

2025 ANNUAL REPORT

APDES Permit No. AKS-052558

Submitted by:
Municipality of Anchorage



Alaska Department of Transportation and Public Facilities



Prepared for:
Alaska Department of Environmental Conservation

Prepared by:
Watershed Management Services
Project Management and Engineering Department
Municipality of Anchorage



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Acronyms

ACGP	Alaska Construction General Permit
ADEC	Alaska Department of Environmental Conservation
ADNR	Alaska Department of Natural Resources
AK-CESL	Certified Erosion and Sediment Control Lead
AMC	Anchorage Municipal Code
APDES	Alaska Pollutant Discharge Elimination System
ARDSA	Anchorage Road and Drainage Service Area
AWC	Anchorage Waterways Council
BMP	Best Management Practice
CBERRRSA	Chugiak Birchwood Eagle River Rural Road Service Area
CGP	Construction General Permit
CO	Certificate of Occupancy
CR	DOT&PF Central Region
DCM	Design Criteria Manual
D&ES	DOT&PF Statewide Design & Engineering Services
DOT&PF	Alaska Department of Transportation and Public Facilities
EPA	Environmental Protection Agency
ESCP	Erosion Sediment Control Plan
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
GIS	Geographic Information System
GPS	Global Positioning System
GRSA	Girdwood Road Service Area
HMCP	Hazardous Material Control Plan
HGDB	Hydro geodatabase
IPM	DOT&PF Integrated Pest Management Plan
LID	Low Impact Development
M&O	DOT&PF Central Region Division Maintenance and Operation
MASS	Municipality of Anchorage Standard Specifications
MEP	Maximum Extent Practicable
MOA	Municipality of Anchorage

MS4	Municipal Separate Storm Sewer System
MS4GDB	MS4 Geodatabase
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
OGS	Oil and Grit or Oil and Grease Separator
PS&E	Plans, Specification, and Estimate
QA	Quality Assurance
QAP	Quality Assurance Plan
ROW	Municipal Rights of Way
SEO	DOT&PF Statewide Environmental Office
SOP	Standard Operating Procedures
SPCC	Spill Prevention, Control, and Countermeasure
SSAC	DOT&PF Standard Specification for Airport Construction
SSHC	DOT&PF Standard Specification for Highway Construction
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWTPRGM	Storm Water Treatment Plan Review Guidance Manual
TMDL	Total Maximum Daily Loads
WMS	Watershed Management Services

Introduction

The Municipality of Anchorage (MOA) and the State of Alaska Department of Transportation and Public Facilities (DOT&PF) submit this report in fulfillment of the annual reporting requirements of the Alaska Pollutant Discharge Elimination System (APDES) Permit No. AKS052558, “*Authorization to Discharge Under the National Pollutant Discharge Elimination System*” (Permit), effective date August 1, 2020. This report satisfies the criteria outlined in Permit Section 4.4 and is organized by program to demonstrate compliance with the *Storm Water Management Plan*, which was developed to meet the requirements in Permit Section 2. Documents produced in compliance with this report are included in associated Appendices A through G.

The APDES permit expired in July 2025 and will continue in full force until the effective date of the new permit. MOA and DOT&PF have applied for the renewal of this permit and are in negotiations with the Alaska Department of Environmental Conservation (ADEC).

The permittees’ responsibilities are both joint and individual; they are laid out in their Inter-jurisdictional Agreement, which describes their respective roles and responsibilities related to this Permit. Coordination among groups within the permittees’ organizations is outlined in their Program Coordination Plans.

Responsibilities for specific requirements have been shared with the Anchorage Waterways Council (AWC). The delegated activities are in Public Education for General Audiences (Permit Part 3.6) and Program Evaluation of Animal Facilities (Part 3.3.3).

1. Program Organization

1.1 Storm Water Management Plan

The actions and activities of the Anchorage Municipal Separate Storm Sewer System (MS4) program have been documented in its Storm Water Management Plan (SWMP). The SWMP is intended to reduce pollutant discharges from the MS4 into receiving waters to the maximum extent practicable (MEP). The permittees have identified the prescribed best management practices (BMPs), including control measures, system design, engineering methods, and other provisions, appropriate to control and minimize pollutants and to address the Permit requirements and deliverables.

The annual report documents the compliance measures taken during the year to fulfill the SWMP. Activities are identified in the appropriate program summaries, along with the results of collected data, activity summaries, appendix references, and web links to associated supporting materials. Also, in each program section are performance self-assessments and summaries of planned activities for future reporting cycles.

The SWMP was updated for the fourth permit term and provided in the 2020 Annual Report. It was reviewed and updated in 2025 for consistency with progress in compliance activities. The revised plan is provided in Appendix A1.

1.2 Program Effectiveness

The annual report presents the work accomplished by the Permittees during the 2025 calendar year.

Each monitoring program report included in this submittal provides a detailed description of the results for the current monitoring year. If problematic outfalls were identified, the follow-up actions are discussed in the program findings.

The Quality Assurance Plan (QAP) was updated in the first year of the Permit term to reflect changes in program activities.

Pollutant load allocations, in the form of total maximum daily loads (TMDLs), are assigned by the state to several creeks and lakes in Anchorage based on the State’s Primary Use designation as drinking water sources. Dry- and wet-weather screening indicators of bacterial impacts from stormwater to the identified receiving systems. Wet-weather bacteria remain occasionally high at some outfalls. To address the sources of most bacteria, the permittees continue to provide public education on pet waste management through the ‘Scoop the Poop’ message.

Dry weather screening in 2024 identified one outfall with test levels requiring further investigation for fecal coliform and detergents. Investigators collected samples on multiple days across the drainage area connected to the outfall. They determined that the two pollutants were not from a single source but instead from two or more unrelated sources. The detergents appeared to result from vehicle washing outside designated wash bays. Municipal Watershed Management Services (WMS) notified commercial businesses in July 2024 that could cause the problem and educated them about the impact of soap on the receiving system. Detergents were not detected in the 2024 sampling; therefore, the letters are believed to be useful for awareness to help mitigate detergent contamination. Fecal coliform was not traced to a single source; it appeared to be related to nonpoint sources and potential homeless activities in the area. Both pollutants were monitored in 2025 and were nondetectable, requiring no further follow-up.

Street sweeping assessment activities were conducted annually to improve sweeping operations. The real-time assessment provides qualitative feedback to help operators adjust practices to maintain a visually clean standard.

Primary coordinating groups implemented operations of the storm sewer system. Coordination is managed through agreements between WMS and each participating MS4 operator; these plans were updated as operations changed and for the new permit term. The DOT&PF Central Region Maintenance and Operations (M&O) staff have provided 2025 MS4 Summaries for their respective permit compliance areas. They are provided in Appendix A2.

1.3 Program Resources

The permittees have broken their program costs into two functional categories: Maintenance & Operations and Program Management/Project Administration. The maintenance costs are summarized from the program breakdowns contained in the MS4 Summaries. The 2025 costs from DOT&PF, Anchorage Road and Drainage Service Area (ARDSA), Chugiak Birchwood Eagle River Rural Road Service Area (CBRRSA), and Girdwood Road Service Area (GRSA) are presented in Table 1.

Table 1 – 2025 SWMP Program Costs

	DOT&PF	ARDSA	CBERRRSA	GRSA	Total
Maintenance & Operations	\$3.6M	\$2.73M	\$0.74M	\$0.067M	\$7.12M
Program Management/ Administration	\$0.37M	\$1.15M	-	-	\$1.52M
Total	\$3.97M	\$3.88M	\$0.74M	\$0.067M	\$8.64M

1.4 Watershed Planning

The permittees must complete an individual watershed plan for a specific water body before the permit term ends. The Campbell Creek Watershed Plan was developed during the fourth permit term and is posted on the [WMS website](#). This plan was developed using a scoping document from the third permit term for Campbell Creek. The scoping document assessed whether watershed activities support site-based low-impact development (LID) practices and recommended next steps to achieve the identified goals. The Campbell Creek Watershed Plan outlines future actions to achieve the goals and is provided in Appendix B1.

The MS4 permit requires permittees to complete a scoping document, in accordance with Permit Part 2.7.2, for a single watershed plan for a specific water body before this permit's expiration date. The 2025 Watershed Planning Scoping document was prepared in April 2025 and is provided in Appendix B2. This scoping document determined that the objectives of watershed plans are being met through regulatory documents and other MOA mechanisms. The permittees no longer see a need to develop watershed plans.

During the fourth permit term, WMS developed Stormwater Master Plans for Chester Creek and Campbell Creek. These Stormwater Master Plans present the analysis, results, and recommendations resulting from a baseline stormwater infrastructure assessment completed for watersheds in Anchorage. These Master Plans are focused on quantitatively evaluating storm drain infrastructure condition and hydraulic performance and are intended to help guide public and private development within the watershed. These plans are also available on the [WMS website](#).

2. Construction Site Management

2.1 Regulatory Mechanisms and Standards

DOT&PF Projects: The DOT&PF Statewide Design & Engineering Services' (D&ES) mission is to provide technical services to DOT&PF and other state and federal agencies. They develop, publish, and manage standard construction contract specifications, standard modifications for highways, and statewide special provisions for highways and airports. They coordinate with and advise others in the development and use of specifications for buildings, marine highways, and harbors. The DOT&PF Chief Engineer issues directives informing DOT&PF staff of new specifications, manuals, and other standards to administer DOT&PF projects.

