

# Draft Stormwater Management Plan

Town of Fletcher

NCS000424

June 24, 2021



Prepared By:



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## **PART 1: INTRODUCTION**

The purpose of this Stormwater Management Plan (SWMP) is to establish and define the means by which the Town of Fletcher will comply with its National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit and the applicable provisions of the Clean Water Act to meet the federal standard of reducing pollutants in stormwater runoff to the maximum extent practicable.

This SWMP identifies the specific elements and minimum measures that the Town of Fletcher will develop, implement, enforce, evaluate and report to the North Carolina Department of Environmental Quality (NCDEQ) Division of Energy, Minerals and Land Resources (DEMLR) in order to comply with the MS4 Permit number NCS000424, as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater from the MS4 as owned and operated by the Town of Fletcher and located within the corporate limits of the Town of Fletcher.

In preparing this SWMP, the Town of Fletcher has evaluated its MS4 and the permit requirements to develop a comprehensive 5-year SWMP that will meet the community's needs, address local water quality issues and provide the minimum measures necessary to comply with the permit. The SWMP will be evaluated and updated annually to ensure that the elements and minimum measures it contains continue to adequately provide for permit compliance and the community's needs.

Once the SWMP is approved by NCDEQ, all provisions contained and referenced in this SWMP, along with any approved modifications of the SWMP, are incorporated by reference into the permit and become enforceable parts of the permit. Any major changes to the approved SWMP will require resubmittal, review and approval by NCDEQ, and may require a new public comment period depending on the nature of the changes.

**PART 2: CERTIFICATION**

By my signature below I hereby 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 fines and imprisonment for knowing violations.

I am also aware that the contents of this document shall become an enforceable part of the NPDES MS4 Permit, and that both the Division and the Environmental Protection Agency have NPDES MS4 Permit compliance and enforcement authority.

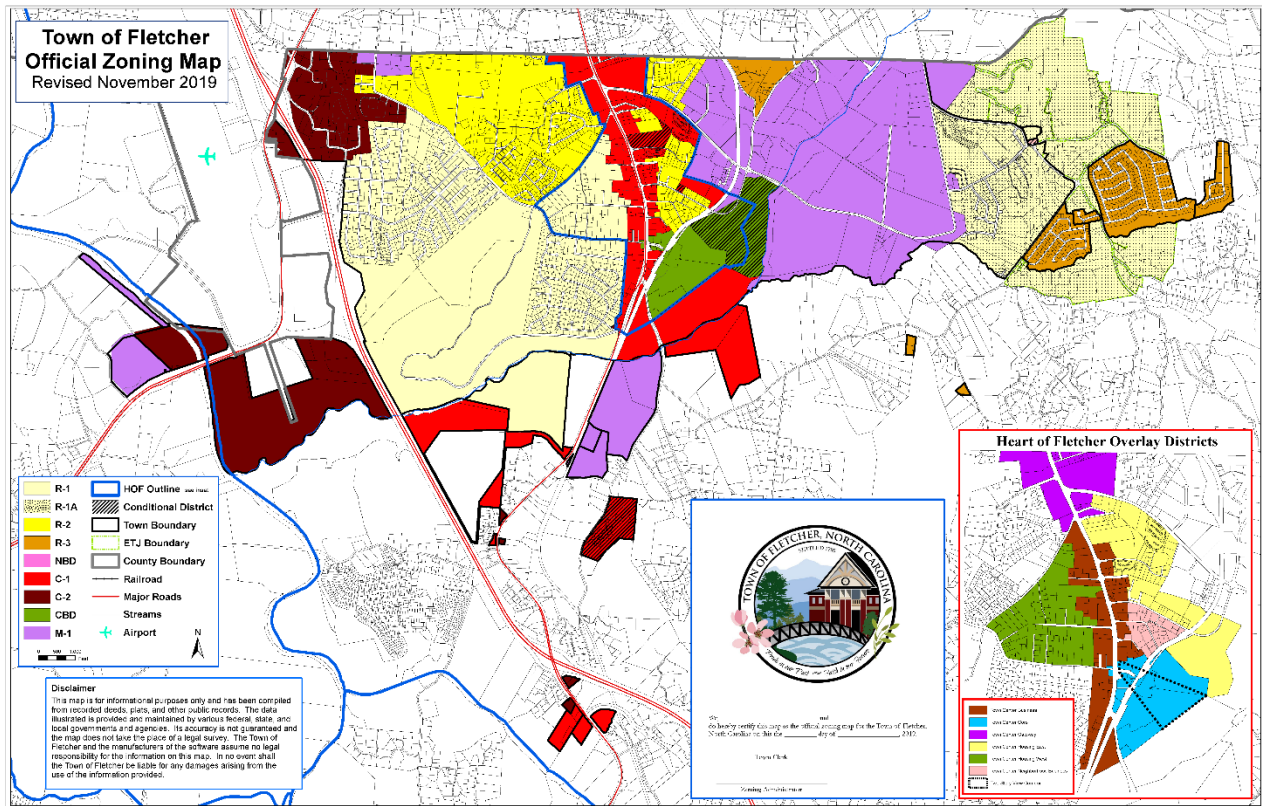
- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):
  - A specific individual having overall responsibility for stormwater matters.
  - A specific position having overall responsibility for stormwater matters.

<i>Signature:</i>	
<i>Print Name:</i>	Mark Biberdorf
<i>Title:</i>	Town Manager
Signed this <input type="text"/> day of 2021	

## PART 3: MS4 INFORMATION

### 3.1 Permitted MS4 Area

This SWMP applies throughout the corporate limits of the Town of Fletcher., including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the Town's boundary, as of the date of this document.



### 3.2 Existing MS4 Mapping

The most current MS4 mapping was completed in 2007 as part of a Stormwater Masterplan. It included 230 outfall locations and analysis (135 major pipe outfalls). Existing culverts were studied in 2007 to determine conditions and possible pipe failure analysis. Documentation consisted of culvert sizes, conditions and locations. This Mapping has not been updated since 2007. The Town's 2007 Outfall Map includes all pipe outfalls that were inventoried throughout the Town. A total of 230 outfall points including pipes and channels, 59 pipes/culverts and 6 bridges were mapped. The number represented in Table 1 represents an estimate of the mapped area and the estimated number of major outfalls.

The Town of Fletcher Stormwater Master Plan was created to address the following stormwater related items:

- Creating a National Pollutant Discharge Elimination System (NPDES) Phase II compliant Stormwater Ordinance.
- NPDES compliant stormwater outfall inventory and illicit discharge detection.
- Town of Fletcher culvert capacity analysis.
- Detailed Wildwood Garden/ Higgins Branch analysis.
- Minimum Detailed Hoopers Valley Estates / Hoopers Creek Analysis.
- On-going Stormwater Conveyance System Maintenance.

