Joint Report on the Implementation of the State Sedimentation Pollution Control Program and the State Stormwater Program

Statutory Authority:	S.L. 2017-10, Section 4.15
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Receiving Entities:
Environmental Review Commission

Submitting Entity:
NC Department of Environmental Quality

Introduction

Pursuant to Session Law 2017-10 (Senate Bill 131), the Department of Environmental Quality (DEQ) is required to submit a combined report to the Environmental Review Commission by October 1 of each year that provides an annual update on the implementation of both the State Sedimentation Pollution Control Program and the State Stormwater Program housed within the Division of Energy, Mineral, and Land Resources. This report contains two sections that outline how the Department has implemented these programs through its seven Regional Offices and Central Office as well as in coordination with multiple local government programs that implement these programs through Local, State and Federal laws, rules and permits.

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Executive Summary – Annual Sedimentation Program Report

The Department shall report to the Environmental Review Commission on the implementation of the Sedimentation Pollution Control Act (SPCA) of 1973 on or before 1 October of each year. The Division of Energy, Mineral, and Land Resources is responsible for implementing the SPCA. There are 54 delegated SPCA programs across the state implemented by either county or municipal governments. In November of 2020, the Town of Clayton received delegation authority for administering and enforcing the SPCA. The total number of new applications received by the Department increased from 2,380 in FY 2019-20 to 2,428 in FY 2020-21. The total number of newly disturbed acres increased from 31,104 acres in FY 2019-20 to 32,317 acres in FY 2020-21. Sediment inspections increased from 10,813 in FY 2019-20 to 12,743 inspections in FY 2020-21.

Background

"The sedimentation of streams, lakes and other waters of this State constitute a major pollution problem. Sedimentation occurs from the erosion or depositing of soil and other materials into the waters, principally from construction sites and road maintenance. The continued development of this State will result in an intensification of pollution through sedimentation unless timely and appropriate action is taken. Control of erosion and sedimentation is deemed vital to the public interest and necessary to the public health and welfare, and expenditures of funds for erosion and sedimentation control programs shall be deemed for a public purpose".

-Preamble to the Sedimentation Pollution Control Act of 1973

The Division of Energy, Mineral, and Land Resources (DEMLR) in the Department of Environmental Quality administers the SPCA. The Sedimentation Control Commission has also delegated administration of the SPCA to 53 county or municipal governments and the North Carolina Department of Transportation. The local program delegations do not regulate land-disturbing activities conducted by local, State or United States governments or persons with the power of eminent domain (e.g. public utilities), which remain under jurisdiction of the DEMLR.

The state sedimentation program also plays a critical role in meeting federal construction stormwater permitting requirements under the Clean Water Act. The United States Environmental Protection Agency (EPA) implements federal permitting requirements for stormwater discharges from active construction sites, but also has the authority to delegate those permitting responsibilities to the states. In many ways, federal construction stormwater requirements mirror the requirements of the state Sedimentation Pollution Control Act and the intent of the federal program is the same – to prevent damage to water bodies and other property.

North Carolina has delegated authority that allows DEQ - rather than EPA - to issue federal construction stormwater permits in the state. DEMLR has incorporated cross-training of central and regional personnel and consolidation of inspection and monitoring forms between the erosion and sedimentation control program and the construction stormwater program. This allows one point of contact for meeting both programs' permitting, inspection and reporting requirements to be used to communicate compliance with both programs' state and federal provisions.

Program Implementation

There has been a slight increase in the number of new projects under state jurisdiction with 2,428 new applications received in FY 2020-21. The actual area of land-disturbance covered by new erosion and sedimentation control plans approved in FY 2020-21 increased to approximately 32,317 acres. These totals do not include erosion and sedimentation control plans approved by local government sedimentation programs or land disturbed by the Department of Transportation under its delegated program.