In 2024, the DOT&PF Chief Engineer issued one stormwater-related directive to the DOT&PF regions incorporating revisions to the Alaska Standard Plans Manual, HSM20-47 and HSM20-48.

- February 28, 2024, Chief Engineers Directive: The 2024 Alaska Environmental Procedures Manual was adopted effective March 1, 2024. This Manual update incorporates changes to federal regulations and provides updated guidance on environmental procedures. The Directive can be found at:

https://dot.alaska.gov/stwddes/dcspubs/assets/pdf/directives/24/022824_epm.pdf

The current addition of the 2024 Alaska Environmental Procedures Manual can be found at:

<https://dot.alaska.gov/stwddes/desenviron/resources/enviromanual.shtml>

2.1.1 Ordinance and/or Regulatory Mechanism

DOT&PF Projects: The DOT&PF regulates storm water management of its highway, aviation, and public facility construction projects through its Statewide and Regional Standard Specifications:

- Section 641 Erosion, Sediment, and Pollution Control for Highway Construction
- Item P-641 Erosion, Sediment, and Pollution Control for Airport Construction
- Section 01 57 10 Erosion, Sediment, and Pollution Control for Statewide Public Facilities Construction

DOT&PF reviews and may update these standard specifications every two years; they are part of the biennial statewide standard specification re-publication. Regional special specification modifications are developed on a project-specific basis. DOT&PF reviews the DOT&PF SWPPP construction forms annually and updates or modifies individual forms as necessary.

In 2021, these Erosion, Sediment, and Pollution Control specifications were revised to reflect regulatory changes resulting from the Alaska Department of Environmental Conservation (ADEC) reissuance of the Alaska Construction General Permit (ACGP).

- The final version of the 641 Specification for Highway Construction was accepted by the Federal Highway Administration (FHWA) and made ready for use by the September 27, 2021, Chief Engineer's Directive.
- The final version of the P-641 Specification for Airport Construction was accepted by the FAA and made ready for use by the December 22, 2021, Chief Engineer's Directive.
- The final version of the 01 57 10 Specification for DOT&PF Public Facility Construction was accepted and made ready for use on November 15, 2021.

In 2022, the Erosion, Sediment, and Pollution Control specifications were revised to allow the use of SWPPPTrack for SWPPP documentation.

- The 641 Specification for Highway Construction was made ready for use by the February 10, 2022, Chief Engineer Directive HSP20-5.
- The P-641 Specification for Aviation Construction was made ready for use by the March 9, 2022, Chief Engineer Directive ASP-9.

In 2023, DOT&PF:

- Issued the April 18, 2023 Chief Engineer Directive HSP20-5A to replace the February 10, 2022 Chief Engineer Directive HSP20-5 and revised the SWPPPTrack special provisions in their 641 Specification for Highway Construction.
- Issued the April 18, 2023 Chief Engineer Directive ASP-9A to replace the February 9, 2022 Chief Engineer Directive ASP-9 and revised the SWPPPTrack special provisions in their P-641 Specification for Aviation Construction.
- Updated the Liquidated Damage Table in their 641 Specification for Highway Construction, P-641 Specification for Airport Construction, and 01 57 10 Specification for DOT&PF Public Facility Construction.

- Updated the Erosion, Sediment Control Liquidated Damages Table in their standard construction forms 25D-146H (for Highway projects), 25D-146F (for Statewide Public Facilities projects), and 25D-146A (for Aviation projects).

In 2025, DOT&PF did not revise the Standard Specification Section 641, Item P-641, and Section 01 57 10.

The Standard Specification Section 641, Item P-641, Section 01 57 10, and the DOT&PF SWPPP construction forms are construction contract requirements used to document permit compliance. DOT&PF personnel enforce stormwater specifications for each construction project.

DOT&PF Central Region Construction guides contract stormwater administration to its project staff through three mechanisms:

- The Alaska Construction Manual, Chapter 3.11, 9.9, 9.10, and 9.17;
- DOT&PF Chief Engineer's directives; and
- Having storm water specialists dedicated solely to storm water guidance and education.

These three mechanisms must be used on all DOT&PF highway, aviation, and public facility construction projects; they outline procedures for implementing and monitoring construction SWPPPs.

The latest edition of the Alaska Construction Manual became effective on March 10, 2023. Minor modifications to the Alaska Construction Manual regarding stormwater were made in February 2021 to sections 3.11 and 9.9. The Alaska Construction Manual link is:

https://dot.alaska.gov/stwddes/dcsconst/assets/pdf/constman/2023/acm_all.pdf

Highway Standard Modification for Section 641 for Highways Erosion, Sedimentation, and Pollution Control (identified as Special Provision HSP20-5A) link is:

https://dot.alaska.gov/stwddes/dcspubs/assets/pdf/directives/attach/23/041823_hsp20_5a.pdf

Aviation Standard Specification for Section P-641 for Airports Erosion, Sedimentation, and Pollution Control (identified as Statewide Airport Special Provision ASP-9A) link is:

https://dot.alaska.gov/stwddes/dcspubs/assets/pdf/directives/attach/23/041823_asp_9a.pdf

Links for Section 01 57 10 for Public Facility Construction are not currently available.

DOT&PF Construction SWPPP Forms link is:

<https://dot.alaska.gov/stwddes/dcsconst/index.shtml> (under the Forms heading, Construction Forms bullet)

DOT&PF Chief Engineer's Directives link is:

<https://dot.alaska.gov/stwddes/dcspubs/directives.shtml>

Municipal Projects: The MOA regulates storm water management during the construction of its own (public) projects through Municipality of Anchorage Standard Specifications (MASS), Division 20 (MASS Section 20.02). These standard specifications are periodically updated and contractually enforced. A link to the MASS is found at:

https://www.muni.org/Departments/project_management/Pages/MASS.aspx

Private Development: The MOA regulates stormwater management at private construction sites through Anchorage Municipal Code (AMC) Title 21. It can be found in AMC 21.07.040.E. This code is available at:

https://www.municode.com/library/ak/anchorage/codes/code_of_ordinances?nodeId=TIT21LAUSPL_NECOFFJA12014_CH21.07DEDESTNECOFFJA12014_21.07.040DRSTWATRERCOPRDI

2.1.2 Construction Storm Water Manual

DOT&PF Projects: Use of the SWPPP Guide and other related materials is directed by the DOT&PF Chief Engineer. These materials are available for download on a dedicated Storm Water and Water Quality webpage managed and maintained by the DOT&PF Statewide Environmental Office (SEO).

DOT&PF revised its SWPPP Guide in March of 2021 to reflect changes made in the 2021 Alaska Construction General Permit. The SWPPP Guide, 2017 Edition, was designated an official reference document and authorized for use on March 31, 2017, following approval from the FHWA and FAA.

DOT&PF Statewide Environmental Office Storm Water and Water Quality Website link is:

<https://dot.alaska.gov/stwddes/desenviron/resources/stormwater.shtml>

The Alaska SWPPP Guide, 2021 Edition (entire guide with appendices) link is:

<https://dot.alaska.gov/stwddes/desenviron/resources/stormwater.shtml> (under the Construction Storm Water Resources heading, Storm Water Pollution Prevention Guide (SWPPP) Guide bullet)

Municipal and Private Projects: The MOA updated its Stormwater Treatment Plan Review and Guidance Manual (SWTPRGM) in 2017 to reflect the current regulatory program based on the APDES permit and the current ACGP. A document review during the fourth term, along with regular use and community feedback, demonstrates that it remains aligned with current regulations and does not require further updating. It is incorporated as Volume 2 of the Anchorage Stormwater Manual, adopted by the Anchorage Assembly. It is available at:

https://www.muni.org/Departments/project_management/WM/Documents/DCM/ASM_Volume2_Final_December2017.pdf

2.2 Plan Review and Approval

DOT&PF Projects: Sometimes, DOT&PF consolidates two or more projects into a single Construction Contract. DOT&PF typically files one Notice of Intent (NOI) per Construction Contract unless the projects are disconnected and have vastly different site conditions/SWPPP requirements. DOT&PF will report on the number of active or carryover Construction Contracts or NOIs filed with the ADEC. These DOT&PF contracts/NOIs are hereafter known as projects in this report.

Below is a list of DOT&PF Construction Contracts/NOIs that have multiple projects:

DOT&PF 2025 Construction Contracts with Multiple Projects and one NOI:

- 1 Project No. CFAPT00881 – ANC Terminal Northside Aprons & Taxi lane Reconstruction and ANC Terminal Water Main Improvements (New project)
- 2 Project No. CFHWY00731 – AMATS: Eagle River Loop Rd – Eagle River Rd to Old Glen Highway Pavement Preservation, and CFHWY00621 – North Eagle River Access Pavement Preservation (Carry over)
- 3 Project No. CFHWY00132 – Minnesota Dr: Tudor to 15th Ave. Pavement Preservation, and Project No. CFHWY00366 – HSIP: Anchorage Pedestrian Lighting, Ph II (Carry over)

Seven (7) projects (i.e., Construction Contracts) were carried over from the 2024 construction season in the Municipality of Anchorage MS4 permit area. During 2025, DOT&PF reviewed and approved SWPPPs for nine (9) projects eligible to discharge construction stormwater under the requirements of the 2021 ACGP within the MS4 permit area. All nine projects filed for and received an NOI. All 16 projects were contracted and administered by DOT&PF. A list of these 16 projects is provided in Appendix C1.