A MS4 GIS map is not available on-line at this time. See BMP #11 for plans to provide on-line maps.

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	80	%
No. of Major Outfalls* Mapped	135	total

See BMPs #11 and #14 for updating mechanisms and timelines for improving the MS4 mapping.  
*\*An outfall is a point where the MS4 discharges from a pipe or other conveyance (e.g. a ditch) directly into surface waters. Major outfalls are required to be mapped to meet permit requirements. A major outfall is a 36-inch diameter pipe or discharge from a drainage area > 50-acres; and for industrial zoned areas a 12-inch diameter pipe or a drainage area ≥ 2-acres.*

### 3.3 Receiving Waters

The Town of Fletcher MS4 is located within the French Broad River Basin and discharges directly into receiving waters as listed in Table 2 below. Applicable water quality standards listed below are compiled from the following NCDEQ sources:

- [Waterbody Classification Map](#)
- [Impaired Waters and TMDL Map](#)
- Most recent NCDEQ Final [303\(d\) List](#)

Table 2: Summary of MS4 Receiving Waters

Receiving Water Name	Stream Index / AU Number	Water Quality Classification	303(d) Listed Parameter(s) of Interest
Cane Creek		C	Benthos (Nar, AL, FW); Fish Tissue Mercury (Nar, FC, NC)
Pinner Creek		C;Tr	
Hoopers Creek		C;Tr	
Kimsey Creek		C	
Higgins Creek		C	
Fraday Lake		C	

C – Class C (fishable/swimmable waters)

Tr – Trout Waters

Benthos (Nar, AL, FW) – Narrative Standard, Aquatic Life, Fresh Waters

Fish Tissue Mercury (Nar, FC, NC) – All waters, river basins, and watershed in North Carolina

### 3.4 MS4 Interconnection

The Town of Fletcher MS4 is not interconnected with another regulated MS4 and directly discharges to the receiving waters as listed in Table 2 above.

Town roadways interconnect with NCDOT state-maintained roads throughout the jurisdiction such as SR 25 Hendersonville Road, Route 1358 Fanning Bridge Road, Route 1006 Howard Gap Road, Route 1545 Cane Creek Road, Route 1547 Old Airport Road and multiple other secondary NCDOT roadways. At this time a copy of the NCDOT statewide MS4 has not been made publicly available. Therefore, the below responses are based purely on road ownership.

The ownership of the roadway was not used as a determining factor for inclusion in 2007 when the Town's original stormwater outfall inventory was performed. The Town has not completed the MS4 system inventory. This BMP is scheduled to be performed during this coming permit cycle. Therefore, we believe the Town's MS4 likely does interconnect with the statewide NCDOT MS4 and includes:

- a. The interconnection is receiving stormwater from the NCDOT MS4. The number of interconnections is unknown. The quantity will be determined and reported during this permit cycle.
- b. The interconnection maybe discharging stormwater into the NCDOT MS4. The number of interconnections is unknown. The quantity will be determined and reported during this permit cycle.
- c. The Town of Fletcher MS4 mapping does identify interconnections with the NCDOT MS4.
- d. The Town of Fletcher MS4 mapping may include NCDOT MS4 outfalls.



### 3.5 Total Maximum Daily Loads (TMDLs)

The TMDL(s) listed in Table 3 below have been approved within the MS4 area, as determined by the map and list provided on the [NCDEQ Modeling & Assessment Unit web page](#). The table also indicates whether the approved TMDL has a specific stormwater Waste Load Allocation (WLA) for any watershed directly receiving discharges from the permitted MS4, and whether a Water Quality Recovery Program has been implemented to address the WLA.

Table 3: Summary of Approved TMDLs

Water Body Name	TMDL Pollutant(s) of Concern	Stormwater Waste Load Allocation (Y/N)	Water Quality Recovery Program (Y/N)
Statewide	Mercury	N	N

Approximately 98% of the mercury deposited in NC is due to air emissions. Other minor sources may include wastewater treatment plants and industrial wastewater dischargers. The Town of Fletcher has no wastewater treatment facilities. There are several NPDES permit holders in Fletcher (see Section 3.7). Local impacts of non-point source discharges are controlled by NCDEQ Water Quality programs such as the Phase II Program. The Town of Fletcher has implemented its Phase II program by contracting with Henderson County for permitting of stormwater management measures. See other areas of this SWMP for additional information on strategies for water quality recovery.

The following link provides additional information on the NC Statewide Mercury TMDL.  
[https://files.nc.gov/ncdeq/Water%20Quality/Planning/TMDL/FINAL%20TMDLS/Statewide/NCMercuryTMDL\\_EPASubmit.pdf](https://files.nc.gov/ncdeq/Water%20Quality/Planning/TMDL/FINAL%20TMDLS/Statewide/NCMercuryTMDL_EPASubmit.pdf)

### 3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are identified within the regulated MS4 urbanized area. Based upon a review of the [Endangered and Threatened Species and Species of Concern by County for North Carolina Map](#) and [Listed species believe to or known to occur in North Carolina map](#) as provided by the [U.S. Fish and Wildlife Service](#), the species listed in Table 4 have the potential to occur within the regulated MS4 urbanized area. Of those species listed, Table 4 summarizes the species that may be significantly impacted by the quality of surface waters within their habitat.

Table 4: Potential Federally Listed Species/Habitat Impacted by Surface Water Quality

Scientific Name	Common name	Species Group	Federal Listing Status
<i>Haliaeetus leucocephalus</i>	Bald Eagle	Vertebrate	BGPA
<i>Glyptemys muhlenbergii</i>	Bog Turtle	Vertebrate	T (S/A)
<i>Myotis septentrionalis</i>	Northern long-eared bat	Vertebrate	T
<i>Alasmidonta raveneliana</i>	Appalachian elktoe	Invertebrate	E
<i>Sagottaroa fasciculata</i>	Bunched arrowhead	Vascular Plant	E
<i>Sarracenia rubra</i> <i>ssp.jonesii</i>	Mountain sweet pitcherplant	Vascular Plant	E
<i>Helonias bullata</i>	Swamp pink	Vascular Plant	T

BGPA – Bald and Golden Eagle Protection Act

T – Threatened T (S/A) – Threatened due to similarity of appearance

E – Endangered

### 3.7 Industrial Facility Discharges

The Town of Fletcher MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the [NCDEQ Maps & Permit Data web page](#).

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name
NCS000424	Town of Fletcher SW Discharge, Individual (MS4)
NCG020167	Oldcastle Materials
NCG030011	Borg Warner Cooling Systems
NCG030430	Blue Ridge Metals Corp.
NCG050030	Wilson Art International
NCG050399	Upm Raflatac, Inc.
NCG080866	Southeastern Freight Line
NCG140160	Southern Concrete Materials
NCGNE0208	DHL Express
NCGNE0428	Borg Warner Remanufacturing
NCGNE0547	Upm Raflatac, Inc.
NCGNE0892	Smartrac Technology

### 3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the Town of Fletcher as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The Town of Fletcher has evaluated residential and charity car washing for possible significant water quality impacts. Dry street sweeping is the method for street cleaning.

