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SECTION 1: The Importance of Pollution Prevention and Good Housekeeping

1.1 Introduction

Storm water runoff occurs when rain and snowmelt flows over land and does not soak into the ground. Runoff is part of the natural water cycle. However, human activity in urban areas impacts the natural water cycle by increasing runoff and reducing infiltration. Runoff in urban areas tends to pick up trash, chemicals, sediment, and other pollutants and deliver them directly to local drains, rivers and lakes untreated. This can lead to poor water quality and impair uses, such as recreation and fish habitat.

Many municipal activities have the potential to impact surface water. Some activities, such as construction site management, vehicle washing and street maintenance can negatively impact water quality. Other activities, such as street sweeping, storm drain cleaning and employee training, can help improve water quality. Negative impacts can be reduced through the use of best management practices to protect water quality. A municipal pollution prevention and good housekeeping program can help control and reduce storm water pollution while addressing local land and water restoration goals and objectives.

1.2 Purpose and Scope

This guidebook was developed by the Macatawa Area Coordinating Council in coordination with the Allegan County Drain Commissioner's (ACDC's) office (on behalf of Allegan County) and other members of the Macatawa Watershed Storm Water Committee to document the pollution prevention and good housekeeping (PPGH) program in order to maintain compliance with the State of Michigan's NPDES permit for discharge of storm water to surface waters of the state from a municipal separate storm sewer system (Part 31 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended). The guidebook provides detailed information about the ACDC's storm water controls, inspection procedures, operation and maintenance procedures, best management practices, and other required program components that must be followed in order to maintain compliance with the MS4 permit.

1.3 Users of the Guidebook

This guidebook is intended to be used and maintained at all facilities owned and operated by the ACDC that fall within the jurisdiction of the MS4 permit. Users will include facility managers and employees that are engaged in pollution prevention and good housekeeping activities that are described in the guidebook.

1.4 Organization of the Guidebook

The guidebook is divided into the following sections:

Section 1: The Importance of Pollution Prevention and Good Housekeeping

This section provides an overview of the purpose and use of the guidebook. Included is information about the Macatawa Watershed, regulatory program requirements and definitions and acronyms.

Section 2: Municipal Structural Storm Water Control Inventory

This section contains detailed information about storm water structural controls owned by the ACDC within the urbanized area.

Section 3: Structural Storm Water Control Operation and Maintenance Activities

Section 3 provides procedures for inspecting and maintaining catch basins owned by the ACDC that are located in the urbanized areas of Allegan County.

Section 4: Municipal Operations and Maintenance Activities

This section provides an assessment of operation and maintenance activities that are performed by the ACDC and the potential pollutants associated with those activities. Best management practices are described for these activities. Also included is a procedure for conducting street sweeping.

Section 5: Additional Program Components

The final section of the handbook provides information on other program components that are required by the MS4 permit. Included is information related to vegetation management, contractor oversight and an employee training program.

1.5 Watershed Information

Allegan County contains three major watersheds: the Macatawa, the Kalamazoo River and the Black River. Regulated urban areas are only located with the Macatawa Watershed (Figure 1), therefore information about the Kalamazoo and Black River Watersheds is not provided.

The Macatawa Watershed covers 175 square miles, 37% of which is in Ottawa County, and the landuse (2009) is 46% agriculture, 33% urban and 21% natural/forested and water/wetland (MACC 2012). The watershed has lost over 85% of its wetlands and 75% of its forestland to agriculture and urbanization. From 1978 to 2009, urban land increased from 15% of the watershed area to 33% (MACC 2012). With this increase in urbanization came an increase in impervious surfaces, with most of the urbanized subwatersheds having more than 20% impervious surface cover (Fongers 2009). An increase in impervious surfaces resulted in dramatic increases in the volume of storm water runoff (89% on average from 1978 to 2005), which has resulted in a flashy stream system that is plagued by erosion and sediment laden flows during many rain or snowmelt events. Most peak flows have increased by more than 100% and runoff volumes in most subwatersheds have increased by over 75% since 1978 (Fongers 2009).

