections.

### 4.4.4. Items to be Included in the Annual Report:

- Documentation of enforcement actions taken during the reporting period including the number, type (e.g. Notice of Violation, Stop Work Order), and amount of any assessed penalties

## 4.5. Certification

### 4.5.1. Description

GESA requires all local government employees involved with plan review, site inspections, E&S Ordinance enforcement, and construction site operations to undergo the applicable training seminars developed by the GSWCC. The City also requires all non-City of Savannah construction site operators to provide evidence in their LDA Permit application that they have received the appropriate certification. Evidence of site personnel certification must also be produced during an inspection, upon request. The City also requires all applicable City staff to receive this training as soon as possible after the start of their employment.

### 4.5.2. Measurable Goals:

- Ensure all MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the Georgia Soil & Water Conservation Commission.

### 4.5.3. Schedule

- Ongoing, 2022 – 2027: Education/Training Activities

### 4.5.4. Items to be Included in the Annual Report

- Provide documentation of current GSWCC certifications held by City staff.

# 5. Highly Visible Pollutant Sources (HVPS)

*Permit Section 3.3.5: Highly Visible Pollutant Sources, Table 3.3.5*

## 5.1. HVPS Facility Inventory

### 5.1.1. Description

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). After the inspection conducted during the previous permit period, the City now considers the following types of businesses to be HVPS:

- Auto Repair/Maintenance Facilities that use oil, grease, lubricants, and other automotive fluids
- Veterinary Offices/Kennels

The inventory may also contain businesses or facilities that do not fit the above categories if they are determined to be a HVPS and are not already included in the industrial facilities inventory. The inventory is updated annually based on changes to the business license database and field validation and will be included in each Annual Report.

### 5.1.2. Measurable Goals:

- Update the HVPS Inventory on an annual basis.

### 5.1.3. Schedule:

- Annually, 2022 – 2027: Update HVPS Inventory

### 5.1.4. Items to be Included in Annual Report:

- Updated HVPS Inventory

## 5.2. Inspection Program

The City will be responsible for conducting stormwater inspections on-site at facilities on the HVPS inventory list such that 100% of facilities are inspected over the permit period (2022 – 2027). Inspections shall be scheduled annually such that at least 5% of the facilities in the HVPS inventory are inspected annually. HVPS may be prioritized for inspection based on evidence or knowledge of potential illicit discharge issues, impaired waterways, history of violations, etc.

A City inspector will visit the HVPS site and assess the condition and presence of pollutants on-site. HVPS inspection checklists included in Appendix D (or generated from a tablet) shall be used to record the inspection results. City staff will inspect the site for evidence of stormwater pollution in the following areas, if applicable, and this information will be noted:

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas
- Waste generation, storage, treatment and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

Documentation shall be maintained on all inspections, problems found, and actions taken.

### 5.2.1. Measurable Goals:

- Inspect 100% of HVPS sites within the permit period, with at least 5% inspected in any given year.

### 5.2.2. Schedule:

- Annually, 2022 – 2027: Complete inspections of at least 5% of HVPS Sites each year.

### 5.2.3. Items to be Included in the Annual Report:

- Provide the total number of HVPS facilities and the number and percentage of inspections conducted during the reporting period.
- Provide a completed checklist for each inspected HVPS site conducted that reporting period.

## 5.3. Enforcement Procedures

### 5.3.1. Description

If upon inspection, an HVPS site is found to have issues that would be considered an illicit discharge that warrant a Notice of Violation, then the City will proceed to an enforcement action as outlined in the IDDE Plan and/or the Enforcement Response Plan. If an illicit discharge has not taken place but practices on site indicate a high probability that such a discharge could occur, or there is a minor issue that doesn't require the issuance of an NOV, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and issue a verbal warning. Generally, the City will attempt to notify property owners/operators within 10 business days of the initial inspection if issues are discovered. The City will then re-inspect the site within 1 year to determine if corrective actions have been taken, if such measures are warranted.

For violations that continue unabated, the City will implement the enforcement provisions of the IDDE Plan and the ERP, as approved by EPD, including issuing violations, sending notifications, and taking enforcing measures necessary to abate the violation and/or restore the property.