Since 2011, the DOT&PF Central Region (CR) has maintained a renewable term contract with STANTEC, Inc. to perform Quality Assurance (QA) document reviews for Specification Section 641, Item P-641, and Specification Section 01 57 10 prior to project certification and field implementation. In 2016, DOT&PF Statewide Public Facilities began using the services provided by STANTEC Inc. QA review is performed by the Water and Wastewater group within STANTEC for all projects requesting the service. On average, between 40 and 50 DOT&PF CR Construction and Statewide Public Facilities projects with an NOI use this service.

Before projects apply for an NOI, STANTEC reviews the initial SWPPP and provides comments for the project to incorporate, considering all pertinent environmental permits. During construction, STANTEC reviews the project-site inspection reports prior to certification, including all other inspection-generated documentation, and provides comments to edit and correct the documentation to prevent permit non-compliance caused by paperwork errors. DOT&PF CR Construction and Statewide Public Facilities will continue using this QA contract for the foreseeable future and have no plans to terminate the service.

The DOT&PF Highway Preconstruction Manual and the DOT&PF Aviation Preconstruction Manual require Erosion and Sediment Control Plans (ESCP) to be developed for each project owned, designed, or administered by the DOT&PF. The ESCP provides sufficient information and guidance in the contract documents to enable the Construction Contractors to prepare a well-conceived, cost-effective SWPPP as required by the CGP. The DOT&PF assigns design and environmental staff, as well as the DOT&PF CR Storm Water Specialist, to review the ESCP.

The review process for highway projects is as follows:

- The ESCP writer develops a project specific ESCP “early” and in collaboration with the DOT&PF Construction Section and the DOT&PF Environmental Analyst. The DOT&PF Highway Preconstruction Manual does not specify when the ESCP is reviewed. However, the ESCP needs to show permanent erosion and sediment control features, including final stabilization, on the roadway plan and detailed drawings. For small and simple projects, the ESCP may be reviewed at the Plans-in-Hand (PIH) phase (representing when the plans, specifications, and estimate are approximately 75 percent complete). For large and complex projects, the ESCP is reviewed at the Plans, Specifications, and Estimate (PS&E) phase (representing when the plans, specifications, and estimate are approximately 95 percent complete).
- Individuals submit their written comments to the Design Project Manager or give the ESCP writer red-lined edits of the ESCP.
- The ESCP writer can discuss comments or the red-lined edits with the individual who wrote the comments. DOT&PF responds to all comments.
- The Design Project Manager checks and verifies that the ESCP review comments are incorporated at the time bid documents receive FHWA project certification. FHWA requires DOT&PF certification stating that the Final PS&E (representing when the plans, specifications, and estimate are 100 percent complete and ready for bid) is complete and has been developed in accordance with applicable design standards and the Title 23 USC responsibilities assumed by DOT&PF in the Stewardship and Oversight Agreement dated December 21, 2012.

- The Design Project Manager files the ESCP comments after certification.

The review process for aviation projects is as follows:

- The ESCP writer develops a project-specific ESCP for all projects. The ESCP is reviewed at the Plans-in-Hand (PIH) phase (representing when the plans, specifications, and estimate are approximately 75 percent complete). The PIH documents ensure compliance with project scope and design standards, verify environmental commitments, review design details, coordinate technical recommendations, assess the cost-effective constructability of the project, and evaluate product quality.
- Individuals enter their review comments into the Design Review Comment web page or give the ESCP writer red-lined edits of the ESCP.
- ESCP writer may discuss comments or the red-lined edits with the individual who wrote the comments. DOT&PF enters all comment responses on the comment web page.
- Individuals review the Revised ESCP at the Plans, Specifications, and Estimates (PS&E) phase (representing when the plans, specifications, and estimates are approximately 95 percent complete).
- Individuals review the PS&E ESCP and follow the same process as the PIH ESCP.
- The DOT&PF Design Project Manager checks and verifies that the ESCP review comments are incorporated at the time bid documents receive FAA project certification. The FAA requires DOT&PF Certifications stating that they will comply with/have complied with statutory and FAA-imposed administrative requirements.
- The Design Project Manager files the ESCP comments after certification.

In addition, on large projects, a separate ESCP-focused meeting occurs after the PS&E review. This meeting discusses the ESCP comments from above and project-specific stormwater issues. The Design Project Manager follows the same process described above to review and verify ESCP review comments, then files them after certification.

DOT&PF is a co-operator on projects with the Construction Contractor performing the work. Once construction begins, most DOT&PF projects with an active NOI are subject to a documentation audit and field review conducted by a CR Storm Water Specialist. After the initial SWPPP Documentation audit and field review are completed, the projects are typically visited monthly for an informal check of documentation and field conditions. The review is based on the ADEC Inspection Checklist for the Construction General Permit (AKR10). Two (2) projects operating within the MS4 permit area underwent documentation and field review prior to 2025. Two (2) projects operating within the MS4 permit area participated in this documentation and field audit in 2025:

1. CFHWY00132 – Minnesota Dr: Tudor to 15th Ave. Pavement Preservation: June 5, 2023
2. CFAPT00465 – ANC Taxiway Z West Improvements: October 6, 2024
3. Z581050000 Seward Highway MP 75-90, Phase III: May 5, 2025
4. CFHWY00731 – AMATS: Eagle River Loop Road (Eagle River Rd to Old Glenn Highway) & North Eagle River Access Road (Powder Ridge Drive to Old Glenn Highway) Pavement Preservation: July, 17, 2025

Municipal and Private Projects: The WMS continues to review construction SWPPPs for projects conducting ground disturbance greater than 10,000 square feet. The types of projects reviewed include any work requiring a building permit, utility work, new subdivisions, and road projects.

In 2025, WMS reviewed and approved approximately 463 residential and commercial permits, and several additions to commercial and government buildings. WMS also conducted SWPPP reviews of 15 Municipal Projects. The Municipal Development Services Division's computer-based building permit administration system, INFOR, continues to track and document plan reviews and approvals in 2025. It also handles documentation for Construction Site Inspections and Enforcement.

2.2.1 Inspection and Enforcement Tracking

DOT&PF Projects: A summary of inspection activities shows that DOT&PF conducted 242 site inspections on 16 projects within the MS4 permit area in 2025. DOT&PF performed:

- 126 site inspections on eight (8) highway projects ranging from major highway realignment to repaving arterial roads.
- 116 site inspections on eight (8) aviation projects at the Ted Stevens Anchorage International Airport that include major taxiway and taxi lane reconstruction and facility support projects.

For each of these inspections, DOT&PF reviewed the SWPPP or other site documentation and conducted a physical inspection of the site to confirm that there were no illicit discharges or permit noncompliance incidents. After each visit, DOT&PF prepared an inspection report and included the report in the SWPPP. Any required corrections were given to the site representative. In 2025, no stop-work orders were issued to any DOT&PF construction project within the MS4 permit area. The records for site inspections, along with associated compliance follow-up, are available for review at individual project offices.

Municipal and Private Projects: A summary of inspection activities reveals that 185 commercial site inspections and 265 residential site inspections were conducted with 24 corrections during 2025, including 16 construction-related inspections from the illicit discharge reporting website located at:

<https://www.muni.org/Departments/OCPD/development-services/report-problem/Pages/default.aspx>

For each inspection, the SWPPP or other site documentation was reviewed, and a physical site inspection was conducted to confirm the absence of illicit discharges. After the visit, an inspection report detailing the findings and any required corrections was provided to the site representative. Where corrections were indicated, a re-inspection was scheduled to confirm compliance. When compliance isn't achieved within the specified period, a stop-work order is issued until compliance is achieved. In 2025, no stop-work orders were given. The records for site inspections, along with associated compliance follow-up, are available for review at WMS.

2.2.2 Enforcement Response Policy

DOT&PF Projects: DOT&PF's Enforcement Response Policy is contained in the following documents:

- Alaska Construction Manual, March 10, 2023 Edition, Chapter 9.9 SWPPP & HMCP Implementation and Monitoring, the most current edition is dated February 16, 2021
- Standard Specification Item 641 Erosion, Sediment, and Pollution Control for Highway Construction (identified as Standard Modification HSM20-38), the most current edition is dated December 31, 2021
- Item P-641 for Erosion Sediment and Pollution Control Airport Construction, the most current edition is dated December 31, 2021

- Standard Specification Item 01 57 10 Erosion, Sediment, and Pollution Control for Public Facilities Construction, most current edition is dated November 15, 2021

The Alaska Construction Manual spells out the inspector's qualifications and duties, non-compliance reporting, and monitoring paperwork. The standard specifications provide project and administrative requirements for controlling erosion, sedimentation, and pollutant discharge. The work must follow applicable local, state, and federal requirements, including the CGP and the MS4 Permit. DOT&PF personnel contractually enforce the stormwater specifications on each construction project.

