



Annual Report
April 1, 2017 – March 31, 2018
Gadsden-Etowah MS4 Entities
Gadsden, Etowah County, Alabama
S&ME Project No. 4482-18-002

PREPARED FOR:
Gadsden-Etowah MS4

PREPARED BY:
S&ME, Inc.
360D Quality Circle NW, Suite 450
Huntsville, AL 35806

May 30, 2018



May 30, 2018

Attention: Gadsden-Etowah MS4 Steering Committee

Reference: **Annual Report: April 1, 2017 – March 31, 2018**
Gadsden- Etowah MS4 Entities
Gadsden, Etowah County, Alabama
S&ME Project No. 4482-18-002

Dear Gadsden-Etowah MS4 Steering Committee:

S&ME, Inc. has prepared the attached Annual Report (April 1, 2017-March 31, 2018 reporting period) for the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1700288, dated August 11, 2017.

S&ME, Inc. appreciates the opportunity to provide our services to the City of Gadsden, Rainbow City, City of Hokes Buff, City of Southside, City of Glencoe, City of Attalla, and Etowah County. If you should have questions concerning this report, or if additional information is required, please contact us.

Sincerely,

S&ME, Inc.

A handwritten signature in black ink that reads "Christa C. Lyons".

Christa C. Lyons
Project Manager

A handwritten signature in blue ink that reads "Deborah J. Jones".

Deborah J. Jones, P.E.
Senior Engineer



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Annual Report: April 1, 2017 – March 31, 2018

Gadsden- Etowah MS4 Entities

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-18-002



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1.0 Introduction

S&ME, Inc. has prepared this Annual Report for the Gadsden – Etowah MS4 Entities that comprise the *Gadsden, Alabama Urbanized Area* Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1700288, dated August 11, 2017. Ms. Christa Lyons, Ms. Emily Kennedy, and Ms. Deborah Jones with S&ME compiled information provided by each entity and prepared this report.

The urbanized area consists of the following entities (jurisdictions): The City of Gadsden, City of Rainbow City, City of Southside, City of Glencoe, City of Hokes Bluff, City of Attalla, and portions of unincorporated Etowah County.

Authorization date and responsible official for each entity are provided in Table 1.1.

Table 1-1: Responsible Officials and Authorization Dates

Entity	Name	Date
City of Attalla	Larry Means, Mayor	October 24, 2017
City of Gadsden	Sherman Guyton, Mayor	October 12, 2017
City of Glencoe	Charles C. Gilchrist, Mayor	August 23, 2017
City of Hokes Bluff	Scott Reaves, Mayor	October 25, 2017
City of Rainbow City	Terry John Calhoun, Mayor	August 18, 2017
City of Southside	Wally Burns, Mayor	January 7, 2018
Etowah County	Tim Graves, Engineer	September 11, 2017

The Annual Report is required by Part VI of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) General Permit ALR040000 for discharges from regulated small municipal separate storm sewer systems (MS4). Permit numbers for each entity are provided in Table. 1.2.

Table 1-2: Permit Numbers for MS4 Entities

Entity	ADEM Permit Number
City of Attalla	ALR0400052
City of Gadsden	ALR0400053
City of Glencoe	ALR0400054
City of Hokes Bluff	ALR0400055
City of Rainbow City	ALR0400056
City of Southside	ALR0400057
Etowah County	ALR0400009



1.1 Permit History

The Storm Water Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 requires nationwide coverage of all operators of small MS4s located within the boundaries of an “urbanized area” as defined by the latest decennial Census. Based on the results of the 2010 census, the Bureau of the Census designated the *Gadsden, Alabama Urbanized Area* to include the City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and portions of unincorporated Etowah County. A map outlining the approximate boundary of the *Gadsden, Alabama Urbanized Area* is included in **Appendix A, Figure 1**.

The *Gadsden, Alabama Urbanized Area* initially applied for and received a NPDES MS4 Phase II General Permit from the ADEM in 2003. The five-year permit expired on March 9, 2008. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration and permit coverage was extended through re-issuance of the MS4 Phase II General Permit ALR04-0009 with an effective date of February 1, 2011. This permit expired on February 1, 2016 and was administratively continued. A Notice of Intent for renewal of the permit was submitted by each entity 180 days prior to expiration; therefore the permit coverage was extended until the Alabama Department of Environmental Management (ADEM) issued a separate permit for each entity with an effective date of October 1, 2016. Maps outlining the approximate urbanized area and city limits for each entity are included in their corresponding appendix.

A copy of the NPDES General Permit is included in the 2017 Storm Water Management Program Plan (SWMPP).

1.2 Storm Sewer System

A Municipal Separate Storm Sewer System (MS4) is defined by 40 CFR Part 122.26(b)(8) to be a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is:

- (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;
- (ii) Designed or used for collecting or conveying storm water;
- (iii) Not a combined sewer; and,
- (iv) Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

1.3 Area and Population Description

The *Gadsden, Alabama Urbanized Area* is located in northeast Alabama and encompasses approximately 38,223 acres. Populations of each entity covered by the referenced NPDES General Permits are shown in the following table.



Table 1-3: Populations from 2000 and 2010 Census

Entity	2000 Census Population	2010 Census Population
City of Attalla	6,592	6,048
City of Gadsden	38,978	36,856
City of Glencoe	5,152	5,160
City of Hokes Bluff	4,149	4,286
City of Rainbow City	8,428	9,602
City of Southside	7,036	8,412
Etowah County	103,459*	104,430*

* Total for the county, including municipalities

1.4 Hydrologic Units in the Urbanized Area

Neely Henry Lake (Coosa River) is the primary receiving water for the Gadsden-Etowah MS4. Hydrologic Hierarchy, Watersheds, and Subwatersheds are provided in the tables below.

Table 1-4: Hydrologic Hierarchy

REGION	03	South Atlantic-Gulf
SUBREGION	0315	Alabama River Basin
BASIN	031501	Coosa-Tallapoosa: Above the confluence of and including the Coosa and Tallapoosa River Basins
SUBBASIN	03150106	Middle Coosa

Table 1-5: Watersheds in the Urbanized Area

Watershed	HUC
Coosa River-Black Creek	03150106-01
Big Wills Creek	03150106-02
Coosa River-Big Canoe Creek	03150106-03

Table 1-6: Subwatersheds in the Urbanized Area

SUBWATERSHED	HUC	TOTAL AREA (ACRES)
Little Wills Creek	03150106-01-06	18,121
Black Creek	03150106-01-07	40,879



Horton Creek	03150106-01-08	16,902
Dry Creek	03150106-02-02	9,778
Big Cove Creek	03150106-02-03	18,028
Turkey Town Creek	03150106-02-04	57,474
Little Canoe Creek - Lake Sumatanga	03150106-03-04	20,260
Lower Big Canoe Creek	03150106-03-06	33,299
Coosa River - H. Neely Henry Lake	03150106-03-09	46,439
Lower Ohatchee Creek	03150106-04-05	19,980

1.5 Water Quality Concerns

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and EPA’s Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to their designated use classifications. The identified waters are prioritized based on severity of the pollution. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment. The TMDL process establishes the allowable loading of pollutants, or other quantifiable parameters for a waterbody, based on the relationship between pollution sources and in-stream water quality conditions.

As mentioned in Section 1.3, Neely Henry Lake is the primary receiving water for the Gadsden-Etowah MS4. In 1996, the ADEM identified five of the six reservoirs on the Coosa River within the State of Alabama’s borders as being impaired, including Neely Henry Lake. The following table summarizes the impaired segments of Neely Henry Lake.