### 5.3.2. Measurable Goals:

- Implement enforcement procedures for violations noted during HVPS inspections.

### 5.3.3. Schedule:

- Ongoing, 2022 – 2027: Take enforcement actions, as needed and appropriate

### 5.3.4. Items to be included in Annual Report:

- Documentation of enforcement actions taken on HVPS sites during the reporting period

## 5.4. Educational Activities

### 5.4.1. Description

City staff distribute excerpts from the Georgia Stormwater Management Manual Volume 3: Pollution Prevention Guidebook during all HVPS inspections.

### 5.4.2. Measurable Goals:

- Distribute HVPS educational material during facility inspections.

### 5.4.3. Schedule:

- Annually, 2022 – 2027: Distribute educational materials during HVPS inspections.

### 5.4.4. Items to be included in Annual Report:

- Copy of educational material distributed during HVPS inspections and displayed on website

# 6. Enforcement Response Plan (ERP)

*Permit Section 3.3.6: Enforcement Response Plan (ERP)*

## 6.1. ERP Implementation

### 6.1.1. Description

The City of Savannah has developed and will continue to implement the City's ERP, which includes the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. The City's ERP was approved by EPD in 2013. In 2020, EPD provided comments to the City on the 2017 SWMP and requested additional changes to the City's ERP. A copy of the City's updated ERP is included in Appendix F.

The City will review the ERP annually and revise, as necessary. If the ERP is revised, the City will submit it to EPD for review.

### 6.1.2. Measurable Goals:

- Review the ERP annually

### 6.1.3. Schedule:

- Ongoing, 2022 – 2027: Take enforcement actions, as needed and appropriate.
- Annual, 2022 – 2027: Update ERP, if necessary.

### 6.1.4. Items to be included in Annual Report:

- The revised ERP, if updates were completed during the reporting period

# 7. Impaired Waters

*Permit Section 3.3.7: Impaired Water Bodies*

### 7.1.1. Description

Waterways within the City of Savannah that appear on the 2022 305(b)/303(d) list for not meeting the standards of their designated use are summarized in the table below.

*Table 4: 2022 305(b)/303(d) Listed Impaired Waters*

| Impaired Section (As Described by EPD) | Segment Length (miles) | Criterion Violated | Use | Potential Causes |
|---|---|---|---|---|
| Casey Canal Area 1<br>*Head of Canal to DeRenne Ave*<br>*(Ogeechee River Basin)*<br>*GAR030602040308* | 3 | Dissolved Oxygen (DO), Fecal Coliform (FC) | Fishing | Urban Runoff |
| Casey Canal Area 2<br>*DeRenne Ave to Montgomery Cross Road*<br>*(Ogeechee River Basin)*<br>*GAR030602040309* | 3 | DO, FC | Fishing | Urban Runoff |
| Hayners Creek<br>*Casey Canal Montgomery Cross Road to Vernon River*<br>*(Ogeechee River Basin)*<br>*GAR030602040310* | 1.9 | DO, FC | Fishing | Urban Runoff |
| Little Ogeechee River<br>*Little Ogeechee Pond to below US 17 near Burroughs*<br>*(Ogeechee River Basin)*<br>*GAR030602040208* | 6 | DO, FC, Se | Fishing | Urban Runoff |
| Little Ogeechee River<br>(aka Green Island Sound)<br>Vernon River to Ossabaw Sound<br>(Ogeechee River Basin)<br>GAR030602040317 | 1 | Enterococci | Recreation and Fishing | Urban Runoff |
| Ogeechee River<br>*Black Creek to Canoochee River*<br>*(Ogeechee River Basin)*<br>*GAR030602020605* | 19 | FC,<br>Fish Tissue (Mercury) | Fishing | Non- Point Source |
| Ogeechee River<br>*Canoochee River to US 17*<br>*(Ogeechee River Basin)*<br>*GAR030602040319* | 1.2 | Fish Tissue (Mercury) | Fishing | Non- Point Source |
| Savannah Harbor<br>*SR 25 to Elba Island Cut*<br>*(Savannah River Basin)* | 4 | DO | Fishing | Urban Runoff |

