



City of Staunton, Virginia



MS4 ANNUAL REPORT

**For the Virginia Stormwater Management Program General
Permit Registration Statement for Small Municipal Separate
Storm Sewer Systems (MS4)**

General Permit No. VAR040133

**Reporting Period: Permit Cycle 3, Year 1
July 1, 2023 through June 30, 2024**

Certification

CERTIFICATION STATEMENT

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

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Date: September 25, 2024

Permit Number: VAR040133

MS4 Name: City of Staunton

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INTRODUCTION

Discharges from municipal separate storm sewer systems are regulated under the Virginia Stormwater Management Act, the Virginia Stormwater Management Program (VSMP) Permit regulations and the Clean Water Act as point source discharges. MS4 regulations were developed and implemented in two phases. Implementation of the first phase began in the early 1990s and required that operators of MS4s serving populations of greater than 100,000 people (per the 1990 decennial census) apply for and obtain a permit to discharge stormwater from their outfalls. The second phase of MS4 regulations became effective March 23, 2003, and required that operators of small MS4s in "urbanized areas" (as defined by the latest decennial census) obtain a permit to discharge stormwater from their outfalls.

In August 2013, the City of Staunton received a Notice of Designation as a regulated small MS4. Part of the City's jurisdiction had been identified as being located within an urbanized area according to the 2010 Decennial Census. As a result, the City must apply for and maintain coverage under the General Permit for the Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems. Similar to the Phase I programs, small MS4 programs must be designed and implemented to control the discharge of pollutants from their storm sewer system to the maximum extent practicable in a manner that protects the water quality in nearby streams, rivers, wetlands and bays.

On May 16, 2018, the City of Staunton submitted a Registration Statement outlining the City's MS4 Program to the Department of Environmental Quality (DEQ). On November 1, 2018, the City received notification from DEQ that the City had obtained continuing coverage under the General VPDES Permit for Small MS4s. Coverage under the Virginia General Permit for Discharges from Small Municipal Storm Sewer Systems requires each MS4 locality to submit an annual report by October 1 of each year describing the status of the Program's implementation for the previous permit year, July 1 through June 30.

Costs for the MS4 program are offset by Staunton's stormwater utility fee. Staunton uses an 18-tier system based on square footage of impervious area per parcel. The current fee scales with the average impervious area per tier where the equivalent residential unit (ERU) is 2,600 square feet. Property owners can receive up to 2 tier reductions worth of annual credits for constructing, operating, and maintaining stormwater quantity and quality BMPs. The utility fee structure will be reevaluated periodically in conjunction with the MS4 permit renewal.

Stormwater discharges from Phase II (small) MS4s are regulated under the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems. Small MS4s include storm sewer systems operated by cities, counties, towns, federal facilities such as military bases, Veteran's Affairs hospitals and research facilities, Department of Defense facilities and parkways, and state facilities such as VDOT, community colleges and public universities.

Under the General Permit, small MS4s must develop, implement and enforce a program that includes the following “six minimum control measures”:

- Public education and outreach on stormwater impacts
- Public involvement and participation
- Illicit discharge detection and elimination
- Construction site stormwater runoff control
- Post-construction stormwater management in new development and redevelopment
- Pollution prevention/good housekeeping for municipal operations

ABOUT STAUNTON

Located in the historic Shenandoah Valley, Staunton was first settled in 1732. The hamlet was named in honor of Lady Staunton, wife of Sir William Gooch who served as lieutenant-governor of Virginia from 1727 to 1749. The Virginia General Assembly established Staunton as a town in 1761.

Staunton, unique among cities for its natural beauty and architectural heritage, provides an excellent quality of life for its unified community by continuing the tradition of citizen leadership, innovation, and perseverance. The best of its history combined with the best new ideas and technology make Staunton an exceptional small city with charm, energy, ambiance, and creativity that others seek to emulate.

Today, Staunton is an independent city with a population of 24,512 as of 2010 census, located within Augusta County. Staunton is approximately 19.7 square miles in size. The urbanized area within the City of Staunton is 13.2 square miles as identified in Figure 1. This urbanized area represents a portion of the Staunton-Waynesboro Metropolitan Statistical Area, as defined by the Office of Management and Budget, which had a population of 118,502 as of the 2010 census.

The City of Staunton lies within four (4) major watersheds. The hydrologic unit codes (HUC) are the following:

<u>Name</u>	<u>HUC 12</u>	<u>VAHU6</u>
➤ Lewis Creek	020700050301	PS06
➤ Christians Creek/Barterbrook Branch	020700050202	PS09
➤ Middle River/Falling Spring Run	020700050302	PS07
➤ Middle River/Bell Creek	020700050104	PS04

2010 Census Urbanized Area - Staunton, VA

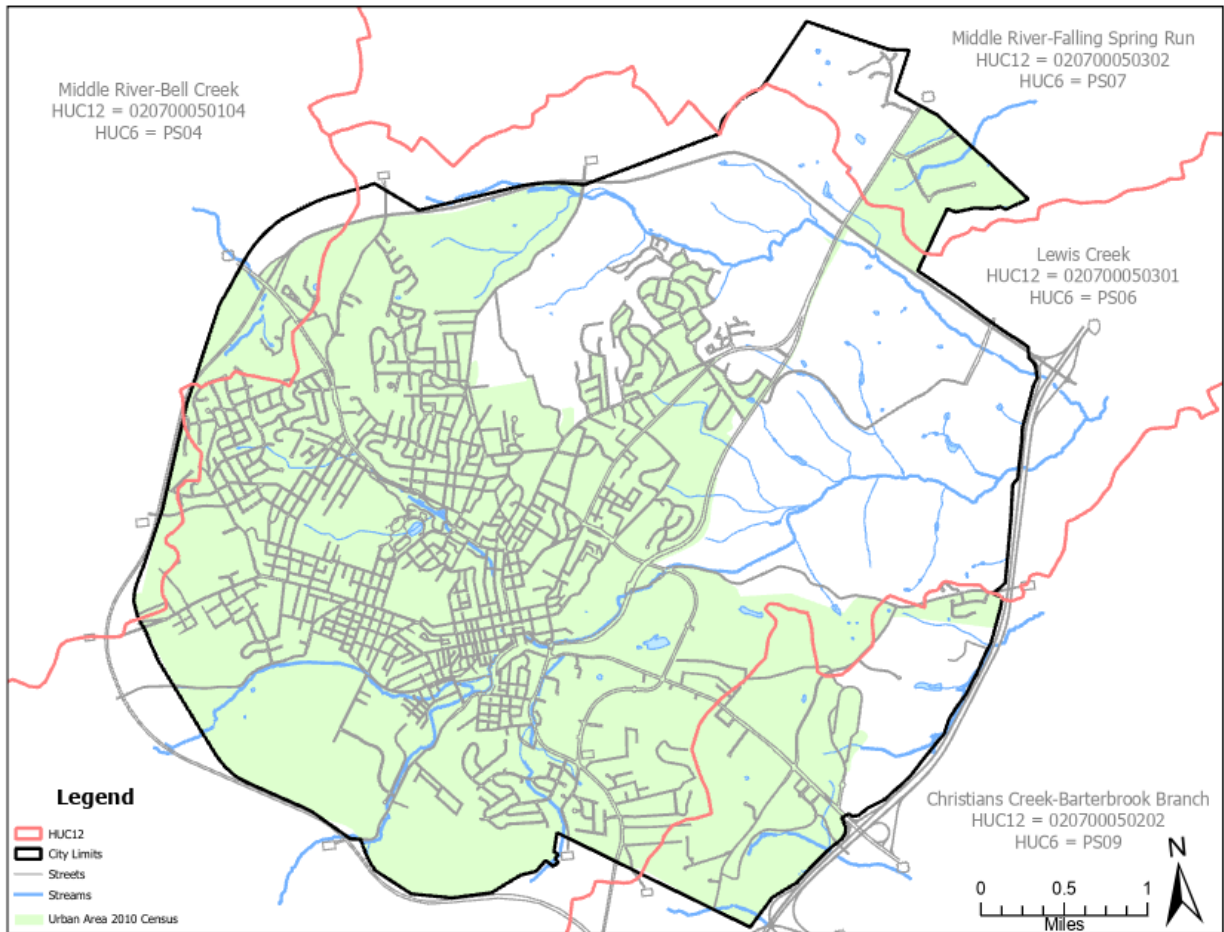


Figure 1

MS4 PROGRAM

Minimum Control Measure 1 – Public Education and Outreach

The public education and outreach (PE&O) BMPs are a critical component of City's MS4 program. The PE&O program helps the citizens of the community to better understand the environmental challenges that they are facing as a community. This new knowledge will encourage the community as a whole to implement changes in their lifestyles that will reduce the negative impacts their daily choices have on the environment. Additionally, this program empowers the citizens to become part of the stormwater runoff solution by having a better understanding of program goals and providing a variety of ways to communicate observed issues to the program administer.

The PE&O BMP focuses on the following high priority areas:

- Waste/Pollution Management was selected due to the immediate impact to the community. The City of Staunton spends significant resources every year to clean streets, maintain BMP's, and to facilitate better water quality for the community.
- Watershed Awareness was selected to bring attention to the importance of caring for and maintaining the quality of the City's watersheds and how the City's watersheds being located at the headwaters affects downstream watersheds and ultimately the Chesapeake Bay itself.
- Chesapeake Bay and local waterway nutrient impacts was chosen to increase citizen understanding and support for the City's nutrient reduction efforts. The City is required to dedicate significant resources on the reduction of nutrients to address TMDL's. Resource allocation is restricted without significant community support.

Modifications to MCM 1: None this permit year.

BMP – 1.1 School Presentations (Category - Speaking Engagements)

The City continues to develop targeted presentations to give to city schools and college students. The presentations are age appropriate with the goal of building on past presentations in future years. Presentations include interactive tools to help better understand the effects of water pollution and strategies for prevention as they relate to the City's high priority topics. In addition to presentations, the City has engaged with local colleges to set up stormwater related activities that may receive course credit. The City hopes to continue this effort to connect students to local stormwater issues through practical, hands-on engagement relative to stormwater management and flood awareness.