This history of landuse changes in the Macatawa Watershed has led to most of the tributaries being listed as impaired and not supporting water quality for a variety of uses, most commonly warm water fishery and other aquatic wildlife due to sedimentation and phosphorus. A phosphorus total maximum daily load (TMDL) was approved for Lake Macatawa in 2000 (Walterhouse 1999). The majority of the phosphorus load in Lake Macatawa, 90%, was determined to be from nonpoint sources. Since the TMDL was developed prior to the issuance of the Phase II program, discharges from MS4s are part of the nonpoint source load allocation. The Nonpoint Source Phosphorus Reduction Plan for the Macatawa Watershed was developed and approved in 2000. Numerous efforts were made to reduce nonpoint sources of phosphorus throughout the watershed, but by 2008, water quality monitoring showed little improvement. The TMDL was renewed at that time and a process was started to update the plan. The Macatawa Watershed Management Plan was approved in 2012 and provides best management practice recommendations for reducing sediment and phosphorus loads from priority areas in the watershed, including recommendations for urban areas.

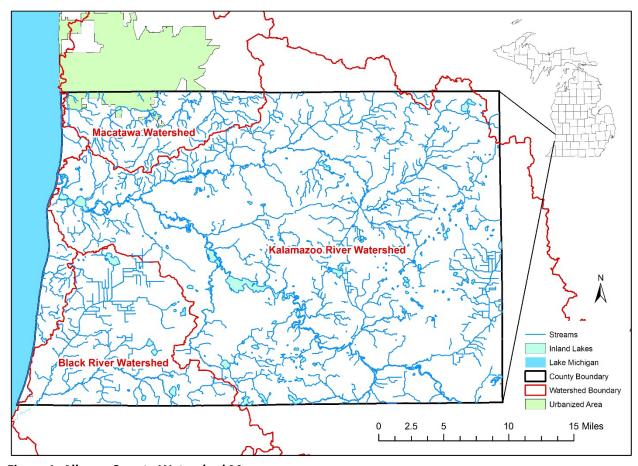


Figure 1. Allegan County Watershed Map

1.6 Regulatory Requirements

The federal Clean Water Act (CWA), as amended in 1987, is the principal legislation for establishing requirements for the control of storm water pollutants. Enforcement of the CWA and other federal laws has generated numerous federal, state and local requirements and programs that deal directly or indirectly in controlling storm water discharges. In the following sections, various programs are discussed in relation to the control of pollutants from municipal storm water systems.

Federal NPDES Program

In 1972, provisions of the federal Water Pollution control Act, also known as the Clean Water Act (CWA) was amended so that discharge of pollutants to waters of the United States from any point source is effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added Section 402(p) that established a framework for regulating municipal, industrial and construction storm water discharges under the NPDES program. In 1990, the EPA published final Phase I regulations that established application requirements for storm water permits for municipal separate storm sewer systems (MS4s) serving populations over 100,000 and certain industrial facilities, including construction sites greater than 5 acres. In 1999, the EPA published final Phase II regulations for communities with an MS4 serving populations less than 100,000 and operators of construction sites 1 to 5 acres in size.

Municipal NPDES Storm Water Programs

In Michigan, municipalities were given the option to apply for a jurisdictional permit or a watershed permit and work together with other MS4s within a watershed to meet Phase II requirements. The watershed approach uses the local watershed management plan as a basis for guiding water quality protection activities. MS4 communities whose jurisdictions spanned multiple watersheds were allowed to select which watershed to work with. The six communities that have jurisdictional boundaries within the Macatawa Watershed all elected to work collectively under a watershed permit with the assistance of the Macatawa Area Coordinating Council.

On April 1, 2016, all Macatawa Watershed permittees reapplied for MS4 permit coverage under the new individual permit required by the State of Michigan as of 2013. As part of the new permit, phase II communities are required to develop and implement a Storm Water Management Plan with the following six minimum control measures:

<u>Public Participation/Involvement Program</u> – Provide opportunities for citizens within the jurisdiction to review the Storm Water Management Plan and participate in the implementation and periodic review of the plan.

<u>Public Education Program</u> – Distribute education materials and perform outreach to inform citizens about storm water issues and actions they can take to help prevent storm water pollution.

<u>Illicit Discharge Elimination Program</u> – Develop and implement a plan to detect and eliminate illicit discharges and connections to the storm drain system, including illegal dumping.

<u>Construction Storm Water Runoff Control Program</u> – Develop, implement and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land.

<u>Post-Construction Storm Water Runoff Program</u> – Develop, implement and enforce a program to address discharge of storm water runoff from new and redeveloped areas to minimize water quality impacts and maintain or restore stable stream hydrology.

<u>Pollution Prevention and Good Housekeeping Program</u> – Develop and implement a program to prevent or reduce pollutant runoff from municipal facilities and operations. This is the purpose of this guidebook.