| | | | | |
|---|---|---|---|---|
| Ogeechee River<br>*US 17 to Richmond Hill,*<br>*4.7 miles downstream US 17*<br>*(Ogeechee River Basin)*<br>*GAR030602040320* | 3.7 | Fish Tissue (Mercury) | Recreation and Fishing | Non- Point Source |
| Pipemakers Canal<br>*Unnamed Tributary U/S of Dean Forest Road*<br>*to Savannah River*<br>*(Savannah River Basin)* | 4 | FC | Fishing | Urban Runoff |
| Tributary to Salt Creek<br>(Tributary to Red Gate Canal)<br>Headwaters near Louis Mill Blvd to Trib. 500' downstream Veterans Parkway<br>(Ogeechee River Basin)<br>GAR030602040213 | 1.3 | FC | Fishing | Urban Runoff |
| Salt Creek<br>Bend one mile U/S US Hwy. 17 to Hardin Canal<br>(Ogeechee River Basin) | 0.7 | FC | Fishing | Urban Runoff |
| Salt Creek<br>H/W to bend one mile U/S US Hwy. 17<br>(Ogeechee River Basin) | 4 | DO | Fishing | Urban Runoff |

The City has developed a plan to perform water quality monitoring of the impaired waters listed above and to implement BMPs to address the pollutants of concern (POC). For more information regarding best management practices designed to address water quality impairments, please see the Impaired Waters Monitoring & Implementation Plan (IWP) in Appendix H.

The City will analyze the trends in monitoring data collected as part of this effort and assess the effectiveness of the BMPs for addressing the POCs in the IWP.

The City will also review Georgia EPD's updated 305(b)/303(d) list bi-annually for waters within their jurisdiction that are not supporting their designated use. For newly listed waterbodies, the City will propose an update to the Impaired Waters Monitoring & Implementation Plan for the POC and submit a revised copy of the document to EPD for approval. Following approval of the IWP, the IWP will be implemented, and a copy will be incorporated into the SWMP as Appendix H.

### 7.1.2. Measurable Goals:

- Implement approved Impaired Waters Monitoring & Implementation Plan.
- Bi-annual review of the 305(b)/303(d) list, and update of IWP, if required
- Perform pollutant of concern (POC) water quality monitoring and analysis.

### 7.1.3. Schedule:

- Bi-Annually, 2022 – 2027: Review 305(b)/303(d) list and report on Impaired Waters Monitoring & Implementation Plan.
- Annually, 2022- 2027: Conduct monitoring and report on water quality trends and analysis

- Annually, 2022-2027: For those waters impaired for bacteria, if two years of data demonstrates the level of bacteria is consistently below numeric criteria, then the permittee must prepare a Sampling Quality Assurance Plan (SQAP) and submit to EPD.
- Annually, 2022-2027: Review water quality monitoring data and assess the effectiveness of the BMP's.
- Ongoing, 2022 – 2027: Implement BMPs identified in the plan.

### 7.1.4. Items to be Included in Annual Report:

- Monitoring data collected during the reporting period
- Summary of water quality trends over time for pollutants of concern
- Assessment of the effectiveness of BMPs implemented to address pollutants of concern
- Revised Impaired Waters Monitoring & Implementation Plan, if revisions are made during the reporting period.

# 8. Municipal Employee Training

*Permit Section 3.3.8: Municipal Employee Training*

### 8.1.1. Description

The City of Savannah will conduct stormwater-related training for its employees at least once each reporting period. Alternatively, the City may send employees to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including good housekeeping, IDDE, industrial and HVPS inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID), and/or pollution prevention procedures. The City shall keep records of the training including the training agenda and/or materials as well as a list of attendees for inclusion in the Annual Report.

### 8.1.2. Measurable Goals:

- Ensure that City staff obtain the appropriate stormwater education and training.

### 8.1.3. Schedule:

- Annually, 2022 – 2027: Conduct employee training.

### 8.1.4. Items to be included in the Annual Report:

- Summary of training conducted or attended during the reporting period. This may include agendas and/or training materials as well as a list of attendees, topics, and attendance dates.