These specifications authorize DOT&PF personnel to issue verbal warnings and provide written notices to the construction project after each inspection. The SWPPP Construction Inspection Report and the Corrective Action Log document the timely maintenance or corrective actions required.

DOT&PF revised Section 641 Statewide and Regional Highway Specifications and Item P-641 Statewide and Regional Aviation Specifications in 2019, because of an initiative implemented by the DOT&PF Statewide Design and Engineering Services Office to review all DOT&PF manuals biennially and revise them as needed.

DOT&PF has revised Specification 641, Item P-641, and Section 01 57 10 - the Statewide and Regional Highway, Aviation, and Public Facility Specifications, respectively, to conform with the reissuance of the CGP in 2021. Specification 641 received final approval in September 2021. Item P-641 received final approval in December 2021. Section 01 57 10 received final approval in November 2021.

Escalation enforcement measures include:

- Orally suspending the work if the suspension is to protect workers, the public, or the environment from imminent harm
- Written suspension of work explaining the defects, reasons, corrective actions, and time allowed to complete the corrective actions.
- Withhold monies from the construction contractor until corrective action is completed.
- Assessing damages or equitable adjustments against the contract amount
- Employing others to perform corrective actions and deduct the costs from the contract amount.

Alaska Construction Manual link is:

https://dot.alaska.gov/stwddes/dcsconst/assets/pdf/constman/2023/acm_all.pdf

Highway Standard Modification for Section 641 for Highways Erosion, Sedimentation, and Pollution Control (identified as Special Provision HSP20-5A) link is:

https://dot.alaska.gov/stwddes/dcspubs/assets/pdf/directives/attach/23/041823_hsp20_5a.pdf

Aviation Standard Specification for Section P-641 for Airports Erosion, Sedimentation, and Pollution Control (identified as Statewide Airport Special Provision ASP-9A) link is:

https://dot.alaska.gov/stwddes/dcspubs/assets/pdf/directives/attach/23/041823_asp_9a.pdf

Links for Section 01 57 10 for Public Facility Construction are not currently available.

Municipal and Private Projects: The MOA updated its escalating enforcement policy for the fourth permit term. It was provided with the 2020 Annual Report. Another update will be provided in the first-year annual report for the renewal of the fifth permit term.

2.2.3 Construction General Permit Violation Referrals

DOT&PF Projects: DOT&PF Erosion and Sediment Control Advisors provide guidance to project staff on reporting noncompliance in the Alaska Construction Manual, Chapter 9.9. In 2024, DOT&PF had three (3) non-compliant storm water discharge to report to ADEC within the MOA.

- Project No. ANC Terminal Northside Aprons & Taxi lane Reconstruction & ANC Terminal Water Main Impr. These projects had a non-allowable discharge on September 5, 2025, September 12, 2025, and October 12, 2025. See Appendix C2 for a copy of the discharge reports. The project Tracking No. is AKR10H0RY.

ADEC visited one (1) DOT&PF project located in the MS4 permit area for CGP compliance inspections in 2025. The findings of these inspections did not result in any notices of violation being issued to the DOT&PF. See Appendix C3 for a copy of these reports.

- Project No. Z581050000 Seward Highway MP 75-90, Phase III, was visited by ADEC for a compliance inspection on May 29, 2025. The project NOI Tracking No. is AKR10H0JV.

Municipal and Private Projects: The Permit requires the MOA to report to ADEC when they find projects that failed to comply with the CGP prior to breaking ground. In 2025, MOA filed two non-compliance complaints with the ADEC.

2.3 Construction Program Education and Training

During the second term of the permit, agencies and interest groups agreed on a standardized training course aimed at construction site owners, operators, and their key personnel. In 2012, the Memorandum of Understanding to establish Certified Erosion and Sediment Control Leads in Alaska (AK-CESCL) was updated by eight governing members comprised of the ADEC, the Alaska Department of Natural Resources (ADNR), the DOT&PF, the Alaska Railroad Corporation, the Associated General Contractors, the MOA, the US Army Corp of Engineers, and the Associated Builders and Contractors of Alaska. The original agreement, training requirements, and course elements for the AK-CESCL program were provided in the 2010 Annual Report. The updated agreement, as provided in the 2013 Annual Report, made minor revisions to clarify the training program's procedures. In 2015, the Alaska Storm Water Steering Committee approved a one-day, eight-hour Refresher Course to satisfy the AK-CESCL renewal requirements. In 2017, the agreement was updated to continue the program as laid out in the 2012 amendment. It was provided in the corresponding annual report.

The refresher course is a summary of the two-day initial AK-CESCL class. To be eligible to take this training, you must have an active AK-CESCL number and have taken the two-day (16-hour) class or refresher class within the last three years. It thoroughly examines concepts of erosion and sediment pollution control and design procedures as they apply to construction projects. The refresher course is a training and certification program to comply with the ACGP and the MOA's SWTPRGM. The refresher course stresses risk management, reviews proper best management practices, and provides guidance. Upon passing the 8-hour refresher course, the applicant is granted an AK-CESCL certificate. Applicants not passing the (8-hour) refresher course must retake the two-day (16-hour) class.

In 2020, due to COVID-19, the Steering Committee gave current holders of CESCL cards a one-year extension to accommodate the unavailability of in-person training. In 2021, the group developed an online training program. Ongoing training is additionally available through Alaska General Contractors and Alaska Safety Alliance.

Agencies met in 2024 to discuss training needs, and the program was updated and recertified. The website for the program is:

<https://AK-CESCL.com>

For DOT&PF: DOT&PF participated in the following trainings:

- AK-CESCL Certification and AK-CESCL Recertification Courses: The DOT&PF CR Construction section sponsored one (1) AK-CESCL Certification in-person class, and three (3) AK-CESCL Recertification classes online in 2025. The classes were taught by the DOT&PF CR Storm Water Specialist, Joshua James. AK-CESCL instruction sponsored by DOT&PF is for internal staff. A total of 52 certifications were issued to DOT&PF staff in 2025.
- Spring Fling: DOT&PF CR Construction Section holds an annual 16-hour training event for its entire construction staff. This training includes updates on preferred BMPs, control measures, innovative approaches, regulation changes, permit updates, and policy or standards updates. DOT&PF held Spring Fling in person on March 25 and 26, 2025. The event lasted eight hours each day.
- 2025 Watershed Update/APDES Annual Meeting: March 4, 2025. This half-day meeting reviewed the findings of monitoring, assessments, mapping, and new programs associated with the permit.

For the MOA: The MOA conducted or participated in the following training:

- 2025 Watershed Update/APDES Annual Meeting: March 4, 2025. This half-day meeting reviewed the findings of monitoring, assessments, mapping, and new programs associated with the permit. It was attended by members of MOA, DOT&PF, and the private sector.
- Staff participants in a webinar titled “*Essential Elements of Improving Water Quality: Getting Post-Construction SCMs Right,*” hosted by Stormwater University.
- WMS has identified an inventory of videos covering relevant topics related to stormwater management. They range from regulatory practice to updated technical practice and current events. A list of the videos is available on the MOA Stormwater YouTube Channel:

https://www.youtube.com/channel/UCdr0yQY12_mDVHTMaRVBFVw

3. Storm Water Management for Areas of New and Redevelopment

3.1 Regulatory Mechanisms and Standards

3.1.1 Ordinance and/or Regulatory Mechanism

DOT&PF Projects: DOT&PF regulates project development through the Alaska Highway Preconstruction Manual and Alaska Aviation Preconstruction Manual. Both manuals require DOT&PF to comply with local ordinances; therefore, all projects within the MOA follow the Municipal Design Criteria Manual (DCM).

Alaska Highway Preconstruction Manual link:

<https://dot.alaska.gov/stwddes/dcsprecon/preconmanual.shtml>

Alaska Aviation Preconstruction Manual link:

<https://dot.alaska.gov/stwddes/dcsprecon/> (under the Airport heading)

MOA Projects: The MOA regulates permanent stormwater controls on its projects through the Municipal DCM. The DCM has been updated by a committee of local community experts to better guide drainage management and align with the goals of Permit Section 3.1.2.

Private Projects: The MOA regulates private sector permanent stormwater controls under Anchorage Municipal Code Title 21, which references the DCM for policy and technical details. The DCM is discussed in the following section.

3.1.2 Storm Water Design Criteria Manual

DOT&PF Projects: Effective August 1, 2016, it is the policy of DOT&PF CR to apply the guidance contained within the latest approved version of the MOA *Anchorage Stormwater Manual* to projects located within the boundaries of the MOA. This policy was revised on May 9, 2018, to include relevant information specific to DOT&PF CR. The latest version of this policy, effective August 28, 2018, applies the guidance contained within version 1.0 of the MOA, *Anchorage Stormwater Manual, Volume 1*, dated December 2017, to projects located within the boundaries of the MOA, with several exceptions laid out in the policy provided in the 2018 annual report.