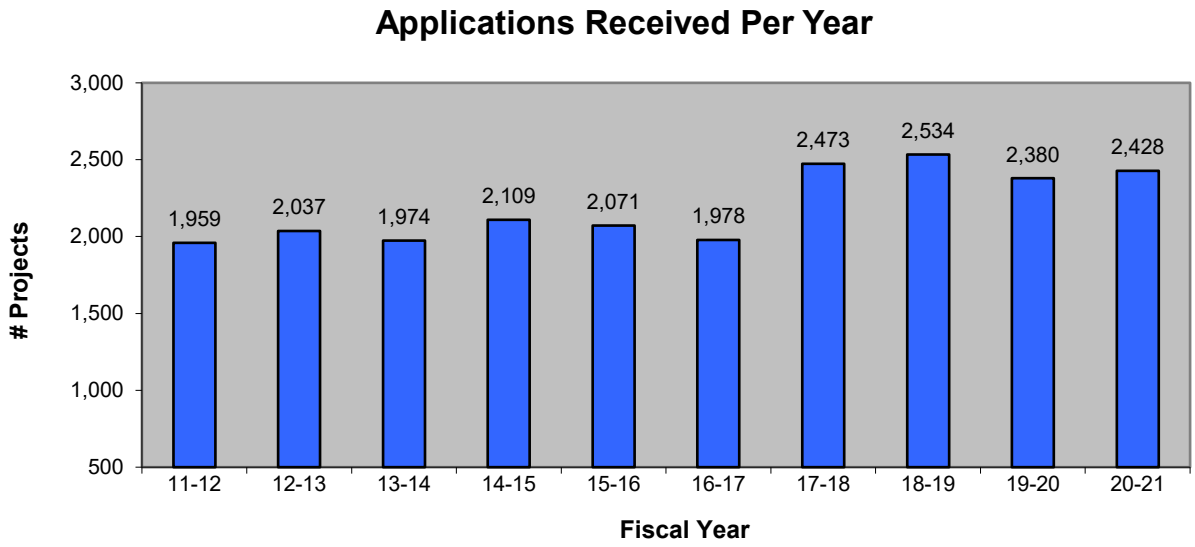

Figure 1 - Applications Received Per Year

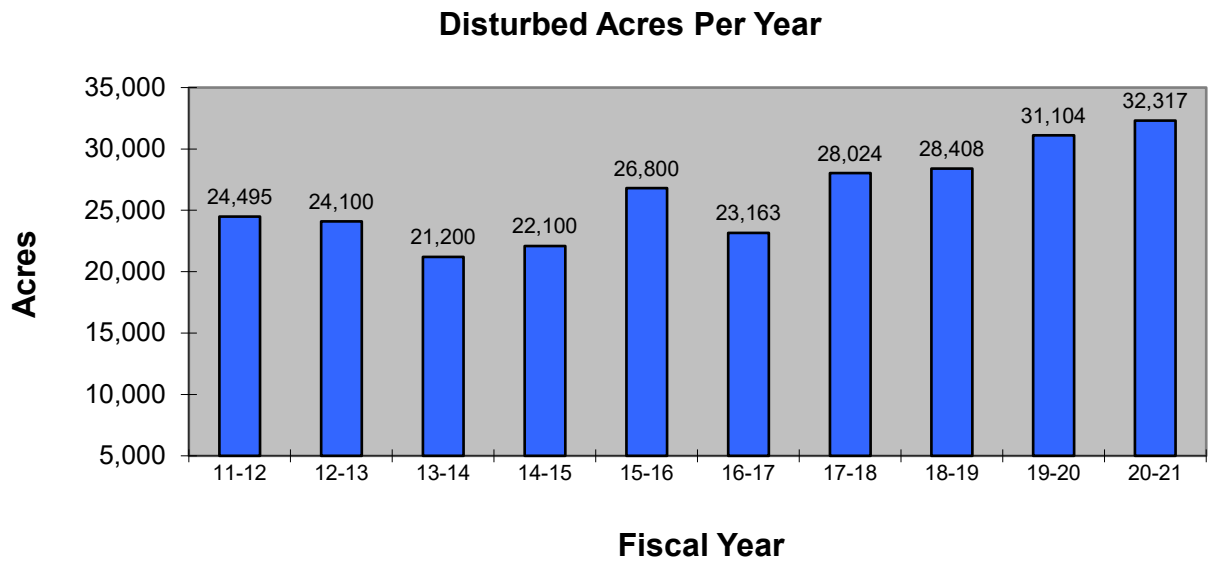

Figure 2 - Disturbed Acres Per Year

The number of open sediment projects requiring inspection by the state program has been estimated at 8,000 projects for several years. However, improvements to our database reporting capabilities during FY 2012-13 resulted in a more accurate estimate of 12,181 open projects at that time. Since that time, the number fluctuated and then dropped to 7,700 open projects during fiscal year of 2016-17 as a result of improved database management and an increased effort to inspect and close out completed and stabilized projects that had remained inactive during and following the Great Recession. The number of open projects is reported as 11,005 for FY 2020-21. The total includes all sites that are either under active construction or are inactive and not completed.