The Division has not required that other non-stormwater flows be specifically controlled by the Town of Fletcher.

Wash water associated with car washing that does not contain detergents or does not discharge directly into the MS4 is considered incidental. However, these types of non-stormwater discharges that do contain detergents have been evaluated by the Town of Fletcher to determine whether they may significantly impact water quality. As a result of no complaints, and the small amount of visual observations, it has been determined that residential and charity car washing with detergent is considered incidental in the Town of Fletcher.

Table 6: Non-Stormwater Discharges

Non-Stormwater Discharge	Water Quality Impacts
Water line and fire hydrant flushing	Incidental
Landscape irrigation	Incidental
Diverted stream flows	Incidental
Rising groundwater	Incidental
Uncontaminated groundwater infiltration	Incidental
Uncontaminated pumped groundwater	Incidental
Uncontaminated potable water sources	Incidental
Foundation drains	Incidental
Air conditioning condensate	Incidental
Irrigation waters	Incidental
Springs	Incidental
Water from crawl space pumps	Incidental
Footing drains	Incidental
Lawn watering	Incidental
Residential and charity car washing	Incidental
Flows from riparian habitats and wetlands	Incidental
Dechlorinated swimming pool discharges	Incidental
Street wash water	N/A
Flows from firefighting activities	Incidental

### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Fletcher is not aware of other significant water quality issues within the permitted MS4 area.

Table 7 below summarizes the water quality pollutants identified throughout Part 3 of this SWMP, the likely activities/sources/targeted audiences attributed to each pollutant, and identifies the associated SWMP program(s) that address each. In addition, the Town of Fletcher has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

The target audiences, as shown in Table 7 were identified due to the potential for these entities to contribute to pollutants and because they are the groups that have probable ability to affect positive change.

Table 7: Summary of Target Pollutants and Sources

Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target Pollutant(s)/Audience(s)
Litter	Residents, Businesses, Schools	Public Education & Outreach, Public Involvement & Participation
Yard Waste	Residents, Businesses, Schools	Public Education & Outreach Public Involvement & Participation
Illicit discharges	Residents, Businesses, Industrial, public employees	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection & Elimination (IDDE)
Sediment	Construction Sites	Construction Site Runoff Control, Post-Construction Site Runoff Control
Illegal Dumping	Residents, Businesses, Industrial, public employees	Public Education & Outreach, Pollution Prevention & Good Housekeeping
Improper Disposal of Waste	Residents, Businesses, Industrial, public employees	Public Education & Outreach, Pollution Prevention & Good Housekeeping

## PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

### 4.1 Organizational Structure

In the Town of Fletcher the Planning Director is designated as the Stormwater Program Administrator. The Stormwater Administrator is responsible for operation of the SWMP, the MS4 Permitting and for yearly reporting to NCDEQ. The Planning Director falls under the umbrella of the Town Manager. The

Planning Director works closely with the Public Works Director for municipal operations and reporting as specified in this SWMP.

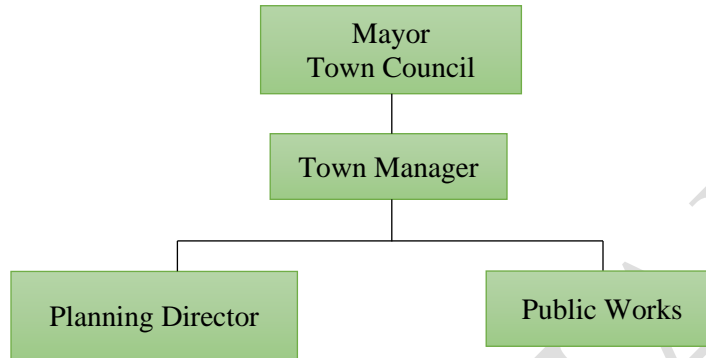


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Planning Director	Eric Rufa	Planning and Zoning
SWMP Management	Planning Director	Eric Rufa	Planning and Zoning
Public Education & Outreach	Planning Director	Eric Rufa	Planning and Zoning
Public Involvement & Participation	Planning Director	Eric Rufa	Planning and Zoning
Illicit Discharge Detection & Elimination	Planning Director	Eric Rufa	Planning and Zoning
Construction Site Runoff Control	Planning Director Implemented by Henderson County Engineering	Eric Rufa Natalie Berry, PE	Erosion Control Local Program
Post-Construction Stormwater Management	Planning Director Implemented by Henderson County Engineering	Eric Rufa Natalie Berry, PE	Phase II Local Program
Pollution Prevention/Good Housekeeping for Municipal Operations	Public Works Director	Jabbo Pressley	Public Works

Municipal Facilities Operation & Maintenance Program	Public Works Director	Jabbo Pressley	Public Works
Spill Response Program	Planning Director Public Works Director	Eric Rufa Jabbo Pressley	Planning and Zoning Public Works
MS4 Operation & Maintenance Program	Planning Director Public Works Director	Eric Rufa Jabbo Pressley	Planning and Zoning Public Works
Municipal SCM Operation & Maintenance Program	Public Works Director	Jabbo Pressley Eric Rufa	Public Works for scheduled maintenance and rainfall event inspections Planning and Zoning Outsourcing for annual inspection/certifications
Pesticide, Herbicide & Fertilizer Management Program	Public Works Director	Jabbo Pressley	Public Works
Vehicle & Equipment Cleaning Program	Public Works Director	Jabbo Pressley	Public Works
Pavement Management Program	Public Works Director	Jabbo Pressley	Public Works
Total Maximum Daily Load (TMDL) Requirements	Planning Director	Eric Rufa	Planning and Zoning

#### 4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Fletcher shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and comply with the requirements of the NPDES MS4 Permit. The budget includes the permit administering and compliance fee, which is billed by the Division annually.

The Town of Fletcher's current stormwater program is funded under the Planning Department Budget. An amount of \$30,000 is currently budgeted for the program over the permit term. Current analysis shows the MS4 program to be under-funded. The Town is currently evaluating their budget in order to have adequate funds for implementation of the SWMP and to comply with MS4 Permit requirements.

The Town currently has one full time employee and one part-time employee in the Planning and Zoning Department. Stormwater Program responsibilities are currently overseen by the Planning and Zoning Director. The Public Works Director is also involved in elements of the SWMP. In order for the

successful implementation of certain sections of this SWMP, it will be determined (BMP #4) if additional funds will be required for adding staffing or contract employees.

