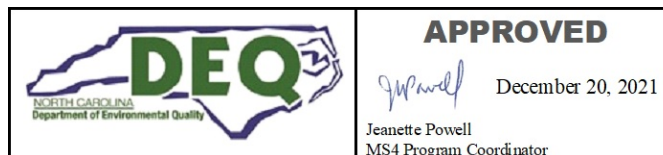


Stormwater Management Plan

City of High Point

NCS000421

November 15th, 2021



NCS000421 SWMP
City of High Point
November 15th, 2021

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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 City of High Point 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 City of High Point 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 NCS000421, as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater from the MS4 as owned and operated by the City of High Point and located within the corporate limits of the City of High Point.

In preparing this SWMP, the City of High Point 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.

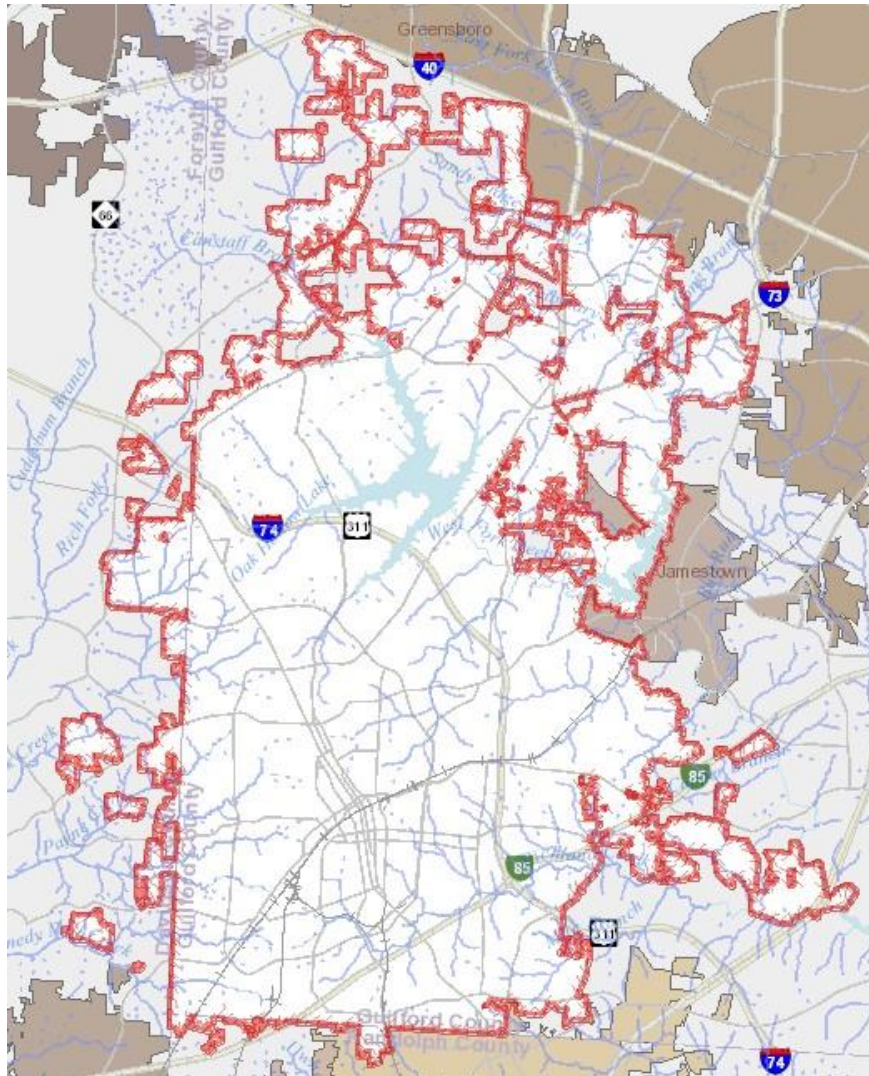
<i>Signature:</i>	
<i>Print Name:</i>	Tasha Logan Ford
<i>Title:</i>	City Manager
Signed this // day of November , 2021.	

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

This SWMP applies throughout the corporate limits of the City of High Point, including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the corporate limits of City of High Point as of the date of this document.

As of January 2020, the jurisdictional and MS4 service area for the City of High Point is 57.8 square miles. The source of this information is the City of High Point, Public Services Department and Planning & Development Department, which updates jurisdictional and geographical boundaries as changes occur.



3.2 Existing MS4 Mapping

The current MS4 mapping includes pipes, flow direction, ditches, inlets, catch basins, manholes, outfalls, sizes, condition, etc., and is contained in our GIS mapping program and in a secure layer of ThePoint, an interactive map which allows searches for property information as well as many other types of information related to areas of High Point. The City of High Point does not provide access to stormwater structural layers to the general public, however.

Go to <https://gisweb10.highpointnc.gov/JS/ThePoint/> to access the Interactive GIS Data Viewer.