# 9. Public Education

*Permit Section 3.3.9: Public Education*

## 9.1. Stormwater Webpage

### 9.1.1. Description

The City of Savannah will continue to maintain a Stormwater Management webpage that is linked through the City's homepage (https://www.savannahga.gov/). The Stormwater Management webpage can be accessed through the link below:

https://www.savannahga.gov/508/Stormwater-Management

Currently, the site contains information on topics such as the following (please note the content of the City's stormwater webpage will be updated as needed, at least annually, so the list below may not be exhaustive and/or reflect the most recent changes made to the City's webpage):

- The Stormwater Management Department
- General stormwater and water resources issues
- Annual river clean-up event
- The City's NPDES Phase I Medium MS4 Stormwater Management Program
- Stormwater system maintenance
- Coastal Stormwater Supplement to the Georgia Stormwater Management Manual and training opportunities
- Green infrastructure/Low Impact Development
- Stormwater utilities and training
- Tidal creek habitats
- Natural resource conservation on construction sites
- The City's Stormwater Management Local Design Manual

Webpage updates are conducted as new information becomes available about innovative design methodologies, including low impact development, green infrastructure, LEED for New Construction Sustainable Sites, and other relevant stormwater pollution prevention and nonpoint source pollution reduction strategies. The City will promote this webpage as a part of other public education initiatives and will maintain a "counter" to the website so that it can determine how frequently the site is visited.

### 9.1.2. Measurable Goals:

- Maintain and update website to include applicable and relevant educational materials.
- Continue to track the frequency of visits to the stormwater webpage.

### 9.1.3. Schedule:

- Annually, 2022 – 2027: Review and update website educational material as necessary.

### 9.1.4. Items to be Included in Annual Report:

- Link to educational information on City's website
- Screenshot of Stormwater Management website
- Number of website visits recorded by the website counter

## 9.2. Public Information Booklet

### 9.2.1. Description

The City will distribute to new and existing water customers a new water customer information booklet designed to address water resource issues including stormwater pollution prevention. The booklet addresses the following topics:

- Stormwater pollution prevention
- Septic system maintenance
- Pet waste
- Lawn fertilizer
- Insecticides
- Gas and motor oil spills and leaks
- Lawn clippings and leaves
- Receiving water and watersheds

Booklets will be reviewed and updated on an annual basis. Booklets will be restocked as they run out and the City will track how many booklets are handed out during the reporting period.

### 9.2.2. Measurable Goals:

- Review booklet on an annual basis and track the number of booklets handed out.

### 9.2.3. Schedule:

- Annually, 2022 – 2027: Review booklet

### 9.2.4. Items to be included in Annual Report:

- Copies of the booklet distributed during the reporting period
- Number of booklets distributed during the reporting period

## 9.3. Educational Tours/School Lectures

### 9.3.1. Description

The City's Water Resources Division conducts tours of municipal facilities throughout the year as part of the "One Water" program or other educational outreach efforts to educate students and the public about flooding and stormwater management, drinking water supply and treatment, and wastewater treatment. Tours are available to the general public and students of all ages. Tours may include topics such as the following, and/or other relevant stormwater-related information:

**Tour A – Water, Water Everywhere:** Tour of the water supply and treatment plant to learn how the City produces drinking water.

**Tour B – Flushing Fantastic:** Tour of the President Street facility wastewater treatment plant to show how wastewater is treated to meet water quality standards.

**Tour C – Clean Water Begins Here:** Tour explaining why the City floods, how City staff manages stormwater, and benefits of residential stormwater harvesting.

The City's Water Resources Division also provides a middle school water resource education program that is held by teachers during school through a digital platform custom-made for Savannah. The Water Resources Division contracts with Tinker, Inc. to provide this program. Tinker sends semesterly reports depicting engagement, learning gains, and teacher feedback. This report can be submitted with the Annual Report. Additionally, City staff may visit local schools as needed/upon request to conduct lectures/ presentations on water resources, stormwater, drinking water, and wastewater treatment. The City will continue to offer education tours and school lectures through the year. At least one education tour and/or school lecture will be provided annually.

### 9.3.2. Measurable Goals:

- Provide at least one educational tour and/or school lecture per year.

### 9.3.3. Schedule:

- Annually, 2022 – 2027: Perform tours and/or school visits.