Table 1-7: Impaired Waterbody Segments in the Urbanized Area

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES
AL03150106-0309-101	Coosa River (Neely Henry Lake)	Swimming Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources
AL03150106-0309-102	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources



Table 1-7: Impaired Waterbody Segments in the Urbanized Area

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES
AL03150106-0104-101	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments
AL03150106-0104-102	Coosa River (Neely Henry Lake)	Public Water Supply Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments

Sources of nutrient and organic enrichment from non-point sources within the Coosa River watershed include:

- ◆ Runoff from pastures
- ◆ Runoff from animal operations
- ◆ Direct discharge to streams due to cattle
- ◆ Improper land application of animal waste
- ◆ Failing septic systems
- ◆ Urban runoff

Point source contributors of storm water pollution within the Coosa River watershed include:

- ◆ Discharge from wastewater treatment plants
- ◆ Discharge from industrial operations

In 2008 the EPA approved TMDLs for Neely Henry Lake related to Nutrients (Total Phosphorous), pH, and Dissolved Oxygen. The Gadsden-Etowah MS4 is required to achieve a **30% reduction in Total Phosphorus discharge loading**.

Part IV.D of the NPDES General Permit requires that the SWMPP include BMPs and control measures specifically targeted to achieve the waste load allocations prescribed in the TMDL. The SWMPP must also include monitoring provisions to document that the waste load allocations prescribed in the TMDL are being achieved.

1.6 Coordination Between Entities

Each of the eight entities will provide at least one member to the Gadsden-Etowah Storm Water Steering Committee. Each entity will be responsible for providing the required annual updates and monitoring data to the Steering Committee.



Coordination between departments and individuals internal to each of the eight entities is established in each section of the Plan specific to the individual entities.

In March 2014, the Gadsden-Etowah Storm Water Steering Committee developed an Illicit Discharge Detection and Elimination (IDDE) Program for the entities to collectively use as a guidance. The IDDE Program is included in the 2017 SWMPP.

1.7 Responsible Party

Each entity is responsible for the coordination and implementation of their entity’s SWMPP. Each entity provides a presentative to participate on the Storm Water Steering Committee for the urbanized area. The Storm Water Steering Committee is responsible for the implementation of the monitoring plan. Current membership of the Storm Water Steering Committee is as follows:

Table 1-8: MS4 Storm Water Steering Committee

ENTITY	CONTACT	PHONE NO.	EMAIL
City of Gadsden	Jeremy Ward	256-549-4527	jward@cityofgadsden.com
City of Gadsden	Heath Williamson	256-549-4520	hwilliamson@cityofgadsden.com
City of Attalla	Jason Nicholson	256-441-9200	j.nicholson@attallacity.com
City of Rainbow City	Kevin Ashley	256-413-1240	kashley@rbcalabama.com
City of Rainbow City	Wiley Mclain	256-413-1240	wiley@rbcalabama.com
City of Southside	Judd Rich	256-442-9775 Ext. 103	jrich@cityofsouthside.com
City of Glencoe	Brian Bramblett	256-492-1424	brianbramblett@cityofglencoe.net
City of Hokes Bluff	Lisa Johnson	256-492-2414	hbcity@cityofhokesbluff.net
Etowah County	Tim Graves	256-549-5358	tgraves@etowahcounty.org
Etowah County	Robert Nail	256-549-5358	Rnail@etowahcounty.org

1.8 SWMPP Components

Part III.B of the NPDES General Permit requires that the Permittee develop and implement a storm water management program that includes the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations



In 2016, S&ME was retained by the Gadsden-Etowah Storm Water Steering Committee to revise and update the SWMPP for the Gadsden-Etowah MS4. The updated SWMPP was submitted to the ADEM on January 1, 2017. The ADEM approved the submitted SWMPP in January of 2017.

1.9 Annual Review

The SWMPP will be reviewed annually by the each entity in preparation for the annual report required by Part V of the NPDES General Permit. The Storm Water Steering Committee will review the monitoring plan annually.

1.10 Updates to the SWMPP

The SWMPP may be updated following the procedures laid out in Part IV.B.2 of the NPDES General Permit. Changes to the SWMPP adding components, controls, or requirements may be made at any time, provided the ADEM is notified in writing. The changes must also be documented in the annual report.

Permission to make changes to the SWMPP to remove or replace components, controls, or requirements must be requested from the ADEM a minimum of 60 days prior to making the change. If the request is denied, the ADEM will provide a written response giving the reason for the decision.

1.11 Annual Report Components

Part VI of the NPDES General Permit requires that the Gadsden-Etowah MS4 prepare and submit annual reports to the ADEM each year by May 31. The Annual Report must cover the year prior to the submittal date (April 1 through March 31) and is required to include the following:

1. Contacts and responsible parties who had input to and are responsible for the preparation of the annual report
2. Overall evaluation of the SWMPP developments and progress for the following:
 - a. Major accomplishments
 - b. Overall program strengths/weaknesses
 - c. Future direction of the program
 - d. Overall determination of the effectiveness of the SWMPP taking into account water quality/watershed improvements
 - e. Measureable goals that were not performed and reasons why the goals were not accomplished
 - f. Evaluation of the monitoring data
3. A narrative report of all minimum storm water control measures of the permit to include the following:
 - a. Minimum control measures completed and in progress
 - b. Assessment of the controls

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S&ME Project No. 4482-18-002



- c. Discussion of proposed BMP revisions or any identified measureable goals that apply to the minimum storm water control measures
4. Summary table of the storm water controls that are planned/scheduled for the next reporting cycle
5. Results of information collected and analyzed during the reporting period including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the Maximum Extent Practical (MEP)
6. Notice of reliance on another entity to satisfy some of your permit obligations
7. All monitoring results collected during the reporting period
8. Proposed changes to the SWMPP



2.0 Storm Water Monitoring

2.1 Rationale Statement

As discussed in Section 1.4, the Gadsden-Etowah MS4 currently discharges to an impaired waterbody. Part IV.D.1(c) of the NPDES General Permit requires that the SWMPP include a monitoring plan to assess the effectiveness of the BMPs in achieving the waste load reductions/allocations outlined in the TMDL.

The intent of the proposed monitoring program is to evaluate the effectiveness of the City’s BMPs in achieving the required reduction as established in the TMDL and to generally evaluate overall water quality. Where deviations are documented and/or expected, the collected monitoring data will be used to determine the extent and cause of the pollutant of concern.

The Storm Water Monitoring Plan including monitoring parameters, monitoring locations, field documentation, and sampling procedures is described in Section 2 of the SWMPP dated January 1, 2017.

2.2 Monitoring Events

Since January 2013, S&ME, Inc. was been retained by the Gadsden-Etowah Storm Water Steering Committee to collect the required quarterly water samples for 2013 and the subsequent years as well as provide analyses of the sampling events.

Table 2-1: Monitoring Events

MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2012 – March 31, 2013	2013 Q1	March 12 & 13, 2013
April 1, 2013 – March 31, 2014	2013 Q2	May 8 & 20, 2013
	2013 Q3	September 23, 2013
	2013 Q4	December 10, 2013
	2014 Q1	February 6, 2014
	2014 Q2	June 26, 2014
April 1, 2014 – March 31, 2015	2014 Q3	September 30, 2014
	2014 Q4	November 19, 2014
	2015 Q1	March 23, 2015
	2015 Q2	April 22, 2015
April 1, 2015 – March 31, 2016	2015 Q3	September 30, 2015
	2015 Q4	November 19, 2015

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	2016 Q1	March 15, 2016
April 1, 2016 – March 31, 2017	2016 Q2	June 29, 2016
	2016 Q3	August 9, 2016
	2016 Q4	December 7, 2016
	2017 Q1	March 2, 2017
	2017 Q2	June 21, 29, & 30, 2018 and July 5, 2018
April 1, 2017 – March 31, 2018	2017 Q3	August 16 & 17, 2017
	2017 Q4	October 25 & 26, 2017
	2018 Q1	March 27 & 28, 2018

A monitoring report was issued to the members of the Steering Committee following each monitoring event. Copies of the reports for the monitoring events conducted during the April 1, 2017 to March 31, 2018 reporting period are provided in **Appendix C**.