Objective and Expected Results: By targeting grades 4 through 12 and college students, the City provides children and young adults with the necessary information to foster stormwater awareness that translate into long lasting positive changes toward stormwater management.

Implementation Schedule: The City continues to provides the presentations throughout the permit cycle. The city targets 4 to 6 presentations per year. The Environmental Programs Division is responsible for developing and offering the presentations. The Environmental Programs Division intent is to engage with local colleges to develop activities eligible for course credit.

Method to Determine Effectiveness: The measure for this BMP is based on the total number of presentations per year and the total number of students involved. The annual report includes these numbers.

City School Presentations

Permit Year 1	Number of Presentations Planned	Number of Presentations Conducted		Number of Students Impacted	Number Presentations Anticipated next year	Number Anticipated Students Impacted
		Power Point	Enviroscape			
July 1, 2023- June 30, 2024	4	4	12	200	4	200

Presentation Details

Program	MCM	Presentation	Audience	Date	# of Students
School Presentations	1.1	Stormwater, Watersheds, and Enviroscape for Shelburne 2024	Shelburne Middle School - 6th grade Science 12 Different Classes Ms. Evans	11/13/2023	200
JMU Students presentation	1.1	Staunton Watershed and Wharf Flooding Issue	JMU Architecture Class Traci Wiles	3/22/2024	18

BMP – 1.2 Stormwater Awareness Handouts (Category - Written Materials)

The City has developed educational brochures and other handouts to provide information in an easy-to-read format. The brochures concentrate on the high priority topics. In keeping the topics open to all high priority areas, the City has the flexibility to modify the Program from one topic to another as priorities change from one year to the next. Each brochure includes information about the topic, identifies the desirable changes in behavior and provides contact information for questions and reporting. The educational brochures are made available through mass mailings and at various City offices and community events. Other handouts could include bumper stickers, t-shirts, or other promotional style materials.

Objective and Expected Results: By distributing written educational materials to the citizens, this program's objective is to raise the general awareness of stormwater issues and provide actions the public can take to help protect water quality and minimize impacts to stormwater runoff.

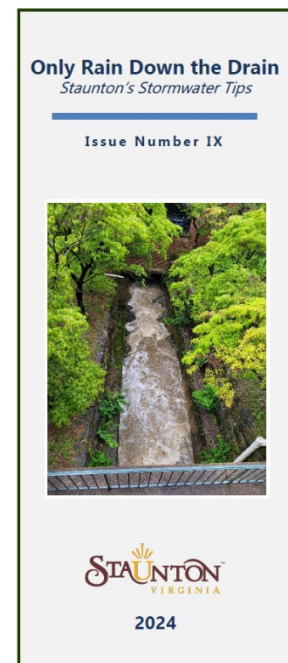
Implementation Schedule: Waste brochures continue to be developed and distributed throughout the permit cycle. Distribution of the brochures began during the 3rd year of the permit. Environmental Programs Division is responsible for the content and distribution of the handouts.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of materials distributed. The annual report includes the type and number of handouts.

Stormwater Awareness Brochures

Permit Year 1	Number of Brochures Distributed
July 1, 2023 - June 30, 2024	11,995

See [Appendix E](#) for the full brochure.



BMP – 1.3 Watershed Awareness (Category - Electronic Media)

The City continues to develop social media material to provide information in an easy to share format. The material focuses on the topic of “Watershed Awareness”. This topic was chosen to highlight the importance of effective stormwater management locally and the impact Staunton’s watersheds, which are located near the headwaters of the Chesapeake Bay, have on the water quality of downstream watersheds and ultimately the Chesapeake Bay. The City incorporates multiple types of social media outlets, i.e., Facebook, YouTube, etc. to allow flexibility as priorities change and opportunities arise from one year to the next. Each post will include resources and information on general stormwater education, Staunton’s watersheds, Staunton’s MS4 program, the SW Utility Fee program, or any related SWM construction projects. The intent is to help inform the public about the effects these environmental programs have on the local waterways and identify desirable changes in behavior to help improve water quality in the community. Post also provide contact information for questions and reporting. Information is made available through social media posts via a public, City-run social media format.

Web link to the City’s Facebook page: <https://www.facebook.com/stauntonstormwater>

Objective and Expected Results: By using social media to reach citizens, the City hopes to raise the general awareness of stormwater management within the community and at the state level. This information also provides actions the public can take to help protect water quality and minimize the impacts to stormwater runoff.

Implementation Schedule: The Watershed Awareness social media material will continue be developed and posted throughout the permit cycle. The Environmental Programs Division is responsible for the social media material and its distribution.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of website hits. The annual report includes this number.

Watershed Awareness Social Media

Permit Year 1	Number Hits/Likes/Reaches
July 1, 2023 - June 30, 2024	8,805

Breakdown	Amount
FB Reaches	8,100
New FB page likes	233
Total FB likes	705
Total FB page visits	1,600

Page Followers	Amount
New	270
Total	798

Gypsy Hill Park stream restoration project underway

After multiple disasters, the project will finally restore the main stream through the historic park.



<https://www.whsv.com/2024/03/27/gypsy-hill-park-stream-restoration-project-underway/>

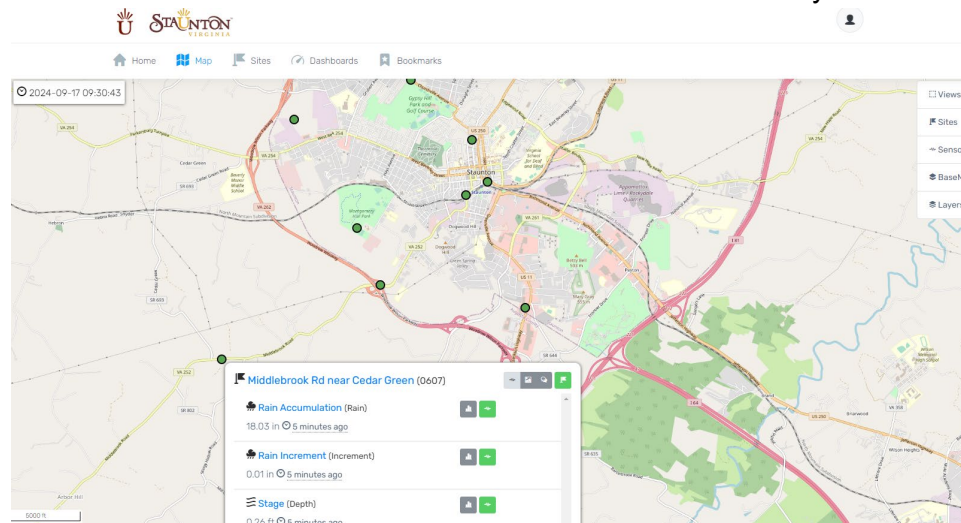
Gypsy Hill Park Stream Restoration Project on track to be completed in 2025



<https://www.whsv.com/2024/07/02/gypsy-hill-park-stream-restoration-project-track-be-completed-2025/>

BMP – 1.4 Flood Awareness Program

After the historic flooding in August of 2020, the City procured a flood study of the city's watershed and existing stormwater conveyance systems to determine potential flood mediation measures. The most impactful and cost-effective measure recommended was the implementation of a flood warning/awareness system. The system includes five in-stream depth sensors and six rain gauge sensors that have been installed throughout the Lewis Creek watershed. These sensors connect to a public dashboard that displays near real time stream depth and rain gauge data. Citizens can view this dashboard at any time and can sign up to receive alerts via text message or email when conditions are indicative of potential flooding conditions within the flood prone/floodplain areas of the city. The dashboard is integrated into the National Weather Service and WHSC-TV3 weather alert systems.



The dashboard can be viewed at: <https://stauntonva.onerain.com/>

Implementation Schedule: The Flood Awareness Program will continue to be operated throughout the permit cycle. The Environmental Programs Division, Public Works and IT departments are responsible for the maintenance of the system.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of alert subscribers.

Flood Awareness Program – Flood Awareness System

Permit Year 1	Number of Alert Subscribers
July 1, 2023 - June 30, 2024	194
New subscribers in FY24	43

BMP – 1.5 Community Events (Category – Public Education Activities)

Objective and Expected Results: The Environmental Programs Division will attend at least one community event per year to engage with the public through activities and presentations and handout information and promotional materials. At previous community events, the Division has presented an interactive Enviroscope display to demonstrate watershed mechanics and pollution prevention, but the specific display can be tailored to the prospective audience. Participation in these events raises the awareness of the stormwater runoff and pollution issues concerning watersheds, both locally and at the state level.

Implementation Schedule: The Environmental Programs Division currently attends the yearly Earth Day celebration but plans to attend other events as available. Environmental Programs Division will be responsible for scheduling and planning their attendance at the event(s).

Method to Determine Effectiveness: The measure for this BMP will be based on the total number of events attended per year and estimated size of the event. The annual report includes these numbers.

Community Events		
Permit Year 1	Number of Events	Description
July 1, 2023 - June 30, 2024	1	Earth Day



Environmental Program Specialist, Willow Hughes, engages with citizens at Earth Day.

BMP – 1.6 GIS Story Board Maps (Category – Media Materials)

Objective and Expected Results: The Environmental Programs Division has created GIS Story Board Maps to inform the public about stormwater related projects constructed by the City and also general watershed information. The story board maps focus on current and recently completed projects and feature before and after photos, project plans and location, and purposes for the project. The story board maps allow the public to see the application of best management practices to help control stormwater runoff and pollution reduction in a highly visual but still detailed narrative.

Implementation Schedule: The Environmental Programs Division currently has one GIS Story Board Map on their website at <https://www.ci.staunton.va.us/departments/community-development/environmental-programs-division/gypsy-hill-stream-restoration> The division intends to produce one Story Board Map per year (as projects and topics allow).

