

2022 ANNUAL REPORT

APDES Permit No. AKS-052558

Submitted by:
Municipality of Anchorage



Alaska Department of Transportation and Public Facilities



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Acronyms

AK-CESL	Certified Erosion and Sediment Control Lead
ADEC	Alaska Department of Environmental Conservation
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
DCM	Design Criteria Manual
DOT&PF	Alaska Department of Transportation and Public Facilities
EPA	Environmental Protection Agency
ESCP	Erosion Sediment Control Plan
FHWA	Federal Highway Administration
GIS	Geographic Information System
GPS	Global Positioning System
HMCP	Hazardous Material Control Plan
HGDB	Hydrogeodatabase
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
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
OGS	Oil and Grit or Oil and Grease Separator
ROW	Municipal Rights of Way
SOP	Standard Operating Procedures

SWPPP	Storm Water Pollution Prevention Plan
SWTPRGM	Storm Water Treatment Plan Review Guidance Manual
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 Alaska Pollutant Discharge Elimination System (APDES) Permit No. AKS 05255-8, “*Authorization to Discharge Under the National Pollutant Discharge Elimination System*” (Permit), effective date August 1, 2020. This report satisfies the criteria set forth in Permit Section 4.4 and is organized by program to demonstrate compliance with the “*Storm Water Management Plan*” developed to meet the requirements laid out in Permit Section 2. Documents produced in compliance with this report are included in associated Appendices A through H.

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 between groups within the permittee’s organizations are laid out in their Program Coordination Plans.

Responsibilities for certain requirements have been shared with the Anchorage Waterways Council (AWC). The delegated activities are in the areas of Public Education for General Audiences located in Permit Part 3.6, and program evaluation of Animal Facilities, located in 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 the discharge of pollutants from the MS4 into receiving waters to the maximum extent practicable (MEP). The permittees have identified the prescribed best management practices (BMP) including control measures, system design, engineering methods, and other provisions appropriate to the control and minimization of pollutants and addressing the Permit requirements as described in Sections 3 and 4 of the Permit.

The annual report documents the compliance measures taken during the year in fulfillment of the SWMP. Both documents are laid out consistent with Sections 3 and 4 of the Permit. Activities are identified in their appropriate program summaries along with results of information collected, summaries of activities, and appendix references and web-links to associated supporting materials. Also, in each program section are self-assessments of performance 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 updated in 2022 to show consistency with progress in compliance activities. It is included in the 2022 Annual Report submittal.

Program Effectiveness

The February reporting date for the 2022 Annual Report fell in the fifth month of the third year of the permit, running from August 1, 2020 through July 31, 2025. It presents the work the Permittees accomplished during the latter part of the second year and the first half of the third year of the fourth term. The activities performed during the second half of the third year will be reported in the 2023 annual report.

Each of the monitoring program reports presented with this submittal provides a detailed presentation of results from the current monitoring year. These reports indicate what follow-up actions are indicated from the program findings.

The Quality Assurance Plan (QAP) was updated in 2020 to reflect changes in program activities.

Pollutant load allocations, in the form of total maximum daily loads (TMDL), 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 provide indicators of bacterial impacts from storm water to identified receiving systems. Wet weather bacteria continue to be occasionally high at some outfalls. To address the sources of most bacteria, the permittees are continuing to provide public education about pet waste management with the Scoop the Poop message. They are also continuing to participate in efforts to manage waterfowl population impacts.

Street sweeping assessment activities were continued annually to assist with improving sweeping operations. Real-time assessment provides qualitative feedback to help operators adjust practices for development of a visually clean standard.

The operations of the storm sewer system were implemented by primary coordinating groups. Coordination is managed through agreements between Municipal Watershed Management Services (WMS) and each of the participating MS4 operators; these plans were updated as operations change and for the new permit term. The M&O operators have provided 2022 MS4 Summaries for their areas of permit compliance. They are provided in Appendix A1.

Program Resources

The permittees have broken their program costs into two functional categories: Maintenance & Operations (M&O) and Program Management/Project Administration. The maintenance costs are summarized from the program breakdowns contained in the MS4 Summaries. The 2022 costs from DOT&PF, Anchorage Road and Drainage Service Area (ARDSA), Chugiak Birchwood Rural Road Service Area (CBRRSA), and Girdwood Road Service Area (GRSA) are presented in Table 1.1.

1: Table 1.1 – 2022 SWMP Program Costs

	DOT&PF	ARDSA	CBERRSA	GRSA	Total
Maintenance & Operations	\$3.3M	\$2.0M	\$0.20 M	\$0.054M	\$5.5M
Program Management/ Administration	\$0.38M	1.0M	-	-	\$1.4M
Total	\$3.7M	\$3.0M	\$0.20M	\$.054M	\$6.9M

1.2 Watershed Planning

The permittees have two existing watershed plans. The *Little Campbell Creek Watershed Plan* and the *Chester Creek Watershed Plan* were developed under the guidance of working groups composed of diverse agency interests and supported by staff from Watershed Management Services (WMS), the U.S. Fish and Wildlife Service, and the Anchorage Waterways Council.