1.1 Analysis of Monitoring Results

Direct comparison of monitoring results can be misleading, as each rain event that was sampled varied in intensity and duration. Seasonal variation is also expected, due to fertilizer application schedules and natural algae growth cycles.

At this time, there is not sufficient data to determine the amount of reduction in Total Phosphorous from the MS4 or to analyze seasonal trends in the sampled waterways. Charts 1 through 9 in **Appendix B** summarize the analytical data collected since the Monitoring Program was first implemented in March of 2013.

1.1.1 Monitoring Point AT5

Monitoring point AT5 evaluates flow in Big Wills Creek approximately 0.27 mile downstream of its confluence with Little Wills Creek. Big Wills Creek flows from the City of Valley Head, Alabama to Gadsden, Alabama, passing through the City of Fort Payne. Big Wills Creek totals approximately 87 miles in length, with a watershed of over 365 square miles. Approximately seven square miles of the Gadsden-Etowah MS4 contribute to Big Wills Creek upstream of monitoring point AT5.

When compared to the other monitoring points, elevated levels of orthophosphate, total phosphorous, nitrate-nitrite, total Kjeldahl nitrogen, and total suspended solids have consistently been observed at

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monitoring point AT5. As shown in Charts 1 through 9, analytical values for AT5 are regularly the maximum value as compared to the other points observed during the monitoring events.

A basic statistical summary of the analytical results for all samples collected at monitoring point AT5 is provided below in Table 2-3.

Table 2-3: Basic Statistical Summary of Water Data for AT5

PARAMETER	MINIMUM	MAXIMUM	MEDIAN	AVERAGE	SD
Turbidity (NTU)	9.5	934.0	21.3	74.8	193.6
pH (su)	4.06	8.69	7.79	6.97	1.27
Dissolved Oxygen (mg/L)	2.59	20.43	9.03	9.62	4.28
Temperature (°C)	6.91	26.00	15.70	17.24	6.03
Nitrate-Nitrite (mg/L)	0.3	1.8	0.8	0.9	0.3
Orthophosphate (mg/L)	0.07	0.66	0.26	0.30	0.17
Total Phosphorous (mg/L)	0.11	0.86	0.32	0.35	0.20
Total Kjeldahl Nitrogen (mg/L)	0.27	1.47	0.51	0.57	0.31
Total Suspended Solids (mg/L)	9	76	19	31	21

As previously discussed, the Gadsden-Etowah MS4 encompasses approximately 1.9% of the Big Wills Creek watershed; therefore, there is potential for the elevated levels to be a result of upstream activities outside of the MS4 area. The Gadsden-Etowah MS4 will continue to monitor point AT5 during the April 1, 2018 to March 31, 2019 reporting period. If elevated levels of phosphorous and nitrogen continue to be observed, the Gadsden-Etowah MS4 may consider the addition of upstream monitoring points to verify whether or not the source is external to the MS4 area.

2.2.1 Monitoring Point SME1

Monitoring point SME1 was sited to observe water quality at the location where the combined flow from Big Wills Creek, Black Creek, and Horton Creek enters the Coosa River, approximately 6.6 miles downstream from AT5. Monitoring point GD8 is located in Black Creek and monitoring point RC2 is located in Horton Creek. The monitoring locations are identified on Figure 2 in **Appendix A**.

The analytical results for phosphorous and nitrogen at SME1 have consistently been lower than those recorded at AT5, indicating that dilution is occurring before the combined flow from AT5, GD8, and RC2 discharges to the Coosa River.

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2.3 Analytical Results

Field observations and analytical results will be recorded at the time of sampling. The resulting field notes and laboratory analytical reports will be retained by each entity for a minimum of 3 years.

2.4 Evaluation of Results

Results from each sampling event will be evaluated annually.



3.0 Reporting and Record-Keeping

Part V.A of NPDES General Permit ALR040000 issued to each entity of the Gadsden-Etowah MS4 that comprises the *Gadsden, Alabama Urbanized Area* outlines the monitoring, recordkeeping, and reporting requirements.

3.1 Annual Reports

Annual reports are due to the ADEM by May 31 of each year. The annual report will cover the period from April 1 through March 31 of the year prior to the submittal date and will include:

1. List of contacts/responsible parties for the preparation of the Annual Report
2. Evaluation of SWMPP and discussion of the following:
 - a. Major accomplishments
 - b. Overall program strengths/weaknesses
 - c. Future direction of the program
 - d. Evaluation of the effectiveness of the SWMPP in achieving water quality/watershed improvements
 - e. Measureable goals that were not performed and reasons why
 - f. Evaluation of monitoring data
3. Measurable goals for each of the five minimum control measures
4. Proposed changes to the SWMPP, including changes to BMPs or measurable goals
5. An assessment of whether or not the existing BMPs are appropriate
6. Summary of storm water activities planned for the upcoming year
7. Progress toward reducing the discharge of pollutants to the maximum extent practicable

3.2 Recordkeeping

The following records must be maintained by each entity and will be made available for examination. Records will be retained for a minimum period of at least three (3) years from the data of the sample, measurement, report, or application for the term of the NPDES General Permit, whichever is longer.

The following is a list of records to be retained:

- ◆ Copies of all reports required by the permit
- ◆ Copies of monitoring reports
- ◆ Copy of the NPDES General Permit
- ◆ Copy of the Notice of Intent



4.0 City of Attalla (ALR0400052)

The City of Attalla (City) encompasses approximately 7.5% of the Urbanized Area and accounts for approximately 9% of the population. A map depicting the City of Attalla's urbanized area and city limits is located in **Appendix D-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Jason Nicholson, P.E.
City Engineer
612 4th Street, NW
Attalla, Alabama 35954
(256) 538-9986
jason.attalla@gmail.com

4.1 Public Education and Public Involvement on Storm Water Impacts

4.1.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Attalla completed six (6) of the seven (7) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP and partially complete one (1) objective.

The City of Attalla monetarily supported and promoted the 2017 Water Festival; however, a City representative did not participate due to rescheduling of the event and scheduling conflicts (Activity 5).



A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

4.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

4.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

4.1.4 Proposed Changes

The City of Attalla requests no other changes to the Public Involvement and Public Involvement strategies identified in the 2017 SWMPP.

4.1.5 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

4.2 Illicit Discharge Detection and Elimination

4.2.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Attalla completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.



4.2.2 Proposed Activities for the April 2, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

4.2.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

4.2.4 Proposed Changes

The City of Attalla requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

4.2.5 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the IDDE program in the City of Attalla regulated MS4 area.

4.3 Construction Site Storm Water Runoff

4.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Attalla completed five (5) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP and failed to meet one (1) objective.

A City of Attalla representative did not complete a QCI Training (Activity 4).

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

4.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



4.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

4.3.4 Proposed Changes

The City of Attalla requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

4.3.5 Responsible Party

The City of Attalla Mayor's office is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

4.4 Post-Construction Storm Water Management in New Development and Redevelopment

4.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Attalla completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

4.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

4.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.



4.4.4 Proposed Changes

The City of Attalla requests no changes to the Post-construction Storm Water Management strategies identified in the 2017 SWMPP.

4.4.5 Responsible Party

The City of Attalla Mayor's office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

4.5 Pollution Prevention and Good Housekeeping for Municipal Operations

4.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Attalla completed seven (7) of the seven (7) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Attalla also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- The City of Attalla maintains the oil recycling underneath a shelter to limit contact with stormwater (Activity 8)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix D-2**. Supporting documentation is also included in **Appendix D-3**.

4.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix D-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

4.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.