In addition to the six measures listed above, the Storm Water Management Plan must identify measureable goals for each for each control measure. The goals will be used by the MS4 and the MDEQ to gauge compliance and evaluate effectiveness of individual best management practices or of the storm water management program as a whole. Phase II communities must also monitor their efforts and prepare periodic progress reports demonstrating that they are implementing their minimum control measures and are in compliance with the permit requirements.

1.7 Definitions and Acronyms

The following is a list of terms and acronyms that are commonly used throughout the guidebook.

ACDC – Allegan County Drain Commissioner

<u>BMP – best management practice</u>. Methods or techniques that are used to achieve an objective. In the context of this guidebook, a BMP is any physical structure or behavioral activity that prevents or minimizes the potential for pollution to enter storm water.

<u>CWA – Clean Water Act</u>. Passed in 1972, it is the primary federal law in the United States governing water pollution. The act specifically addresses point and nonpoint source pollution, wastewater treatment and wetland protection.

<u>EPA – Environmental Protection Agency</u>. A federal agency that was established to consolidate federal research, monitoring, standard-setting and enforcement activities to ensure environmental protection. The EPA is in charge of enforcing the Clean Water Act including authorizing states to implement the Stormwater NPDES permitting program.

<u>NPDES – National Pollutant Discharge Elimination System.</u> NPDES is the national program for administering and regulating Sections 307, 318, 402, and 405 of the Clean Water Act. In Michigan, the Michigan Department of Environmental Quality issues permits for storm water discharges associated with Phase II and Phase I communities.

<u>MACC – Macatawa Area Coordinating Council.</u> The MACC is a designated inter-municipality study committee, also known as a metropolitan planning organization, which is the local decision-making body responsible for carrying out the metropolitan transportation planning process. The mission of the MACC is "to encourage cooperation among neighboring units of government on area wide issues."

<u>MDEQ – Michigan Department of Environmental Quality</u>. The Michigan Department of Environmental Quality promotes wise management of Michigan's air, land, and water resources to support a sustainable environment, healthy communities, and vibrant economy. MDEQ is the regulatory agency that, among other things, administers the NPDES program in Michigan and oversees MS4 permitting.

<u>MS4 – Municipal Separate Storm Sewer System</u>. An MS4 is a conveyance or system of conveyances that is owned by a public entity that discharges to waters of the state and is designed to collect and convey storm water. It is not a combines sewer nor part of a publically owned sewage treatment facility.

<u>Phase I Community</u> – Medium to large cities or counties that own or operate a MS4 with a population of 100,000 or more. Phase I of the NPDES permit program was initiated in 1990.

<u>Phase II Community</u> – Small communities who own or operate a MS4 in an urbanized area with a population less than 100,000. Phase II of the NPDES permit program was initiated in 1999.

<u>TMDL – Total Maximum Daily Load</u>. A TMDL is a document that describes the process used to determine how much pollutant a lake or stream can assimilate and meet water quality standards. TMDLs are developed by the MDEQ and must be approved by the EPA.

1.8 References and Resources

Fongers, D. 2009. Macatawa Watershed Hydrologic Study. Hydrologic Studies Unit. Land and Water Management Division. Michigan Department of Environmental Quality.

Macatawa Area Coordinating Council (MACC). 2012. Macatawa Watershed Management Plan.

Walterhouse, M. 1999. Total Maximum Daily Load (TMDL) for Phosphorus in Lake Macatawa. Great Lakes and Environmental Assessment Section, Surface Water Quality Division, Michigan Department of Environmental Quality.

SECTION 2: Municipal Structural Storm Water Control Inventory

2.1 Introduction

One key component of the PPGH Program is a comprehensive inventory of the facilities and storm water controls that are owned or operated by the MS4. Allegan County does not own any municipal facilities within the Holland urbanized area, but does own and operate storm water controls. Digital and hard copy maps of the storm water controls are maintained at the Allegan County Drain Commissioner's office in Allegan (113 Chestnut St, Allegan, MI 49010). The inventory of storm water controls, both contained in this document and within ACDC maps, will be updated within 30 days of the addition, removal or transfer of ownership of any facility or storm water control. The ACDC will make updates to their digital maps and notify the MACC to update this document. Should any facilities be constructed within the Holland urbanized area, or the current urbanized area be expanded to include existing Allegan County facilities, the MACC will facilitate an update of this document to include new facilities or urbanized areas within 30 days of new construction or being made aware of changes to the urban boundaries per US Census and State of Michigan guidelines.