Additional funding will be necessary to meet the requirements of the Town’s MS4 Permit. Steps will be taken to evaluate this need and put funding mechanisms in place (see BMP #3 and #4). In the last 2 fiscal years, the Town has increased their Stormwater budget which is at \$30,000. Town Council is aware of the recent Audit and creation of a new SWMP. There is a plan to go back to Council for the next budget cycle (Jan-March) with a more accurate picture of cost needs to properly run the program. The Town is currently in discussions with Land of Sky Regional Council to evaluate what can be funded through Grants, aiding in the Town’s funding analysis.

### 4.3 Shared Responsibility

The Town of Fletcher will share the responsibility to implement the following minimum control measures, which are at least as stringent as the corresponding NPDES MS4 Permit requirement. The Town of Fletcher remains responsible for compliance if the other entity fails to perform the permit obligation, and may be subject to enforcement action if neither the Town of Fletcher nor the other entity fully performs the permit obligation. Table 9 below summarizes who will be implementing the component, what the component program is called, the specific SWMP BMP or permit requirement that is being met by the shared responsibility, and whether or not a legal agreement to share responsibility is in place. Listed in Table 9 are the current shared program that are in place.

Table 9: Shared Responsibilities

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
3.5 Construction Site Runoff Control Program	Henderson County Delegated Erosion and Sediment Control Permitting	Y
3.6 Post Construction Program	Henderson County Delegated Phase II Post-Construction Stormwater Permitting	Y
BMP #5	Land of Sky Regional Council	N

#### 4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000424 for the Town of Fletcher. Table 10 summarizes contact information for each co-permittee.

Table 10: Co-Permittee Contact Information

Co-Permittee MS4 Name	Contact Person	Phone & E-Mail	Interlocal Agreement (Y/N)
N/A			

#### 4.5 Measurable Goals for Program Administration

The Town of Fletcher will manage and report the following Best Management Practices (BMPs) for the administration of the Stormwater Management Program.

**Table 11: Program Administration BMPs**

Permit Ref.	2.1.2 and Part 4: Annual Self-Assessment			
	Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program. The self-assessment reporting period is the fiscal year (July 1 – June 30).			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
1.	<b>Annual Self-Assessment</b>			
	Perform an annual evaluation of SWMP implementation, suitability of SWMP commitments and any proposed changes to the SWMP utilizing the NCDEQ Annual Self-Assessment Template.	1. Prepare, certify and submit the Annual Self-Assessment to NCDEQ prior to August 31 each year.	1 Annually Permit Years 1 – 4	1. Yes/No
Permit Ref.	1.6: Permit Renewal Application			
	Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric



**Table 11: Program Administration BMPs**

2.	<b>Permit Renewal Application</b>			
	Audit stormwater program implementation for compliance with the permit and approved SWMP, and utilize the results to prepare and submit a permit renewal application package.	1. Participate in an NPDES MS4 Permit Compliance Audit, as scheduled and performed by EPA or NCDEQ.	1. TBD – Typically Permit Year 4	1. Yes/No
		2. Self-audit and document any stormwater program components not audited by EPA or NCDEQ utilizing the DEQ Audit Template. Submit Self-Audit to DEMLR (required component of permit renewal application package).	2. Permit Year 5	2. Yes/No/Partial
		3. Certify the stormwater permit renewal application (Permit renewal application form, Self-Audit, and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.	3. Permit Year 5	3. Date of permit renewal application submittal
<b>Permit Ref.</b>	<b>2.1.1: Adequate Funding and Staffing</b> The permittee shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and meet all requirements of this permit.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
3.	<b>Adequate Funding and Staff</b>			
	Explore options to obtain adequate program funding to fully fund the stormwater program.	1. Work with other Town officials to prepare a gap analysis.	1. Permit Year 1.	1. Yes/No/Status
		2. Evaluate methods and options for obtaining additional funding.	2. Permit Year 2.	2. Yes/ No/Status

**Table 11: Program Administration BMPs**

		3. Implement action items for obtaining the chosen funding mechanism.	3. Permit Year 4.	3. Yes/No/Status
4.	<b>Evaluate need for additional staffing.</b>			
	Evaluate need for additional staffing and/or contract services.	1. Work with other Town officials to determine if additional staffing and/or contract services will be required for successfully implementing the SWMP.	1. Permit Year 2.	1. Yes/No/Status
		2. Based on findings, create a timeline for hiring additional staff or contract services and determine job description/duties.	1. Permit Year 4.	1. Yes/No/Status

**PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM**

The Town of Fletcher will implement a Public Education and Outreach Program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and steps the public can take to reduce pollutants in storm water runoff.

The target audiences and identified pollutants listed in Part 3.9 of this SWMP, which will be addressed by the Public Education and Outreach Program, are summarized in Table 12 below. In addition, the Town of Fletcher is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste.

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Litter	General Public, Residents, Businesses, Schools
Yard Waste	Residents, Businesses, Schools
Illicit Discharges	Residents, Businesses, Industrial, public employees
Sediment	Construction Sites
Illegal Dumping	Residents, Businesses, Industrial, public employees
Improper Disposal of Waste	Residents, Businesses, Industrial, public employees

The Town of Fletcher will manage, implement, and report the following public education and outreach BMPs.

**Table 13: Public Education and Outreach BMPs**

Permit Ref.	<b>3.2.2 and 3.2.4: Outreach to Targeted Audiences</b>			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
5.	<b>Partnership with Land of Sky Council of Governments</b>			
	The Town will contract with the Land of Sky Regional Council (LOSRC) to implement programs and create materials for public education and outreach to residents, youth, businesses, and commercial property owners within the Town’s jurisdiction. Include social media.	1. Execute a legal agreement with LOSRC to provide educational materials and activities that target Town of Fletcher audiences as listed in Table 12.	1. Permit Year 2	1. Yes/No/Status
2. Provide education and outreach to target audiences on topics per Table 12 each year so that all topics and audiences have been addressed by permit year 5.		2. Annually Permit Years 2 - 5.	2. Report event type, number of contacts made and topics addressed.	
6.	<b>Update literature</b>			
	The Town will evaluate their current handout and, if necessary, create an updated brochure that can be used throughout the permit period. Key placement of brochures will be determined and distributed at Town Hall.	1. Inventory current literature. Evaluate whether current literature is appropriate for use and if not create and have printed new materials.	1. Permit Year 1.	1. Yes/No/Status
2. Place literature in key locations at the Town Hall facility. Replace monthly.		2. Permit Years 1 - 5.	2. Yes/No/Status	

**Table 13: Public Education and Outreach BMPs**

<b>Table 13: Public Education and Outreach BMPs</b>				
<b>7.</b>	<b>Participate in a public event</b>			
	The Town will pass out general stormwater awareness literature at a minimum at one public event lead by the Town and display informative information related to stormwater.	1. Man a booth at one public event to distribute literature.	1. Permit Years 3-5.	1. Yes/No/Status Number of contacts made
		2. For the events, create a display and/or other visual materials with specific information about pollutants of concern such as litter, nutrients, non-point source pollution, waste disposal. Include <i>how to help</i> material pertaining to the target audience(s).	2. Permit Year 3	2. Yes/No/Status
<b>Permit Ref.</b>	<b>2.1.7, 3.2.3 and 3.6.5(c): Web Site</b> Measures to provide a web site designed to convey the program’s message(s) and provide online materials including ordinances, or other regulatory mechanisms, or a list identifying the ordinances or other regulatory mechanisms, providing the legal authority necessary to implement and enforce the requirements of the permit and SWMP. The web page shall also provide developers with all relevant post-construction requirements, design standards, checklists and/or other materials.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>8.</b>	<b>Stormwater Page on the Town’s Website</b>			
	The Stormwater web page will be updated to include at a minimum the following stormwater related items:	1. Make improvement to the Stormwater web page to include listed items.	1. Permit Years 1 through 3.	1. Yes/No/Status Date that it was rolled out.