Private and MOA Projects: The MOA establishes design criteria for permanent stormwater controls through Chapter 2 of its DCM, referenced from AMC Title 21. The manual's *Volume I, Management and Design Criteria*, provides guidance for new development. This manual was rewritten in 2017 to reflect current regulations and stormwater management practices. A document review conducted during the fourth term, combined with regular use and community feedback, demonstrates that it remains current with respect to regulations. Minor administrative edits are postponed until a substantial update is warranted. The design criteria are available on the [WMS Website](#).

3.2 Green Infrastructure/LID Strategy and Demonstration Projects

3.2.1 LID Incentives Strategy

Incentives for LID use are established in the MOA's DCM and stormwater manuals. They include:

- **20% Area Allowance:** This provision allows runoff from up to 20% of a site to be untreated, provided an equivalent volume of water is treated from somewhere else on the site using Green Infrastructure techniques. This provision is helpful for areas with unique grading challenges or roadway projects with super-elevated curves.
- **Utilizing Landscape:** Provisions and design criteria are provided for incorporating stormwater treatment facilities into site landscaping and grading. This helps maximize space utilization on a site.
- **Detention and Downstream Analysis Modification:** The detention and downstream analysis requirements have been modified to allow more flexibility in designing on-site stormwater controls. Designers can now choose from two options to meet these requirements. The first option remains the same as the old criteria, where designers provide on-site detention and ensure adequate capacity in the receiving system. The second option offers a pathway for increased on-site detention without analyzing downstream capacity.
- **Local Criteria for Storm Water Controls:** The new DCM offers detailed design criteria for a menu of stormwater “tools” tailored to Anchorage’s site-specific development challenges. These criteria demonstrate how to incorporate green infrastructure efficiently, even on challenging sites.

- Streamlined Reporting Requirements: The new DCM has streamlined drainage reporting requirements. For small- and mid-size projects, full drainage reports have been replaced with drainage certification forms to guide the designer through the necessary considerations. For large projects, the report format has been updated and simplified.
- Alternative Compliance: The new DCM offers a pathway forward for projects that may have difficulty incorporating Green Infrastructure based on other conflicting municipal requirements. The Alternative Compliance route may waive conflicting requirements to encourage the use of Green Infrastructure, at the MOA's discretion.

Additionally, the MOA continues to encourage residential rain gardens and LID projects. This program encourages all types of vegetated LID techniques. Incentive support includes, but is not limited to, technical guidance, manuals, brochures, websites, tours, hands-on workshops, private consultations, ongoing classroom support for school projects, and ongoing maintenance for public rain gardens.

3.2.2 LID/Green Infrastructure Projects

The DOT&PF and the MOA must, collectively, construct four projects or evaluate existing projects, as required by Part 3.2.3 of the Permit for the incorporation of LID.

DOT&PF Projects: In 2025, DOT&PF had no projects designed to meet the LID evaluation requirements under the Term IV permit. There was no opportunity to meet the LID standard.

Municipal Projects: Over the past year, eight subdivisions incorporated LID/Green Infrastructure measures into road and drainage systems to reduce stormwater runoff. These include:

- 22-003 Sky Ridge – vegetated swales, infiltration chambers, soak-away pits
- 24-001 Fern Hollow – vegetated swales
- 24-005 Carol Creek Phase 1 – infiltration gallery, vegetated swales
- 25-003 Olympus – rock-lined swales
- 22-009 Equestrian Heights (new work in 2025) – additional vegetated swale
- 25-002 Panoramic Ridge – vegetated swales, infiltration trenches
- 25-001 Holtan Hills – sheet flow off road and infiltration
- 25-004 Center Street IPP – vegetated swales

3.2.2.1 LID EVALUATION

The Permittees are required to quantitatively evaluate the effectiveness of select LIDs by the fourth year of the Permit. This requirement is met through evaluating new projects or revisiting projects constructed in the second and third terms of the permit. The Green Infrastructure/LID Performance Report was presented in the 2024 Annual Report.

Criteria for LID application must be reviewed and updated, as necessary, based on the evaluation findings by the end of the fifth year. This review was conducted in 2025, and no revisions to the DCM were determined.

3.3 Permanent Storm Water Controls Plan Review and Approval

DOT&PF Projects: DOT&PF continues to review all projects during the two phases of project development:

- Plans-In-Hand Review (approximately 75 percent complete)

- Plans, Specification, and Estimate (PS&E) Review (approximately 95 percent complete)

The CR Hydraulics Engineer reviews permanent drainage and erosion control features across all three design phases for conformance with the design criteria stated in Section 3.1.2.

Municipal Projects: The MOA conducts a regulatory review of all municipal projects with 10,000 sf or more to ensure compliance with the MS4 Permit requirements under Section 3.2.4. The reviews encompass construction erosion control measures and permanent stormwater management practices. Reviews are documented through the MOA's online tracking system, INFOR, and are required for issuance of a development project permit. The MOA will continue coordinating with ADEC to ensure our projects comply with ADEC wastewater regulations.

3.4 Permanent Storm Water Management Controls Tracking & Enforcement

3.4.1 Inventory and Tracking

The Municipal Street Maintenance Division uses an asset management database to inventory and track municipal- and state-owned stormwater controls. This inventory and tracking database enables Street Maintenance to access information on the condition and maintenance requirements of the permittees' stormwater controls.

The DOT&PF and CBERRRSA worked with WMS to capture information about state-owned and area-wide controls. They make regular updates to incorporate MS4 public improvements and new information from construction record drawings.

Private Storm Water Controls: During the second term of the permit, WMS developed a database of new and existing stormwater controls and has updated it annually to reflect new developments. As-built drawings of private stormwater controls are required before closing a Municipal Building Permit for new and redeveloped properties. These as-builts are scanned and recorded into the database. The MOA also requires the submittal of an Operations and Maintenance (O&M) agreement for private stormwater controls. During 2025, WMS continued to update the information, functionality, and accessibility of this database using web-based GIS. The goal is to improve data entry, data retrieval, and site inspections.

3.4.2 O&M Agreements

WMS requires commercial development projects to provide a legally enforceable, transferable O&M agreement for private stormwater controls on new and redeveloped properties, documenting regular maintenance and demonstrating compliance with the MOA. The location and other relevant property information for the O&M agreements are entered into a municipal database to support tracking and inspection of the permanent controls. The MOA maintains copies of the recorded agreements.

In 2025, the MOA received 22 legally recorded O&M agreements and conducted post-construction permanent-control inspections.

3.4.3 Inspection and Enforcement

The Permittees must ensure proper long-term operation and maintenance of permanent stormwater management practices through an inspection program.

DOT&PF and Municipal Storm Water Infrastructure: See Section 5 for details on the inspection and maintenance of DOT&PF and municipal stormwater management controls and infrastructure.

Private Stormwater Management Controls: The MOA requires as-built (record) drawings of all constructed stormwater controls approved under a municipal permit for projects 10,000 sf and larger. The drawings are scanned into a tracking database.

Projects falling under this new requirement must request a permanent control inspection to obtain a conditional certificate of occupancy. As part of this process, projects must provide surveyed as-built permanent stormwater controls and a recorded maintenance agreement with the MOA for the upkeep of these controls. The MOA manages installed permanent stormwater controls as a “use permit” and will require periodic re-certification and inspections based on site sensitivity and past compliance. Maintenance records will be required from the owner/operator before renewal. High-priority sites requiring annual inspections will be identified using Checklist #3 in Building Safety Handout AG 21.

In 2025, 22 new properties with permanent private stormwater controls were inspected, and 10 properties were reinspected, including sensitive sites that require annual inspection.

3.5 Permanent Storm Water Controls Training

DOT&PF: M&O headquarters staff completed the following trainings in 2025:

- 2025 Watershed Update/APDES Annual Meeting: March 4, 2025. This half-day meeting reviewed the findings of monitoring, assessments, mapping, and new programs associated with the permit. Members of MOA, DOT&PF, and the private sector attended it.
- *Urban Hydrology and Green Infrastructure* on January 27, 2025
- *How to Choose the Correct BMPs for your Construction Site* on January 28, 2025
- *RUSLE Equation* on February 20, 2025
- *Campbell Creek Watershed Stormwater Master Plan* on March 4, 2025
- *Making the SWPPP work for you* on August 7, 2025
- *So Many Dam Problems, So Many Dam Possibilities* on November 5, 2025
- *Climate Resiliency in Project Planning and Design* on November 12, 2025
- *Designing Healthy Watersheds* on November 19, 2025
- *When the Usual BMPs Don't Work* on December 9, 2025

MOA: The MOA conducted and/or participated in the following trainings:

- 2025 Watershed Update/APDES Annual Meeting: March 4, 2025. This half-day meeting reviewed the findings of monitoring, assessments, mapping, and new programs associated with the permit. Members of MOA, DOT&PF, and the private sector attended it.
- Staff participated in one or more of the online trainings listed below:
 - *Innovative and Intelligent Stormwater Modeling Approaches to Combat Flooding.*
 - *Stormwater Management Pond Sediment – Valuable Resource or Costly Waste?*
 - *Stormwater Management and Maintenance in a Changing Regulatory Landscape.*
 - *Low and Behold – Barometric Changes and Amplified Storm Events.*

- WMS maintains a YouTube site with training and selected videos covering relevant topics related to stormwater management. They range from regulatory practice to updated technical practice and current events. A list of the videos is available on the MOA Stormwater YouTube Channel:

https://www.youtube.com/channel/UCdr0yQY12_mDVHTMaRVBFVw

4. Industrial and Commercial Discharge Management

4.1 Inventory of Industrial and Commercial Facilities

An inventory and map of facilities discharging to the MS4 must be updated during the second and fourth years of the Permit. It must include industrial sectors listed in 40 CFR 122.26(b)(14), facilities subject to section 313 of the Emergency Planning and Community Right to Know Act, 42 U.S.C. 11023, municipal landfills, maintenance yards and facilities, hazardous waste recovery, treatment, storage, and disposal facilities; private and public snow disposal sites; large commercial parking lots (two acres and larger) that use deicer chemicals; vehicle or equipment wash systems; animal facilities as discussed in Part 3.3.3, and any other industrial or commercial facility with the potential to impact the MS4 negatively. The Industrial Inventory and Map was completed in 2024 and submitted with the 2024 Annual Report.