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped		99%
No. of Major Outfalls* Mapped		1,203 as of 7-14-2021

**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 \geq 2-acres.*

3.3 Receiving Waters

The City of High Point MS4 is located within the Cape Fear and Yadkin River Basins 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
Cape Fear River Basin			
Boulding Branch	17-3-2	WS-IV:*	
Deep River (including High Point Lake at normal pool elevation)	17-(1)	WS-IV;CA:*	
East Fork of Deep River	17-2-(0.3)	WS-IV	Fecal Coliform; Turbidity
East Fork of Deep River	17-2-(0.7)	WS-IV;CA:*	Fecal Coliform; Turbidity
Hiatt Branch	17-3-1-(1)	WS-IV:*	
High Point City Lake	17-(1)	WS-IV;CA:*	
Long Branch	17-2-1-(1)	WS-IV	Eco/Biological Integrity Fish Com Eco/Biological Integrity Benthos

Long Branch	17-2-1-(2)	WS-IV;CA:*	Eco/Biological Integrity Fish Com Eco/Biological Integrity Benthos
Mile Branch (Two Mile Branch / Jackson Lake)	17-7-3	WS-IV:*	
Oak Hollow Lake	17-3-(0.7)	WS-IV;CA:*	
West Fork of Deep River	17-3-(0.3)	WS-IV:*	Eco/Biological Integrity Fish Com
West Fork of Deep River	17-3-(0.7)	WS-IV;CA:*	Eco/Biological Integrity Fish Com
Richland Creek	17-7-(0.5)	WS-IV:*	Fecal Coliform
Richland Creek	17-7-(4)	WS-IV;CA:*	Fecal Coliform
Unnamed tributaries within the Cape Fear River Basin			
Yadkin River Basin			
Rich Fork Creek	12-119-7	C	Fecal Coliform
Payne Creek	12-119-7	C	
Kennedy Mill Creek	12-119-7	C	
Unnamed tributaries within the Yadkin River Basin			

3.4 MS4 Interconnection

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

The MS4 does not interconnect with the statewide NCDOT MS4 and includes:

- a. The interconnection is not receiving stormwater from the NCDOT MS4. The number of interconnections is known/estimated/unknown. (N/A)
- b. The interconnection is not discharging stormwater into the NCDOT MS4. The number of interconnections is known/estimated/unknown. (N/A)
- c. The City of High Point MS4 mapping does not identify interconnections with the NCDOT MS4.
- d. The City of High Point MS4 mapping does not 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)
E. Fork Deep River	Fecal Coliform	Y	Y ¹
Richland Creek	Fecal Coliform	Y	Y ²
Rich Fork Creek	Fecal Coliform	Y	Y ¹

Y¹ : Outfall monitoring program only

Y² : TMDL water quality monitoring plan (2015)

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>Fusconaia masoni</i>	Atlantic pigtoe	Clams	Proposed Threatened
<i>Notropis mekistocholas</i>	Cape Fear Shiner	Fish	Endangered
<i>Percina rex</i>	Roanoke logperch	Fish	Endangered
<i>Isotria medeoloides</i>	Small whorled pogonia	Flowering Plants	Threatened
<i>Helianthus schweinitzii</i>	Schweinitz's sunflower	Flowering Plants	Endangered
<i>Perimyotis subflavus</i>	Tricolored bat	Mammals	Under Review
<i>Clemmys muhlenbergii</i>	Bog Turtle	Reptiles	Threatened
<i>Fusconaia masoni</i>	Atlantic pigtoe	Clams	Proposed Threatened

3.7 Industrial Facility Discharges

The City of High Point 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
NCG030009	Thomas Built Buses Inc - High Point
NCG030010	Thomas Built Buses Incorporated (Cape Fear River Basin)
NCG030010	Thomas Built Buses Incorporated (Yadkin River Basin)
NCG030517	Mickey Truck Body Inc - High Point