### 9.3.4. Items to be included in Annual Report:

- Summary of tour(s) and/or school visit(s) conducted during the reporting period. This may include number of events performed and estimated number of attendees and/or a description of the activities provided, and educational content provided during the tour or school visit. Documentation of the performed event such as a report from a participating third party, agenda for the days activities, confirmation emails, or other documents provided to verify and support the accomplished activity.

## 9.4. Storm Drain Art Program

### 9.4.1 Description

The City's Water Resources Division coordinates a storm drain art program to bring awareness of the connection to our rivers and ocean through the storm drain. Every year a call for artists is advertised and submissions are reviewed by a panel of local experts in ecology and art. Ten designs are selected for ten drains throughout the city. The website https://waterconnectsusall.com introduces the purpose of the project and displays the ten selected designs as well as the unselected designs. Around 6 drain murals are installed each year. Signs are posted by each drain for approximately 30 days after the installation is completed to state the purpose of the project and display the website address.

### 9.4.2 Measurable Goals:

- Install new storm drain murals.

### 9.4.3 Schedule:

- Annually, 2022 – 2027: install 30 drain murals.

### 9.4.4 Items to be included in Annual Report:

- Pictures of completed storm drain arts.
- Project timeline

## 9.5. Native Plant Sale

### 9.5.1 Description

The City partners with Chatham County, Tybee, Pooler, and local plant vendors to organize a native plant sale every year in the spring at the Coastal Botanical Gardens. Local plant vendors have a selection of native species for sale that will thrive in the coastal environment. The Native Plant Sale & Tree Giveaway focuses on the importance of native plants and trees to the coastal environment and local water bodies. At the event, City hosts kid-friendly educational activities and raffles off rain barrels. Raffle tickets are distributed based on the number of native plants purchased by the attendee. The event is advertised on social media and online newsletters.

### 9.5.2 Measurable Goals:

- Manage sale of native plants and rain barrel raffle tickets

### 9.5.3 Schedule:

- Annually, 2022 – 2027

### 9.5.4 Items to be included in Annual Report:

- Flyer advertising event
- Number of native plants/raffle tickets purchased

# 10. Public Involvement

*Permit Section 3.3.10: Public Involvement*

## 10.1. Public Input on SWMP & Annual Report

### 10.1.1. Description

The City will invite the public to provide input on the SWMP by posting a copy of the draft document (before finalization and transmittal to the EPD) as well as the City's most recent MS4 Annual Report transmitted to the EPD on the City's website. The website will contain a link that will allow the public to submit comments to the City on the proposed best management practices included within the SWMP as well as on the activities summarized in the Annual Report. The City will incorporate any needed revisions to the SWMP, and address any comments provided on the Annual Report in the next Annual Report submitted to the EPD, or within the SWMP, if applicable.

### 10.1.2. Measurable Goals:

- Post the City's current draft SWMP on the website for public review/comment.
- Post the latest Annual Report submitted to EPD on the website for public review/comment.

### 10.1.3. Schedule:

- Annually, 2022 – 2027: Post Annual Report and draft SWMP update, if changes were made.

### 10.1.4. Items to be Included in Annual Report:

- Comments received by the City on the SWMP and/or Annual Report and a description of how they were addressed
- Documentation of the posted Annual Report and draft SWMP provided as a web link.

## 10.2. Litter Clean-Up Events

### 10.2.1. Description

For over 15 years the City of Savannah Water Resources Division organized the Hayners Creek River Cleanup. This was possible due to a kayak rental vendor who had a large inventory of over 40 kayaks for our volunteers. This was critical as the land surrounding the creek is private, residential homes. The only access the litter in the marsh was in a watercraft. When the vendor died there were no other kayak rental companies with the required inventory. As such the City started supporting the Savannah and Ogeechee Riverkeeper clean up events. The City continues to support them in a variety of ways like supplying the trash containers, supplying litter grabbers, supplying promotion through website and city social media outlets. In addition individual Council members and community churches and nonprofits organize litter cleanup throughout the city. In 2021 there were 31 separate clean up events sponsored by City Council members.

### 10.2.2. Measurable Goals:

- The City will support Savannah and Ogeechee Riverkeeper with river clean-up events and continue to support community clean-up events.