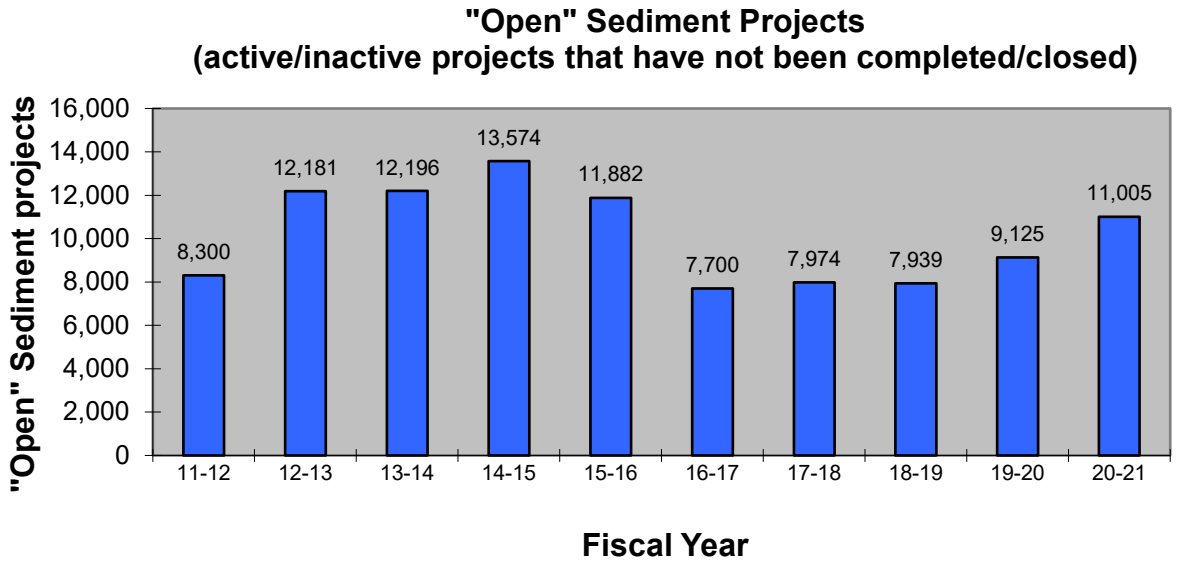

Figure 3 - Count of Open Sediment Projects

The number of full-time equivalent positions (FTE) in the DEMLR's Sedimentation Control Program declined for several fiscal years until steadying as shown below:

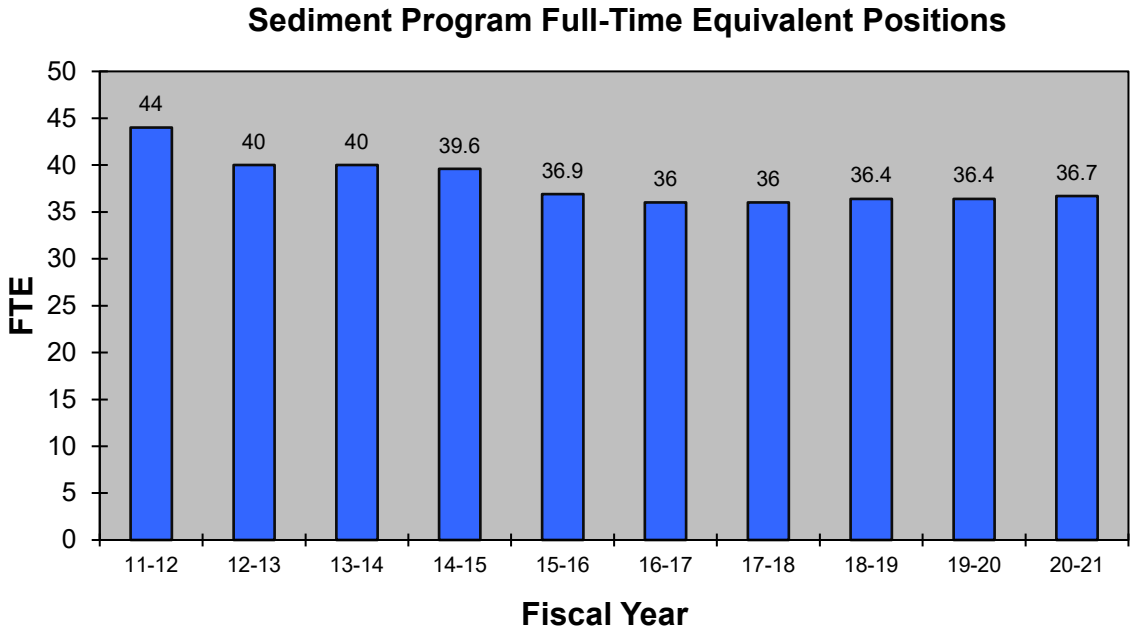

Figure 4 - Sediment Program Full-Time Equivalent Positions

Since revenue for the program comes from a sedimentation plan review fee for new projects, an increase in new construction has consequently provided some increase in our funding for vacant positions and operations. As the numbers show, there exists a lag between the number of projects and the number of staff available for inspections. Program staff have been successful in filling the vacancies in the Land Quality Section, despite frequent turnover, and the number of FTE positions is finally beginning to climb.