NCG050370	Innocor Foam Technologies - ACP, Inc.
NCG060003	Kao Specialties Americas LLC
NCG060041	Piedmont Chemical Ind I LLC
NCG060205	Custom Finishers Incorporated
NCG060244	Hunter Farms Dairy
NCG060359	Innospec Performance Chemicals
NCG060381	Cambrex High Point, Inc.
NCG070029	Glass Unlimited-High Point Inc
NCG080683	High Point City-Fleet Maintenance Facility
NCG080702	High Point City Transit
NCG090020	Axalta Coating Systems U.S.A., LLC (High Point)
NCG090021	Akzo Nobel Coatings Incorporated
NCG120105	Kersey Valley MSW Landfill
NCG140003	Childers Concrete
NCG140215	ARGOS USA - High Point Concrete Facility (previously Ready Mixed Concrete Plant 75)
NCG160041	Larco Construction Co - High Point
NCG170388	Chambers Fabrics Incorporated
NCG180036	Haworth Inc-Wood Seating Plant
NCG180220	High Point Furniture Industries
NCG180254	Marsh Furniture Co
NCG240007	City of High Point Ingleside Compost Facility
NCGNE0048	Premiere Cushion-Hickory Springs Mfg. Co.
NCGNE0104	Leggett & Platt Inc-Guilford
NCGNE0118	Patheon Softgels Inc.
NCGNE0134	Environmental Air Systems Inc
NCGNE0150	Patrician Furniture Co
NCGNE0166	Poly Pride, Inc.
NCGNE0241	Ultra -Flex
NCGNE0264	Carpenter Co - High Point
NCGNE0281	Henredon Furniture-Guilford
NCGNE0284	Carson's Hospitality
NCGNE0291	Novamelt Americas LLC
NCGNE0313	Sunrise Medical DC
NCGNE0325	Suiza Dairy Group, LLC (dba Dairy Fresh, LLC)-High Point
NCGNE0482	V & E Components Inc
NCGNE0497	Triad Fabco Industries
NCGNE0498	Triad Fabco Industries-High Point
NCGNE0517	Leggett & Platt, Inc.
NCGNE0615	General Elastic Corp-Randolph
NCGNE0751	Baltek, Inc
NCGNE0758	Axalta Coating Systems U.S.A., LLC
NCGNE0766	Harriss & Covington Hosiery
NCGNE0791	Mannington Wood Floors
NCGNE0839	Gotico Furniture and Accents
NCGNE0863	NC National Guard High Point Armory & FMS #8
NCGNE0951	Hancock & Moore, LLC

NCGNE0970	Baker Interiors Furniture Company - High Point
NCGNE0991	Syntec Seating Solutions LLC
NCGNE1022	High Point Furniture Industries
NCGNE1131	Fastenal Company
NCGNE1144	V&E Components, Inc.
NCGNE1208	Thomas Clyde Lamar ARC NC028
NCGNE1227	Fortis Solutions Group
NCGNE1255	Ornamental Products LLC
NCGNE1323	Waste Industries LLC
NCGNE1384	Freud America - High Point - 218 Feld
NCGNE1385	Freud America - High Point - 220 Feld
NCS000421	High Point city - Small MS4
NCS000582	Ennis Flint

3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the City of High Point as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The City of High Point has evaluated residential and charity car washing and street washing for possible significant water quality impacts.

Street washing discharges are addressed under the Pavement Management Program in Part 10 of this SWMP. The Division has not required that other non-stormwater flows be specifically controlled by the City of High Point.

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 not been evaluated by the City of High Point to determine whether they may significantly impact water quality. However, the City of High Point will continue to educate the general public on the hazards associated with car washing. Measures to address these target pollutants are provided in Part 5 of this SWMP.

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	Possible
Flows from riparian habitats and wetlands	Incidental
Dechlorinated swimming pool discharges	Incidental
Street wash water	Possible
Flows from firefighting activities	Incidental

3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the City of High Point is 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 City of High Point has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

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	General Public, Businesses, Schools	Public Education & Outreach, Public Participation
Pet Waste/Fecal Coliform	General Public, Parks, Greenways, Sewer Overflows, Failing Septic Systems	Public Education & Outreach, Illicit Discharge Detection & Elimination
Sediment	Construction Erosion, Stream Bank Erosion	Construction Site Runoff Control
Illicit Discharges	General Public, Businesses, Municipal Employees	Public Education & Outreach, Illicit Discharge Detection & Elimination, Public Involvement
Illegal Dumping	General Public, Businesses, Municipal Employees	Public Education & Outreach, Illicit Discharge Detection & Elimination, Pollution Prevention & Good Housekeeping

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Stormwater Division is responsible for compliance of the City of High Point’s NPDES Permit. All related activities/requirements/etc. for compliance are the responsibility of the Stormwater Division, with the exception of Engineering Services, which oversees the Construction Runoff portion of the Permit.

See Appendix A for Organizational Chart.

Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Dep. Public Services Director	Robby Stone	Public Services Administration
SWMP Management	Public Services Manager	Justin Gray	Public Services Stormwater Division
	Operations Analyst	Vacant	
Public Education & Outreach	Stormwater Specialists	Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division
Public Involvement & Participation	Stormwater Specialists	Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division
Illicit Discharge Detection & Elimination	Stormwater Specialists	Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division
Construction Site Runoff Control	Engineering Services Director	Trevor Spencer	Engineering Services Division
	Civil Engineer II	Aspasia Vlachou	
	Erosion Control Inspectors	Scott Ford Kathy Blake	
Post-Construction Stormwater Management	Operations Analyst	Vacant	Public Services Stormwater Division
Pollution Prevention / Good Housekeeping for Municipal Operations	Stormwater Specialists	Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division