4.1.1 Performance Standards

Permit Part 3.3.1.3 requires permittees to identify a stormwater discharge that is not adequately addressed and to develop performance standards for the activity. The permittees have identified Mobile Food Operations and Special Outdoor Events as the focus. These operations require fuel generators, and spills during refueling could occur, leading to illicit discharges into the stormwater system. MOA developed educational materials and a policy for generator operations. The finalized policy was executed in the spring of 2025. The policy is in Appendix D1 of this report.

4.2 Snow Disposal Sites

Part 3.3.2 requires permittees within four years to “update the inventory and map locations of all permittee-owned and privately-owned snow disposal sites that discharge directly to the MS4 or to receiving waters.” This inventory is included in Section 4.1 and its associated appendix, Inventory of Industrial and Commercial Facilities and Activities.

During the fourth year of the permit term, the permittees “must evaluate whether the current snow disposal ordinance and design criteria protect surface water quality by explicitly regulating the operation of private snow disposal sites within the MOA.” The 2024 Snow Disposal Evaluation Report was submitted in the 2024 Annual Report.

4.3 Animal Facilities

The MOA continues to track animal control facilities under the current program, based on Permit Part 3.3.3. An evaluation of the animal facilities program was submitted with the 2023 annual report. It addresses the permitted areas, including “kennels, pens, recreational facilities, stables, show facilities, or other commercial animal facilities currently regulated by the MOA, dog parks, and the zoo.”

5. Storm Water Infrastructure and Street Management

5.1 Storm Sewer System Inventory and Mapping

The MOA and DOT&PF annually update their MS4 inventory from construction record drawings, as required under Permit part 3.4.1. This inventory includes:

- Pipe systems;
- Inlets, catch basins, and outfalls;
- Structural stormwater treatment controls;
- Receiving waters of the MS4;
- Sub-basins of each outfall;
- MS4 roads and parking lots; and
- MS4 maintenance and storage facilities and snow disposal sites.

These maps show the combined DOT&PF and MOA infrastructure and are regularly updated and available on the [WMS website for Muni.org](#).

5.2 Catch Basin and Inlet Inspections and Maintenance

In compliance with Permit part 3.4.2, the permittees must maintain a program to evaluate all permittee-owned or operated catch basins and inlets and take appropriate maintenance action based on these inspections.

Central Region M&O, the maintenance arm for DOT&PF's Anchorage MS4 jurisdiction, is continuing mapping efforts to correct existing DOT&PF pipe mapping as well as capture new pipe features for inclusion in maintenance mapping sets. In 2025, DOT&PF inspected 2,858 structures and cleaned 2,092 catch basins. In addition, they inspected and cleaned 48 Oil-Grit Separators (OGS).

The MOA's authorized MS4 maintenance agency for the Chugiak-Birchwood-Eagle River Rural Road Service Area (CBERRRSA) continued implementing a comprehensive catch basin and inlet inspection and maintenance program for their service area. In 2025, 13 OGS structures, 1,157 catch basins/manholes, and other drainage management structures were inspected and cleaned.

The MOA's authorized MS4 maintenance agency for the Girdwood Road Service Area (GRSA) implemented a comprehensive catch basin and inlet inspection and maintenance program for their service area. Their systems are on a bi-annual cleaning schedule based on previous fill rates. In 2025, it was determined that no cleaning was needed. The next scheduled cleaning will be in 2026.

The MOA's Anchorage Road and Drainage Service Area (ARDSA), comprising most of the roads in Anchorage not maintained by road service areas or owned by DOT&PF, continued its ongoing OGS and catch basin inspection and maintenance program. During 2025, 325 OGS units were inspected and cleaned. Based on Fill rate data from previous years, 583 catch basins and manholes were cleaned annually and biannually. Also, 2,391 catch basins and manholes were cleaned on a 4-year cycle. A total of 2,974 catch basins & manholes were cleaned from the inventory of 10,055 units.

The Permittees collected fill-rate data for their catch basins during the third permit term, updated their respective cleaning schedules based on both effectiveness and efficiency, and implemented the updated schedules for the 2025 cleaning season. The cleaning schedules for DOT&PF and ARDSA were provided

in the 2020 annual report. The remaining operators, CBERRRSA and GRSA, continued to inspect and clean their systems annually or biannually.

5.3 Street and Road Maintenance

5.3.1 Standard operating procedures

The permittees must update and submit the Street Maintenance Standard Operating Procedures within four years of the permit's effective date. Standard Operating Procedures (SOPs) are reviewed annually by MOA and DOT&PF street maintenance agencies. When they are made, updates are submitted with the corresponding annual report. The complete updated sets were provided in the 2024 Annual Report.

5.3.2 Inventory of materials

Part 3.4.3.2 of the Permit requires permittees to "...maintain an inventory of street/road maintenance material, including use of sand and salt..." and report the inventory in the annual report. Road maintenance materials used by all MOA MS4 operators primarily include winter traction-enhancing materials. The types of materials used vary somewhat from agency to agency and street to street, but primarily include traction-enhancing sands and a variety of deicers and anti-icers. MOA operators add deicers to the sand before applying it to the road surface to maintain sand fluidity in sanding vehicles and to help embed sand particles into the road ice. The DOT&PF applies liquid deicer directly to road surfaces or applies sand before deicer application. Sand gradations vary by agency. DOT&PF operators typically use a finer gradation on their mostly higher-speed roads than MOA operators, for both safety and to improve sand stability on the road surface. Inventory tables for these materials are summarized in Table 2.

Table 2 – Anchorage MS4 Street Materials Inventory, 2025

Item	Type	Units	Amt. Stored	Amt. Ordered	Amt. Used	Storage Location
DOT&PF						
Sand	M&O spec.	ton	6,000	7,000	9,000	Anchorage
Sand	M&O spec.	ton	3,200	2,000	1,800	Birchwood
Sand	M&O spec.	ton	2,200	5,000	4,200	Girdwood
NaCl	granular	ton	1,800	2,600	2,000	Anchorage
NaCl	granular	ton	120	400	340	Birchwood
NaCl	granular	ton	200	800	620	Girdwood
MgCl ₂	brine	gal	-	-	-	Girdwood
CaCl ₂	brine	tons			-	Anchorage
MOA-CBERRRSA						
Sand	E-Chips	ton	17,500	8,000	6,800	Hiland
NaCl	granular	ton	100.96	100.96	0	Hiland
MgCl ₂	brine	gal	7,000	7,000	3,600	Hiland
MOA-ARDSA						
Sand	ARDSA spec	ton	15,000		10,000	Anchorage
NaCl	Granular	Ton	300		100	Anchorage
MgCl ₂	brine	gal	30,000		30,000	Anchorage
MOA-GRSA						

Sand	E-chips	Ton	738	846	1,250	Girdwood
NaCl	Granular	Ton	47.16	54	80	Girdwood
MgCl ₂	brine	gal	0	0	0	Girdwood

5.4 Street and Road Sweeping

5.4.1 Sweeping Management Plan

The permittees updated their Street Sweeping Management Plans in accordance with the Visually Clean Standard. The permittees each developed individual sweeping plans, as required by Permit Part 3.4.4, to accommodate differences in their respective sweeping operations. These were provided in the 2020 annual report.

A list of roads where sweeping is technically infeasible was provided in the plans, and it includes alternative control measures, as required by Permit Part 3.4.4.3. A visual inspection is performed to identify trash or other pollutants, which are addressed and documented during ditch and catch basin cleaning. Additional measures may be determined for these roads as needed.

5.4.2 Sweeping Assessment

Permit Part 3.4.4.4 requires the permittees to "...perform annual assessments of street sweeping effectiveness to minimize pollutant discharges to storm drains and creeks..." following permit-defined performance factors. The permittees have provided their 2025 street sweeping summaries in Appendices E1 and E2.

5.5 Pesticide, Herbicide, and Fertilizer Applications

DOT&PF: During 2025, pesticides were applied to control invasive weeds at specific locations within the DOT&PF Right-of-Way. A full list of the locations where pesticides were applied and the pesticides that were used is available upon request or on the department's Integrated Pest Management plan website at:

<https://dot.alaska.gov/stwdmno/ipm/>

To reduce pollutant discharge associated with herbicide applications, certified applicators applied herbicides in accordance with the ADEC-approved DOT&PF Integrated Pest Management (IPM) plan, ADEC pesticide control regulations 18 AAC 90, and the MOA pesticide code.