Any facilities that are constructed within the urbanized area or added due to urbanized area boundary changes will be assessed for their potential to discharge pollutants to surface waters of the state within 30 days of construction or addition to the urbanized boundary. The assessment will be conducted by the MACC using the assessment checklist provided in Appendix A.

2.2 Structural Storm Water Control Inventory

Table 1 provides a list of current storm water structural controls owned by Allegan County within the Holland urbanized area.

Table 1. Allegan County Storm Water Structural Controls

County Drain		Catch	Detention	Open Ditch /	Notes
Name	No.	Basin	Basin	Swale	Notes
Downda Drain	744			1	original constr dwg in permanent drain file
Heritage Meadow Drain (1)	761	4			asbuilts in permanent drain file
Heritage Meadow Drain (2)	761	10	1		asbuilts in permanent drain file
Laketown Village Drain	715			1	original constr dwg for LV Condo in permanent drain file, bypass only, not onsite system
Laketown Village Drain (West Wind Village Phase I)	715	12	3	2	asbuilts in permanent drain file
Virginia Park Intercounty Drain (Pine Hollow & E. Br.)	570	14		1	original constr dwg in permanent drain file
Virginia Park Intercounty Drain (West Br.)	570	13			original constr dwg in permanent drain file
Camelot Woods Drain	138	3	1		copies of constr dwg in permanent drain file (also see Camelot Woods #2 plat file)
Pine Drive & Pine Drive No. 2 Drains	706, 730	5,9			copies of constr dwg in permanent drain file (also see Camelot Woods plat file)
Tanglewood Drain	712	15	5		original constr dwg in permanent drain file
Jack Pine Ridge Drain	683	4	1		original constr dwg in permanent drain file
TOTALS		77	8	3	

SECTION 3: Structural Storm Water Control Operation and Maintenance Activities

3.1 Catch Basin Inspection and Maintenance

All Allegan County owned MS4 catch basins will be inspected at least once during ACDC's 3-year rotational maintenance schedule (see Table 1 for locations). Catch basins are inspected by the Drain Maintenance Supervisor (DMS) or other trained ACDC employees. At each catch basin the inspector will look for debris and sediment blocking the inlet and remove if found. They will also check for sediment and trash in the sump. The inspection will also include checking for damage or cracks to frame, grate, basin walls, etc. All maintenance needs will be documented on the standard ACDC Inspection Report. Catch basin sumps that are 50% or more full of sediment will be scheduled for cleaning within 30 days. Other maintenance needs are assessed at the time of inspection. Maintenance that can be performed with hand tools (such as small obstruction and rubbish removal) is generally addressed immediately by the inspector. Maintenance that will require a contractor and equipment will be scheduled within 30 days and completed within 90 days.

Once catch basins have been inspected and identified for cleaning, this information will be given to the DMS. The DMS will schedule cleaning with a certified contractor who will properly clean the catch basins and appropriately dispose of removed materials. The ACDC will retain a receipt from the contractor noting the quantity of collected material and the location where it was disposed. All catch basin cleaning and material disposal will be conducted following the MDEQ Catch Basin Cleaning Activities Guidance Document (Appendix B).

Citizens are invited to call the main ACDC office to report issues related to catch basins. When a request or complaint is received, a message is sent to the DMS for response. A phone call or inspection is usually performed within 2 business days for routine maintenance calls. If a blockage or flooding due to a county drain is reported, follow-up is performed within 24 hours. Citizens with complaints not related to county drains are forwarded to the appropriate public agency, otherwise ACHD is the county enforcing agency for soil erosion and sedimentation control issues on private developments.

3.2 Other Storm Water Controls

Table 1 also lists other storm water controls owned by Allegan County not associated with facilities. These controls are also inspected at least once during ACDC's 3-year rotational maintenance schedule by the DMS or other trained ACDC employees. A visual inspection will include verifying accessibility of the storm water controls and ensuring that they are free of debris and other pollutants. Vegetated controls will be checked for erosion and noxious weeds or invasive species. The inlet and outlet pipes will be inspected for blockage and physical damage. Any problems discovered or maintenance needs will be documented on the standard ACDC Inspection Reports. Copies of the inspection reports are kept in the permanent drain files at the Drain Commissioner's office. Storm water structural controls will be scheduled for maintenance when they reach 50% capacity. Most maintenance needs will be contracted out, but some simpler maintenance may be performed by ACDC staff. A filter bag will be used on the pump outlet to filter small sized particles when dewatering detention basins. Water will be discharged to a location downstream of the basin utilizing appropriate soil erosion measures. The material removed from the detention basins will be will be transported by truck and disposed of at an approved landfill.