Municipal Facilities Operation & Maintenance Program	Stormwater Specialists	Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division
Spill Response Program	All Stormwater Division Staff	All Stormwater Division Staff	Public Services Stormwater Division
MS4 Operation & Maintenance Program	Public Services Manager Street Maint. Superintendent	Justin Gray Ken Sult	Public Services Stormwater Division
Municipal SCM Operation & Maintenance Program	Public Services Manager	Justin Gray	Public Services Stormwater Division
Pesticide, Herbicide & Fertilizer Management Program	Safety Officer	Jim Gwynn	Public Services Administration
Vehicle & Equipment Cleaning Program	Public Services Manager	Justin Gray	Public Services Stormwater Division
Pavement Management Program	Public Services Manager Street Maint. Superintendent	Justin Gray Ken Sult	Public Services Stormwater Division (Streets Department)
Total Maximum Daily Load (TMDL) Requirements	Operations Analyst Stormwater Specialists	Vacant Robbie Baker Kelsie Burgess Abigail Rosendale	Public Services Stormwater Division

4.2 Program Funding and Budget

In accordance with the issued permit, the City of High Point 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 stormwater program is funded through a stormwater utility fee charged to property owners within city limits. Residential customers are charged 1 Equivalent Residential Unit (ERU) of \$4 per month.

All commercial and industrial properties are charged based on the total amount of impervious area on a property divided by the ERU (Equivalent Residential Unit) of 2,588 square feet multiplied by \$4 per month. Example: 100,000 sq. ft. / 2588 sq. ft. = 38.64 ERU, 38.64 ERU X \$4 per month = \$154.56 per month for the stormwater utility fee.

The stormwater utility fee sufficiently funds program needs and services, and a staff of 26 employees. The staff consists of 1 Public Services Manager, 1 Operations Analyst, 1 GIS Analyst, 2 Administrative Associates, 3 Stormwater Specialists, 2 Stormwater Supervisors for field service crews, 1 Stormwater Technician (camera truck operator), and 15 Motor Equipment Operators for field service crews. The stormwater utility fee collects revenue in excess of \$5.45 million annually, while the Stormwater Division has a total operating budget of approximately \$2.9 million.

4.3 Shared Responsibility

The City of High Point does not share the responsibility to implement any of the six minimum control measures.

Table 9: Shared Responsibilities

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
N/A		

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000421 for the City of High Point.

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 City of High Point 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.	BMP Description
	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.	Annual Self-Assessment			
	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 FY21/22 FY22/23 FY23/24 FY24/25	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
2.	Permit Renewal Application			
	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 FY24/25	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 FY25/26	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 FY25/26	3. Date of permit renewal application submittal

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The City of High Point 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 City of High Point 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/Household Waste	General Public
Pet Waste/Fecal Coliform	General Public, Public/Private Sanitary Sewer Infrastructure
Sediment	Developers, Contractors, Homeowners, Landscapers
Fats, Oils & Grease	General Public, Commercial, Industrial, Food Industries
Nutrients (Phosphorus/Nitrogen)	General Public, Commercial, Landscaping
Illicit Discharges	General Public, Businesses, Municipal Employees
Illegal Dumping	General Public, Businesses, Municipal Employees
Improper Disposal of Waste	General Public, Businesses, Municipal Employees

The City of High Point will manage, implement, and report the following public education and outreach BMPs.

Table 13: Public Education and Outreach BMPs	
Permit Ref.	3.2.2 and 3.2.4: Outreach to Targeted Audiences Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above and shall document the extent of exposure of each media, event, or activity, including those elements implemented locally or through a cooperative agreement.

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
3.	School Outreach			
	Develop age-specific educational information for use in schools and for presentations to school age children. Will present information in appropriate format.	1. Provide age-specific stormwater presentations upon request.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of students reached
		2. Reach out to Guilford County Schools and Private schools to remind them of the programs offered.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status
		3. Organize stream habitat events for schools and/or summer camps as requested	3. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Number of participants
4.	Public Event Tabling			
	Set up public education table at a variety of public events and locations in order to reach diverse groups, minorities ,and underserved populations. Educational topics will vary and may include general stormwater awareness and the pollutants/sources listed in Table 12 above for the general public target audience (litter, pet waste, septic tank systems, FOG, nutrients, illicit discharges, illegal dumping).	1. Monthly Library Table	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of interactions at the table
		2. Monthly Farmer's Market Table	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of interactions at the table
		3. Attend at least 3 other City of High Point Public events.	3. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Number of events held and number of interactions