Method to Determine Effectiveness: The measure for this BMP will be based on the number of views per story map per year. The annual report will include these numbers.

Link to story map: <https://arcg.is/1Xjrr8>



GIS Story Maps

Permit Year 1	Number of Story Maps	Number of views
July 1, 2023 - June 30, 2024	1 – Gypsy Hill Park Stream Restoration	840

Minimum Control Measure 2 – Public Involvement / Participation

The public involvement/participation (POP) BMP promotes valuable input and assistance from the community. It providing the public opportunities to play an active role in the program is instrumental in a successful program. By promoting the availability of the program to the community, public participation will increase leading to a reduction in stormwater pollutants and improved water quality.

The first Lewis Creek Technical Advisory Committee meeting (PCB study) on January 25, 2020 had 15 attendees, including representatives of various local and state agencies and concerned citizens. The second Lewis Creek Technical Advisory Committee meeting (Lewis Creek PCB Total Maximum Daily Load (TMDL) study) on August 18, 2021 had 14 attendees, including representatives of various local and state agencies and concerned citizens. Meeting summaries are available upon request. As of this year, the city is still waiting on the site remediation plan from CSX/DEQ for review. Plans have not yet been approved by DEQ.

Modifications to MCM 2: None this permit year.

BMP – 2.1 Stormwater Webpage

The City has a dedicated stormwater webpage which provides detailed stormwater information to the public. The stormwater webpage is found on the City website at the address below. Information available on the webpage includes: definitions of common stormwater elements (i.e. stormwater, watershed, Chesapeake Bay, pollution prevention, etc.), details about why stormwater is important, identification of how citizens can help, links to the City's stormwater program elements (Ordinances, erosion & sediment control, policies, design standards, general permit, annual reports, etc.), links to Federal and State stormwater program information and contact information for reporting and questions.

Web link to the City's Stormwater Webpage: [Environmental Programs Division | City of Staunton](#)

Objective and Expected Results: The objective of the dedicated website is to provide large amounts of detailed federal, state and local program information, accessible to a large number of citizens. The result is to easily be able to search for and find detailed information on stormwater in general as well as information pertaining to the City of Staunton's MS4 Program. The website also provides citizens with information on how to comment on the City's MS4 program plan, and report erosion/sediment control issues, illicit discharges, and stormwater related complaints.

Implementation Schedule: The City has implemented the website and will maintain the website by adding the annual reports and updating the site's content and links. The Environmental Programs Division will be responsible for the page's content and will advise the webmaster of all required changes.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of website hits that occur each year. The annual report will include this number.

Stormwater Webpage

Permit Year 1	Number of Website Hits
July 1, 2023 - June 30, 2024	2,756
Increase from last year	1,670

BMP – 2.2 Tree Planting & Restoration Program

The City currently has a Tree Planting Program where new trees are planted and dead or diseased trees are replaced with new plantings and structural pruning is performed on young existing trees. The City also helps organize and participates in an Arbor Day/Earth Day event where seedlings are handed out to participants. The City will continue its tree planting program and its participation in the Arbor Day/Earth Day event. The City will hand out seedlings and educational brochures and discuss the benefits of tree planting on water quality.

Objective and Expected Results: Encourage the community to actively take part in stormwater enhancements. Raise the general awareness of stormwater issues as well as discussing actions, such as tree planting, the public can take to help protect water quality and minimize impacts to stormwater runoff.

Implementation Schedule: The City will continue its Tree Planting Program and participating in the Arbor Day/Earth Day event. Parks and Recreation will continue to be responsible for these programs

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of trees planted, the number of trees pruned, the number of participants and the number of seedlings handed out at the Arbor Day/Earth Day event. The annual report will include these numbers.

Multiple tree related events & tree planting days were held in FY24:

- Parks and Rec **planted 54 new trees** and **pruned 294 trees**. The number of trees planted/pruned by city staff is lower than last year. The previous year included pruning & replacement planting brought on by the severe storm in July of 2022.
- On April 26th Ware Elementary Students visited Gypsy Hill Park to, learn about trees & watersheds, and the impact of activities in their yard. About **70 children attended**.
 - Matthew Sensabaugh, City Horticulturist talked about urban trees
 - Willow Hughes, Env. Programs talked about the stream restoration project
 - Cole Young, VDOF forester talked about trees in a forest setting.
- Staunton Tree Stewards **planted 17 large tree saplings** around a “heat island” parking lot at the top of Mary Baldwin University campus. This event took place on April 13, 2024 and had 20 volunteers.
- Staunton Tree Stewards held their annual tree seedling giveaway at Shenandoah Green’s Earth Day Event on Saturday, April 20, 2024. During this event, **90 Staunton residents** took **369 seedlings to plant** in their yards.
- Staunton Tree Stewards **planted 3 more large saplings** in front of the Valley Children’s Advocacy Center on Greenville Avenue, on Tuesday, April 23, 2024.

Trees Planted/Pruned by Parks and Rec.

Permit Year 1	Total Number of trees planted	Total Number of trees pruned	Total Number of Arbor Day participants
July 1, 2023 - June 30, 2024	54	294	70



Staunton Tree Stewards planting trees around Staunton.

BMP – 2.3 DEQ/DCR Adopt-A-Stream Program

The City actively participates in the Virginia Adopt-A-Stream program. The Stormwater Webpage includes links to Virginia's program with directions on how to apply. The City will procure and house the needed material for volunteers to use during the clean-up event. Materials will include safety information, trash bags, safety vests and traffic control-warning signs. The City will also coordinate trash pick-up if needed.

Objective and Expected Results: Encourage the community to actively take part in stormwater enhancements to improve stream quality.

Implementation Schedule: The City continues to implement the Adopt-A-Stream program. The Environmental Programs Division is responsible for the website's content and for coordinating the provision of available materials to volunteers.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total linear feet of stream adopted. The annual report will include this number.

Annual Reporting: With the help of the Lewis Creek Watershed Advisory Committee, one group signed up to Adopt-a-Stream last year and five other organizations expressed interest in signing up. The **Shenandoah Valley Club of the Deaf** finalized their adoption of a portion of Lewis Creek that runs through the Virginia School for the Deaf and Blind's property. **(+/- 2900 linear feet adopted)**. Their Adopt-a-Stream signs have officially been printed and installed by Public Works. This club hosts approximately **4 clean-ups a year** with at least **2 large bags of trash collected each time**.



The City and the Lewis Creek Watershed Advisory Committee also participated in the Chesapeake Bay Foundation's Clean the Bay Day on June 1, 2024. **70 volunteers** helped to clean up **1,150 pounds of trash** from 4 local streams. This event totaled **+/- 7,760 linear feet** of stream cleanup. The City plans to utilize social media to continue gaining interest in this BMP.

Clean the Bay Day: Asylum Creek, Gum Springs, Lewis Creek, and Buttermilk Springs

Number of Volunteers	Distance Covered (Miles)	Number of Bags Collected	Total Weight Collected (lbs)
70	~ 8	40	1,150

Top 10 Items Collected:

- Cigarette butts
- Plastic fragments
- Plastic food wrappers
- Plastic beverage bottles
- Metal fragments
- Foam insulation & packaging (Styrofoam)
- Aluminum beverage cans
- Plastic grocery bags
- Glass and ceramic fragments
- Paper books, newspaper, and magazines.

902 cigarette butts were collected in just 2 hours. This is indicative of a major problem around Staunton and a general lack of awareness that cigarette butts are made of plastic filaments. Shenandoah Green is going to launch a cigarette butt awareness campaign around Staunton this year to address this local problem.



BMP – 2.4 Adopt-A-Street Program

The City currently has an Adopt-A-Street Program designed to provide an opportunity for citizens and civic groups to get involved in their community. Individuals, organizations or businesses may participate. These groups agree to adopt a street and to keep the designated area cleared of litter and other debris. In exchange, the program participants are given materials to help them with the cleanup. Signs bearing the name of their organization will be posted at the beginning of their designated cleanup areas. Areas may include City streets, vacant lots, walkways and public parking lots. The Stormwater Webpage includes links to the City's program.

Objective and Expected Results: Encourage the community to actively take part in stormwater enhancements by decreasing the trash and litter that could possibly reach a waterway.

Implementation Schedule: This program will be ongoing with Public Works continuing to be responsible for its implementation.

Method to Determine Effectiveness: The effectiveness of this BMP will be based on the total miles of street adopted. The annual report will include this number.

Annual Reporting: Zero miles of street were adopted during Permit Year 1. The City plans to utilize its social media accounts to gain more interest in this BMP.

Adopt-A-Street Program

Permit Year 1	Total miles of street adopted
July 1, 2023 - June 30, 2024	0

BMP – 2.5 Stormwater Partnerships (Monitoring)

The City has established a partnership with the local environmental advocacy group, the **Lewis Creek Watershed Advisory Committee (LCWAC)**. The partnership will ensure that local impaired waters and pollutants of concern are emphasized in education and outreach efforts.

Objective and Expected Results: To ensure the education, outreach efforts, and volunteer opportunities are enhanced to the maximum extent possible by a coordinated effort.

Implementation Schedule: The Environmental Programs Division will continue to send a representative to committee meetings during the upcoming permit cycle.

Method to Determine Effectiveness: The effectiveness of this BMP is based on the total number of meetings that were attended. The annual report will include this number.

Stormwater Partnerships

Permit Year 1	Total Number of Meetings Attended
July 1, 2023 - June 30, 2024	9

This permit year the LCWAC continued to help implement the Trout Unlimited - “Trout in the Classroom” program into Staunton City Public Schools.

Other Lewis Creek Watershed Advisory Committee Public Awareness Efforts:

- LCWAC continues to work towards the possibility of painting the wharf parking lot blue to delineate the location of Lewis Creek where it runs under the parking lot. This would be the first effort to gain public awareness of the stream location with the thought of possibly ‘daylighting’ Lewis Creek in this location in the future.