**Table 13: Public Education and Outreach BMPs**

	<ul style="list-style-type: none"> <li>• Links to pertinent permitting authorities.</li> <li>• Links to Applicable Ordinances.</li> <li>• The MS4 Permit and SWMP.</li> <li>• Hotline and instructions for reporting illicit discharges and other environmental issues.</li> <li>• Opportunities for public involvement.</li> <li>• General stormwater awareness information.</li> </ul>	2. Maintain the web page, including any updates and resolving technical issues.	2. Annually, Permit Years 1-5.	2. Yes/No/Status
<b>Permit Ref.</b>	<b>3.2.5: Stormwater Hotline</b> Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>9.</b>	<b>Advertise the Stormwater Hotline</b>			
	Provide the hotline number and protocol to the general public and business community.	1. Provide the hotline and pertinent information on the Stormwater Web page and in all new stormwater literature.	1. Continuously Permit Years 1-5	1. Yes/No/Status
<b>10.</b>	<b>Train Hotline Staff</b>			
	Train staff on SOP to direct hotline calls to appropriate responders.	1. Develop SOP for managing hotline calls.	1. Permit Year 1	1. Yes/No/Status
		2. Train staff on SOP.	2. Annually Permit Years 1-5	2. Number trained

**PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM**

This SWMP identifies the minimum elements and implementation of a Public Involvement and Participation Program that complies with applicable State, Tribal and local public notice requirements. The Town of Fletcher will manage, implement and report the following public involvement and participation BMPs.

<b>Table 14: Public Involvement and Participation BMPs</b>				
<b>Permit Ref.</b>	<b>3.3.1: Public Input</b> Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>11.</b>	<b>Town Meetings</b>			
	Stormwater issues and program implementation items will be brought to the Town Council. Citizens can provide input.	1. Advertise Board meetings and agendas on web site.	1. Annually Permit Years 1 - 5.	1. Yes/No/Status
<b>12.</b>	<b>Stormwater Website Page</b>			
	Provide a contact person and e-mail address for citizen’s questions related to stormwater on the Stormwater website page. Provide a link to the Town’s MS4 mapping for availability to the public.	1. See BMP #8 and #9.	1. See BMP #8 and #9.	1. See BMP #8 and #9.
		2. Inform relevant Town departments about this protocol.	2. Permit Year 1.	2. Yes/No/Status
		3. Provide a link to the Town’s MS4 mapping.	3. Permit Year 5	3. Yes/No/Status Date it became available.
<b>Permit Ref.</b>	<b>3.3.2: Volunteer Opportunities</b> Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>13.</b>	<b>Identify Volunteer Groups Existing in the Area</b>			
	Create a list of existing volunteer groups that could have potential for improving stormwater issues and reducing pollutants. Focus would be participation with residents, commercial businesses, and/or students.	1. Create a list of potential volunteer groups and document their main focus.	1. Permit Year 2.	1. Yes/No/Status

**Table 14: Public Involvement and Participation BMPs**

		2. Contact at least one of the volunteer groups and establish an activity focused on stormwater issues.	2. Annually Permit Years 2-5	2. Yes/No/Status
		3. Implement a minimum of one citizen participation activity focused on stormwater issues.	3. Annually Permit Years 3-5.	3. Date and type of event, number of participants
<b>14.</b>	<b>Create a Town Park Clean-up Day</b>			
	Create and Implement a Town Park Clean-up Day Event.	1. Plan a clean-up day for one of the Town's Parks. Decide how it will be advertised, who will run it, and what equipment is needed.	1. Permit Year 2.	1. Yes/No/Status
		2. Implement Town Park Clean-up Day. Document how many volunteers, what took place, take pictures.	2. Annually Permit Years 3-4.	2. Date of event and number of participants

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**PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM**

The Town of Fletcher will develop, manage, implement, document, report and enforce an Illicit Discharge Detection and Elimination Program which shall, at a minimum, include the following illicit discharge detection and elimination BMPs.

<b>Table 15: Illicit Discharge Detection and Elimination BMPs</b>				
<b>Permit Ref.</b>	<b>3.4.1: MS4 Map</b> Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>15.</b>	<b>Update MS4 Major Outfalls and Municipal Storm Sewer System Map</b>			
	Create a strategy to update the existing Outfall Map and complete a new municipal storm sewer system map starting with the existing maps and information provided in the Town’s 2007 Stormwater Masterplan. Map to include inlets, pipe systems and sizes, flow directions, culvert locations, major outfalls and streams.	1. Evaluate existing materials and create a scope for moving forward in the creation of a new MS4 Map. Put measures in place for the effort to be completed.	1. Permit Year 1.	1. Yes/No/Status
		2. Create New MS4 Map and determine areas to be inventoried by creating three inventory areas that comprise approximately 1/3 of the Town’s jurisdictional area.	2. Permit Year 2.	2. Yes/No/Status Report currently known number of major outfalls.
		3. Perform an inventory and inspections of outfalls and sewer systems within one inventory area and add to the map.	3. Annually Permit Years 3-5.	3. Yes/No/Status Report number of major outfalls added and total.
		4. Continuously update the MS4 Map documenting any new additions/changes to inventoried areas.	4. Annually Permit Years 4-5.	4. Yes/No/Status Report number of major outfalls added and total.
<b>Permit Ref.</b>	<b>3.4.2: Regulatory Mechanism</b> Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions.			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>