		4. Coordinate and attend the annual Public Services Day event.	4. Annually Permit years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	4. Number of attendees
		5. Coordinate and attend one event in High Point for Guilford Creek Week.	5. Annually Permit years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	5. Number of attendees
5.	Utility Bill Inserts			
	Stormwater bill inserts will continue to be inserted into combined utility bill statements and distributed to all City residents and businesses receiving a utility bill on at least a semi- annual schedule.	1. Develop and distribute a stormwater flyer for general stormwater information/pet waste/ septic tank systems.	1. Semi-Annually Permit Year 1 FY21/22	1. Number of flyers mailed
		2. Develop and distribute a stormwater flyer for illicit discharges/illegal dumping and general stormwater information	2. Semi-Annually Permit Year 2 FY22/23	2. Number of flyers mailed
		3. Develop and distribute a stormwater flyer for litter/household wastes/automotive care and leaf pick	3. Semi-Annually Permit Year 3 FY23/24	3. Number of flyers mailed
		4. Develop and distribute a stormwater flyer for general stormwater information and fats, oils, and grease (FOG)	4. Semi-Annually Permit Year 4 FY24/25	4. Number of flyers mailed
		5. Develop and distribute a stormwater flyer for illicit discharge/illegal dumping and yard waste/leaf pickup.	5. Semi-Annually Permit Year 5 FY25/26	5. Number of flyers mailed
6.	Stormwater Information Documents			
	Informational pamphlets, brochures, and giveaways with specific stormwater topics, as well as general information to be handed out to targeted groups and be available at all tabling events.	1. Develop a list of target audiences, groups, and/or businesses for each informational document.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status

		2. Develop a schedule for inventory of all informational documents and giveaways.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of documents of each topic distributed
7.	Information Kiosks			
	Multiple stormwater documents will be displayed at locations throughout the City including City Hall (Customer Service), Public Services Department, the City of High Point Visitors Center, Public Library, Piedmont Environmental Center, and other city-maintained recreational facilities.	1. Develop a location list and schedule to regularly check kiosks	1. Annually Permit Year 1 FY21/22	1. Yes/No/Status
2. Check kiosks to ensure documents are available and replenished		2. Quarterly Permit Years 2-5 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of documents of each topic distributed	
8.	Social Media			
	Work with the City of High Point's Public Information Office to promote information about upcoming events and other stormwater-related educational information using multiple social media outlets (Facebook, Next Door, Twitter, Instagram)	1. Post at least three stormwater specific informational social media posts per year.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of views per post and topic
9.	Advertisements, Media, Etc.			
	Utilize additional physical or digital advertising spaces to increase visibility of the stormwater message.	1. At least once per year, use non-municipal website or outdoor advertisement space (e.g., La Noticia print and website, using ad space inside and outside of High Point Transit Buses, billboards, shopping carts, etc.) to display an informational stormwater message.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status, and topic(s) displayed

Permit Ref.	2.1.7, 3.2.3 and 3.6.5(c): Web Site			
	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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
10.	Informational Web Site			
	The Stormwater Services Division will maintain an internet web site that contains detailed information regarding all aspects of the stormwater permit requirements, services offered, educational brochures/fliers, and reporting/contact information.	1. Maintain the stormwater web page and update any changes as needed.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Add a link on the Stormwater webpage to the NCDEQ Stormwater webpage	2. Permit Year 1 FY21/22	2. Yes/No/Status
Permit Ref.	3.2.5: Stormwater Hotline			
	Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
11.	Stormwater Hotline			
	Dedicated Customer Service number for all Public Services has been established where citizens can call to report stormwater pollution violations. This number is publicized on the website, stormwater flyers and give-away items (pens, pencils, magnets, etc.)	1. Respond to calls and inquiries within one business day (for non-emergencies), and immediately to an IDDE.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of calls received and number of resolutions
		2. Advertise hotline/helpline in all ads, printed materials, social media, and website.	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status

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 City of High Point will manage, implement, and report the following public involvement and participation BMPs.

Table 14: Public Involvement and Participation BMPs				
Permit Ref.	3.3.1: Public Input Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
12.	Stormwater Hotline			
	Dedicated Customer Service number for all Public Services has been established where citizens can call to report stormwater pollution violations (See BMP 11).	1. See BMP 11	1. See BMP 11	1. See BMP 11
Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
13.	Adopt-a-Street Program			
	Provide public and private organizations the opportunity for volunteers to participate in cleaning up local streams.	1. Check in with Keep High Point Beautiful President for Adopt-a-Street results	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Pounds of trash and recycling collected, date and number of participants
14.	Adopt-a-Stream Program			
	Provide public and private organizations the opportunity for volunteers to participate in cleaning up local streams.	1. Partner and coordinate with organizations in efforts to clean up adopted stream.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Pounds of trash and recycling collected, date and number of participants

Table 14: Public Involvement and Participation BMPs

		2. Recruit at least one new Adopt-A-Stream group per year.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of new groups
15.	Storm Drain Marking Program			
	Volunteers place drain markers on storm drains to assist in stormwater and watershed education within neighborhoods and public streets.	1. Recruit at least one new storm drain marking volunteer group per year.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Coordinate storm drain marking and track marked drains	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of storm drains marked, number of participants

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The City of High Point 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.