BMP – 2.6 Hazardous Waste Collection Day (Disposal/Collection Event)

The City will continue to participate in the regional household hazardous waste collection day. The event is held once a year in the fall at the Augusta County Government Center. The following types of waste are accepted; solvents, oil-based paints, fuels, used oil, computer equipment, lead-acid batteries, rechargeable batteries, herbicides/pesticides, small electronics, antifreeze, compact fluorescent bulbs, and fluorescent bulbs. Information about the event will be made available on the stormwater website. The City will also continue to promote this BMP by sharing informational flyers prior to the event.

Objective and Expected Results: By actively promoting the hazardous waste collection day, the City will reduce the risk of improper storage, disposal and discharges within the MS4.

Implementation Schedule: The program is ongoing. Public Works will continue to be responsible for coordinating the informational flyer.

Method to Determine Effectiveness: The City will track the total number of City vehicles dropping off hazardous waste. The annual report will include this number.

Hazardous Waste Collection Day	
Permit Year 1	Total Number of City Vehicles
July 1, 2023 - June 30, 2024	83

Minimum Control Measure 3 – Illicit Discharge Detection and Elimination

For the purposes of this permit, an illicit discharge is defined as any discharge to a municipal separate storm sewer system that is not composed entirely of storm water, with exceptions for those discharges which occur pursuant to any other VSMP permit. These discharges can have immediate and long-lasting impacts to the ecosystem of your local water bodies.

Modifications to MCM 3: None this permit year.

BMP – 3.1 IDDE Detection Program

The City will update and maintain the IDDE Program to detect, identify and address unauthorized discharges. The program will use maintained and updated storm sewer mapping with all outfalls identified. The mapping system is used to screen for illicit discharges. The dry weather screening element of the program includes:

- Prioritized screening schedule
- Perform a minimum 50 field screenings per year
- Methodologies to collect general information such as the date of last rain, quantity of rain, visual observations, etc.
- Defines the time frame to conduct investigations based on priorities
- Methodologies to determine the source of all illicit discharges
- Mechanisms to eliminate illicit discharges, including procedures for legal action
- Methods for follow up
- Mechanisms to track all investigations

The City strives to prohibit non-stormwater discharges into the storm sewer system through modifications to the ordinance. The stormwater webpage and stormwater hotline will be used to promote and facilitate public reporting of illicit discharges. A copy of the program has been included in Appendix A.

Objective and Expected Results: The goal of this control measure is to maintain, update, and enforce a program to detect, identify and address illicit discharges into City's regulated MS4 system.

Implementation Schedule: The City will maintain and implement the IDDE program throughout the permit cycle. Environmental Programs Division is responsible for implementing the program with support from Public Works for investigations. The Environmental Programs Division is responsible for ongoing maintenance of the storm sewer mapping.

The illicit discharge ordinance, City of Staunton City Code, Title 13, Division IV, Illicit Discharge and Connections, can be found at: <http://www.codepublishing.com/VA/staunton.html>

Physical interconnection letters were sent to VDOT and Augusta County during Permit Cycle 1, Year 2.

Method to Determine Effectiveness: The City tracks the number of illicit discharges detected and enforcement actions. The annual report includes these numbers.

Modifications to MCM 3: None this permit year.

No active illicit discharges were observed or required follow-up. Further documentation of the outfall screenings and reports of illicit discharges are available upon request. A summary of all illicit discharge reports and investigations has been included in [Appendix A](#).

51 MS4 regulated outfalls were screened in Permit year 1 – no illicit discharges detected.

Outfalls Referred for Maintenance

Responsible Department	Total Number of Outfalls Referred
Public Works	7
Parks and Rec	0
Owners of private BMPs	0

Mapping and Information Tables Confirmation Statement: Mapping updates continued during Permit Year 1 to add/delete regulated outfalls as necessary, and currently there are 353 regulated outfalls. An outfall point of discharge map has been included in [Appendix B](#). Further documentation of the outfalls and points of discharge is available upon request.



Photo of stormwater conveyance channel taken during IDDE inspections.

BMP – 3.2 Mapping of Stormwater Network

The City will continue to maintain an accurate storm sewer system mapping and information table for City owned stormwater facilities using GIS and GPS locating technologies. Information to be collected and maintained includes:

- Outfalls
- Natural Streams
- Structural stormwater BMPs type and location
- Storm sewer type and size
- The storm sewer map will include at least the following:
- Location of all MS4 outfalls
- A unique identifier for each outfall
- The name and location of all waters receiving discharges from MS4 outfalls and the associated HUC (6th order)

The associated information table for each outfall will include at least the following:

- A unique identifier
- The estimated MS4 acreage served
- The name of the receiving water and indication if the receiving water is impaired
- The name of any applicable TMDL(s)

Objective and Expected Results: The storm sewer mapping is a critical element of the IDDE (BMP 3.1) and structural BMP maintenance (BMP 5.2) programs. Accurate and up-to-date mapping is necessary for these programs to succeed.

Implementation Schedule: The City continues to maintain the storm sewer mapping throughout the duration of the permit cycle. Environmental Programs Division is responsible for developing and maintaining the sewer mapping using GIS/CAD.

Method to Determine Effectiveness: The City tracks the number of storm structures mapped. The annual report will include these numbers.

Mapping of Stormwater Network

Permit Year 1	Total number of storm sewer structures	Total number of storm sewer outfalls
July 1, 2023 - June 30, 2024	2,747	749

Minimum Control Measure 4 – Construction Site Runoff Control

Uncontrolled stormwater runoff from construction sites can significantly impact rivers, lakes and estuaries. Sediment is the main pollutant of concern leaving a construction site. However, there are also other pollutants that commonly discharge from construction sites, including fertilizer, pesticides, oil and grease, concrete truck washout and construction debris. The construction site stormwater runoff control (CSSRC) BMP has been developed to significantly reduce or eliminate construction site pollutants from entering the local water bodies.

Modifications to MCM 4: None this permit year

BMP – 4.1 Erosion and Sediment Control Program (VESCP)

The City administers an existing program that applies to large sites as well as single family home construction. The Environmental Programs Division reviews site plans and performs site inspections. Any commercial site and any disturbance over 10,000 square feet requires a erosion and sediment control plan to be submitted and approved. The City issues a land-disturbance permit prior to any land-disturbance taking place. A pre-construction meeting is held to discuss VESCP controls and to review the plan. A City VESCP inspector also makes site visits and approves the initial controls installed. The program is enforceable through the City Code (Chapter 13). **The City employs one DEQ certified VESCP/VSMP Combined Administrator and one Environmental Programs Specialist who is a DEQ certified VESCP/VSMP Inspector and Plan Reviewer.**

The legal authorities utilized by the City to ensure compliance with our VESCP and VSMP Programs include the following:

- Staunton City Code - Title 13
- City's Subdivision and Zoning Ordinance
- Virginia Erosion and Sediment Control Law and Regulations
- Virginia Stormwater Management Act and Regulations

Additional information concerning the City's Erosion and Sediment Control Program (VESCP) can be found at: [https://www.ci.staunton.va.us/departments/Environmental Programs Division-division/erosion-and-sediment-control-program](https://www.ci.staunton.va.us/departments/Environmental%20Programs%20Division-division/erosion-and-sediment-control-program)

Written procedures and policies for plan review, inspection and enforcement can be found at: <http://www.codepublishing.com/VA/staunton.html> and <https://www.ci.staunton.va.us/government/permits>

Objective and Expected Results: The City's VESCP is in place to prevent adverse impacts from erosion and sedimentation from all construction sites.

Implementation Schedule: The VESCP is an existing program and will continue to be implemented throughout the permit cycle. Environmental Programs Division will continue to be responsible for the VESCP.

Method to Determine Effectiveness: A number of parameters is tracked pertaining to the VESCP including; number of land disturbing activities, acres of land disturbed, number of inspections, and enforcement actions. The annual report includes these values.

Erosion and Sediment Control Program (VESCP)

Permit Year 1	Actions	Total	Commercial sites	Single-family sites
July 1, 2023 - June 30, 2024	Total number of regulated land-disturbing activities	81	8	73
	Total number of acres disturbed	94.289	81.475	12.814
	Total number of inspections conducted	1254	240	1014
Permit Year 1	Enforcements	Total	Notice to Comply	Stop Work Orders
July 1, 2023 – June 30, 2024	Total number of enforcement actions taken	137	108	29

Minimum Control Measure 5 – Post Construction Runoff Control

Post-construction stormwater impacts are increases in the type and quantity of pollutants entering the receiving streams. An increase in the quantity of runoff can cause stream bank scouring and downstream flooding. Implementing a combination of structural and non-structural BMPs reduces the water quality effects of increased impervious areas and are crucial elements of MS4 programs. Procedures have been developed and implemented to inspect and maintain all permanent structural BMPs for both City and privately maintained facilities.

Modifications to MCM 5: None this permit year.

BMP – 5.1 Virginia Stormwater Management Program – Require VSMP Permits

The City became a VSMP Authority on July 1, 2014, responsible for administration of our local VSMP Program in accordance with Commonwealth of Virginia regulations. The City requires a VSMP permit for land disturbances of 1 acre or greater and land disturbances less than 1 acre but part of a common plan of development 1 acre or greater. Evidence of permit coverage from DEQ is required prior to any land-disturbance taking place. The City Environmental Programs Division is responsible for BMP 5.1. Written procedures for inspection and enforcement are located in the Environmental Programs Division offices at 116 W Beverley Street. A copy of the VSMP approval letter is in Appendix Q of the MS4 Program Plan 2018-2023.

The City employs one DEQ certified VESCP/VSMP Combined Administrator and one Environmental Programs Specialist who is a DEQ certified VESCP/VSMP Inspector and Plan Reviewer. See BMP 4.1 for a description of the legal authorities and written procedures utilized by the City to ensure compliance with our VESCP and VSMP Programs.