**Table 15: Illicit Discharge Detection and Elimination BMPs**

<b>BMP No.</b>	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>16.</b>	<b>Maintain Legal Authority</b>			
	Review existing Ordinance confirming the Town’s legal authority to enforce and take actions for prohibiting, detecting and eliminating illicit discharges and connections and illegal dumping and spills.	1. Review ordinance and make any necessary changes. Document any revisions.	1. Permit Year 1.	1. Yes/No/Status
<b>Permit Ref.</b>	<p><b>3.4.3: IDDE Plan</b>                      Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to:</p> <ul style="list-style-type: none"> <li>a) Locate priority areas likely to have illicit discharges,</li> <li>b) Conduct routine dry weather outfall inspections,</li> <li>c) Identify illicit discharges and trace sources,</li> <li>d) Eliminate the source(s) of an illicit discharge, and</li> <li>e) Evaluate and assess the IDDE Program.</li> </ul>			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>17.</b>	<b>IDDE Plan</b>			
	Develop and implement a written IDDE Plan which includes an assessment of the most vulnerable areas for illicit discharges. Use the current MS4 mapping for all known outfalls and determine on paper areas of higher risk by studying factors such as location to industries, zoning, higher concentration of population, areas along Cane Creek, watershed considerations.	1. Create a written IDDE Plan using current Town resources, include procedures and documentation to address a) through e) in Permit Ref. 3.4.3.	1. Permit Year 1	1. Yes/No/Status
		2. Submit the IDDE Plan to DEQ for approval.	2. Permit Year 1	2. Yes/No/Status Report date submitted.
		3. Implement the IDDE plan.	3. Continuously Permit Years 2-5.	3. Yes/No/Status
<b>18.</b>	<b>Review and Enhancements to the IDDE Plan</b>			

**Table 15: Illicit Discharge Detection and Elimination BMPs**

	Review the IDDE Plan and make any necessary improvements.	1. Review annually and make necessary improvements to the IDDE Plan.	1. Annually Permit Years 2-5.	1. Yes/No/Status
<b>Permit Ref.</b>	<b>3.4.4: IDDE Tracking</b> Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>19.</b>	<b>Track all known illicit discharge, illicit connection and illegal dumping events</b>			
	Create a tracking mechanism for documenting where illegal activities took place, what was done to inform the violator, records of all correspondence, records of all activities related to the illegal activity and final resolutions.	1. Create a documenting data sheet, that can be used by the appropriate municipal departments for tracking of all activities related to the IDDE.	1. Permit Year 1	1. Yes/No/Status
		2. Perform IDDE inspections using the data sheet.	2. Annually Permit Years 2-5.	2. Number of illegal activities documented. Yes/No/Status
<b>Permit Ref.</b>	<b>3.4.5: Staff IDDE Training</b> Measures to provide training for municipal staff and contractors who, as part of their normal job responsibilities, may observe an illicit discharge, illicit connection, illegal dumping or spills. Training shall include how to identify and report illicit discharges, illicit connections, illegal dumping and spills. Each staff training event shall be documented, including the agenda/materials, date, and number of staff participating.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>20.</b>	<b>Staff Training</b>			
	Create a program to train Town staff in IDDE procedures and hotline protocol (see BMP 10).	1. Develop training program.	1. Permit Year 2	1. Yes/No/Status
		2. Train public works staff that will be using the IDDE Plan and new employees that will be involved in IDDE, when hired.	2. Permit Year 2 and new employees within first year hired.	2. Yes/No/Status Number trained
<b>21.</b>	<b>Review Public Works Standard Operating Procedure (SOP)</b>			

**Table 15: Illicit Discharge Detection and Elimination BMPs**

	Review and adopt any necessary changes to the Town’s Public Works Standard Operating Procedure (SOP) so field staff can identify and report stormwater issues, illicit discharges, illegal dumping, etc. Include procedures for stormwater items such as storm sewer, ditch and culvert maintenance, street maintenance, and public works staff review of MS4 map and outfall locations.	1. Make the written SOP available to Public Works Staff and provide an SOP and stormwater awareness orientation for staff.	1. Permit Year 4	1. Yes/No/Status
		2. Create an informational poster which summarizes SOP.	2. Permit Year 4	2. Yes/No/Status
		3. Post informational poster in key locations for quick reference by staff members.	3. Continuously Permit Years 4-5	3. Yes/No/Status
<b>Permit Ref.</b>	<b>3.4.6: IDDE Reporting</b> Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>22.</b>	<b>Stormwater Hotline</b>			
	A Stormwater Hotline will be maintained for Town’s citizens to ask questions and report stormwater issues. The hotline number will be available on the Town’s Website and in educational literature (See BMPs #8, #9 and #10).	1. See BMPs #8, #9 and #10.	1. See BMPs #8, #9 and #10.	1. See BMPs #8, #9 and #10.

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**PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM**

In accordance with 15A NCAC 02H .0153, the Town of Fletcher relies upon the North Carolina Sedimentation Pollution Control Act (SPCA) of 1973 as a qualifying alternative program to meet a portion of the NPDES MS4 Permit requirements for construction site runoff control measures. The SPCA requirements include reducing pollutants in stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre and includes any construction activity that is part of a larger common plan of development that would disturb one acre or more. The state SPCA Program is either delegated to a city/town, delegated to a county, or implemented by NCDEQ in non-delegated areas.

Table 16: Qualifying Alternative Program Components for Construction Site Runoff Control Program

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity	Meets Whole or Part of Requirement
3.5.1 - 3.5.4	Henderson County Delegated SPCA Program*	15A NCAC Chapter 04 NCDEQ Approved Delegation & Resolution R-07-4 between Henderson County and the Town of Fletcher	Henderson County	Whole

\* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: <https://www.hendersoncountync.gov/waterresources/page/erosion-control-local-program-0>

The Town of Fletcher also implements the following BMPs to meet NPDES MS4 Permit requirements.

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	<b>3.5.6: Public Input</b> Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
23.	<b>Municipal Staff Training</b>			

**Table 17: Construction Site Runoff Control BMPs**

	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. Annually Permit Years 1-5	1. Number of staff trained
<b>24.</b>	<b>Stormwater Hotline and Town’s Stormwater Webpage</b>			
	The Stormwater Hotline will be maintained for citizen’s use for reporting sediment run-off from construction sites and for questions concerning construction site activities. (See BMPs #8, #9 and #10.)	1. See BMPs #8, #9 and #10.	1. See BMPs #8, #9 and #10	1. See BMPs #8, #9 and #10
<b>Permit Ref.</b>	<b>3.5.5: Waste Management</b> Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>25.</b>	<b>Ordinance for Waste Management</b>			
	Review current Town Ordinance and Henderson County Resolution to determine authority and to ensure proper legal authority concerning construction site waste management. Develop and implement an ordinance to require construction site operators to control waste.	1. Review current Ordinance and Henderson County Resolution.	1. Permit Year 1	1. Yes/No/Status
		2. Update the Town Ordinance and County Resolution to provide enforcement authority.	2. Permit Year 1	2. Yes/No/Status
		3. Maintain legal authority.	Continuously, after ordinance is adopted.	3. Yes/No/Status
<b>26.</b>	<b>Waste Management Contractor Information Materials</b>			
	Develop information materials for contractors to address waste management on construction sites.	1. Create a document that can be referenced from the Town’s website.	1. Permit Year 3	1. Yes/No/Status

## **PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM**

This SWMP identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the Town of Fletcher and discharge into the MS4. These elements are designed to minimize water quality impacts utilizing a combination of structural Stormwater Control Measures (SCMs) and/or non-structural BMPs appropriate for the community, and ensure adequate long-term operation and maintenance of SCMs.