Regional activities for the 2020-21 fiscal year include:

- 1,825 new erosion and sedimentation control plan reviews
- 607 sedimentation express plan reviews
- 990 revised erosion and sedimentation control plan reviews
- 12,743 sedimentation site inspections
- 194 notices of violation
- 13 enforcement case referrals

Plan Approval

The SPCA requires review of a proposed erosion and sedimentation control plan within 30 days for a new plan submittal and within 15 days for a revised plan. As mentioned above, newly disturbed acreage in North Carolina increased since the last fiscal year. The number of new erosion and sedimentation control plans received was 2,428 (up from 2,380 in FY 2019-20). For the past several years, the total number of new projects has fluctuated slightly but consistently remained around 2,000 and hovering more recently above this mark. In addition, DEMLR encourages applicants to meet with permit review staff in advance of the initial plan submittal to resolve quality and completeness issues prior to formal submittal to reduce the overall time for plan review and approval.

The Express Permitting Program for erosion and sedimentation control plans provides for plan review within as little as three working days. During FY 2020-21, 607 Express Permit reviews were conducted. This represents a 14% increase in express permit reviews from the 532 express reviews completed in the previous year. The Winston-Salem, Mooresville, Raleigh and Fayetteville regions conducted the most express reviews.

Inspections

Regional staff conducted 12,743 inspections last year, an increase of 1,930 inspections from the previous year. Inspection reports document field observations, and compliance or non-compliance with the SPCA. Based upon current staffing levels, open erosion and sedimentation control projects are inspected, on average, once every 10 to 11 months. Those under enforcement are usually inspected more frequently.

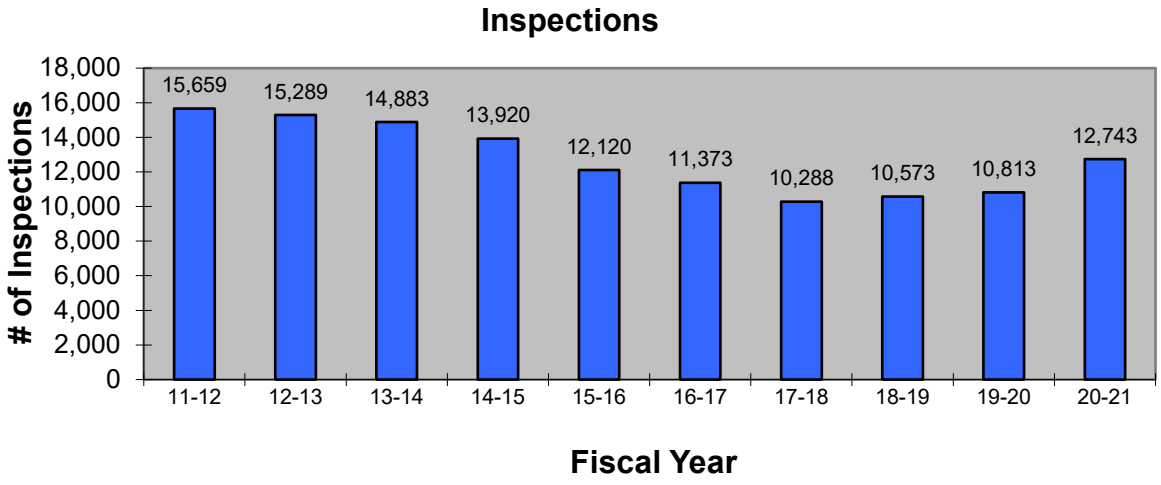

Figure 5 - Inspections per Year

The following are photos of good and poor practices found on construction sites during inspections. (Figures 6-13)

Figure 6 - Unmanaged Concrete Washout

Figure 7 - Good Construction Entrance

Figure 8 – Poor Construction Entrance

Figure 9 - Good Application of Ground Cover

Figure 10 - No Ground Cover

Figure 11 - Rill Erosion on Sediment Basin Slope

Figure 12 - Good Vegetative Stabilization

Figure 13 - Good Inlet Protection

Enforcement

The DEMLR documents compliance or non-compliance with the SPCA through sedimentation inspection reports. Most violations are resolved by providing an inspection report to the responsible party and requesting correction of the deficiencies. Of the 12,743 inspections conducted during FY 2020-21, 194 (1.5%) resulted in a Notice of Violation (NOV). The NOVs led to 13 requests from the regional offices for additional enforcement action (7% of NOVs issued). Four civil penalties and two injunctions were assessed this fiscal year.

The Attorney General's Office provides litigation support to DEQ by filing actions in state courts and federal bankruptcy court to defend the agency's civil penalty assessments, complaints for injunctive relief, and to collect unpaid civil penalties.

Local Programs

The Sedimentation Control Commission encourages local governments to administer a delegated erosion and sedimentation control program by providing a model ordinance and technical assistance. Once a program is delegated to a local government, the DEMLR provides periodic oversight to ensure that the local programs are meeting the standards for the state program. State personnel informally assist and advise the local staff on problematic sites. The DEMLR's goal is to review each local program at least once every two years. The Division reviews the city or county ordinance to ensure that it is as stringent as state law and rules. The DEMLR's Regional Engineer and State Sediment Specialist and/or their Assistants meet with the local program staff during the review. A detailed report is provided back to the local government, noting strengths, deficiencies, and corrective actions. A summary report is presented to the Sedimentation Control Commission at its quarterly meetings.