Allegan County requires that all construction of new County-owned facilities or new storm water controls designed for water volume control will be designed, installed and maintained in accordance with the county's post construction runoff control performance standards and long-term operation and maintenance requirements.

SECTION 4: Municipal Operations and Maintenance Activities

4.1 Assessment

All Allegan County owned drainage systems were assessed by the ACDC's Engineer to determine which operation and maintenance (O&M) activities are occurring within right of ways. The county does not own any facilities within the urbanized area. The following activities were assessed: drain system O&M and landscape maintenance.

A summary of the operation and maintenance activities and associated potential pollutants is found is Table 2. The assessment will be revised within 30 days of any significant changes to operation and maintenance activities or to the best management practices that are implemented.

4.2 Best Management Practices

Best management practices (BMPs) are physical structures that are installed or actions that are taken to prevent or reduce the potential for storm water pollution when undertaking certain activities. Best management practice summary sheets for operations and maintenance activities conducted by Allegan County within the urbanized area are found in the pages following Table 2. These BMPs will be implemented for all applicable activities that are occurring on Allegan County property and right-of-ways within the regulated urbanized area. Though not required by the storm water permit, the BMPs will also be used for applicable activities conducted outside of the urbanized area.

Table 2. Operation and Maintenance Activities and Associated Pollutants

		POLLUTANTS									
Field Programs	Activities	Sediment	Nutrients	Trash	Metals	Bacteria	Oil & Grease	Organics	Pesticides	Oxygen Demanding Substances	BMP Summary Sheet (page #)
	Mowing/Trimming	Χ	Χ	Χ		Χ			Χ	Χ	11
Landscape Maintenance	Fertilizer & Pesticide Management	Х	Х						Х		11
	Inspection and Cleaning of Stormwater Conveyance Structures	х	х	х		х		х		X	12
Drainage System Operation and Maintenance	Controlling Illicit Connections and Discharges	Х	Х	Х	Х	Х	Х	Х	Х	Х	See Illicit Discharge Elimination Plan
	Controlling Illegal Dumping	Χ	Χ	Х	Χ	Χ	Χ	Х	Χ	Χ	13
	Maintenance of Inlet and Outlet Structures	Х		Х	Х		Х			Х	14

Lawn Care and Landscape Maintenance Category of Municipal Operation: Landscape Maintenance **BMP Description:** • Use phosphorus-free fertilizer in all cases except when starting a new lawn from seed, patching/repairing a lawn with seed or when a soil test has shown there is a need The area of lawn will be measured prior to applying fertilizer to ensure that the proper amount is Maintain at least a 3-foot buffer of no fertilizer application when applying adjacent to surface water or storm water controls • Grass should be cut no shorter than three inches to encourage root growth • All grass clippings and fertilizer will be swept or blown off impervious surfaces back onto lawns to prevent runoff into storm drains • When irrigating, follow a schedule to maximize efficiency and prevent excess water from running off • When selecting landscape plants, choose species that are appropriate for the site conditions. Use of native species is encouraged to minimize the need for fertilizing and irrigation. Any pesticide application will be completed by an employee or contractor that is certified by the State of Michigan as a pesticide applicator in the applicable category Measurable Goals: 100% of fertilizer used within the urbanized area is phosphorus free 100% of pesticide applications completed by a certified individual Timeline/Implementation Schedule: Employee training once every 5 years or within 1 year for new hires **Specific Components and Notes: Responsible Party for this BMP** Indicate who specifically is responsible for the implementation and monitoring of this BMP. This should be the individual who is actively involved with the BMP. Name:

Based on Macatawa Watershed Project's Lawn Care Seal of Approval criteria

Department:

Phone:

E-mail:

Storm Water Conveyance Structures

Category of Municipal Operations: Drainage System Operation and Maintenance

BMP Description:

- Check surface over the pipe system for settlement or lost cover
- Inspect structural condition of outlet and inlets including headwalls and aprons for cracks, separation or collapsed ends
- Look for scouring or undermining, including evidence of animal burrows
- Look for scour at inlets and outlets due to heavy volumes and flows and assess need for erosion control
 measures
- Check for obstructions due to excessive vegetation, particularly trees or other woody vegetation
- Check pipe structure for collapse or deformation
- Check for corrosion on metal pipe, particularly at the inlet
- Look for deposition of sediment and other debris and remove as necessary

M	leas	ura	hl	e	Go	al	ls:

Inspections conducted annually

100% of maintenance needs addressed within 90 days of discovery

Timeline/Implementation Schedule:
Employee training once every 5 years or within 1 year for new hires
Specific Components and Notes:
Responsible Party for this BMP
Indicate who specifically is responsible for the implementation and monitoring of this BMP. This should be
the individual who is actively involved with the BMP.
Name:
Department:
Phone:
E-mail:
E IIIVIII

Based on Storm Water System Inspection and Maintenance Manual, Georgia Department of Transportation, 2015.