MOA: The pesticide code was updated during the second term to strengthen application restrictions, notifications, and certification requirements. These code requirements are enforced at municipal facilities, and an application log is maintained.

The MOA pesticide code Title 15.75 link:

https://library.municode.com/ak/anchorage/codes/code_of_ordinances?nodeId=TIT15ENPR_CH15.75PECO

During 2025, permittees used pesticides in MOA greenhouses to control insects. A complete list of pesticides used is available upon request.

5.6 Storm Water Pollution Prevention Plans

Storm Water Pollution Prevention Plans for certain permittee-owned activities are required by Part 3.4.6 of the Permit. Permittees have existing plans for their material storage facilities, maintenance yards, and snow

disposal sites. They are updated regularly and are available in Table 3 for each owner, and, where practical, at each facility site.

5.6.1 Inspections

In 2025, inspections conducted under the SWPPP were performed at the facilities listed in Table 3. Corrections were made as needed. The inspection reports are on file at each facility office, and annual inspection reports are provided in Appendix F1 & F2.

Table 3 – MS4 Facilities with Storm Water Pollution Prevention Plans

Facility	Facility Location	SWPPP Location	Activities
DOT&PF			
Anchorage Maintenance Station	5300 E. Tudor Rd., Anchorage	5300 E. Tudor Rd., Anchorage	Equipment & Materials Storage, Maintenance
Birchwood Maintenance Station and Birchwood Airport	20651 Birchwood Spur Rd., Birchwood	5300 E. Tudor Rd., Anchorage	Equipment & Materials Storage
Girdwood Maintenance Station and Girdwood Airport	MP 90 Seward Hwy./ 888 Toad Stool Drive, Girdwood	MP 90 Seward Hwy./ 888 Toad Stool Drive, Girdwood	Equipment & Materials Storage, Maintenance
O'Malley Snow Disposal Site	10675 Old Seward Hwy, Anchorage	5300 E. Tudor Rd., Anchorage	Snow Storage
Tudor Snow Disposal	6110 Tudor Road, Anchorage	6110 Tudor Road, Anchorage	Snow Storage (operating under ARDSA SWPPP)
Hiland Road Snow Disposal Site	8500 Hiland Road, Eagle River	5300 E. Tudor Rd., Anchorage	Snow Storage
CBERRRSA			
Eagle River Maintenance	VFW Road, Eagle River	VFW Road, Eagle River	Equipment & Materials Storage
Chugiak Maintenance Facility	19200 Kerbow Ln., Chugiak	19200 Kerbow Ln., Chugiak	Equipment & Materials Storage
Eagle River Snow Disposal	Eklutna Park Drive, Eagle River	Eklutna Park Drive, Eagle River	Snow Storage
ARDSA			
Kloep Maintenance Facility	5701 Northwood Drive, Anchorage	5701 Northwood Drive, Anchorage	Equipment Maintenance, Materials Storage & Snow Storage
Muldoon Maintenance & Storage Facility	7909 Boundary Ave., Anchorage	7909 Boundary Ave., Anchorage	Equipment Maintenance & Materials Storage

Native Heritage Snow Disposal	8902 Heritage Center Drive, Anchorage	8902 Heritage Center Drive, Anchorage	Snow Storage
Commercial Dr. Snow Disposal	2941 Commercial Drive, Anchorage	2941 Commercial Drive, Anchorage	Snow Storage
Mountain View Snow Disposal	5100 Mountain View Drive, Anchorage	5100 Mountain View Drive, Anchorage	Snow Storage
Sitka Street Snow Disposal	1525 Sitka Street, Anchorage	1525 Sitka Street, Anchorage	Snow Storage
Tudor Snow Disposal	5300 Tudor Road, Anchorage	5300 Tudor Road, Anchorage	Snow Storage
C Street Snow Disposal	395 W 100 th Avenue, Anchorage	395 W 100 th Avenue, Anchorage	Snow Storage
Dowling Snow Disposal Site	6531 Spruce Street, Anchorage	6531 Spruce Street, Anchorage	Snow Storage

5.7 Training

The MOA and DOT&PF coordinated quarterly during 2025 to discuss their respective activities and operational issues. Street managers from DOT&PF and MOA participated in the 2025 APDES Annual Meeting on March 4, 2025, and in the semi-annual meetings on March 25, 2025, and October 29, 2025.

DOT&PF crew members and MOA Maintenance crews participate in regular staff meetings. They are provided with information on APDES permit requirements in various presentations and staff meetings to support their understanding, decision-making, and record-keeping for activities associated with Permit compliance.

DOT&PF: DOT&PF M&O staff at facilities within the Permit boundaries are required to attend SWPPP and Spill Prevention, Control, and Countermeasure (SPCC) training annually. The DOT&PF CR M&O environmental analyst provides training. This training took place online on May 15, 2025. Training logs will be provided upon request.

In addition, CR DOT&PF M&O requires that all station managers and ditch crew leads be AK-CESCL certified. In 2025, five operators from the Anchorage and Girdwood stations completed and passed the AK-CESCL Refresher course; no staff needed to attend the full two-day AK-CESCL class.

MOA: The MOA conducted or participated in the following training:

- *Innovative and Intelligent Stormwater Modeling Approaches to Combat Flooding.*
- *Stormwater Management Pond Sediment – Valuable Resource or Costly Waste?*
- *Stormwater Management and Maintenance in a Changing Regulatory Landscape.*
- *Low and Behold – Barometric Changes and Amplified Storm Events.*
- *CBERRRSA participated in a summer and winter staff training that covered safety, productivity, operations, and public relations.*
- *Advancing Sustainable Design in Recreational Trails and Embankments.*
- *The Future of Automation, What’s Possible.*
- *Maintaining “Water-Balance” During Political Uncertainty.*

- The MOA maintains a YouTube channel for MOA Storm Water training. Playlists are available for various training topics, including Cold Weather/Climate, LID, Storm Water Management, Storm Water Construction Practices, Illicit Discharges, Inspection, Maintenance, and Rain Gardens. MOA YouTube channel for MOA Storm Water training:

https://www.youtube.com/channel/UCdr0yQY12_mDVHTMaRVBFVw

6. Illicit Discharge Management

6.1 Illicit Discharge Regulatory Strategy

The MOA regulatory authority for stormwater pollution control is in [AMC Title 21.07.040](#). This code provides the basis for managing discharges to the storm sewer system and waters of the U.S. It conforms to Permit requirements consistent with Part 3.5.1.1, provides a stormwater permit for discharges not covered under building permits, and accommodates CGP review authorities. It has been reviewed in 2025 and is up to date with current Permit requirements. No updates are required.

The Code Enforcement Hotline (907) 343-4141 continues to operate, with staff taking calls during regular business hours and retrieving messages from callers with complaints outside regular business hours. These hotline complaints are recorded in the MOA's Infor (Hansen) Complaint Management System and forwarded to the appropriate department for response.

The online complaint portal [#ANCWorks](#) is available to community members on the Muni.org website to record and track complaints.

Table 4 tallies complaints recorded through the online tracking system. Complaints were followed up within the required two working days and, when possible, resolved within a week. *Storm Water – Construction* complaints were handled through inspections in the construction site management program. *Prohibited Discharge* complaints were handled as *Illicit Discharge* complaints.

Table 4 – Service Requests by Complaint Type, 2025

Department	Complaint Type	Number of Requests	Number Resolved
Private Development	Storm Water – Construction	37	37
WMS	Prohibited Discharges – Private property	25	25
WMS	Prohibited Discharges – ROW/Public Property	16	16

6.1.1 Illicit Discharge Mapping

Appendix G1 contains a location map of 2025 Anchorage prohibited discharge complaints. Inspectors visited all the sites and, where appropriate, initiated clean-up. There were no recurrences associated with any of the other discharges.

6.2 Dry Weather Screening

The permittees continued to implement the dry weather screening program in compliance with Permit requirements. The 2025 report is provided in Appendix G2. In 2025, no outfalls selected for screening exceeded the program thresholds for any parameter. It is discussed in Section 1.1.

6.3 Spill Prevention and Response

The permittees must prevent, respond to, contain, and clean up all sewage and other spills that may discharge into the MS4. The Spill Response Plan Update, which describes MOA and DOT&PF, was provided in the 2021 report.

6.3.1 2025 Spill Response

Spills that enter the MOA MS4 or receiving waters are reported to and archived by MOA staff via Infor computer software. Spills that WMS staff responded to were contained and isolated to ground surfaces, but did not enter the storm drain system and are not included.

In 2025, WMS Staff responded to three spills.