In accordance with 15A NCAC 02H .0153 and .1017, the Town of Fletcher implements the following State post-construction program requirements, which satisfy the NPDES Phase II MS4 post-construction site runoff control requirements as Qualifying Alternative Programs (QAPs) in the MS4 area(s) where they are implemented.

Table 18: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program

State QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
None	N/A	N/A

Table 19: Summary of Existing Post-Construction Program Elements

<b>Permit Requirements for Plan Review and Approval</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(a) Authority	Legal Agreement between Henderson Co. and the Town of Fletcher	8-9-2010
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 Water Quality Protection	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.3(b) Plan Review	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 F and I	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.3(c) O&M Agreement	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 K	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.3(d) O&M Plan	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 K	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.3(e) Deed Restrictions/Covenants	Currently not addressed in the Land Development Code. (See BMP #30)	
3.6.3(f) Access Easements	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 K	Adopted: 11-14-2005 Amended: 04-08-2019
<b>Permit Requirements for Inspections and Enforcement</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(b) Documentation	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 L and M	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.2(c) Right of Entry	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 O	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.4(a) Pre-CO Inspections	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 M. 1.	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.4(b) Compliance with Plans	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 L and M	Adopted: 11-14-2005 Amended: 04-08-2019

3.6.4(c) Annual SCM Inspections	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 O	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.4(d) Low Density Inspections	Currently not specifically addressed in the Land Development Code. (See BMP #28)	
3.6.4(e) Qualified Professional	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.5 O	Adopted: 11-14-2005 Amended: 04-08-2019
<b>Permit Requirements for Fecal Coliform Reduction</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.6(a) Pet Waste	Town of Fletcher Land Development Code Article 6. Environmental Protection 6.6 A	Adopted: 11-14-2005 Amended: 04-08-2019
3.6.6(b) On-Site Domestic Wastewater Treatment	Henderson Co Septic Program and Water and Well Program	

The annual reporting metrics for the post construction program are provided in Table 20: Post Construction Site Runoff Control BMPs below.

<b>Table 20: Post Construction Site Runoff Control BMPs</b>				
<b>Permit Ref.</b>	<b>3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements</b>			
	Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>27.</b>	<b>Standard Reporting</b>			
	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/Qualifying Alternative Program being implemented as listed in Tables 18 and 19.	1. Track number of low density and high-density plan reviews performed.	1. Continuously Permit Years 1-5	1. Number of plan reviews performed for low density and high density.
		2. Track number of low density and high-density plans approved.	2. Continuously Permit Years 1-5	2. Number of plan approvals issued for low density and high density.
		3. Maintain a current inventory of low-density projects and constructed SCMs including SCM type or low-density acreage, location and last inspection date.	3. Continuously Permit Years 1-5	3. Summary of number and type of SCMs added to the inventory; and number and acreage of low-density projects constructed.
		4. Track number of SCM inspections performed.	4. Continuously Permit Years 1-5	4. Number of SCM inspections.



**Table 20: Post Construction Site Runoff Control BMPs**

		5. Track number of low-density inspections performed.	5. Continuously Permit Years 1-5	5. Number of low-density projects inspections.
		6. Track number and type of enforcement actions taken.	6. Continuously Permit Years 1-5	6. Number and type of enforcement actions taken/issued.
<b>Permit Ref.</b>	<b>3.6.2: Legal Authority</b> Measures to maintain adequate legal authorities through ordinance or other regulatory mechanism to: (a) review designs and proposals for new development and redevelopment to determine whether adequate stormwater control measures will be installed, implemented, and maintained, (b) request information such as stormwater plans, inspection reports, monitoring results, and other information deemed necessary to evaluate compliance with the Post-Construction Stormwater Management Program, and (c) enter private property for the purpose of inspecting at reasonable times any facilities, equipment, practices, or operations related to stormwater discharges to determine whether there is compliance with the Post-Construction Stormwater Management Program.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>28.</b>	<b>Evaluation of Ordinance and Existing Agreement with Henderson County to implement the Town of Fletcher’s Post Construction Stormwater Program.</b>			
	The in-place Agreement with Henderson County for implementing the Post-Construction Stormwater Program for the Town of Fletcher shall be reviewed in its entirety along with related mechanisms such as Town’s ordinance, County Ordinance, and both websites.	1. Develop an ordinance and mechanism for deed restrictions, covenants, and low-density inspections.	1. Permit Year 1.	1. Yes/No/Status Report code reference and projected adopted dates.
		2. Proceed with any required legal processes such as Council or Board approvals.	2. Permit Year 2.	2. Yes/No/Status
		3. Implement changes and make any necessary updates to public materials.	3. Permit year 3.	3. Yes/No/Status
<b>Permit Ref.</b>	<b>3.6.3: Plan Review and Approval</b> Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10).			

**Table 20: Post Construction Site Runoff Control BMPs**

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
29.	<b>Agreement with Henderson County for executing Plan Reviews and Approvals.</b>			
	An agreement is currently in place for Henderson County to review and approve plan submittals for post construction stormwater projects within the Town of Fletcher. The Town's own projects will be reviewed and approved by NCDEQ regional office staff.	1. Obtain data from Henderson County for the Town to track projects within their jurisdiction. Include how many projects and their final status.	1. Continuously.	1. Report number of Post Construction Approvals which have been implemented.
<b>Permit Ref.</b>	<b>3.6.4: Inspections and Enforcement</b> Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
30.	<b>Inspections of low-density projects</b>			
	Establish the legal authority for inspection of low-density projects.	1. Code revision and implementation as part of BMP #28.	1. Permit Year 3(See BMP #28)	1. Yes/No/Status
		2. Perform inspections of Low-Density Projects	2. After BMP #28 is in place and then each project a minimum of once within the 5-year permit term, with a minimum goal of 50% year 4, and 50% year 5.	2. Yes/No/Status How many were inspected.
31.	<b>Inspection of Post Construction Stormwater SCMs</b>			
	Develop a schedule and detailed strategies for inspection of post construction SCMs.	1. Inspect all the post construction SCMs within the Town's jurisdiction and take appropriate actions for SCMs that are out of compliance.	1. Each SCM shall be inspected at a minimum once within the 5-year permit term, with a minimum goal of 20% per year.	1. Number of SCMs inspected and how many SCMs there are.