Table 15: Illicit Discharge Detection and Elimination BMPs				
Permit Ref.	3.4.1: MS4 Map 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
16.	Storm Sewer System Inventory			
	Provide dedicated field staff to collect and update stormwater infrastructure data.	1. Add pertinent data for new stormwater infrastructure (pipes, junctions, structures, outfalls) to our Stormwater GIS system for new construction 2. Maintain storm sewer system map including stormwater conveyances, flow direction, major outfalls, and surface waters.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26 2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status 2. Yes/No/Status Total number of mapped outfalls
17.	Stormwater Web Map			
	All SCMs within the City of High Point are identified and added to the current SCM Stormwater Web Map.	1. Add new SCMs to mapping database once construction and/or conversion from erosion control basin	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
18.	Camera Crew			
	In-house staff collects stormwater infrastructure data for existing systems using pipe camera.	1. Maintain process for collecting data and incorporating pertinent information into GIS database	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status

Table 15: Illicit Discharge Detection and Elimination BMPs

Permit Ref.	3.4.2: Regulatory Mechanism			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
19.	Enforcement			
	The Illicit Discharge Control Ordinance will charge the Public Services Director or designee with implementing the Illicit Discharge Detection and Elimination program. The ordinance does specify legal penalties to be implemented in cases of non-compliance. (Code of Ordinances, Title 12, Chapter 3 - Public Nuisances).	1. Maintain illicit discharge ordinance, administration, and enforcement procedures.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
Permit Ref.	3.4.3: IDDE Plan			
	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: <ul style="list-style-type: none"> a) Locate priority areas likely to have illicit discharges, b) Conduct routine dry weather outfall inspections, c) Identify illicit discharges and trace sources, d) Eliminate the source(s) of an illicit discharge, and e) Evaluate and assess the IDDE Program. 			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
20.	Written IDDE Plan			
	Maintain and implement a written IDDE Plan.	1. Continue to update the IDDE Plan as required by any change in ordinance, state statute or other federal regulation than is specific to IDDE incidents	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
21.	Outfall Inspections			

Table 15: Illicit Discharge Detection and Elimination BMPs

	Perform regular dry weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit discharges and illicit connections.	1. Inspect 25% of all major outfalls within the City limits every year.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
22.	Detection and Elimination			
	Detect and identify illicit discharges and connections; conduct dry-weather outfall monitoring; respond to citizen concerns made via the Customer Service line; train City personnel on recognizing and reporting illicit discharges or connections.	1. Continue to respond to IDDEs, train employees, and conduct outfall monitoring	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Maintain equipment and materials to detect IDDEs and analyze stormwater samples.	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status
Permit Ref.	3.4.4: IDDE Tracking 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
23.	Notice of Violation (NOV) Letters			
	NOVs with a detailed description of the incident along with date/time stamped photos are sent certified mail to the violator or representative. Follow-up occurs when the time allotted for compliance has expired.	1. Continue to update system processing of IDDE records and implement procedures that may increase efficiency of handling these incidents	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Store illicit discharge information in database and Excel spreadsheet; maintain hard copies of NOV letters, photos, and other pertinent information in physical files	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Number of enforcement actions issued

Table 15: Illicit Discharge Detection and Elimination BMPs

Permit Ref.	3.4.5: Staff IDDE Training			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
24.	Staff Training			
	Provide stormwater training to all groups of municipal staff and/or contractors each year. Training shall include how to identify and report illicit discharges, illicit connections, illegal dumping, and spills.	1. Maintain an employee training program on detecting and reporting illicit discharges, illicit connections, illegal dumping, and spills.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status, Number trained
Permit Ref.	3.4.6: IDDE Reporting			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
25.	Stormwater Hotline			
	Dedicated Customer Service number for all Public Services has been established where citizens can call to report stormwater pollution violations.	1. Promote and publicize phone number to receive reports related to illicit discharges.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of IDDEs reported each year.
26.	On-Call Duty Officer			
	On-Call duty officer to be available after normal business hours to investigate illicit discharges, illegal dumping and spills if reported.	1. Promote and publicize phone number to receive reports related to illicit discharges.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of IDDEs reported each year.

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the City of High Point 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
3.5.1 - 3.5.4	City of High Point Delegated SPCA Program*	15A NCAC Chapter 04 NCDEQ Approved Delegation	City of High Point

* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found in the City of High Point Development Ordinance, Chapter 6, Section 6.3 - Soil Erosion and Sedimentation; and Chapter 9, Sections 9.5. – Enforcement, 9.6. - Enforcement Procedure , 9.7. – Remedies, and 9.9. - Assessment of Civil Penalties.

The City of High Point also implements the following BMPs to meet NPDES MS4 Permit requirements.