The first occurred on February 21, 2025, when MOA Street Maintenance visually observed diesel leaving the Gage Tree Service property located at 6231 Burlwood St., entering the ROW along Burlwood St, and then entering a storm drain. The MOA immediately deployed booms and absorbent pads along the ROW to prevent further contamination. WMS visited the site on February 24, 2025, initiated an investigation, and determined that Gage Tree Service had a diesel spill of approximately 20 gallons. The owner was contacted to inform them of the cleanup procedure and DEC reporting requirements. The owner refused to clean the site and report to DEC; therefore, WMS reported the spill directly to DEC on February 26, 2025. Upon further investigation, WMS determined that the spill should not have entered the storm drain system, as BMPs are required under the O&M Agreement. According to the Stormwater Operations and Management Plan, the site sloped into an on-site infiltration basin and storm drain, which were no longer present; they had been filled in. On March 05, 2025, MOA issued a violation requiring the site to be returned to the original design plan and the O&M Agreement. During the final inspection on July 30, 2025, the site was returned to the original design within the O&M Agreement. The violation was lifted.



Figure 1: Gage Tree Service site visit 02/26/2025



Figure 2: Gage Tree Service site visit 06/30/2025



Figure 3: Gage Tree Service Final Inspection 07/20/2025



The second spill occurred near University Lake and was reported to DEC on May 29, 2025. DEC contacted ANTHC, which responded immediately and deployed a boom at the University Lake outfall. MOA staff were also contacted by DEC and responded on 06/02/2025. WMS investigated the outfall and the OGS and found no evidence of contamination. Both ANTHC and WMS staff were unable to identify a source of

contamination within the Tudor Centre drainage area. Under DEC purview, the boom was left at the outfall, and daily visual monitoring for sheen at the outfall continued. ANTHC contracted with REPUBLIC Services to remove any visible sheen from the lake during this monitoring period and to sample the sheen when found. On June 18, 2025, the MOA cleaned all OGS chambers; old booms were removed, and new ones were installed in the OGS and in the downstream manhole. ANTHC staff continued to monitor the lake 3 times daily and found no sheen during their visits. WMS and ANTHC continued to search for a point source of contamination but were unable to identify a site. On June 25, 2025, DEC issued a letter of interest to the MOA. On July 1, 2025, DEC, MOA, and ANTHC met to discuss sample findings and next steps. The sample results show minimal containment. It was determined to close the investigation and remove the booms at the outfall. The booms in the OGS and manhole stayed in place.

The third illicit discharge was at the same outfall on University Lake. On September 12, 2025, WMS was contacted by DEC about another illicit discharge at the outfall on University Lake. WMS did a site visit and saw a sediment plume at the outfall with minimal sheen. The weather was rainy with 1.25 inches of rainfall over the previous 2 days. WMS determined that the sheen was from the initial storm flush. WMS identified the source of the sediment as the Medical Center construction site. ANTHC was contacted regarding the sediment discharge, and they responded by improving the BMPs to prevent further runoff.

Similar spill responses have occurred at the same location at University Lake in the summer of 2023 and 2024. Following significant spills in the area, MOA developed a project to evaluate the storm drain system at Tudor Centre. The project aims to identify and evaluate potential upgrades and alternatives to the system to prevent future illicit discharges from entering University Lake and Chester Creek. This project is in the Draft Design Study Report phase and is scheduled for completion by the end of February 2026. The MOA's next step will be to determine alternatives and upgrades to the system and implement them through Capital Improvement Projects.

The MOA has also added this outfall to the annual dry-weather monitoring schedule. This outfall was previously sampled in only two of the five years of the permit term. The MOA plans to sample this location regularly to determine whether any point-source contamination occurs in University Lake.

6.4 Used Oil and Toxic Materials

The permittees operate an ongoing program to accept hazardous materials, including used oil and toxic waste, at the Anchorage Regional Landfill and Central Transfer Station. Those locations will take up to five gallons of household hazardous waste for no cost. Information and public education materials for this program are found on the Municipal Solid Waste Services homepage at:

<http://www.muni.org/departments/sws/pages/default.aspx>

6.5 Training

Training on identifying and eliminating illicit discharges, spills, and illicit connections to the MS4 was conducted through the implementation of Dry Weather Screening Monitoring as outlined in the Monitoring Plan.

Staff training was supported by:

- 2025 Watershed Update/APDES Annual Meeting: March 4, 2025. This half-day meeting reviewed the findings of monitoring, assessments, mapping, and new programs associated with the permit. It was attended by members of the MOA, DOT&PF, and the private sector.
- A variety of online courses covering stormwater issues were taken; refer to Section 3.5.

- WMS meets for regular staff meetings where members share information about watershed activities and discuss relevant topics and videos related to stormwater management. They include illicit discharge identification, cleanup, and education. A list of the videos on WMS's YouTube Training Channel is located at:

https://www.youtube.com/channel/UCdr0yQY12_mDVHTMaRVBFVw

7. Public Education and Involvement

7.1 Public Education and Involvement

The MOA, on behalf of the permittees, agreed with the Anchorage Waterways Council (AWC) to conduct the ongoing public education required by the Permit. A complete account of education activities for 2025 is provided in Appendix H1.

The 2024 Anchorage Watershed Perception Survey, found in Appendix H2, was developed and completed to satisfy the requirement in Section 3.6.1.2 of the Permit. This is the fourth watershed perception survey since 2010, completed by the Anchorage Waterways Council (AWC), and will wrap up the permit period from 2020 through 2025.

In addition to the AWC activities, the MOA conducted one additional activity:

- Scoop the Poop Day: The traditional Anchorage Scoop the Poop Day was held on April 26, 2025. AWC, in conjunction with MOA WMS, hosted in-person Scoop the Poop Day events at the University Lake and Connors Bog dog parks and encouraged other DIY events. WMS staffed tables at University Lake and Connors Bog and assisted in handing out trash bags, trowels, shovels, different equipment, snacks, and dog treats to members of the public to facilitate dog poop cleanup. Overall, the event was very successful, with many volunteers participating and hundreds of pounds of dog poop collected and properly disposed of at the landfill.

7.2 Targeted Education and Training

See the following sections of this Annual Report regarding targeted training for permittee staff:

- Construction - Section 2.3
- New and Redevelopment Areas - Section 3.5
- Storm Water Infrastructure - Section 5.7
- Illicit Discharge - Section 6.6

7.3 Annual Meeting

The 2025 Annual Meeting provided participants with information on MS4 Permit related activities. The meeting was held on the morning of March 4, 2025, at the BP Energy Center and was attended by over 50 people interested in stormwater management. Information was presented on relevant topics, including dry- and wet-weather monitoring, pesticide screening, Campbell Creek Watershed Master Plan, and green infrastructure projects. The MOA, DOT&PF, and contractors participated in the meeting and answered attendees' questions. The presentation slides, program agenda, and poster summary are available in Appendix H3.

7.4 Bi-Annual Meetings

Biannual meetings between the permittees and ADEC were held in 2025 to provide a forum for discussion of permit activities and issues. These meeting summaries are available in Appendix H4.

7.5 Storm Water Website

In 2025, the permittees updated their website to be hosted on the Muni.org domain.

The [Watershed Management Services webpage](#) contains all program information, including draft and final project reports, data, map products, forms, permit applications, Storm Water Pollution Prevention Plan (SWPPP) guidance, and watershed plans.

8. Monitoring and Assessment

8.1 Discharges to Water Quality Impaired Waters

As listed in the Permit, pollutants of concern in the MOA receiving waters include fecal coliform bacteria, petroleum products, and, for one lake, dissolved oxygen. The MOA, acting on behalf of the permittees, will measure and evaluate the effectiveness of activities to control these pollutants of concern through the following means:

- Stormwater outfall monitoring
- Controls effectiveness monitoring
- Dry weather screening and follow-up
- Public education and involvement program

8.2 Monitoring Plan

The MOA, on behalf of the permittees, updated the “Quality Assurance Project Plan” (QAP) containing the monitoring program plan for fourth-term activities. The MOA, on behalf of the permittees, conducts monitoring for various purposes as summarized in Table 5. The updated QAP was presented in the 2020 Annual Report.

Table 5 – Storm and Surface Water Monitoring Program Schedule

Monitoring Program Component	Proposed Sampling Dates				
	2021	2022	2023	2024	2025
Pesticide Screening	None	Aug-Sept	none	Aug-Sept	None
Dry Weather Screening	Jun-Aug	Jun-Aug	Jun-Aug	Jun-Aug	Jun-Aug
Control Measure Effectiveness	April-Nov	April-Nov	April-Nov	April-Nov	April-Nov
Stormwater Outfalls	Apr-Nov	Apr-Nov	Apr-Nov	Apr-Nov	Apr-Nov
LID Monitoring	May-Oct	May-Oct	May-Oct	May-Oct	May-Oct

8.2.1 Pesticide Screening

This sampling program continues the program initiated in the first permit term. Sampling is to be conducted in the second and fourth years of the permit term. Pesticide screening was conducted in 2024; the results were included in the 2024 Annual Report.

8.2.2 Storm Water Outfall Monitoring

Stormwater Outfall Monitoring continued in 2025 as planned for the fourth term. Results are provided in Appendix I1.

8.2.2.1 Storm Water Outfall Monitoring Evaluation

An evaluation of monitoring results is required in year four of the Permit term, with the results included in the applicable annual report. The 2024 Stormwater Outfall Monitoring Report evaluates the results of the monitoring program. It discusses the effectiveness of street sweeping to reduce turbidity and fecal coliform bacteria in outfalls, public education to reduce fecal coliform bacteria, and other relevant control measures. This evaluation report was provided in the 2024 Annual Report.