The Commission then acts to continue the delegation, continue the review, place the program on probation, or give a 30-day notice that the Commission will assume administration and enforcement of the program.

Fortunately, the vacancy in the Assistant position was filled in June of 2020, so eleven formal local program reviews were conducted during FY 2020-21. In addition, the regional offices provided 344 hours of technical assistance to the local programs during that same period.

Training and Education

In the Fall of 2020, the DEMLR helped plan Erosion and Sedimentation Control Design webinars for design professionals, contractors and developers. These are the result of a joint planning effort between NCSU, the International Erosion Control Association (IECA) and DEMLR staff. The planning team hosted a series of one-hour virtual sessions in place of the traditional in-person design and planner's workshop. A wide range of experts presented on common E&SC issues and on solutions based on design and solid research. State and local program representatives provided updates on the latest regulatory changes and approaches to successful plan approval.

The Division's Annual Local Program Workshop (2021) was held completely virtual for the first time ever, due to the Coronavirus Disease of 2019. (It had to be cancelled in 2020.) These webinars required the creativity of the Division's Sediment Education Specialist and staff from the Water Resources Research Institute to develop virtual breakout rooms and unique online applications with which to collaborate and solve problems. Both webinars attracted far more participants than ever before with the Local Program webinar averaging 140 participants over four days, and the design and planning webinar training approximately 255 professionals in regulatory changes and research updates from October into December.

Program staff have continuously worked to improve publications and resources for both the regulated community and Division staff. The electronic ***Sediments*** newsletter is distributed through a listerv of approximately 400 recipients, and is also made available as an online news publication. Erosion and sedimentation control videos (originally recorded on VHS tape) have been edited and made available on YouTube.

New Program Efforts

The DEMLR is refining the risk factor threshold of project size and analyzing appropriate inspection frequencies for higher risk projects based on staffing and resources. These will apply to construction projects requiring an erosion control plan. The DEMLR has been awarded funding from NC's Office of Resilience and Recovery to develop the probable maximum precipitation model. This model will assist state and local government agencies with infrastructure planning and resiliency. On March 10th, the Director presented DEMLR's risk-based approach to the Water Quality Committee of the Environmental Management Commission and will be partnering with Division of Water Resources staff in a larger discussion on Executive Order 80 and the efforts of the two divisions to address resiliency in their respective programs.

Several guidance documents have been published for DEMLR staff, local government officials, and the regulated community, including topics covering expectations for local government programs, a questionnaire for local governments requesting delegation, jurisdictional boundaries and special design considerations of local government programs (for assisting applicants), referrals to local floodplain administrators for land

disturbances suspected of occurring within a FEMA regulated floodway (for staff), and a timely Hurricane Weather Advisory for Construction Sites.

Executive Summary – Annual Stormwater Program Report

The Stormwater Program serves a large and diverse number of permittees in a highly efficient manner. In addition to keeping up with our permitting workload described under "Program Overview" below, the top five ***accomplishments*** of the Stormwater Program for the year are as follows:

#1: A new webinar series to increase knowledge of stormwater.
In September 2020, the Stormwater Program launched its "Wow Webinar" series. Each month, a one-hour webinar is offered to the regulated community and the public to increase understanding and communication about a wide variety of stormwater issues.

#2: Electronic reporting for NPDES Industrial Stormwater permittees.
Industries that are covered under an NPDES Industrial Stormwater permit are required to monitor the quality of stormwater discharged from their facilities and report that data to DEMLR. Previously, this data was reported on Data Monitoring Report (DMR) forms that are sent in paper copy to DEMLR. However, during the past year, the Stormwater Program has begun transitioning permittees into an electronic reporting process.

#3: Comprehensive reorganization of seven NPDES General Permits.
On July 1, 2021, the Stormwater Program renewed seven industrial general permits. Each of these permits has been reorganized and improved so that it is easier to understand and reference to assist the industrial permittees.

#4: Guidance for operation and maintenance of Stormwater Control Measures.
The Stormwater Program has created a new Stormwater Control Measure (SCM) Operation and Maintenance web page with photographs and a description of the most common. The new web page provides inspection forms and a "how to" webinar for inspecting SCMs that can be easily understood by the homeowners' associations and business owners.

#5: Continued excellent service to permittees throughout the pandemic.
The Stormwater Program has continued to be responsive to permittee questions and requests throughout the pandemic. In addition, the Stormwater Program has made creative use of tools such as the web site, the digital filing systems, webinars, and virtual meetings to maintain contact with the wide variety of customers we serve.