4.5.4 Proposed Changes

The City of Attalla requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

4.5.5 Responsible Party

The City of Attalla Mayor's office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

4.6 Overall Program Evaluation

4.6.1 Major Accomplishments

The City of Attalla's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 40 out of 42 planned strategies, partially completed 1 strategy, and completed 1 additional strategy. This is a significant improvement over previous reporting periods.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City conducted stream-walking activities on 2.35 miles of streams within the Urbanized Area. Ten (10) outfalls were identified during the reporting period and dry weather screening was conducted at each of the outfalls. A sewer overflow was identified and corrected. The City has 3.31 miles remaining to walk within the MS4 Boundaries to complete the Storm Water System Map. To date the City has successfully walked 7.95 miles of the 11.26 miles of stream inventory.

The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified a deficiency that has been corrected.

4.6.2 Overall Programs Strengths and Weaknesses

Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. This limits their availability to



participate in activities throughout the City related to the SWMPP. The City currently employs a City Engineer as the primary executive of the storm water program. The Building Inspector will assist with the storm water program responsibilities; the program duties are handled by two individuals. The City does not currently have the ability to expand the Department for the storm water program; therefore, this weakness is expected to remain for several years.

4.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Attalla is committed to educating the citizens of the SWMP Program and how the actions of others can impact the storm water and the Coosa River.

4.6.4 Overall effectiveness of the SWMPP


The City of Attalla is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



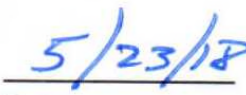
4.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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



Larry Means, Mayor
City of Attalla, Alabama



Date



5.0 City of Gadsden (ALR0400053)

The City of Gadsden (City) encompasses approximately 41.7% of the Urbanized Area and accounts for 56.2% of the population. A map depicting the City of Gadsden's urbanized area and city limits is located in **Appendix E-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

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Engineering Superintendent
90 Broad Street
Gadsden, AL 35901
256-549-4527
jward@cityofgadsden.com

5.1 Public Education and Public Involvement on Storm Water Impacts

5.1.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Gadsden completed thirteen (13) of the thirteen (13) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed seventeen (17) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies were:

- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 9a)



- The City of Gadsden maintains No Dumping / No Littering Signs (Activity 14)
- The City of Gadsden participated in Public Meetings related to non-point source and storm water issues (Activities 15, 16, and 17)
- The City of Gadsden has maintained the Black Creek Trail along the creek (Activity 18)
- The City of Gadsden supported the Gadsden Beautification Board (Activity 19)
- The City of Gadsden has a Facebook page where events and council meetings are advertised on the page as well as photos from events promoted by the City (Activity 20)
- The City of Gadsden coordinated and participated in cleanups along Black Creek Gorge and Wildlife Sanctuary (Activity 21)
- The City of Gadsden coordinated and participated in cleanups at the River Walk at Coosa Landing (Activity 22)
- The City of Gadsden has participated and provided in-kind services at the Habitat Dragon Boat Festival (Activity 23)
- The City of Gadsden has placed 55 recycling trailers at 48 locations around the County to collect cardboard to be taken to the City's recycling center (Activity 24)
- The City of Gadsden attended the Keep Etowah Beautiful Breakfast and received 3 awards for participation and cooperation in KEB events (Activity 25)
- The City of Gadsden conducted a cleanup at the Library (Activity 26)
- The City of Gadsden Engineering Department maintains five pet waste stations (Activity 27)
- The City of Gadsden purchased a storm water inspection camera to help find storm water issues in the closed storm water system portions. (Activity 28)
- The City of Gadsden sponsored the AG Day Event (Activity 29)
- The City of Gadsden sponsored the KEB Message in a Bottle event (Activity 30)
- The City of Gadsden installed dog waste signs in downtown residential areas (Activity 31)
- The City of Gadsden added storm water messages on the inlet tops and manhole lids on several city projects (Activity 32)
- The City of Gadsden was featured in the Alabama Power Shoreline Magazine (Activity 33)

A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Gadsden, and a brief description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

5.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



5.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

5.1.4 Proposed Changes

The City of Gadsden requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

5.1.5 Responsible Party

The City of Gadsden Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

5.2 Illicit Discharge Detection and Elimination

5.2.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Gadsden completed eighteen (18) of the eighteen (18) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed one (1) strategy beyond those proposed in the previous Annual Report and 2017 SWMPP:

- Mr. Jeramy Ward, Engineering Superintendent, attended Erosion and Sediment Control and Storm water Classes through SESWA, APWA and ASCE, Soil and Water Conservation Committee - Clear Water Alabama, and Auburn University (Activity 19)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

5.2.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



5.2.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

5.2.4 Proposed Changes

The City of Gadsden requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

5.2.5 Responsible Party

The City of Gadsden Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Gadsden regulated MS4 area.

5.3 Construction Site Storm Water Runoff

5.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Gadsden completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed three (3) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP:

- The City of Gadsden provided an all-inclusive pamphlet on storm water impacts from construction site runoff to individuals requesting building/development permits (Activity 7)
- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 8)
- The City of Gadsden Engineering Employees discussed with the contractor's responsibility for Erosion and Sediment Control during construction project meetings (Activity 9)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

5.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



5.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

5.3.4 Proposed Changes

The City of Gadsden requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

5.3.5 Responsible Party

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

5.4 Post-Construction Storm Water Management in New Development and Redevelopment

5.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Gadsden completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

5.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

5.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.



5.4.4 Proposed Changes

The City of Gadsden requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.

5.4.5 Responsible Party

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

5.5 Pollution Prevention and Good Housekeeping for Municipal Operations

5.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Gadsden completed nine (9) of the nine (9) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Gadsden also completed thirteen (13) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Petroleum spill kits are maintained on municipal trucks and equipment and replaced when needed (Activity 10)
- Mr. Jeramy Ward, Engineering Superintendent, is a Certified Professional in Erosion and Sediment Control (Activity 11)
- Mr. Jeramy Ward, Engineering Superintendent, is a Certified Professional in Municipal Storm Water Management. (CPMSM) (Activity 12)
- Inmates crews are used to pick up litter throughout the city (Activity 13)
- The City of Gadsden recycled copy paper and newspapers at City Hall (Activity 14)
- The City of Gadsden coordinated and participated in cleanups along Black Creek Gorge and Wildlife Sanctuary (Activity 15)
- The City of Gadsden coordinated and participated in cleanups at the River Walk at Coosa Landing (Activity 16)
- The City of Gadsden purchased a storm water inspection camera to help find storm water issues in the closed storm water system portions. (Activity 17)
- The City of Gadsden has placed 55 recycling trailers at 48 locations around the County to collect cardboard to be taken to the City's recycling center (Activity 18)
- Mr. Jeramy Ward, Engineering Superintendent, attended Erosion and Sediment Control and Storm water Classes through SESWA, APWA and ASCE, Soil and Water Conservation Committee - Clear Water Alabama, and Auburn University (Activity 19)
- The City of Gadsden participated in Public Meetings related to non-point source and storm water issues (Activities 20, 21, and 22)



A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix E-2**. Supporting documentation is also included in **Appendix E-3**.

5.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix E-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

5.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

5.5.4 Proposed Changes

The City of Gadsden requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

5.5.5 Responsible Party

The City of Gadsden Mayor's office and Engineering Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

5.6 Overall Program Evaluation

5.6.1 Major Accomplishments

The City of Gadsden's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 53 out of 53 planned strategies and 33 additional strategies. The number of additional strategies is an increase when compared to the previous reporting periods. This also demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City of has completed the Storm Water System Map in 2016 by walking 53.21 miles of streams within the Urbanized Area and identifying 940 outfalls. During this reporting period, the City walked 22.6 miles of



streams during inspection activities. The City inspected 200 outfalls and dry weather screening was conducted at each of the outfalls. Twenty-three (23) dry weather flows were observed and one sample was collected. A sanitary sewer leak was identified and actions were taken to correct the problem.