Objective and Expected Results: The City adheres to current Commonwealth of Virginia regulations with regard to the VSMP permitting to prevent adverse impacts of urban stormwater runoff.

Implementation Schedule: The City of Staunton provides local VSMP administration in accordance with Commonwealth of Virginia Regulations and will continue to require applicable VSMP requirements be instituted throughout the permit cycle. The City will implement changes to their local ordinances to comply with modifications to the VSMP permitting regulations. Environmental Programs Division will be responsible for verifying VSMP permit compliance.

Method to Determine Effectiveness: The total number of permits, inspections, enforcement actions, exemptions applied for and exemptions granted is tracked. The annual report will include these values.

Stormwater Management Program (VSMP)

Permit Year 1	Permits	Total	Commercial sites	Single-family sites
July 1, 2023 - June 30, 2024	Total number of regulated land-disturbing activities	56	6	50
	Total number of exemptions applied for	0	0	0
	Total number of inspections conducted	824	226	598
Permit Year 1	Enforcement	Total	Notices to Comply	Stop Work Orders
July 1, 2023- June 30, 2024	Total number of enforcement actions taken	116	88	28

BMP – 5.2 Structural BMP Maintenance

The City has a program to ensure proper maintenance of all City owned structural BMPs. The City will continue to require a maintenance agreement for any new privately owned structural BMP. The City will continue to encourage owners of private structural BMPs without agreements to acquire the maintenance agreement. The City's Environmental Programs Division maintains a database of stormwater management facilities. This database is located at the Environmental Programs Division offices at 116 W Beverley Street.

Objective and Expected Results: By continuing the BMP maintenance program the City will ensure BMPs are performing optimally and are minimizing adverse impacts to state waters.

Implementation Schedule: The BMP maintenance program will be an ongoing effort throughout the permit cycle. The development of the program is a joint effort between Environmental Programs Division and Public Works. Public Works is responsible for the actual maintenance of all City owned structural BMPs. Environmental Programs Division is responsible for documenting new privately owned BMP agreements.

Maintenance Required/Performed in Permit Year 1: Routine maintenance/debris clearing as needed.

Method to Determine Effectiveness: The City tracks the total number of new BMP agreements. The annual report includes this number.

Structural BMP Maintenance

Permit Year 1	Total Number of BMP Maintenance Agreements	Number of SWM Agreements		Number of SWM Facilities	
		New BMPs	Existing BMPs	New BMPs	Existing BMPs
July 1, 2023 - June 30, 2024	11	8	3	8	3

BMP – 5.3 Structural BMP Inspection

The City operates a program to inspect structural BMPs within the City. The existing maintenance agreements require property owners of private BMPs to inspect maintain and submit a report to the City upon request. The standardized report is available on the stormwater webpage. The City inspects private BMPs once every five years. City owned BMPs are inspected annually per the program described in BMP 5.2.

Objective and Expected Results: By continuing the BMP inspection program the City will attempt to ensure BMPs are performing optimally and achieving design pollutant reduction.

Implementation Schedule: The BMP inspection program will be ongoing throughout the permit cycle. Environmental Programs Division is responsible for implementing the programs and performing the inspections.

Method to Determine Effectiveness: The City tracks the total number of BMP inspections performed by private owners and completed by City personnel. The annual report includes these numbers.

Structural BMP Inspection

Permit Year 1	Total number of inspections	
	Public BMPs	Private BMPs
July 1, 2023 - June 30, 2024	18	50



City maintained BMP – “Lake Tams”

BMP – 5.4 Structural BMP Database

The maintenance of the structural BMP database is instrumental in implementing BMP 5.2 and BMP 5.3. The BMP database includes the type of BMP, ownership, location, date brought online, HUC code, receiving waters, if receiving waterway is impaired, if maintenance agreement exists, number of acres treated and most recent inspection.

Objective and Expected Results: The database is used to track BMP inspections and maintenance to ensure that all BMPs are functioning properly and as designed.

Implementation Schedule: The BMP database is maintained throughout the permit cycle. Environmental Programs Division is responsible for compiling and maintaining the database.

Method to Determine Effectiveness: The City includes the updates to the BMP database in the annual report.

Annual Reporting: The BMP database for BMPs brought online during Permit Year 1 has been included in [Appendix C](#). *SMF information as required was provided to CGP through database for which coverage was obtained.*

BMP – 5.5 BMP Warehouse Submittal Confirmation Statement

All BMPs not reported in accordance with Part I.E.5 were reported through DEQ BMP Warehouse per Part I.E.5.g of the MS4 General Permit.

Minimum Control Measure 6 – Pollution Prevention / Good Housekeeping

The Pollution Prevention/Good Housekeeping BMPs allow the City to examine and alter its own actions in an effort to reduce the amount of pollutant that collects on streets, parking lots, and open spaces because of runoff from vehicle maintenance areas and poor stormwater maintenance.

Modifications to MCM 6: None this permit year.

BMP – 6.1 Street Sweeping

The City is in the process of modifying its street sweeping program to best conform to the new TMDL guidance standards.

Objective and Expected Results: The street sweeping program will reduce the adverse effects that pollutants found on public roads have on receiving waters.

Implementation Schedule: Public Works will continue this program through the permit cycle.

Method to Determine Effectiveness: The City tracks the number of road miles swept and relative data collected. The annual report includes these numbers.

Street Sweeping		
Permit Year 1	Total number of road miles swept	Total number of tons collected
July 1, 2023 - June 30, 2024	2,645	575

BMP – 6.2 Pollution Prevention Training

City departments, Public Works, Parks & Recreation and Fire Department, will continue its pollution prevention training to its employees. Bi-monthly safety committee meetings will incorporate environmental protection into the agenda as part of Public Works' environmental management systems program.

Objective and Expected Results: The pollution prevention training empowers employees with the knowledge and operating procedures to minimize accidental pollutant release that could

contaminate storm water runoff. Through this training, employees realize environmental stewardship has many far-reaching benefits.

Implementation Schedule: The pollution prevention training is a current policy implemented throughout the permit cycle. Each department, Public Works, Parks & Recreation, Fire Department, Police Department and the Environmental Programs Division be responsible for departmental pollution prevention training.

Method to Determine Effectiveness: The City tracks the number of personnel trained. The annual report includes this number.

Pollution Prevention Training			
Permit Year 1	Total number of City personnel trained	Department	Training Date
July 1, 2023 - June 30, 2024	24	Public Works	8/19/2023*
	9	Parks & Rec	9/17/2024**
	50	Fire Department	6/5/2023-6/7/2023***
	50	Police Department	8/23/2024

*This training date for PW was reported last year as well. Due to staffing shortages, PPT training was not provided to PW staff. Environmental Programs Division staff will begin doing quarterly inspections with PW to ensure PPT training is provided.

**The PPT training for Parks & Rec was not provided in FY24 due to frequent staff turn-over but has already been done for FY25.

***Fire department PPT is done every-other year.

BMP – 6.3 SPCC Training

The City will continue to provide personnel with spill prevention control and countermeasure training. The plan specifies material handling procedures and storage requirements and identifies spill cleanup procedures for areas and processes in which spills may potentially occur.

Objective and Expected Results: The SPCC training attempts to standardize operating procedures and employee training toward the goal of minimizing accidental pollutant release that could contaminate storm water runoff.

Implementation Schedule: The SPCC training is a current policy that will continue to be implemented throughout the permit cycle. Moving forward, the Environmental Programs Division will be responsible for ensuring Public Works and Parks & Recreation provide SPCC training.

Method to Determine Effectiveness: The City tracks the number of personnel trained. The annual report will include this number.

Annual Reporting:

Personnel Trained

Department	Number of Employees Trained	Date
Public Works	-	-*
Parks and Rec	9	9/17/2024**

* Due to staffing shortages, training was not done. Environmental Programs staff will work with PW to ensure trainings is provided next FY.

**Training for Parks & Rec was missed due to staffing issues but has already been done for FY25.

BMP – 6.4 Yard Debris Collection Program

The City will continue its yard debris collection program. Residents are asked to rake leaves to the curb each fall where Public Works crews vacuum them up for composting. Usually, each area of the City will have two specific periods for leaf collection. Leaves may be bagged and, in limited numbers, put out with regular refuse.

Objective and Expected Results: By collecting and composting yard waste the City is reducing the amount of gross discards that would otherwise end up in the storm sewer system.

Implementation Schedule: This is a program that Public Works will continue throughout the permit cycle.

Method to Determine Effectiveness: The City tracks the total number of cubic yards and loads of debris collected. The annual report includes these numbers.

Yard Debris Collection Program

Permit Year 1	Total number of cubic yards collected	Total number of loads collected
July 1, 2023 - June 30, 2024	7,629	484

BMP – 6.5 Dedicated Vehicle Wash Facility

The City currently operates and maintains two dedicated vehicle/equipment wash facilities, one at its equipment maintenance shop and one at its parks and recreation maintenance shop.

Objective and Expected Results: This program eliminates the many pollutants that would otherwise enter into the storm sewer system if a dedicated vehicle wash facility did not exist.

Implementation Schedule: This is an ongoing program that Public Works will continue throughout the permit cycle.

Method to Determine Effectiveness: The City tracks the total number of vehicles washed. The annual report includes this number.

Annual Reporting:

Dedicated Vehicle Wash Facilities

Permit Year 1	Total number of vehicles washed
July 1, 2023 - June 30, 2024	850

BMP – 6.6 Storm Sewer Inspection and Maintenance

The City has developed a programmatic storm sewer inspection and maintenance program. The program includes expected routine maintenance and non-routine (repair) maintenance.

Objective and Expected Results: The storm sewer inspection and maintenance program will help ensure the storm sewer system is in good working order.

Implementation Schedule: The ongoing program will continue throughout the permit cycle. Environmental Programs Division and Public works will be responsible for developing and implementing the program.

Method to Determine Effectiveness: The City documents the number of storm structures and linear feet of storm sewer inspected. The annual report includes these numbers.