Program Overview

The DEMLR Stormwater Program comprises many programs aimed at protecting water quality from stormwater impacts. The following is a summary of the NC Stormwater Program's responsibilities:

- NPDES Industrial Stormwater Program: Covers approximately 4,130 facilities (3,151 under general permits, 167 under individual permits, and 880 facilities under no exposure certifications). Industrial activities are required to manage and monitor their facilities for potential sources of stormwater pollution.

- NPDES Construction Program: Covers construction activities that disturb one or more acres under a general permit (NCG01000). Permittees must have an Erosion and Sedimentation Control Plan, adhere to materials handling protocols, inspect their sites and keep records. The Stormwater Program partners with the Sediment Program to implement the NPDES Construction Stormwater Requirements.

- NPDES MS4 Program: Covers 109 entities within urbanizing areas, such as municipalities, counties and universities. Other MS4 permittees include military bases and NCDOT. MS4 entities implement measures within their jurisdictions to prevent and control stormwater pollution from developed areas.

- Post-Construction Program: Requires new developments to have permanent stormwater management measures after the project is built.

- The Stormwater Design Manual is a technical guidance document about implementing the rules pertaining to post-construction stormwater. The companion to the manual is the Stormwater Control Measure Credit Document, which includes the state's estimation of each SCM's effectiveness in protecting hydrology and removing pollutants.

- Water Supply Watershed Protection Program: Local governments with some or all of their jurisdictions within one or more water supply watersheds are required to implement measures within the water supply watersheds to prevent and control stormwater pollution. There are currently 229 watersheds classified as Water Supply Watersheds and 286 local government programs.

- Technical and compliance assistance for all the above programs.

Current Active Stormwater Permits in North Carolina

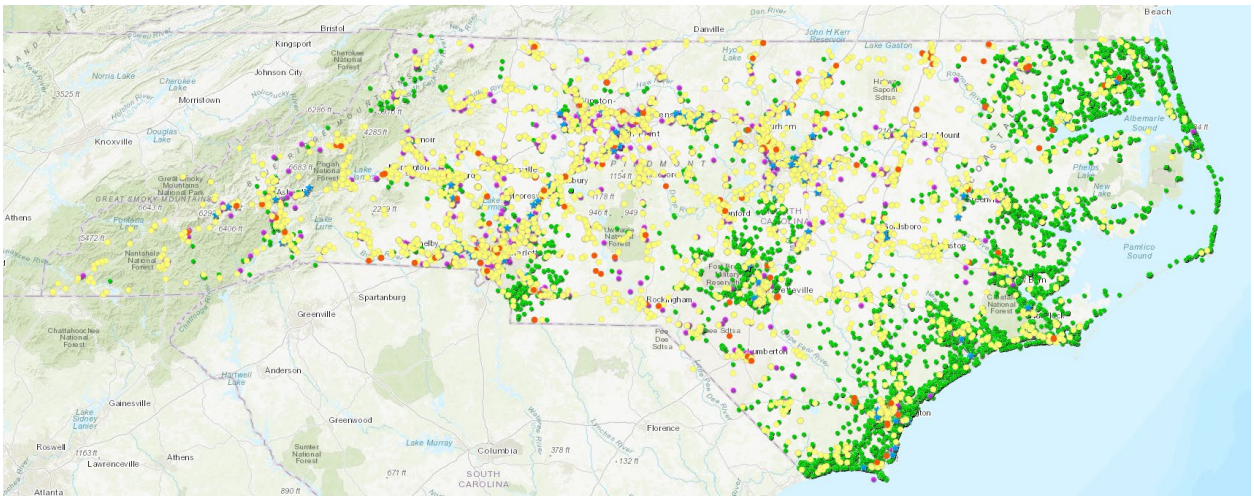

Figure 14 - Active Stormwater Permits in North Carolina

In the map above, green dots indicate post-construction permits, yellow dots indicate industrial stormwater permits, and purple dots indicate No Exposure Certifications.

Accomplishment #1: A new webinar series to increase knowledge of stormwater.

The Stormwater Program launched the Wow Webinar series in September 2020 to continue its communication with permittees, consultants, local governments, and the public during the pandemic and will continue to be a part of the Stormwater Program's offerings in the future. Wow Webinars are held from 11:00 am to 12:00 noon on the third Wednesday of each month. There have been a variety of speakers from within DEQ as well as the stormwater community at large. Webinar topics have included industrial and municipal stormwater, design and permitting, and resilient stormwater strategies.

The webinars are free and offer professional development hours. Each webinar has been attended by 150 to 250 people.

Information about the webinars is available on the Wow Webinar web page, including recordings of previous webinars. The upcoming Wow Webinar Schedule is as follows:

- **Stormwater Public Education & Involvement Sep 15, 2021**
  Wendi Hartup (Town of Kernersville) and other local government representatives will present and answer questions on their journey to create and implement a compliant, effective, and fun public education and involvement program.