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	3.5.6: Public Input 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
27.	Municipal Staff Training			
	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 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Number of staff trained

28.	Stormwater Hotline			
	Dedicated Customer Service number for all Public Services has been established where citizens can call to report stormwater pollution violations. This number is publicized on the website, stormwater flyers and give-away items (pens, pencils, magnates, etc.) (See BMP 11).	1. See BMP 11	1. See BMP 11	1. See BMP 11
Permit Ref.	3.5.5: Waste Management 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			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
29.	Establish and Maintain Legal Authority			
	Provide ordinance to require construction site operators to control waste	1. Develop, adopt and/or update the ordinance	1. Permit Year 1 FY21/22	1. Yes/No/Status, date of adoption
		2. Maintain Legal Authority	2. Continuously Permit Years 2-5 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Summary
30.	Pre-Construction Conference			
	Conduct project conferences with contractors, engineers, plan reviewers and site construction inspectors for all projects with land disturbing activities requiring an E&SC plan	1. Conduct Pre-Construction Meetings	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Document and report number of preconstruction conferences
		2. Develop and distribute informational Fact Sheet at pre-construction conferences	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status Number of Fact Sheets distributed

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 City of High Point 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 City of High Point 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

The City of High Point has existing requirements other than Qualifying Alternative Program(s) for implementation of the NPDES Phase II MS4 post-construction program requirements. These existing requirements are codified in local ordinance(s), and implementation is further defined in guidance, manuals and/or standard operating procedure(s) as summarized in Table 19 below.

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for Plan Review and Approval	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	City of High Point Development Ordinance Chapter 2-2	Ord. No. 7266/17-08, § 2, 1-17-2017; Ord. No. 7476/18-105, § 2.B, 12-3-2018
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	City of High Point Development Ordinance Chapter 6-2	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, § 12, 4-3-2017
3.6.3(b) Plan Review	City of High Point Development Ordinance Chapter 2-2	Ord. No. 7266/17-08, § 2, 1-17-2017; Ord. No. 7476/18-105, § 2.B, 12-3-2018

3.6.3(c) O&M Agreement	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108, § 1, 11-20-2017
3.6.3(d) O&M Plan	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108, § 1, 11-20-2017
3.6.3(e) Deed Restrictions/Covenants	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108, § 1, 11-20-2017
3.6.3(f) Access Easements	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108, § 1, 11-20-2017
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108, § 1, 11-20-2017
3.6.2(c) Right of Entry	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017
3.6.4(a) Pre-CO Inspections	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017
3.6.4(b) Compliance with Plans	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017
3.6.4(c) Annual SCM Inspections	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017
3.6.4(d) Low Density Inspections	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017
3.6.4(e) Qualified Professional	City of High Point Development Ordinance Chapter 6-2-11	Ord. No. 7266/17-08, § 27, 1-17-2017; Ord. No. 7287/17-29, §§ 12, 13, 4-3-2017; Ord. No. 7365/17-108 § 1, 11-20-2017

Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	City of High Point Code of Ordinances, Title 12, Chapter 3, Sec. 12-3-1	Ord. No. 6168/04-65, § 1, 9-7-04; Ord. No. 6541/08-26, 5-19-08; Ord. No. 6573/08-58, § 2, 8-18-2008
3.6.6(b) On-Site Domestic Wastewater Treatment	City of High Point Code of Ordinances, Title 12, Chapter 3, Sec. 12-3-1	(Ord. No. 6168/04-65, § 1, 9-7-04; Ord. No. 6541/08-26, 5-19-08; Ord. No. 6573/08-58, § 2, 8-18-2008

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

Table 20: Post Construction Site Runoff Control BMPs				
Permit Ref.	3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
31.	Standard Reporting			
	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 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	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 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	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 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Summary of number and type of SCMs added to the inventory; and number and acreage of low density projects constructed.	

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
		4. Track number of SCM inspections performed.	4. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	4. Number of SCM inspections.
		5. Track number of low density inspections performed.	5. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	5. Number of low density projects inspected.
		6. Track number and type of enforcement actions taken.	6. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	6. Number of enforcement actions issued.
Permit Ref.	<p>3.6.3: Plan Review and Approval 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). <i>This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.</i></p>			

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
Permit Ref.	3.6.4: Inspections and Enforcement 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. <i>This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.</i>			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
Permit Ref.	3.6.6: Fecal Coliform Reduction 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. <i>This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.</i>			

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the City of High Point 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 City of High Point 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.	3.7.1: Municipal Facilities Operation and Maintenance Program 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
33.	Operation and Maintenance Plan			
	Maintain and update the written Operation and Maintenance Plan.	1. Implement all aspects of the O&M Plan	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status Summary

		2. Update plan on an annual basis.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status Summary
34.	Inventory of Municipal Facilities			
	Update and maintain inventory of municipal facilities that have the potential to generate polluted stormwater runoff.	1. Review and update list of municipal facilities.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Date updated
35.	Municipal Facility Inspections			
	Inspect municipal facilities deemed to have the potential to generate polluted stormwater runoff.	1. Review and update municipal inspection forms.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status
		2. Perform municipal facility inspections on those facilities that have the potential to pollute stormwater.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status, number of inspections
36.	Municipal Employee Training			
	Conduct annual stormwater training that covers general stormwater awareness, pollution prevention and spill response, and IDDE reporting	1. Perform employee training at Facilities that have been identified as having the possibility to have a negative impact on stormwater.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status, Number trained