Storm Sewer Inspection

Permit Year 1	Total number of Storm Structures Inspected	Total Linear Feet of Storm drain Inspected
July 1, 2023 - June 30, 2024	200	2600

BMP – 6.7 Develop/Maintain SWPPPs for Required City Facilities

The City has identified four high priority City facilities that it operates. They are listed below.

Municipal High-Priority Facilities with A High Potential for Pollutant Discharge

Name of facility	Facility Address	Operator	Location of SWPPP
Public Works Operations Facility	1911 Craigmont Road	Public Works	1911 Craigmont Road
Parks and Recreation Maintenance Facilities	330 Park Boulevard	Parks and Recreation	330 Park Boulevard
Middlebrook Avenue Salt Storage Facility	866 Middlebrook Avenue	Public Works	1911 Craigmont Road
Parks and Recreation Pools	600 Churchville Avenue / 1000 Montgomery Avenue	Parks and Recreation	1000 Montgomery Avenue

The City maintains the Stormwater Pollution Prevention Plans (SWPPPs) for each high priority facility. The SWPPS are maintained by the facilities operators, which include Public Works and Parks and Recreation staff. Each SWPPP is located on site at the facility and is available upon request.

Objective and Expected Results: These documents provide guidance to prevent and reduce pollutant runoff from municipal operations.

Implementation Schedule: The City maintains the SWPPPs for each high priority facilities throughout the permit cycle.

Method to Determine Effectiveness: The annual report includes the total number of SWPPP inspections completed.

Permit Year 1 - SWPPP Inspections Performed

Name of facility	Facility Address	Number of Inspections Performed	Number of SWPPP Evaluations	Number of weather events prompting inspection
Public Works Operations Facility	1911 Craigmont Road	0	1	0
Parks and Recreation Maintenance Facility	330 Park Boulevard	1	1	0
Middlebrook Avenue Salt Storage Facility	866 Middlebrook Avenue	0	1	0
Parks and Recreation Pools	600 Churchville Avenue & 1000 Montgomery Avenue	1	1	0

*Staunton's Public Works and Parks and Recreation Divisions have been dealing with short-staffing and increased employee turn-over. As such, the trainings and inspections were largely missed this year. Environmental Programs staff met with both PW and P&R staff this fiscal year to go over inspection expectations. Moving forward, the Environmental Programs Division will provide quarterly inspections/training to ensure compliance with BMP 6.7

BMP – 6.8 Develop/Maintain Nutrient Management Plans for Required City Sites

The City has identified six sites, over one acre, that require a Nutrient Management Plan (NMP). Those sites are listed below.

Municipal Facilities Requiring Nutrient Management Plans

Name of facility	Facility Address	Planner	Acres Covered Under NMP
Gypsy Hill Golf Course	300 Park Boulevard	Parks and Recreation	1.90
John Moxie Baseball Stadium – Gypsy Hill	600 Churchville Avenue	Parks and Recreation	2.5
Jerry May, Bosserman, and Kiwanis Baseball Fields – Gypsy Hill	600 Churchville Avenue	Parks and Recreation	2.5
Springel, Harlow, and Lancaster Girl's Softball Fields – Montgomery Hall	1000 Montgomery Avenue	Parks and Recreation	5.4
Montgomery Hall Park Soccer Complex	1000 Montgomery Avenue	Parks and Recreation	4
Winston Wine Football Complex – Gypsy Hill	600 Churchville Avenue	Parks and Recreation	2.25

The City maintains a Nutrient Management Plan for each of these sites. The plans are located at each of the facilities and are available for review upon request.

Objective and Expected Results: The developed NMP defines the amount, source, placement, form and timing of the application of nutrients and soil amendments to ensure optimal management.

Implementation Schedule: The City will continue to implement the NMP through this permit cycle.

Method to Determine Effectiveness: The annual report include the total amount of nutrients applied to the acreage of each site.

Permit Year 1 - Municipal Facilities Requiring Nutrient Management Plans

Name of facility	Facility Address	Acres Covered Under NMP	Total Amount of Nutrients Applied (lbs./acre)
Gypsy Hill Golf Course	300 Park Boulevard	1.90	Nitrogen: 84.07 Phosphorus: 2.61 Potassium: 63.60
John Moxie Baseball Stadium – Gypsy Hill	600 Churchville Avenue	2.50	Nitrogen: 43.56 Potassium: 43.56
Jerry May, Bosserman, and Kiwanis Baseball Fields – Gypsy Hill	600 Churchville Avenue	2.50	Nitrogen: 43.56 Potassium: 43.56
Springel, Harlow, and Lancaster Girl's Softball Fields – Montgomery Hall	1000 Montgomery Avenue	5.40	Nitrogen: 121.97 Phosphorus: 43.56
Montgomery Hall Park Soccer Complex	1000 Montgomery Avenue	4.00	Nitrogen: 44.00 Potassium: 7.84
Winston Wine Football Complex – Gypsy Hill	600 Churchville Avenue	2.25	Nitrogen: 172.93 Potassium: 43.56

Trainings:

- On April 11, 4 employees completed a pesticide re-certification training course.
- On April 11, 6 employees completed a pesticide certification exam prep course.

Chesapeake Bay TMDL

In December of 2010, the United States Environmental Protection Agency established a total maximum daily load (TMDL), or “Pollution Diet”, to limit the amount of phosphorus, nitrogen, and sediments that can be released into the streams, creeks, and rivers that feed the Chesapeake Bay. These measures were established as an effort to improve the water quality of the Bay and to return it to a swimmable and fishable state. The Bay TMDL limits were divided into smaller TMDLs that were assigned to drainage basins across six (6) states including Virginia. To respond to the TMDL the Commonwealth of Virginia committed to a phased approach to implementation for MS4 programs. The phased approach for MS4 communities includes a requirement to meet a reduction goal of 100% during the 2023 – 2028 MS4 Permit Cycle.

The City of Staunton has developed a draft TMDL action plan based on the 2018 – 2023 permit cycle guidance document and the VAR04 permit requirements. The draft action plan will be finalized, and the City of Staunton will employ appropriate actions to meet the planning document during the 2023 – 2028 cycle. The implementation will provide 100 percent of the L2 Scoping Run based on lands within the 2000 Census urbanized areas.

Staunton will update the draft TMDL action plan to address new sources and grandfathered sources that are in the expanded MS4 area as identified by the 2020 census urban areas.

Objective and Expected Results: The development of a Chesapeake Bay TMDL Action Plan that will provide implementation guidelines and a program of management practices that will facilitate compliance with the condition of future permits.

Implementation Schedule: The City will submit the TMDL Action Plan for the Third permit cycle (July 1, 2023- June 30, 2028) within 12 months of the permit issuance date (November 2023).

- 1) Part II.A.13a – BMPs not Reported to the BMP Warehouse - *No BMPs installed*
- 2) Part II.A.13.b – Credits - *No Credits purchased*
- 3) Part II.A.13.c - *No BMPs installed*
- 4) Part II.A.13.d – BMPs planned for the Next Reporting Period – *Gypsy Hill Park Stream Restoration & Cole Avenue Stream Restoration*

Local TMDL

The City of Staunton is located within the South River and Middle River watersheds in Augusta County Va. This waterway was listed as high priority impairment list for fecal coliform and general benthic in 1996. As a result, a TMLD was developed and approved in April of 2004. The City was not specifically allocated a waste load as part of the TMDL planning process. The final TMDL instead provided allocations to the major sub-watersheds including Lewis Creek. City of Staunton is not required to develop an implementation plan per an email from DEQ representative Nesha Mcrae dated April 8, 2020.

Objective and Expected Results: Not applicable.

Implementation Schedule: Not applicable.

Responsible Parties

The departments and divisions of responsibility for implementation of MS4 program elements are included in BMP descriptions above. Contact information for each responsible party is located below:

Executive Officer

Title: City Manager

Name: Leslie M. Beauregard

Address: P.O. Box 58 Staunton, VA 24402

Phone: 540-332-3812

Email: beauregardlm@ci.staunton.va.us

Program Management

Environmental Programs Division

Title: Environmental Programs Administrator

Name: Peter K. Kesecker

Address: P.O. Box 58, Staunton, VA 24402

Phone: 540-332-3853

Email: keseckerpk@ci.staunton.va.us

Department of Public Works

Title: Director

Name: Dave Irvin

Address: P.O. Box 58, Staunton, VA 24402

Phone: 540-332-3892

Email: irvindh@ci.staunton.va.us

Department of Parks and Recreation

Title: Director

Name: Christopher J. Tuttle

Address: P.O. Box 59, Staunton, VA 24402

Phone: 540-332-3945

Email: tuttlecj@ci.staunton.va.us

Staunton Fire Department

Title: Fire Chief

Name: Jason Ball

Address: P.O. Box 58, Staunton, VA 24402

Phone: 540-332-3884

Email: balljc@ci.staunton.va.us

APPENDICES

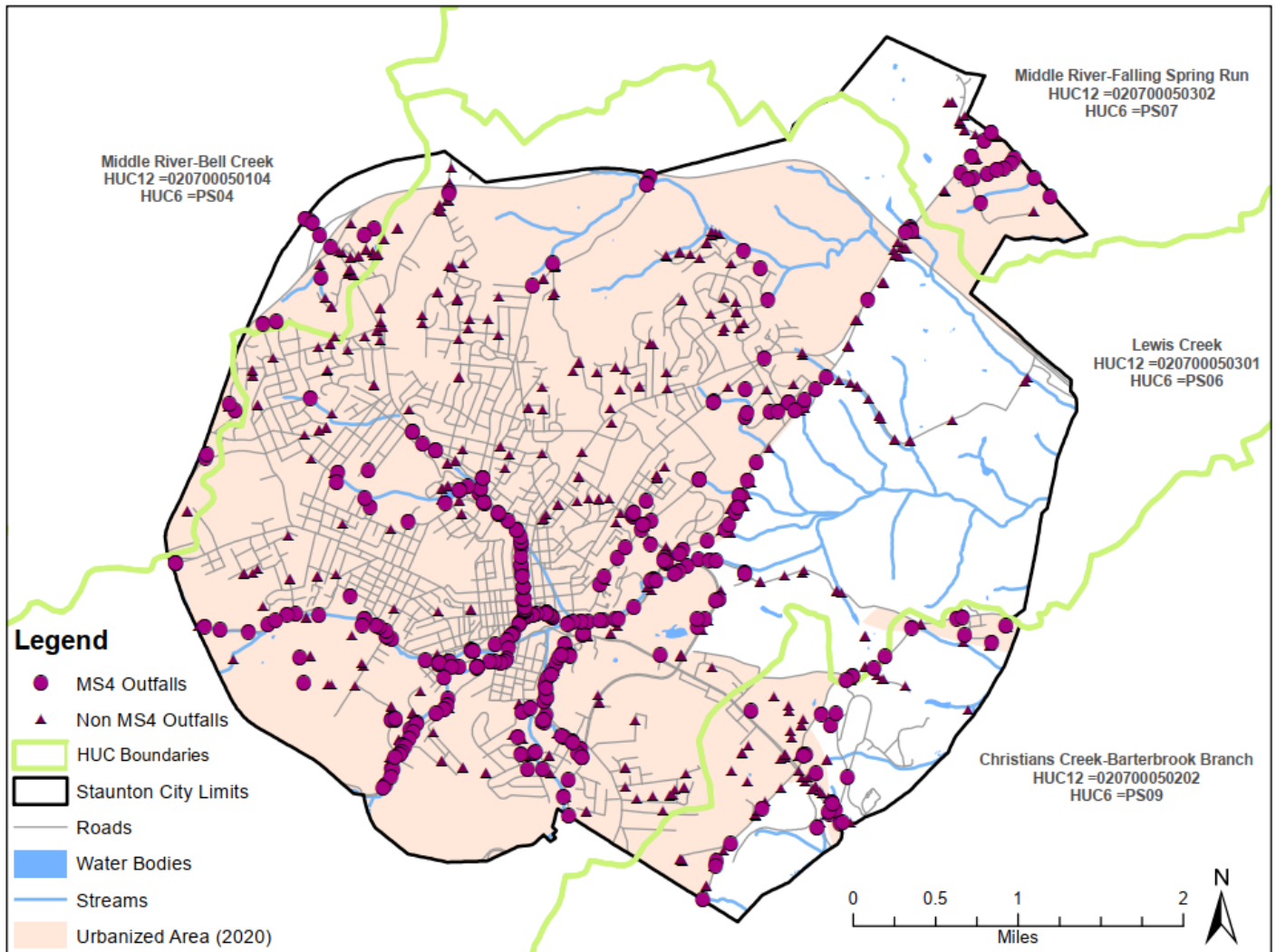
APPENDIX A ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAM DATABASE

Illicit Discharge Detection and Elimination (IDDE) Database - FY24										
July 1, 2023 through June 30, 2024										
Number	Notification Type	Date Potential Illicit Discharge Observed	Date Potential Illicit Discharge Reported	Did Discharge Reach Local Waterway	Was Discharge to Impaired Waters	Photos	Reports	Description of the Investigation (Including Follow Ups)	Resolution of the Investigation	Date Closed
1	VADEQ was notified via online pollution report	7/1/2023	7/3/2023	Yes, Lewis Creek	Yes	N/A		On Saturday, 7/1/23, at about 11:00AM, Public Works (PW) received a call of a sewage discharging from a manhole near 44 Middlebrook Avenue. A PW crew was dispatched to the site and found sewage overflowing from sewer manhole SMX3581. The crew jetted the downstream sewer main cleared the apparent blockage.	During cleaning, coagulated grease was removed from the main, which was the apparent cause of the blockage and subsequent overflow. An estimated 50 gallons of sewage discharged from the system and entered a storm sewer drop inlet about 5 feet away. The inlet discharges to Lewis Creek. No fish kills were observed. The crew collected as much sewage as possible and then washed the asphalt street.	7/3/2023
2	VADEQ was notified via online pollution report	7/4/2023	7/5/2023	No	N/A	N/A		On Tuesday, 7/4/23, at about 1:00PM, Public Works (PW) received a call of a sewage discharging from a manhole in front of the referenced address. A PW crew was dispatched to the site and found a minor volume of sewage (estimated 20 gallons) overflowing from sewer manhole SMX1216.	The crew jetted the downstream sewer main and cleared the apparent blockage, restoring normal flow to the system. The discharged sewage seeped down the street where most of it evaporated in the hot sun. The crew cleaned what remained from the street. No impact to State Waters.	7/5/2023
3	VADEQ was notified via online pollution report	8/5/2023	8/1/1970	No	N/A	N/A		On Saturday, 8/5/23, at about 9:30AM, Public Works (PW) received a call of sewage discharging from a cleanout in front of 490 Mountain View Drive. A PW crew was dispatched to the site and found a minor volume of sewage (estimated 50 gallons) that had overflowed from the sewer cleanout. The crew jetted the lateral and the downstream sewer main and cleared the apparent blockage, restoring normal flow to the system. The discharged sewage seeped into the ground beside the street. The crew cleaned and applied lime to the affected area. No impact to State Waters. Roots and hygiene products were the suspected cause of the blockage.	The crew jetted the lateral and the downstream sewer main and cleared the apparent blockage, restoring normal flow to the system. The discharged sewage seeped into the ground beside the street. The crew cleaned and applied lime to the affected area. No impact to State Waters. Roots and hygiene products were the suspected cause of the blockage.	8/1/2023
4	VADEQ was notified via online pollution report	8/16/2023	8/16/2023	No	N/A	N/A		On Wednesday, 8/16/23, at about 9:30AM, Public Works (PW) received a call of sewage discharging from a manhole at the rear of 911 Greenville Avenue. A PW crew was dispatched to the site and found a minor volume of sewage (estimated 10 gallons) that had overflowed from the sewer manhole (SMX2673).	The crew jetted the sewer main from the downstream manhole and cleared the apparent blockage in only a few minutes, restoring normal flow to the system. The discharged sewage seeped into the ground around the manhole. The crew cleaned and applied lime to the affected area. No impact to State Waters.	8/16/2023
5	VADEQ was notified via online pollution report	9/3/2023	9/5/2023	No	N/A	N/A		On Sunday, 9/3/23, at about 3:00PM, Public Works (PW) received a call of sewage discharging from a manhole in the street in front of 2303 Bare Street. A PW crew was dispatched to the site and found a minor volume of sewage (estimated 50 gallons) overflowing from the sewer manhole (SMX2212).	The crew jetted the sewer main from the downstream manhole, cleared the apparent blockage, and restored normal flow to the system. The discharged sewage seeped across the pavement to the edge of the street with most of it evaporating due to the hot weather. The crew cleaned the remaining overflow from the affected area. No impact to State Waters.	9/5/2023

6	VADEQ was notified via online pollution report	9/21/2023	9/22/2023	No	N/A	N/A	On Thursday, 9/21/23, at about 9:00AM, Public Works (PW) received a call of sewage discharging from a sewer cleanout at 2225 W Beverley Street. A PW crew was dispatched to the site and found a minor volume of sewage overflowing from the cleanout.	The crew jetted the sewer lateral and the sewer main from the cleanout to and through the downstream sewer main. The blockage was cleared and normal flow was restored. During cleaning, many roots were pulled from the sewer system which were the apparent cause of the blockage and subsequent overflow. An estimated 40 gallons of sewage spilled in the street and gutter with some reaching a nearby storm inlet. The crew recovered as much sewage as possible and then cleaned the affected area. No impact to State Waters.	9/22/2023
7	VADEQ was notified via online pollution report	9/24/2023	9/25/2023	No	N/A	N/A	On Sunday, 9/24/23, at about 11:30PM, Public Works (PW) received a call of sewage discharging from a sewer cleanout at 416 Parkwood Lane. A PW crew was dispatched to the site and found that the cleanout was surcharged to the top.	The crew jetted the sewer lateral, unclogging the apparent blockage and restoring normal flow. The exact cause of the blockage was not determined. During cleaning, an estimated 10 gallons of sewage spilled onto the yard and permeated into the ground. Lime was applied to the affected area. No impact to State Waters.	9/25/2023
8	VADEQ was notified via online pollution report	10/12/2023	10/14/2023	Yes, Lewis Creek	Yes	Yes	Pete Kessecker responded to 110 W. Hampton St. to find contractor rinsing drywall mud into the DI located in the parking lot of the facility. Pete talked to the supervisor on duty and advised him to stop immediately. He did not realize IDDE was occurring	Pete Kessecker instructed the supervisor to wash the drywall mud into the sanitary sewer versus the storm sewer in the future. The supervisor apologized and assured him that he would make sure that happen in the future.	10/14/2023
9	VADEQ was notified via online pollution report	10/27/2023	10/27/2023	No	No	N/A	On Friday, 10/27/23, at about 10:15AM, Public Works (PW) received a call of sewage discharging from a sewer manhole behind 405 Straith St. A PW crew was dispatched to the site and found that manhole SMX1217 was overflowing.	The crew jetted the downstream sewer mains, unclogging the apparent blockage and restoring normal flow. The exact cause of the blockage was not determined. An estimated 150 gallons of sewage discharged onto the ground surrounding the manhole and permeated into the ground. Lime was applied to the affected area. No impact to State Waters.	10/27/2023
10	VADEQ was notified via online pollution report	11/14/2023	11/16/2023	No	No		Fire Marshall observed washing of garage floor at Take 5 Oil Change into the parking lot & pollutants entering on-site storm drain. Manager stated this was company policy and that the employees wash the floor with Dawn dish soap.	Manager was told by Fire Marshall not to continue the practice of washing the garage floor into the parking lot.	11/16/2023
11	VADEQ was notified via online pollution report	12/1/2023	12/1/2023	No	No		On Friday, 12/1/23, at about 10:00AM, Public Works (PW) discovered a SSO from manhole SMX4215 beside 827 Greenville Avenue. The crew immediately began jetting the downstream sewer main. In about 30 minutes, the apparent blockage was cleared and normal flow was restored.	An estimated 100 gallons of sewage had discharged into a small drainage swale downstream of the manhole where it permeated into the ground. No impacts to State Waters. Lime was applied to the affected area.	12/1/2023
12	VADEQ was notified via online pollution report	12/19/2023	12/19/2023	No	No		On Monday, 12/19/23, at about 4:00PM, Public Works (PW) discovered a SSO from sewer main behind 544 Calvert Street. The crew immediately began jetting the upstream sewer main. In about 5 minutes, the apparent blockage was cleared and normal flow was restored. An estimated 10 gallons of sewage had discharged into the immediate area around the manhole. Area was limed. No impacts to State Waters.	An estimated 10 gallons of sewage had discharged into the immediate area around the manhole. Area was limed. No impacts to State Waters.	12/19/2023