- **SCMs: Inspections, Maintenance, Deficiencies & Solutions Oct 20, 2021**
  Thomas Moore (G2 Design PA) and Marc Burke (EDGE Environmental) discuss inspections and maintenance of SCMs and share some specific examples of common deficiencies, less frequent failures & their associated corrective measures. Projects involving multiple device types with varying ages will be explored.

- **Statewide Action Plan for Nature-Based Strategies Nov 17, 2021**
  Lauren Kolodij (NC Coastal Federation) identifies barriers and opportunities to using nature-based stormwater strategies to address water quality, flooding and resiliency issues across the state. The resulting Plan focuses on a volume reduction approach to stormwater for new development projects, stormwater retrofits, roadways and working lands to make multi-functional use of the landscape.

- **Caswell Beach Dune Infiltration System Dec 15, 2021**
  Marc Horstman (WK Dickson) will discuss the implementation of a Dune Infiltration System (DIS) at Caswell Beach to address flooding and safety access on the only ingress/egress road in the Town. DISs are a new, innovative coastal Stormwater Control Measure (SCM) that can help build resiliency for coastal towns in mitigating flooding impacts. Also, these systems can provide an auxiliary benefit of improving water quality and can directly reduce the amount of post-storm beach closures.

- **New River Estuary Oyster Highway: Paving the Way for Stormwater Treatment Jan 19, 2022**
  Pat-Donavan-Brandenburg (City of Jacksonville) & Dr. Mark Bush (Virginia Institute of Marine Sciences, William and Mary University) discuss an ecosystem simulation model of the New River Estuary was expanded to include the oyster reefs restored as part of the New River Oyster Highway Project. The expanded model was then used to compute the ecological benefits of the restoration, including water filtration, associated removal of phytoplankton, sediments, nitrogen, and phosphorus, and resulting improvements in water quality. The resulting model is available online with a user-friendly interface to allow interested stakeholders to run their own restoration scenarios and compute the associated benefits.

- **NC Resilient Coastal Communities Program Feb 19, 2022**
  Tancreed Miller (NC Division of Coastal Management) will give a description of DCM's Resilient Coastal Communities Program, which provides funding to match communities with contractors to assess hazards vulnerability and develop shovel-ready resilience projects featuring both nature-based (green) and non-nature based (grey) elements.

- **Mitigation in North Carolina and the Challenges in Urban Settings Mar 16, 2022**
  Periann Russell (NC Division of Mitigation Services) will give an Explanation of NC Division of Mitigation structure, the issues and challenges of restoring streams and wetlands in urban settings.

Accomplishment #2: Electronic reporting for NPDES Industrial Stormwater permittees

Industries that are covered under an NPDES Industrial Stormwater permit are required to monitor the quality of stormwater discharged from their facilities and report that data to DEMLR. Previously, monitoring data was reported on paper Data Monitoring Report (DMR) forms that were mailed to the Division. However, during the past year, the Stormwater Program has begun transitioning permittees into an electronic reporting process.

EPA's NPDES Electronic Reporting Rule requires all NPDES-permitted facilities to submit reports such as data monitoring reports and annual reports electronically rather than in paper. The rule changes only the method by which information is provided, not the content of the information that must be provided.

The benefits of electronic Data Monitoring Report (eDMR) system are that it:

- Saves time and resources by eliminating paper reports.
- Provides a complete and accurate set of monitoring data on industrial facilities. This data can be used to update industrial permits going forward.
- Brings DEQ and permittees into compliance with EPA's NPDES Electronic Reporting Rule.

The Stormwater Program will continue the process of bringing permittees into eDMR until July 1, 2022 when the task will be complete. See Table 1 below for the eDMR schedule.

Table 1: Schedule for NPDES Industrial Permittees to Enter Electronic Reporting

Group	Industrial Permits in this Group	Register in eDMR	Report in eDMR
A	NCS Individual	January 1, 2021	July 1, 2021
B	NCG16 Asphalt Paving NCG17 Textile Mills NCG18 Furniture Manufacturing NCG20 Scrap Metal	April 1, 2021	July 1, 2021
C	NCG06 Food & Kindred NCG08 Transit & Transportation NCG09 Paints and Varnishes NCG10 Used Motor Vehicles NCG12 Landfills	July 1, 2021	January 1, 2022
D	NCG03 Metal Fabrication	August 1, 2021	January 1, 2022

E	NCG05 Apparel, Printing, Rubber NCG07 Stone, Clay, Glass	September 1, 2021	January 1, 2022
F	NCG11 Treatment Works >1MGD NCG13 Non-metal Waste/Scrap NCG21 Timber Products	October 1, 2021	July 1, 2022
G	NCG02 Mining Activities NCG19 Marinas	January 1, 2022	July 1, 2022
H	NCG14 Ready-Mix Concrete NCG24 Compost Operations	March 1, 2022	July 1, 2022

Accomplishment #3: Comprehensive reorganization of seven NPDES General Permits

The following General Industrial Permits were renewed on July 1, 2021: NCG02 (Mining), NCG03 (Metal Fabrication), NCG06 (Food & Kindred), NCG08 (Transit & Transportation), NCG09 (Paints & Varnishes), NCG10 (Used Motor Vehicles), and NCG12 (Landfills).