### 10.2.3. Schedule:

- Annually, 2022 – 2027

### 10.2.4. Items to be Included in Annual Report:

- Webshots and/or copies of event promotions with City logo/City Council member sponsorship.

## 10.3. Adopt-A-Drain

### 10.3.1. Description

The City has implemented an Adopt-A-Drain program to educate local citizens about the importance of keeping stormwater drains free of litter and debris, and to encourage citizens to help keep stormwater drains clean in their neighborhood and/or other areas throughout the City through active involvement.

The City of Savannah has developed an Adopt-A-Drain webpage that is linked through the City's homepage (https://www.savannahga.gov/). The Adopt-A-Drain webpage can be accessed through the link to the Public Works and Water Resources Bureau (the webpage URL is http://www.savannahga.gov/2944/Adopt-A-Drain). The City's Adopt-A-Drain webpage provides information about the stormwater drain adoption program including informative videos that illustrate how to be a "Drain Warrior" as well as how to safely cleanout storm drains and appropriately dispose of accumulated litter and debris. The City will continue to implement the Adopt-A-Drain program and update the webpage as needed.

### 10.3.2. Measurable Goals:

- Continue implementation of city-wide Adopt-A-Drain program.
- Update Adopt-A-Drain webpage (as needed).

### 10.3.3. Schedule:

- Annually, 2022 – 2027: Host Adopt-A-Drain program
- As needed: Update Adopt-A-Drain webpage

### 10.3.4. Items to be Included in Annual Report:

- Screenshot of Adopt-A-Drain webpage and a description of any updates made to the webpage, if applicable
- Number of drains adopted.

## 10.4 Rain Barrel Voucher Program

### 10.4.1. Description

For the past 5 years, the City has coordinated a single rain barrel distribution event where rain barrels are sold for a reduced cost 30 days prior to the event. The City has had a long standing successful water saving toilet voucher program and this has been the template for a new rain barrel voucher program. City of Savannah water customers complete a simple one-page application and are given up to two barrels per water account. Customers must send pictures of the installed barrels or the price of the barrels will be placed on their water bill.

### 10.4.2. Measurable Goals:

- Distribute rain barrel to customers every year.

### 10.4.3. Schedule:

- Annually, 2022 – 2027

### 10.4.4. Items to be Included in Annual Report:

- The number of rain barrels distributed.
- Photos of installations.

# 11. Post-Construction

*Permit Section 3.3.11: Post-Construction*

## 11.1. Post-Construction Stormwater Controls

### 11.1.1. Description

The City of Savannah has adopted the Stormwater Management Ordinance, the Stormwater Management Local Design Manual (LDM) and the Coastal Stormwater Supplement (CSS) to protect the general health, safety and welfare of the community and to comply with specific requirements of the City's NPDES Phase I Medium MS4 Permit. The City's stormwater runoff management regulation strategy involves a three-pronged approach as summarized below:

- Stormwater Management Ordinance: This document serves as the City's legal authority to regulate local stormwater management activities.
- Stormwater Management Local Design Manual (LDM): This document provides community-specific policies, criteria and standards related to stormwater management design, construction and maintenance.
- Coastal Stormwater Supplement (CSS) to the GSMM: This document serves as the technical reference handbook for stormwater management analysis, design, and maintenance.

The City of Savannah has adopted the ordinance and design guidelines recommended by the CSS to the GSMM. Under this ordinance, it is required that developers comply with the rules and regulations governing the development of post-development stormwater management plans for new development and redevelopment in general accordance with CSS standards. The regulations require developers to submit a Stormwater Management Site Plan for the following:

- New development that creates or adds 5,000 square feet or greater of impervious surface area, or that involves land disturbing activity of 1 acre of land or greater
- Redevelopment that creates, adds, or replaces 5,000 sq. ft. or greater of impervious surface area, or that involves land disturbing activity of 1 acre or more, including projects less than 1 acre if they are part of a larger common plan of development or sale.

Stormwater management plans must also address water quality and water quantity issues in accordance with CSS recommendations. The ordinance encourages site design that incorporates green infrastructure and infiltration of stormwater to reduce stormwater runoff rates and volume. The Stormwater Management Site Plan must be reviewed by a Georgia-registered Professional Engineer, or other qualified professional, and be approved by the City before a Land Disturbing Activities (LDA) Permit is issued and construction can begin.