The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified ten deficiencies that have been corrected. The City held a meeting with City employees and supervisors to ensure everyone understood the SOP and check list.

The City has a strong partnership with Keep Etowah Beautiful. This reporting period the City was awarded the Municipality Award, the City of Gadsden Engineering Department and Park and Recreation was awarded the Community Award and 4 employees received Extra Mile Awards.

5.6.2 Overall Programs Strengths and Weaknesses

The City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength is the completion of the Storm Water System Map with the identification of 940 outfalls and 53.21 miles of streams. Additionally, the City has created an Interactive GIS database system to store illicit discharge information. This GIS database provides a significant advantage in tracking in illicit discharge investigations.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs an Engineering Superintendent as the primary executive of the storm water program. The Engineering Department assists with the storm water program responsibilities, including GIS mapping, performing required inspections and assisting with public education efforts; however, the majority of the program duties are handled by one individual. The City does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

5.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Gadsden is committed to educating the citizens of the SWMP and how the actions of others can impact the storm water and the Coosa River.

Annual Report: April 1, 2017 – March 31, 2018

Gadsden- Etowah MS4 Entities

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-18-002



5.6.4 Overall effectiveness of the SWMPP

The City of Gadsden is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



5.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink that reads "Sherman Guyton".

Sherman Guyton, Mayor
City of Gadsden, Alabama

5/22/18
Date



6.0 City of Glencoe (ALR0400054)

The City of Glencoe (City) encompasses approximately 5% of the Urbanized Area and accounts for 4.4% of the population. A map depicting the City of Glencoe’s urbanized area and city limits is located in **Appendix F-1, Figure 1.**

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Brian Bramblett
Code Official
201 Chastain Blvd W
Glencoe, AL 35905
(256)492-1424
brianbramblett@cityofglencoe.net

6.1 Public Education and Public Involvement on Storm Water Impacts

6.1.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Glencoe completed nine (9) of the nine (9) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed four (4) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:



- The City of Glencoe participated in public meetings related to non-point source and storm water issues (Activities 10, 11, and 12)
- The City of Gadsden attended the Keep Etowah Beautiful Breakfast and received an awards for participation and cooperation in KEB events (Activity 13)

A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

6.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

6.1.4 Proposed Changes

The City of Glencoe requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

6.1.5 Responsible Party

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

6.2 Illicit Discharge Detection and Elimination

6.2.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Glencoe completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Glencoe, and a description of activities



planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.

6.2.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to the ADEM.

6.2.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

6.2.4 Proposed Changes

The City of Glencoe requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

6.2.5 Responsible Party

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Glencoe regulated MS4 area.

6.3 Construction Site Storm Water Runoff

6.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Glencoe completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.



6.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

6.3.4 Proposed Changes

The City of Glencoe requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

6.3.5 Responsible Party

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

6.4 Post-Construction Storm Water Management in New Development and Redevelopment

6.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Glencoe completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. This strategy was:

- The City of Glencoe maintained valley gutters throughout the City (Activity 8)
- The City of Glencoe performed maintenance activities and removed debris from a storm water management controls (Activity 9)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.



6.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

6.4.4 Proposed Changes

The City of Glencoe requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.

6.4.5 Responsible Party

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

6.5 Pollution Prevention and Good Housekeeping for Municipal Operations

6.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Glencoe completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Glencoe also completed four (4) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- The City of Glencoe recycled used oil from city vehicles (Activity 7)
- The City of Glencoe participated in public meetings related to non-point source and storm water issues (Activities 8, 9, and 10)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix F-2**. Supporting documentation is also included in **Appendix F-3**.



6.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix F-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

6.5.4 Proposed Changes

The City of Glencoe requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

6.5.5 Responsible Party

The City of Glencoe Mayor's office and Code Enforcement Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

6.6 Overall Program Evaluation

6.6.1 Major Accomplishments

The City of Glencoe's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 45 out of 45 planned strategies and 10 additional strategies. This is a significant improvement over previous reporting periods. The number of completed strategies and additional strategies is an increase when compared to the previous reporting periods.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City contracted S&ME, Inc. to conduct stream-walking activities. The Storm Water System Map was completed this reporting period. During stream-walking activities, 5.63 miles of streams have been walked within the Urbanized Area and 83 total outfalls were identified. During this reporting period, the City walked 2.40 miles of streams during inspection activities. The City inspected 12 outfalls and dry weather screening was conducted at each of the outfalls. Five (5) dry weather flows were observed. No illicit discharges were identified and no samples were collected.



The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified three deficiencies that have been corrected.

The City has a strong partnership with Keep Etowah Beautiful. This reporting period the City was awarded the Municipality Award.

6.6.2 Overall Programs Strengths and Weaknesses

Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs Code Enforcer/Storm Water Coordinator as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.

6.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Glencoe is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

6.6.4 Overall effectiveness of the SWMPP

The City of Glencoe is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



6.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink, appearing to read 'Charles Gilchrist', written over a horizontal line.

Charles Gilchrist, Mayor
City of Glencoe, Alabama

MAY 22 2018
Date



7.0 City of Hokes Bluff (ALR0400055)

The City of Hokes Bluff (City) encompasses approximately 5.5% of the Urbanized Area and accounts for 4.4% of the population. A map depicting the City of Hokes Bluff's urbanized area and city limits is located in **Appendix G-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Ms. Lisa Johnson
City Clerk
3301 Alford Bend Road
Hokes Bluff, AL 35903
(256) 492-2414
lisa.johnson@cityofhokesbluff.com

7.1 Public Education and Public Involvement on Storm Water Impacts

7.1.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Hokes Bluff completed eleven (11) of the eleven (11) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP and partially completed one (1) strategy.

The City of Hokes Bluff planned a cleanup at Hokes Bluff City Block, Mill Pond, and Hokes Bluff Ferry Park; however, it rained that day and the City did not reschedule the event (Activity 7).

The City of Hokes Bluff also completed eleven (11) strategies beyond those proposed in the previous Annual Report. These strategies included:



- The City of Hokes Bluff purchased an advertisement within the Hokes Bluff High School Football Program (Activity 12)
- The City of Hokes Bluff provided a storm water challenge word search to the 4 graders (Activity 13)
- The City of Hokes Bluff purchased t-shirts and gave them to participants at Hokes Bluff City Fest (Activity 14)
- The City of Hokes Bluff maintained 1 “Pet Waste Station” (Activity 15)
- The City of Hokes Bluff celebrated Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 16)
- The City of Hokes Bluff purchased an advertisement at the Softball and Football fields that included a storm water education slogan (Activity 17)
- The City of Hokes Bluff partnered with Keep Etowah Beautiful and the Etowah County Sheriff’s Department to Clean up Highway 278 (Activity 18)
- The City of Hokes Bluff maintains the Ferry Landing and utilizes part time labor during the months of May through October to clean up the area (Activity 19)
- The City of Hokes Bluff maintains the Mill Pond Park and utilizes part time labor during the months of May through October to clean up the area (Activity 20)
- The City of Hokes Bluff offers city dumpsters for additional waste at any time (Activity 21)
- The City of Hokes Bluff advertises a trailer for cardboard at the City Hall placed by the City of Gadsden (Activity 22)
- The City of Hokes Bluff attended an Erosion and Sediment Control training course (Activity 23)

A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Hokes Bluff, and a brief description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

7.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

7.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.



7.1.4 Proposed Changes

The City of Hokes Bluff requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

7.1.5 Responsible Party

The City of Hokes Bluff Mayor's office are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

7.2 Illicit Discharge Detection and Elimination

7.2.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Hokes Bluff completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

7.2.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to the ADEM.

7.2.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

7.2.4 Proposed Changes

The City of Hokes Bluff requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.