This batch of General Permits has been significantly reorganized and improved during the permit renewal process. The "top five" changes in the new general permits versus the recently expired versions include the following:

- **Analytical and quantitative monitoring is required quarterly rather than semi-annually.**
  The intent of this change is to improve the tier response system and to capture stormwater data during each season. Now that data is on the cusp of being entered into the eDMR system, the Division will be able to make better use of the data that is collected to facilitate future decisions about NPDES Industrial Stormwater Permit Monitoring requirements.

- **Clarification on when "No Discharge" may be used on a DMR.**
  The new permits require permittees to begin monitoring with the first measurable storm event of the monitoring period, and to continue monitoring efforts at each subsequent measurable event until data is collected at each outfall. This assists the permittee in complying with the federal requirement to collect and report stormwater data rather than waiting until the end of the monitoring period and not having an event occur.

- **Specific directions and timelines are provided regarding eDMR.**
  The new permits specify that reporting data due 30 days after end of monitoring period, which is intended to further reduce administrative burden for permittees. Also, having a common due date allows for mass reminders to be emailed to permittees.

- **The NCG020000 (Mining Activities) General Permit now includes customized monitoring parameters for several types of special mines.**
  The NCG020000 permit now contains additional monitoring parameters for the following types of special mines: Clay, Feldspar Ore, Lithium Ore, Phosphate, and Industrial Sand. This allows the Division the flexibility to cover these mine types under the NCG020000 permit if it deems that it is appropriate to do so.

- **Many organizational improvements were made in the permits, including:**
  Links are provided throughout the permits to definitions and other sections.
  - Requirements and definitions are standardized.
  - Footnotes were moved to requirements
  - Bullet points were changed to Roman numerals for ease of reference.
  - Bolding/italicizing throughout the permit was removed.
  - Text was broken into manageable sizes
  - References were updated.

Accomplishment #4: Guidance for operation and maintenance of Stormwater Control Measures

SCMs are permanent structural devices that are designed, constructed, and maintained to remove pollutants from stormwater runoff before the water reaches our streams and drinking water supply reservoirs. Some examples of SCMs include wet ponds, bioretention cells, infiltration systems, stormwater wetlands, permeable pavement, and sand filters.

SCMs require regular operation and maintenance to function properly over the long term. Important information about SCM Operation & Maintenance:

- SCMs do not work unless they are maintained properly.
- The type of maintenance that is needed depends on the type of SCM.
- SCMs should be inspected on a quarterly basis at a minimum.
- It is also a good idea to inspect SCMs after larger storm events (exceeding 1 inch over a 24-hour period).

Developers, local governments, homeowners' associations, and DEMLR regional office staff have requested that the Stormwater Program provide information about how to inspect and assess Stormwater Control Measures (SCMs). To fulfill that request, the SCM Operation and Maintenance web page has been created. This page provides a description of each SCM, an inspection form, and a webinar to instruct you about how to conduct an inspection. DEMLR has partnered with Professor Bill Hunt at NC State University to create these resources.

Accomplishment #5: Continued excellent service to permittees throughout the pandemic

The Stormwater Program serves a multitude of permittees in a wide variety of sectors, including industry, local government, construction, and development. The total number of permits that the program manages is over 20,000, with new projects being permitted each week.

Each day, we receive dozens of emails and calls from permittees, consultants, local governments, and the public to the Stormwater Program. The Stormwater Program has been creative to ensure that customers receive the information they need while a significant portion of the staff have been teleworking due to the pandemic.

Some of the ways that the staff have ensured that customers receive the service they need include:

- Emails are closely monitored by all staff and answered regularly. Voicemail greetings have been updated to encourage callers to send emails to staff and then staff follow up with calls or emails as the situation requires.
- The Stormwater Program has increased its use of digital tools such as eDMR and digital upload forms for greater efficiency for permittees and staff and a reduction in paper files (which saves natural resources as well as costs for postage, printing, and storage of paper information).
- When staff receive the same questions on a regular basis, the web site is updated to provide the information on a proactive basis.
- Stormwater staff regularly make presentations to professional, industry, and citizen groups when invited to proactively teach them about the Stormwater Program.
- Permit files are made available on the web site digitally so that interested parties can view information from remote locations.
- An option has been made available in the Wilmington Regional office to have requested paper files sent to a local scanner and receive them digitally rather than having to visit the office in person to view the files.

Summary

The Stormwater Program continues to seek out ways to improve our program such that it is more responsive to permittee needs, more efficient, and more protective of water quality. We appreciate the opportunity to provide this report to the Legislature each year.