Controlling Illegal Dumping

Category of Municipal Operations: Drainage System Operation and Maintenance

BMP Description:

- Develop and implement public awareness program to prevent illegal dumping and encourage reporting
- Train staff to recognize and report incidents
- Establish system to track incidents that will identify:
 - Dumping hot spots
 - Types and quantities of waste
 - Patterns of occurrence (time of day, season, etc.)
 - Method of dumping
 - Responsible parties

Measurable Goals:

Decrease number of illegal dumping reports/discoveries

Timeline/Implementation Schedule:

Employee training once every 5 years or within 1 year for new hires Public education plan – FY2017, FY2019, FY2021 Tracking system in place as of October 2016

Specific	Compone	nts and	Notes

Responsible Party for this BMP

Indicate who specifically is responsible for the implementation and monitoring of this BMP. This should be the individual who is actively involved with the BMP.

Name:		
Department:		
Phone:		
E-mail:		

Based on BMP: Illegal Dumping Controls, Springville City Corporation Public Works Department, Springville UT

Inlet and Outlet Structure Maintenance

Category of Municipal Operations: Drainage System Operation and Maintenance **BMP Description:** Inspect riser/standpipe cover for trash and debris and remove as needed Inspect inlet, outlet pipes and emergency spillways for trash or debris that may be blocking Remove accumulated sediment at inlets, outlets, forebays, and emergency spillways Inspect pipes for structural integrity Inspect rip rap and replace as necessary Check for erosion around inlets, outlets and other features and install stabilization measures as necessary **Measurable Goals:** Annual inspections 100% of identified maintenance needs addressed within 90 days Timeline/Implementation Schedule: Employee training once every 5 years or within 1 year for new hires **Specific Components and Notes: Responsible Party for this BMP** Indicate who specifically is responsible for the implementation and monitoring of this BMP. This should be the individual who is actively involved with the BMP. Name: Department:

Based on Best Management Practices for Maintenance of Private Storm Water Facilities, City of Cedar Rapids, Iowa Public Works Department, 2014.

Phone:

E-mail:

SECTION 5: Additional Program Components

5.1 Managing Vegetated Properties

If pesticide application is determined to be necessary, Allegan County will require proof that the contractor or its employees are certified by the State of Michigan as a pesticide applicator in the appropriate category. As much as possible, contractors will use integrated pest management techniques to minimize the use of pesticides to protect the environment and avoid potential surface or groundwater contamination.

Any County staff that may apply pesticides during vegetation management on properties or in right of ways will be certified by the State of Michigan as a pesticide applicator in the applicable category. Allegan County staff will be trained in the use of integrated pest management in order to consider all potential solutions before applying pesticides.

5.2 Contractor Requirements and Oversight

Allegan County hires contractor to complete routine O&M procedures that are described in this handbook, such as catch basin cleaning and detention basin mowing. Any contractors that are hired to perform O&M activities are required to follow all pollution prevention and good housekeeping practices described in this handbook. Language will be included in any bid packets and contracts to this effect. Contracts will also include language that allows designated County staff to perform inspections to ensure that all PPGH practices are being followed. A copy of the handbook will be made available to all contractors performing O&M on ACDC properties or right of ways.

5.3 Employee Training

The MACC provides training opportunities to Allegan County and other MS4 communities within the Macatawa Watershed. In class training will be scheduled for staff responsible for PPGH activities within 1 year of adopting this manual. Online training modules are being developed to cover PPGH required activities and staff responsible for PPGH activities will be required to complete the modules once during each permit cycle. Any new staff will be required to complete the online training modules within one year of their date of hire. In-class training sessions will be available and scheduled as needed. Additional online modules will be created for special interest topics, such as lawn care or rain garden maintenance Employees will be encouraged to participate in these as applicable.

APPENDIX A

MUNICIPAL PROPERTY ASSESSMENT CHECKLIST