7.2.5 Responsible Party

The City of Hokes Bluff Mayor's office are responsible for overseeing, developing, and coordinating the IDDE program in the City of Hokes Bluff regulated MS4 area.

7.3 Construction Site Storm Water Runoff

7.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Hokes Bluff completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Hokes Bluff also completed one (1) strategy beyond those proposed in the previous Annual Report. This strategy was:

- The City of Hokes Bluff attended an Erosion and Sediment Control training course (Activity 23)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

7.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

7.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

7.3.4 Proposed Changes

The City of Hokes Bluff requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

7.3.5 Responsible Party

The City of Hokes Bluff Mayor's office are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.



7.4 Post-Construction Storm Water Management in New Development and Redevelopment

7.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Hokes Bluff completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

7.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

7.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

7.4.4 Proposed Changes

The City of Hokes Bluff requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.

7.4.5 Responsible Party

The City of Hokes Bluff Mayor's office are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.



7.5 Pollution Prevention and Good Housekeeping for Municipal Operations

7.5.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Hokes Bluff completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Hokes Bluff completed five (5) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- The City of Hokes Bluff maintains the Mill Pond Park and utilizes part time labor during the months of May through October to clean up the area (Activity 9)
- The City of Hokes Bluff maintains the Ferry Landing and utilizes part time labor during the months of May through October to clean up the area (Activity 10)
- The City of Hokes Bluff partnered with Keep Etowah Beautiful and the Etowah County Sheriff's Department to Clean up Highway 278 (Activity 11)
- The City of Hokes Bluff maintained 12 "No Littering" Signs within the City (Activity 12)
- The City of Hokes Bluff advertises a trailer for cardboard at the City Hall placed by the City of Gadsden (Activity 13)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G-2**. Supporting documentation is also included in **Appendix G-3**.

7.5.2 *Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix G-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

7.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

7.5.4 *Proposed Changes*

The City of Hokes Bluff requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.



7.5.5 Responsible Party

The City of Hokes Bluff Mayor's office are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

7.6 Overall Program Evaluation

7.6.1 Major Accomplishments

The City of Hokes Bluff's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 48 out of 49 planned strategies, partially completed 1 strategy, and 17 additional strategies. The number of additional strategies is a significant increase when compared to previous reporting periods. This also demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City of Hokes Bluff contracted S&ME, Inc. to conduct stream-walking activities. The Storm Water System Map was completed this reporting period. During stream-walking activities, 9.16 miles of streams have been walked within the Urbanized Area and 103 total outfalls were identified. During this reporting period, the City walked 1.66 miles of streams during inspection activities. The City inspected 17 outfalls and dry weather screening was conducted at each of the outfalls. Eight (8) dry weather flows were observed. No illicit discharges were identified and no samples were collected.

The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.

7.6.2 Overall Programs Strengths and Weaknesses

Even though the City has a limited number construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the continued public education efforts. The City has continued their community education and involvement in unique ways like a football program, signs at baseball/softball fields, t-shirt give-a-ways, and free dumpster days.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs the City Clerk as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are



handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.

7.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Hokes Bluff is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

7.6.4 Overall effectiveness of the SWMPP

The City of Hokes Bluff is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



7.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink that reads "Scott Reeves".

Scott Reeves, Mayor
City of Hokes Bluff, Alabama

5-22-18

Date



8.0 Rainbow City (ALR0400056)

The City of Rainbow City (City) encompasses approximately 10.2% of the Urbanized Area and accounts for 11.3% of the population. A map depicting Rainbow City's urbanized area and city limits is located in **Appendix H-1, Figure 1.**

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

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8.1 Public Education and Public Involvement on Storm Water Impacts

8.1.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Rainbow City completed ten (10) of the ten (10) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Rainbow City participated in public meetings related to non-point source and storm water issues (Activities 11 and 12)

A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

8.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

8.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

8.1.4 Proposed Changes

Rainbow City requests no changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

8.1.5 Responsible Party

The Rainbow City Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.



8.2 Illicit Discharge Detection and Elimination

8.2.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, Rainbow City completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Rainbow City participated in public meetings related to non-point source and storm water issues (Activities 18 and 19)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

8.2.2 *Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

8.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

8.2.4 *Proposed Changes*

Rainbow City requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

8.2.5 *Responsible Party*

The Rainbow City Mayor's office and Engineering Department are responsible for overseeing, developing, and coordinating the IDDE program in the Rainbow City regulated MS4 area.



8.3 Construction Site Storm Water Runoff

8.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Rainbow City completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

8.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

8.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

8.3.4 Proposed Changes

Rainbow City requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

8.3.5 Responsible Party

The Rainbow City Mayor's office and Engineering Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.



8.4 Post-Construction Storm Water Management in New Development and Redevelopment

8.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Rainbow City completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

8.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

8.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

8.4.4 Proposed Changes

Rainbow City requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.

8.4.5 Responsible Party

The Rainbow City Mayor's office and Engineering Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.



8.5 Pollution Prevention and Good Housekeeping for Municipal Operations

8.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Rainbow City completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

Rainbow City completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Rainbow City participated in public meetings related to non-point source and storm water issues (Activities 7 and 8)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix H-2**. Supporting documentation is also included in **Appendix H-3**.

8.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix H-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

8.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

8.5.4 Proposed Changes

Rainbow City requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

8.5.5 Responsible Party

The Rainbow City Mayor's office and Engineering Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.



8.6 Overall Program Evaluation

8.6.1 Major Accomplishments

Rainbow City's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 46 out of 46 planned strategies and completed 6 additional strategies. This is a significant improvement over previous reporting periods.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City conducted stream-walking activities on 13.5 miles of streams within the Urbanized Area. Twenty-four (24) outfalls were identified during the reporting period and dry weather screening was conducted at each of the outfalls. The City also inspected 27 of the 74 known outfalls and two dry weather flows were identified. No illicit discharges were identified and no samples were taken. The City has 1.5 miles remaining to walk within the MS4 Boundaries to complete the Storm Water System Map. The City has successfully walked 13.5 miles of the 15 miles of stream inventory.

The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.

8.6.2 Overall Programs Strengths and Weaknesses

Even though the City has limited construction projects, the City has been diligent in enforcing the provisions of their Ordinances and the Alabama Construction General Permit at qualifying sites. There has been a significant adjustment of expectations within the City and the City has worked closely with engineers and developers to educate them on the requirements of the Construction General Permit.

Another strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs a City Engineer as the primary executive of the storm water program. The City does not have a Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

8.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. Rainbow City is

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Gadsden- Etowah MS4 Entities

Gadsden, Etowah County, Alabama

S&ME Project No. 4482-18-002



committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

8.6.4 Overall effectiveness of the SWMPP

Rainbow City is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



8.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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



Terry John Calhoun, Mayor
Rainbow City, Alabama


Date



9.0 City of Southside (ALR0400057)

The City of Southside (City) encompasses approximately 13.4% of the Urbanized Area and accounts for 10% of the population. A map depicting the City of Southside's urbanized area and city limits is located in **Appendix I-1, Figure 1.**

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the City planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

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256-442-9775
Juddrich@cityofsouthside.com

9.1 Public Education and Public Involvement on Storm Water Impacts

9.1.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Southside completed eleven (11) of the thirteen (13) Public Education and Outreach strategies identified in the previous Annual Report and the 2017 SWMPP and partially completed (2) strategies.

The City of Southside did not participate in the Groundwater Festival due to scheduling conflicts; however the City did promote and monetarily support the festival (Activity 8).



The City of Southside did not pass out educational materials at the Renew Our Rivers event; however, the City did promote and participate in the event. (Activity 6a).