### 11.1.2. Measurable Goals:

- Annually evaluate the Savannah Stormwater Management Ordinance for post-construction stormwater runoff requirements to determine if revisions are required.
- Update the ordinance, if required.
- Enforce the use of the Stormwater Management Ordinance, Division D: Post-Construction Stormwater Management for development that meets the standard above.
- If or when needed, develop linear project feasibility program to apply to future linear projects.

### 11.1.3. Schedule:

- Ongoing, 2022 – 2027: Enforce the use of the Stormwater Management Ordinance, Division D: Post-Construction Stormwater Management during plan review.
- Annual, 2022 – 2027: Review the Stormwater Management Ordinance, Division D: Post-Construction Stormwater Management and update as needed.
- If and when needed, develop a linear project feasibility program, and submit to EPD for approval.

### 11.1.4. Items to be included in Annual Report:

- If the Stormwater Management Ordinance, Division D: Post-Construction Stormwater Management plan is updated during the reporting period, include the updated ordinance.
- If developed, linear project feasibility program

## 11.2. Green Infrastructure/Low Impact Development

*Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)(2)*

In April of 2016, the City developed a GI/LID Plan to meet the requirements of Section 3.3.11 (b) which requires the following program elements to be addressed. The City updated the GI/LID Plan in 2022 associated with the new 2022-2027 Permit. A copy of the City's GI/LID Plan is provided in Appendix G.

### 11.2.1. Legal Authority

#### 11.2.1.1. Description

The City of Savannah adopted the Coastal Stormwater Supplement to the Georgia Stormwater Management Manual in March 2012 in accordance with its NPDES Phase I Medium MS4 Permit. Furthermore, the City of Savannah performed an assessment of its existing codes to determine if there were any codes that presented an obstacle to smart growth and a green infrastructure approach to stormwater management. The City utilized the checklist developed by the Center for Watershed Protection to perform this assessment. The completed checklist and summary of recommended actions were included in the 2022 Annual Report. The results of the assessment indicated that further development rules to adopt GI/LID were not required. Implementation of the engineering criteria of the CSS through the City Stormwater Ordinance and City of Savannah Stormwater Local Design Manual require newly designed drainage systems for redevelopment and new development in the City to reduce runoff volume and treat water quality through the implementation of GI/LID techniques.

The City will continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. The City will assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, they should also consider the inclusion of incentives for use of GI/LID practices into the ordinance.

#### 11.2.1.2. Measurable Goals:

- Review building codes, ordinances, and other regulations related to impeding GI/LID approaches.

#### 11.2.1.3. Schedule:

- Annually, 2022 – 2027: Review building codes, ordinances, and other regulations related to impeding GI/LID approaches.

#### 11.2.1.4. Items to be Included in Annual Report:

- If updates to the City's Ordinances are made to facilitate GI/LID during the reporting period, the updated code(s) will be included.
- Documentation of regulatory review process undertaken for GI/LID practices.

## 11.3. GI/LID Program

### 11.3.1. Description

The City of Savannah has developed and implemented a GI/LID Plan to address the following elements of the City's GI/LID program:

1. GI/LID techniques and practices
2. GI/LID structure inventory
3. GI/LID inspection and maintenance program

The GI/LID Plan was approved by EPD in January 2016 and reviewed again in 2022. A copy of the most recently revised GI/LID Plan is included in Appendix G. Additionally, the City utilizes a "Fee in Lieu Contribution" which is a payment of money in place of meeting all or part of the post-construction stormwater management criteria required by the Stormwater Management Ordinance. The stormwater fee applies to projects downtown where space for stormwater control measures is often very limited. The fee is added to a fund which the City utilizes to install pervious pavers as part of street repaving projects. The pervious pavers allow stormwater to infiltrate the ground and therefore reduce stormwater runoff quantities that otherwise would increase with the increase of impervious cover.

### 11.3.2. Measurable Goals:

- Review the GI/LID Plan annually and make updates as needed.

### 11.3.3. Schedule:

- Annually, 2022 – 2027: Review GI/LID Plan, and update as needed.