**Table 20: Post Construction Site Runoff Control BMPs**

<b>Permit Ref.</b>	<b>3.6.6: Fecal Coliform Reduction</b> Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>32.</b>	<b>Pet Waste Management</b>			
	Review pet waste management currently being implemented within the Town. Evaluate if there is a need to expand this initiative.	1. Evaluate what is currently in place. 2. If determined additional mechanisms are needed for pet waste control provide for these measures.	1. Permit Year 3. 2. Permit Year 4.	1. Yes/No/Status 2. Yes/No/Status or Not needed

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## PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Fletcher municipal facilities and operations. Pollution prevention and good housekeeping is accomplished through the implementation of seven required programs, which collectively address the ultimate goal of preventing or reducing pollutant runoff from municipal operations such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and municipal storm sewer system maintenance.

Pollution prevention and good housekeeping for municipal operations includes the following programs:

1. Municipal Facilities Operation and Maintenance Program
2. Spill Response Program
3. MS4 Operation and Maintenance Program
4. Municipal SCM Operation and Maintenance Program
5. Pesticide, Herbicide and Fertilizer Management Program
6. Vehicle and Equipment Maintenance Program
7. Pavement Management Program

The Town of Fletcher will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
Permit Ref.	<b>3.7.1: Municipal Facilities Operation and Maintenance Program</b> Measures to manage facilities that are owned and operated by the permittee and have the potential for generating polluted stormwater runoff. The permittee shall maintain a current inventory of municipal facilities; perform facility inspections and routine maintenance; establish specific frequencies, schedules, and standard documentation; provide staff training on general stormwater awareness and implementing pollution prevention and good housekeeping practices.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
33.	<b>Inventory of Municipal Facilities</b>			
	Create an inventory of all Municipal Facilities, including location, function, and document what activities or framework have the potential to generate stormwater runoff pollution.	1. List of all municipal facilities.	1. Permit Year 1.	1. Yes/No/Status Number of facilities.
		2. Perform a site inspection of municipal facilities to determine and document items of potential for spills or stormwater pollution. Review in place SPCC plans and update as necessary.	2. Permit Year 2.	2. Yes/No/Status Number of facility site visits.

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

		3. D Develop SPCC plans for facilities that are determined to need them.	3. Permit Year 2.	3. Yes/No/Status Number of facilities that require a new SPCC Plan
<b>34.</b>	<b>Public Works Standard Operating Procedure (SOP)</b>			
	Review Public Works Department's Standard Operating Procedure (SOP). See BMP #21.	1. See BMP #21.	1. See BMP #21.	1. See BMP #21.
<b>Permit Ref.</b>	<b>3.7.2: Spill Response Program</b> Measures for facilities and operations that store and/or use materials that have the potential to contaminate stormwater runoff if spilled. The permittee shall maintain written spill response procedures and train staff on spill response procedures.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>35.</b>	<b>Spill Potential and Response Procedures</b>			
	Any municipal facility that stores or works with materials which have the potential to contribute to polluted run-off shall be identified and written spill response procedures put in place.	1. Create written spill response procedures and provide to staff. Consider pertinent locations to post document.	1. Permit Year 2.	1. Yes/No/Status
		2. Review procedures with all relevant staff.	2. Annually	2. Yes/No/Status
<b>Permit Ref.</b>	<b>3.7.3: MS4 Operation and Maintenance Program</b> Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>36.</b>	<b>Staff Training for Operation and Maintenance Activities</b>			
	Create a list of operation and maintenance activities to be performed by the Public Works staff. Train staff in maintenance procedures, stormwater awareness and pollution prevention.	1. Create list and means for documentation of O & M duties.	1. Permit Year 1.	1. Yes/No/Status
		2. Inspect and Maintain the MS4 collection system. Document dates and where the maintenance took place.	2. 20% of the MS4 system each year, to accomplish full maintenance of the entire system within the 5-year permit period.	2. Report number of storm drains/catch basins cleaned.

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

Permit Ref.	<b>3.7.4: Municipal SCM Operation and Maintenance Program</b>			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
37.	<b>Schedule and Training for Municipal SCMs O &amp; M</b>			
	Review the Town’s Operation and Maintenance Agreements for all municipal SCM’s. Create a schedule and train staff to perform regular maintenance and inspections as required of each SCM.	1. Complete an inventory of all municipal SCMs. Complete maintenance and inspections, create documentation of when, what was done, issues and corrective measures.	1. Permit Year 1. As required by each specific municipal SCM’s O & M Agreement.	1. Number of municipal SCMs. Report how many SCMs were inspected and maintained.
		2. Complete an annual inspection of each municipal SCM by appropriate personnel for required certification.	2. Annually.	2. Report date of annual certification of each municipal SCM.
Permit Ref.	<b>3.7.5: Pesticide, Herbicide and Fertilizer Management Program</b>			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
38.	<b>Pesticide, Herbicide, Fertilizer Applicator Training</b>			
	Town staff that are responsible for application of pesticides, herbicides and fertilizers shall be certified in proper storage, handling and application of landscape chemicals.	1. Create a list of all Town employees that hold certifications and their certification number.	1. As required by certification schedule.	1. Report how many are certified.
		2. Train all staff on the storage and handling of landscape materials and pollution prevention procedures.	2. Annually.	2. Yes/No/Status
Permit Ref.	<b>3.7.6: Vehicle and Equipment Maintenance Program</b>			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
	Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
	A	B	C	D

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
39.	<b>Vehicle and Equipment Cleaning and Maintenance Facility Inspection</b>			
	Perform routine inspections to ensure that vehicle and equipment facilities are following proper procedures to minimize water quality impacts from vehicle and equipment cleaning and maintenance.	1. Develop an inspection checklist.	1. Permit year 2.	1. Yes/No/Status
		2. Inspect facilities where vehicle and equipment maintenance is performed. Record results and any issues and how issues were resolved.	2. Annually after year 2.	2. Yes/No/Status Number of inspections.
<b>Permit Ref.</b>	<b>3.7.7: Pavement Management Program</b> Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
40.	<b>Street Sweeping</b>			
	Review street sweeping schedule and implementation. Make adjustments if necessary. Enhance documentation materials.	1. Document the Street Sweeping activity protocols and miles of streets swept	1. Annually.	1. Report miles of streets swept.
		2. Document leaf collection time periods and volume collected.	2. Annually	2. Report volume of leaves collected.
41.	<b>Catch Basin Cleaning</b>			
	Create a written schedule for catch basin inspection and cleaning. Document when it was done. (See BMP #40).	1. Document how many basins were inspected and how many cleaned out.	1. See BMP #40	1. See BMP #40
42.	<b>Vehicle Spill Cleanup</b>			
	Maintain a document for procedures of spill clean-up in emergency situations such as vehicle accidents. And documentation for each event.	1. Create a document for spill procedure on streets in emergency situations. (See BMP #35).	1. Permit Year 2.	1. Yes/No/Status
		2. Document each event and how the issue was taken care of including dates.	2. Annually.	2. Yes/No/Status How many events.