The City of Southside also completed nine (9) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- The City of Southside provided educational pamphlets to the City Council Members (Activity 14)
- The City of Southside placed bookmarks in the library and educational materials in the community center (Activity 15)
- The City of Southside displayed educational signs in the City Hall (Activity 16)
- The City of Southside used digital signs to advertise events (Activity 17)
- The City of Southside The City created a Beautification Board (Activity 18)
- The City of Southside participated in public meetings related to non-point source and storm water issues (Activities 19, 20, and 21)
- The City of Southside recycles aluminum cans in the break room at the City Hall (Activity 22)
- The City of Southside recycles metal from city projects (Activity 23)
- The City of Southside collects and recycles used oil at the Maintenance Shop (Activity 24)
- The City of Southside advertises the Gadsden Recycling Center on the webpage (Activity 25)
- The City of Southside has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 26)
- The City of Southside offers dumpsters for citizens to dispose of debris, garbage, and large items (Activity 27)

A table identifying each Public Education and Outreach strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

9.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Public Education and Outreach Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

9.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.



9.1.4 Proposed Changes

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2017 SWMPP.

9.1.5 Responsible Party

The City of Southside Mayor's office and Building Department are responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.

9.2 Illicit Discharge Detection and Elimination

9.2.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Southside completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed three (3) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. The strategy was:

- The City of Southside participated in public meetings related to non-point source and storm water issues (Activities 18, 19, and 20)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

9.2.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

9.2.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.



9.2.4 Proposed Changes

The City of Southside requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

9.2.5 Responsible Party

The City of Southside Mayor's office and Building Department are responsible for overseeing, developing, and coordinating the IDDE program in the City of Southside regulated MS4 area.

9.3 Construction Site Storm Water Runoff

9.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Southside completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

9.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

9.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

9.3.4 Proposed Changes

The City of Southside requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.



9.3.5 *Responsible Party*

The City of Southside Mayor's office and Building Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

9.4 **Post-Construction Storm Water Management in New Development and Redevelopment**

9.4.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the City of Southside completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed one (1) strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. The strategy was:

- The City of Southside maintained a detention pond, to alleviate occasional flooding of Powell St. & pooling around a residential structure (Activity 8).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

9.4.2 *Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period*

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

9.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

9.4.4 *Proposed Changes*

The City of Southside requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2017 SWMPP.



9.4.5 Responsible Party

The City of Southside Mayor's office and Building Department are responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post - Construction Site Storm Water Runoff strategies.

9.5 Pollution Prevention and Good Housekeeping for Municipal Operations

9.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the City of Southside completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

The City of Southside also completed twelve (12) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Southside used minimal amounts of herbicides at ball fields (Activity 9)
- Four employees received chemical spill training (Activity 10)
- The City placed materials to respond to spills at the maintenance shop (Activity 11)
- The City collected used oil at the Maintenance Shop for recycling (Activity 12)
- The City advertised the Gadsden Recycling Center on the webpage (Activity 13)
- The City recycled metal from city projects (Activity 14)
- The County provided prisoner cleanup along City, County, and State right-of-ways upon request (Activity 15)
- The City provided containment facilities for Used Oil & Off Road Diesel Storage Tanks (Activity 16)
- The City has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 17)
- The City of Southside participated in public meetings related to non-point source and storm water issues (Activities 18, 19, and 20)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix I-2**. Supporting documentation is also included in **Appendix I-3**.

9.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The City will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix I-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



9.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

9.5.4 Proposed Changes

The City of Southside requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2017 SWMPP.

9.5.5 Responsible Party

The City of Southside Mayor's office and Building Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

9.6 Overall Program Evaluation

9.6.1 Major Accomplishments

The City of Southside's SWMPP is considerably stronger and more effective than the previous reporting periods. The City completed 49 out of 51 planned strategies, partially completed 2 strategies, and completed 25 additional strategies. The City continued the additional strategies from the previous reporting period which is an increase when compared to previous reporting periods. This also demonstrates the City's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The City of Southside hired a new License Inspector and Building Official in spring 2018 to help implement the SWMPP.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the City was successful in accomplishing the goals set forth.

The City of Southside has completed the Storm Water System Map. Sixteen outfalls have been identified. Sixteen outfalls were inspected during the reporting period and dry weather screening was conducted at each of the outfalls. No illicit discharges were observed and no samples were collected.

The City used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified no deficiencies.



9.6.2 Overall Programs Strengths and Weaknesses

The main strength of the program is the increased public education efforts. The City has increased their involvement in cleanup activities within the City, partnerships with Keep Etowah Beautiful, and public education when compared to the past reporting periods. Specifically the City hosts a City Fest each year which the City staffs a storm water display and advertises “Water Quality Awareness Week”. City fest allows the City to not only reach citizens within the City but also within the County.

Another strength is the completion of the Storm Water System Map. This will significantly help the City in illicit discharge investigations.

The main weakness of the program is the small number of municipal staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The City currently employs Building Inspector as the primary executive of the storm water program. The City does not have an Engineering Department to assist with the storm water program responsibilities; the program duties are handled by one individual. The City does not currently have the ability to expand the Building Department for the storm water program; therefore, this weakness is expected to remain for several years.

9.6.3 Future Direction of the Program

During the upcoming reporting period, the City plans to implement the 2017 SWMPP. The City is working to develop a better way to track and document the completion of the strategies. The City of Southside is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

9.6.4 Overall effectiveness of the SWMPP

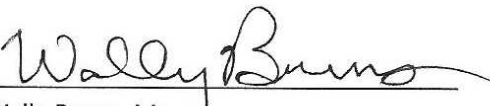
The City of Southside is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



9.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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



Wally Burns, Mayor
City of Southside, Alabama



Date



10.0 Etowah County (ALR0400009)

Unincorporated portions of Etowah County (County) within the *Gadsden, Alabama Urbanized Area* encompass approximately 16.5% of the Urbanized Area and account for approximately 4.5% of the population. Although only a relatively small portion of unincorporated Etowah County lies within the MS4 boundary, the majority of Etowah County lies within the Coosa River watershed. The information, resources, minimum control measures, and best management practices developed for the MS4 Storm Water Management Program can be applied to any area within the County and therefore ultimately benefit water quality of the Coosa River. A map depicting the Etowah County's urbanized area and county limits is located in **Appendix J-1, Figure 1**.

In accordance with Part III.B of the NPDES General Permit, the 2017 SWMPP detailed the specific activities the County planned to undertake regarding the following five minimum control measures:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post-Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 and 2017 SWMPP, and the party responsible for implementing each minimum control measure.

Information for the preparation of this report was provided by:

Mr. Robert Nail, P.E.
County Engineer
402 Tuscaloosa Ave
Gadsden, AL 35901
(256) 549-5358
rnail@etowahcounty.org

10.1 Public Education and Public Involvement on Storm Water Impacts

10.1.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Etowah County completed eleven (11) of the eleven (11) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP and failed to complete one (1) strategy.



Etowah County also completed six (6) strategies beyond those proposed in the previous Annual Report or 2017 SWMPP. These strategies included:

- Etowah County partnered with Advanced Disposal had open-top containers at several locations across County (Activity 12)
- Etowah County sponsored a Drug Collection Day (Activity 13)
- Etowah County supported Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 14)
- Etowah County utilized County inmates to collect trash along the County highways throughout the year (Activity 15)
- Etowah County participated in public meetings related to non-point source and storm water issues (Activities 16 and 17)

A table identifying each Public Education and Public Involvement strategy planned for the 2017-2018 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

10.1.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Public Education and Public Involvement Program during the 2018-2019 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

10.1.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Involvement and Public Involvement Control Measure. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

10.1.4 Proposed Changes

Etowah County requests no other changes to the Public Education and Public Involvement strategies identified in the 2017 SWMPP.

10.1.5 Responsible Party

The Etowah County Engineering Department is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts.