Permit Ref.	3.7.2: Spill Response Program 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
37.	Spill Response Plan			
	A written spill response plan has been developed for municipal facilities that store or use materials that could contaminate stormwater runoff. Municipal facilities with industrial permits have a spill response plan as part of their Stormwater Pollution Prevention Plan or SPCC Plan.	1. Review and update Spill Response Plan annually to ensure plan is effective.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Perform spill response training for municipal employees annually.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status, Number trained
		3. Evaluate municipal facilities to determine if any need to be added or removed from those requiring a Spill Response Plan.	3. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Yes/No/Status
38.	Maintain Inventory of Facilities with a Spill Response Plan			
	Maintain a list of city facilities that have a SPCC Plan, SWPPP, or Spill Response Plan.	1. Update list of city facilities with the potential to pollute stormwater.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status

Permit Ref.	3.7.3: MS4 Operation and Maintenance Program 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
39.	Inspections and Maintenance of Stormwater Conveyances			
	Inspection and Maintenance Plan for stormwater infrastructure inspections.	1. Develop an SOP that identifies frequencies and documentation for maintenance.	1. Permit Year 1 FY21/22	1. Yes/No/Status
		2. Perform inspections in accordance with SOP	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status Number of MS4 inspections performed
		3. Maintain a prioritized Capital Improvement Project (CIP) list.	3. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Yes/No/Status Number of CIPs on list. Number of CIPs completed.
40.	Employee Training			
	Continue stormwater training to employees within the Public Services Department (See BMP 36).	1. See BMP 36	1. See BMP 36	1. See BMP 36

Permit Ref.	3.7.4: Municipal SCM Operation and Maintenance Program Measures to manage municipally-owned, operated, and/or maintained structural stormwater control measures (SCMs) that are installed for compliance with the permittee's post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation.			
	A	B	C	D

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
41.	Municipal SCM Inventory			
	Maintain inventory of municipally owned structural SCMs.	1. Maintain Operation and Maintenance plans for all City-owned SCMs.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Update inventory of City-owned SCMs.	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Date updated; total number of SCMs inventoried
42.	SCM Inspection and Maintenance			
	Perform regular inspections and maintenance of municipal SCMs and document on an annual basis with all related documentation stored in a tracking database.	1. NC SCM Certification is maintained by Stormwater Staff conducting SCM inspections.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status Number of certified staff
		2. Conduct annual SCM inspections per the SCM Inspection SOP.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of inspections performed
		3. Perform needed maintenance identified during the inspections.	3. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Number of SCMs maintained
		4. Update the tracking data base with inspection status and documents.	4. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	4. Yes/No/Status

Permit Ref.	3.7.5: Pesticide, Herbicide and Fertilizer Management Program Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage, and handling training, and shall ensure compliance with permits and applicator certifications.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
43.	Applicator Training for Pesticides, Herbicides and Fertilizer			
	Training of city staff who apply chemicals to help prevent negative water quality impacts from pesticides, herbicides, and fertilizers.	1. Maintain proper licenses or certification for applying pesticides, herbicides, and fertilizers.	1. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status Number of licensed staff
		2. Provide staff training in pollution prevention and applying chemicals.	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status, Number trained

Permit Ref.	3.7.6: Vehicle and Equipment Maintenance Program 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
44.	NPDES Industrial Permit Compliance			
	Ensure that municipal facilities covered under an NPDES industrial permit are maintaining compliance.	1. Update municipal facility inventory with NPDES permit status.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status

		2. Ensure that all NPDES Permits for municipal facilities are renewed as needed.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status; number of industrial stormwater permitted facilities
		3. Use industrial facility inspection form when conducting annual inspections at municipal facilities covered under a NPDES permit.	3. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	3. Yes/No/Status; number of industrial facility inspections performed
		4. See BMP 36	4. See BMP 36	4. See BMP 36
45.	Vehicle and Equipment Cleaning and Maintenance Facility Inspections			
	Vehicle and equipment cleaning and maintenance is included as part of the annual facility inspection.	1. Perform annual inspections and notify responsible person of any corrective actions required.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status Number of inspections performed
		2. Ensure any corrective actions are made by conducting a follow-up inspection and/or contacting the responsible person.	2. Continuously Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Yes/No/Status Number of follow-up inspections performed
Permit Ref.	3.7.7: Pavement Management Program 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 Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
46.	Street Sweeping			

	Street sweeping following a regular schedule in order to reduce pollutants from City owned and maintained streets.	1. Develop a standard operating procedure, including schedules, zones/locations, and proper disposal of collected wash waters and solids.	1. Permit Year 1 FY21/22	1. Yes/No/Status
		2. Implement SOP and documentation.	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Number of street miles swept
47.	Loose Leaf Collection			
	Provide seasonal loose leaf collection in residential areas and compost the collected material at the city operated composting center for use by the city and residents.	1. Publicize/establish protocols for residential brush and bagged leaf collections.	1. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	1. Yes/No/Status
		2. Collect brush and bagged leaves	2. Annually Permit Years 1-5 FY21/22 FY22/23 FY23/24 FY24/25 FY25/26	2. Total weight of brush collected