### 11.3.4. Items to be Included in Annual Report:

- Any updates to GI/LID Plan

## 11.4. GI/LID Structure Inventory

### 11.4.1. Description

The City maintains an inventory of permittee owned, privately-owned non-residential, and publicly-owned by other entities water quality-related GI/LID structures located within the City Limits of Savannah. The inventory includes at a minimum: green roofs, vegetative filter strips, rain gardens, permeable pavers, and/or bioretention and, and any other structure deemed appropriate by the City. The inventory was conducted through field investigations, and includes the "GI/LID Type" as listed above, in addition to pertinent parameters outlined below:

- Unique ID
- Business Name
- Location / Address
- GI/LID Type
- Description / Comments

The inventory is maintained in a GIS database and is updated on an annual basis and included in the Annual Report.

### 11.4.2. Measurable Goals:

- Update the inventory with new GI/LID structures and submit the updated inventory in each Annual Report.

### 11.4.3. Schedule:

- Annually, 2022 – 2027: Update GI/LID structure inventory

### 11.4.4. Items to be included in Annual Report:

- Most recent GI/LID Inventory

## 11.5. Inspection & Maintenance Program

### 11.5.1. Description

Inspections of GI/LID structures will be conducted in accordance with the same schedule maintained for other BMP inspections conducted by City of Savannah staff. Accordingly, City staff will inspect 100% of structures within the 5-year permit term with at least 5% of the structures inspected per year. Inspections will be conducted to ensure that all GI/LID structures are maintained in accordance with their design, the City of Savannah Stormwater Management Ordinance and the recommendations of the CSS. A copy of the Inspection Report for GI/LID structures is provided in Appendix G.

A summary of inspections conducted in subsequent years will be included in the Annual Report. If inspections indicate that a City of Savannah-owned GI/LID structure is in need of maintenance, the City will perform that maintenance. If an inspection indicates that a non-residential, privately-owned BMP requires maintenance, the City of Savannah will notify the private owner of the results of the inspection and any recommended actions.

The City of Savannah will maintain city-owned GI/LID structures in accordance with the recommended procedures and resource availability.

In order to ensure that private, non-residential GI/LID structures are maintained by their private owner in accordance with the CSS, the City has adopted a Stormwater Facility Inspection & Maintenance Agreement designed as part of the site's stormwater management system. This maintenance agreement requires the developer of the site to develop a maintenance program and identify a responsible party for implementation of the prescribed maintenance activities. This agreement must be executed prior to approval of the Stormwater Site Plan, per City of Savannah Stormwater Management Ordinance. This agreement will allow City of Savannah to enforce maintenance standards on private, non-residential GI/LID structures. This agreement is included in Appendix B.

### 11.5.2. Measurable Goals:

- Inspect 100% of the total permittee owned, privately-owned non-residential, and publicly-owned by other entities GI/LID structures within a five (5)-year period. A minimum of 5% of the overall number of inventory structures shall be inspected in each reporting year.
- Ensure that owners are maintaining publicly owned by other entities and privately-owned non-residential GI/LID structures in accordance with their Inspection & Maintenance Agreements.
- Conduct maintenance on all permittee-owned GI/LID structures, as needed, in accordance with EPD approved procedures.

### 11.5.3. Schedule:

- Annually, 2022 – 2027: Complete inspections of at least 5% of permittee owned, publicly-owned by other entities, and privately-owned non-residential GI/LID structures in one year.
- Annually, 2022 – 2027: Complete maintenance of at least 5% of permittee-owned GI/LID structures in one year.

### 11.5.4. Items to be Included in Annual Report:

- Number and percentage of GI/LID structures inspected during the reporting period.
- Documentation of inspections conducted during the reporting year.
- Number of permittee-owned GI/LID structures maintained during the reporting period.
- Documentation of permittee-owned GI/LID structures maintained during the reporting period.
- Copies of any Inspection & Maintenance Agreements executed following the effective date of the 2022-2027 Permit, and maintained summary list of these agreements as well as any other maintained agreements prior to this permit.
- Documentation of activities taken to ensure maintenance of GI/LID structures (e.g. letters to owners, enforcement actions, etc.)