10.2 Illicit Discharge Detection and Elimination

10.2.1 *Implementation Status*

During the April 1, 2017 to March 31, 2018 reporting period, the Etowah County completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed two (2) strategies beyond those proposed in the previous Annual Report or 2017 SWMPP. These strategies included:

- Etowah County participated in public meetings related to non-point source and storm water issues (Activities 19 and 20)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2017-2018 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

10.2.2 *Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period*

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Illicit Discharge Detection and Elimination Program during the 2018-2019 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

10.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.

10.2.4 *Proposed Changes*

Etowah County requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2017 SWMPP.

10.2.5 *Responsible Party*

The Etowah County Engineering Department is responsible for overseeing, developing, and coordinating the IDDE program in the Etowah County regulated MS4 area.



10.3 Construction Site Storm Water Runoff

10.3.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, the Etowah County completed five (5) of the five (5) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2017-2018 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

10.3.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Construction Site Storm Water Runoff Program during the 2018-2019 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

10.3.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

10.3.4 Proposed Changes

The Etowah County requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2017 SWMPP.

10.3.5 Responsible Party

The Etowah County Engineering Department is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.



10.4 Post-Construction Storm Water Management in New Development and Redevelopment

10.4.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Etowah County met seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed two (2) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Etowah County worked to reduce runoff within our right-of way and monitor our areas for erosion using riprap and vegetation (Activity 8)
- Etowah County Partnered with Alabama Department of Conservation and Natural Resources to preserve the endangered rush darter on unnamed tributary to Bristow Creek (Activity 9)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2017-2018 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

10.4.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Post-Construction Storm Water Management Program during the 2018-2019 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

10.4.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-Construction Storm Water Management Control Measure. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

10.4.4 Proposed Changes

Etowah County requests no changes to the Post-Construction Storm Water Management strategies identified in the 2017 SWMPP.



10.4.5 Responsible Party

The Etowah County Engineer's Office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management as well as other Post-Construction Site Storm Water Runoff strategies.

10.5 Pollution Prevention and Good Housekeeping for County Operations

10.5.1 Implementation Status

During the April 1, 2017 to March 31, 2018 reporting period, Etowah County completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed nine (9) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Etowah County removed dead animals from the roadside (Activity 9)
- Etowah County partnered with Advanced Disposal had open-top containers at several locations across County (Activity 10)
- Etowah County provided trash bags for cleanup, maintains the Adopt-A-Mile signs, and disposes of the garbage collected. (Activity 11)
- Etowah County cleared and removed trees and brush from drainage ways as needed (Activity 12)
- Etowah County maintained "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs (Activity 13)
- Etowah County utilized County inmates to collect trash along the County highways throughout the year (Activity 14)
- Etowah County removes and disposes tires as needed (Activity 15)
- Etowah County participated in public meetings related to non-point source and storm water issues (Activities 16 and 17)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2017-2018 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J-2**. Supporting documentation is also included in **Appendix J-3**.

10.5.2 Proposed Activities for the April 1, 2018 to March 31, 2019 Reporting Period

The County will implement the activities listed in the 2017 SWMPP and in the tables in **Appendix J-2** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2018-2019 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



10.5.3 Assessment of Control

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure. The strategies are adequate to address storm water pollution prevention from municipal operations.

10.5.4 Proposed Changes

The Etowah County requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations Program strategies identified in the 2017 SWMPP.

10.5.5 Responsible Party

The Etowah County Engineer's Office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within County operations.

10.6 Overall Program Evaluation

10.6.1 Major Accomplishments

Etowah County's SWMPP is considerably stronger and more effective than the previous reporting periods. The County completed 47 out of 47 planned strategies and 18 additional strategies. The number of additional strategies is an increase when compared to the previous reporting periods. This also demonstrates the County's commitment to implement the SWMPP and Phase II Permit by going beyond what the strategies they committed to in the 2017 SWMPP.

The 2017 SWMPP included changes to strengthen, organize, and consolidate the Storm Water Management Program. Even with these more stringent changes the County was successful in accomplishing the goals set forth.

Etowah County has completed the Storm Water System Map and 47 outfalls were identified. Ten outfalls were inspected during the reporting period and dry weather screening was conducted at each of the outfalls. Six dry weather flows were observed. No illicit discharges were observed and no samples were collected.

The County used the previously established SOPs and an associated checklist for inspections of the municipal facility that has the potential to discharge pollutants through storm water runoff. The inspections identified minor household deficiencies that were not related to storm water.

10.6.2 Overall Programs Strengths and Weaknesses

The County created Keep Etowah Beautiful (KEB) to plan, coordinate, document, and complete public educational and involvement activities to create a love for the county and to increase participation in cleanup activities. KEB is a significant strength of the Public Education and Involvement Control Measure.



In Etowah County, Home Rule is limited by the State constitution. Counties have no general grant of power in the State Constitution and must go to the Alabama Legislature for authority to engage in any activity not currently authorized by the State Constitution. Authority may be granted through constitutional amendments or by an act of the legislature known as "local legislation." Etowah County currently does not have the authority to enact an illicit discharge ordinance, and would require action from the Alabama Legislature to gain that ability. This is a weakness to the program that is unavoidable at this time.

Another weakness of the program is the small number of staff that are able to be dedicated exclusively to the performance of the duties required by the Phase II Permit. The County currently employs two individuals who are the primary executives of the storm water program. The County does have an Engineering Department to assist with the storm water program responsibilities. The County does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

10.6.3 Future Direction of the Program

During the upcoming reporting period, the County plans to implement the 2017 SWMPP. The County is working to develop a better way to track and document the completion of the strategies. Etowah County is committed to educating the citizens of the SWMPP and how the actions of others can impact the storm water and the Coosa River.

10.6.4 Overall effectiveness of the SWMPP

Etowah County is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the SWMPP appears to be effective in meeting the objectives and requirements of the Phase II Permit.



10.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

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

A handwritten signature in black ink that reads "Tim Travis".

Responsible Official
Etowah County, Alabama

5/29/18
Date

Annual Report: April 1, 2017 – March 31, 2018
Gadsden- Etowah MS4 Entities
Gadsden, Etowah County, Alabama
S&ME Project No. 4482-18-002



Appendices

Appendix A – Figures

Appendix B – Charts

Appendix C – Monitoring Reports

Appendix D – City of Attalla (ALR0400052)

Appendix D-1 – City of Attalla Figures

Appendix D-2 – City of Attalla Control Measure Tables

Appendix D-3 – City of Attalla Supporting Documents

Appendix E – City of Gadsden (ALR0400053)

Appendix E-1 – City of Gadsden Figures

Appendix E-2 – City of Gadsden Control Measure Tables

Appendix E-3 – City of Gadsden Supporting Documents

Appendix F – City of Glencoe (ALR0400054)

Appendix F-1 – City of Glencoe Figures

Appendix F-2 – City of Glencoe Control Measure Tables

Appendix F-3 – City of Glencoe Supporting Documents

Appendix G – City of Hokes Bluff (ALR0400055)

Appendix G-1 – City of Hokes Bluff Figures

Appendix G-2 – City of Hokes Bluff Control Measure Tables

Appendix G-3 – City of Hokes Bluff Supporting Documents

Appendix H – City of Rainbow City (ALR0400056)

Appendix H-1 – City of Rainbow City Figures

Appendix H-2 – City of Rainbow City Control Measure Tables

Appendix H-3 – City of Rainbow City Supporting Documents

Appendix I – City of Southside (ALR0400057)

Appendix I-1 – City of Southside Figures

Appendix I-2 – City of Southside Control Measure Tables

Appendix I-3 – City of Southside Supporting Documents

Appendix J – Etowah County (ALR0400009)

Appendix J-1 – Etowah County Figures

Appendix J-2 – Etowah County Control Measure Tables

Appendix J-3 – Etowah County Supporting Documents