APPENDIX B
OUTFALL AND POINTS OF DISCHARGE MAP

Staunton, VA - Outfall Map



APPENDIX C BMP DATABASE ADDITIONS

CITY OF STAUNTON - BMP DATABASE															
PRIVATELY OWNED FACILITIES BROUGHT ONLINE From July 1, 2023 through June 30, 2024															
BMP NO.	SITE NAME	SITE ADDRESS	OWNER	SITE LOCATION		FACILITY TYPE	ACRES TREATED			ONLINE DATE		VA HUG	RECEIVING WATERS	IMPAIRED WATERS	SWM AGREEMENT
				LATITUDE	LONGITUDE		TOTAL	PERVIOUS	PERVIOUS	MONTH	YEAR				
BLC72	Middlebrook Trace I	601 Moore St.	Middlebrook Trace VA, LLC	38.13827	-79.08352	Underground detention system	2.97	2.08	0.89	6	2024	PS06	Lewis Creek	Yes	YES
BLC73	Middlebrook Trace I	601 Moore St.	Middlebrook Trace VA, LLC	38.13827	-79.08352	Bioretention - Level 2	2.49	0.86	1.63	6	2024	PS06	Lewis Creek	Yes	YES
BLC74	Middlebrook Trace I	601 Moore St.	Middlebrook Trace VA, LLC	38.13827	-79.08352	Open Space	4.50	4.50	0.00	6	2024	PS06	Lewis Creek	Yes	YES
BPF-33	Firestone	1008 Richmond Ave	Staunton BF BTS Retail, LLC	38.13866	-79.04853	Underground detention system				5	2024	PS09	Poor Farm Draft	No	YES
BCN16	Cook Out	109 George Cochran Parkway	Cook Out-Staunton, INC	38.1316	-79.04134	Filterra Unit	1.44	0.44	1.01	11	2023	PS09	Christian Creek Trib (N)	No	YES
BCN17	Cook Out	109 George Cochran Parkway	Cook Out-Staunton, INC	38.13145	-79.04158	Filterra Unit	"	"	"	11	2023	PS09	Christian Creek Trib (N)	No	YES
BCN18	Cook Out	109 George Cochran Parkway	Cook Out-Staunton, INC	38.13147	-79.04096	Filterra Unit	"	"	"	11	2023	PS09	Christian Creek Trib (N)	No	YES
BCN19	Cook Out	109 George Cochran Parkway	Cook Out-Staunton, INC	38.13123	-79.04153	Filterra Unit	"	"	"	11	2023	PS09	Christian Creek Trib (N)	No	YES

APPENDIX D

Assessment of the Appropriateness of Identified BMPs

The City of Staunton has determined that the best management practices included in the MS4 Program Plan that the City already had in place during Permit Year 1 represent an appropriate selection and implementation of a stormwater management program as defined by the General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems.

No deficiencies have been found within the existing BMPs or within the new BMPs currently being developed for the Program.

APPENDIX E

FY24 – WASTE AWARENESS BROCHURE ISSUE IX

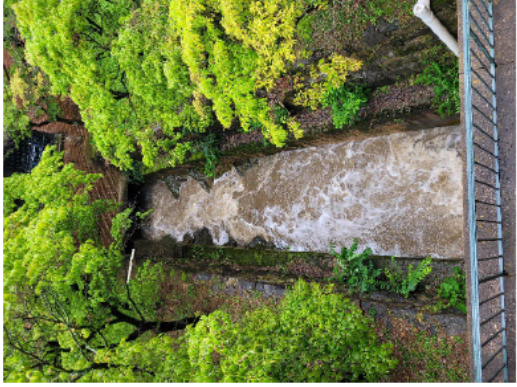
Only Rain Down the Drain

Staunton's Stormwater Tips

Issue Number IX



2024



Staunton's Stormwater Tips

The purpose of this brochure is to educate citizens of Staunton on the importance of stormwater management and pollution reduction. For more information, visit the Environmental Programs Division's page on the City's website.

To report stormwater pollution or other stormwater concerns, please contact the City's Stormwater Hotline at **540.213.6517** or StauntonStormwater@ci.staunton.va.us

Important program updates and additional educational information can be found on our Facebook page at: facebook.com/stauntonstormwater

GET INVOLVED!

Opportunities for public participation:

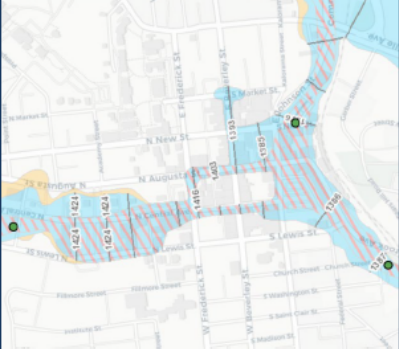
- Adopt-a-Street Program
- Adopt-a-Stream Program
- Regional Household Hazardous Waste Collection Day
- Lewis Creek Watershed Advisory Committee



Community Development Department
116 West Beverley Street
3rd Floor
Staunton, VA 24401
Phone: 540.332.3858
www.staunton.va.us

A Note on Flooding:

There are two streams that flow directly underneath parts of downtown Staunton before meeting under the Wharf parking lot. While interesting, this makes downtown particularly prone to **flooding**.



FEMA floodplain for downtown Staunton.

In response to the major flooding in August of 2020, the City created a **Flood Awareness System**. This system consists of 6 stream depth sensors and 7 rain gauges placed throughout Staunton's watershed. Their near real-time data can be view anytime on the system's online dashboard.

Citizens can also sign up to receive text or email **alerts** that are triggered when monitored streams rise to levels of concern or when the rain gauges receive more than 2-inches of rain in an hour.

For more information or to sign up for alerts, visit the Flood Awareness page of the City's website or view the dashboard directly at stauntonva.onerain.com.

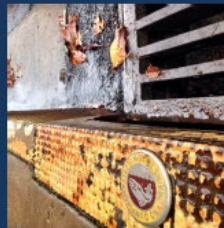
What is Stormwater Runoff?

Stormwater runoff is rain or snow melt that doesn't evaporate or soak into the ground, but instead flows to the City's storm sewer system, which takes it to our local streams.

Impervious areas are any hard surfaces, like rooftops, driveways, and parking lots, that don't allow water to soak into the ground and thus lead to more stormwater runoff. **↑ impervious area = ↑ stormwater runoff.**

What's the Big Deal?

When **1-inch of rain** falls on an acre of impervious surface, it can produce approx. **27,000 gallons of runoff**. Without anywhere for that water to go, even smaller storms could cause flooding. This is why cities have stormwater management systems.



Stormwater also carries many pollutants like trash, motor oil, pet waste, sediment, fertilizers, pesticides, and numerous others directly to local streams. **Stormwater is not treated at the water treatment plant.**

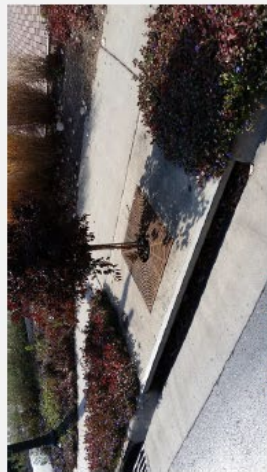


Reducing Stormwater Pollution

One way to reduce stormwater pollution is to implement Best Management Practices or **BMPs**. These are facilities that help to remove or reduce pollutants in stormwater before it is discharged into local waterways.

Some examples of BMPs include:

- Rainwater Harvesting
- Permeable Pavement
- Bioretention
- Filtering Practices



Filtering Practice over a storm drain

At the Source

Stormwater pollution can also be reduced at its source by cleaning up and **minimizing pollution** in the environment before it is carried away by runoff. There are many ways to do this including:

- Picking up pet waste
- Minimizing fertilizer and pesticide use
- Planting native plants
- Maintaining cars to prevent leaks
- Washing cars at a commercial car wash
- Keeping yard waste out of storm drains
- Properly storing and disposing of hazardous materials and cleaning spills
- Reducing road salt use in the winter

MS4 Program

Staunton is required to develop, implement, and enforce an MS4 (Municipal Separate Storm Sewer System) Program that works to **minimize the discharge of pollutants into surface waters**, particularly the Chesapeake Bay, to comply with coverage under General Permit No. VAR04, issued by the Virginia Department of Environmental Quality of the Commonwealth.



Staunton is in the Chesapeake Bay Watershed

Stormwater Utility Fee

The stormwater utility fee was established to help provide funding to administer the Stormwater Management Program and meet MS4 requirements. Some of goals of this program include:

- Identify projects to improve water quality in local streams and tributaries.
- Identify projects to reduce flooding potential and damage.
- Inspect and monitor stormwater management facilities to ensure optimal performance.
- Perform regular Erosion & Sediment Control Inspections of commercial and residential construction sites to ensure compliance.