The permittees completed a scoping document for a Campbell Creek watershed plan in the third term. The scoping document identified whether activities carried out in the watershed are beneficial in accomplishing site-based low impact development (LID) practices and recommended future actions to obtain identified goals. The scoping document will be used to construct a plan to be completed by the end of the fourth term.

A scoping document for an additional watershed must also be completed by the end of the fourth term.

2 Construction Site Management

2.1 Regulatory Mechanism 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, as well as 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 late December 2021, the DOT&PF Chief Engineer issued a storm water-related directive to the DOT&PF regions that updated aviation construction materials related to the issuance of the 2021 Alaska Construction General Permit (CGP). This directive was not cited in the 2021 Annual Report.

- December 22, 2021 Chief Engineer's Directive: Aviation Standard Specifications for Airport Construction (SSAC). This directive updates the Alaska Standard Specifications for Airport Construction, 2021 Edition for projects advertised after December 31, 2021. Specifically, this directive updates Specification P-641 Erosion, Sediment and Pollution Control. This version of the P-641 specification has been accepted by the Federal Aviation Administration (FAA) and was revised to meet the requirements of the 2021 Alaska Construction General Permit.

In 2022, the DOT&PF Chief Engineer issued three storm water related directives to the DOT&PF regions; two directives updated construction materials related to the use of SWPPPTrack, and one updated construction materials for projects without CGP coverage.

- February 10, 2022 Chief Engineers Directive: Statewide Highway Special Provision No. 20-5 (HSP20-5) SWPPPTrack. This directive provides a special provision for Standard Specification for Highway Construction (SSHC) Specification 641 which authorizes the electronic administration of SWPPPs using the SWPPPTrack program. It is to be applied according to regional discretion.
- March 9, 2022 Chief Engineers Directive: Statewide Airport Special Provision No. 9 (ASP-9) SWPPPTrack. This directive provides a special provision for SSAC Specification P-641 which authorizes the electronic administration of SWPPPs using the SWPPPTrack program. It is to be applied according to regional discretion.
- April 13, 2022 Chief Engineers Directive: ESCP Special Provision No. ASP-10 (for airport projects) and ESCP Special Provision No. HSP20-6 (for highway projects). This directive establishes a new specification for both the SSAC, Item P-658 Erosion, Sediment and Pollution Control Without CGP Coverage, and SSHC, Item 658 Erosion, Sediment and Pollution Control Without CGP Coverage. **These special provisions are restricted from being used on projects requiring CGP coverage and those projects located within a Municipal Separate Storm Sewer System (MS4) with its own permitting standards.**

Ordinance and/or Regulatory Mechanism

DOT&PF regulates stormwater management of their 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 updates these standard specifications every two years, and 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 each year and updates and/or modifies individual forms as necessary.

In 2021, these Erosion, Sediment and Pollution Control specifications had been revised to reflect the regulatory changes brought forth by Alaska Department of Environmental Conservation (ADEC) reissuing the ACGP in 2021.

- 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 Engineers 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.
- 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 Engineers Directive.

None of the standard construction forms were updated in 2022.

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

DOT&PF Central Region Construction provides guidance on 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
- Having stormwater specialists dedicated solely to stormwater guidance and education

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

Minor modifications concerning storm water were made to the Alaska Construction Manual in February of 2021 in sections 3.11 and 9.9. The latest edition of the Alaska Construction Manual became effective on December 1, 2020. The Alaska Construction Manual link is:

<http://www.dot.state.ak.us/stwddes/dcsconst/constructionmanual.shtml>

Highway Standard Modification for Section 641 for Highways Erosion, Sedimentation and Pollution Control (identified as Standard Modification HSM20-38) link is:

https://dot.alaska.gov/stwddes/dcspsecs/assets/pdf/hwyspecs/stdmods/stdmods_eng_20.pdf

Aviation Standard Specification for Section P-641 for Airports Erosion, Sedimentation, and Pollution Control link is:

<https://dot.alaska.gov/stwddes/dcspsecs/airportspecifications.shtml>

(Click on “Miscellaneous,” then on the “P-641: Erosion, Sediment, a Pollution Control” link)

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

DOT&PF Construction SWPPP Forms link is:

<http://dot.alaska.gov/stwddes/dcsconst/index.shtml> (under the Forms Heading)

DOT&PF Chief Engineer’s Directives link is:

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

Private Development. The MOA regulates stormwater management at private construction sites through Anchorage Municipal Code (AMC) Title 21. It can be found in AMC 21.07.04.E. This code is available at: https://www.municode.com/library/ak/anchorage/codes/code_of_ordinances?nodet=TIT21LAUSPLNECOFFJA12014_CH21.07DEDESTNECOFFJA12014_21.07.04DRSTWATRERCOPRDI

Municipal Projects. The MOA regulates stormwater management during construction of its own (public) projects through Municipality of Anchorage Standard Specifications (MASS), Division 20 (MASS Section 20.02). These standard specifications are contractually enforced. A link to the MASS is found at http://www.muni.org/Departments/project_management/Pages/MASS.aspx

Construction Storm Water Manual

DOT&PF Projects. Use of the Alaska Storm Water Pollution Prevention Plan (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/Water Quality webpage managed and maintained by the DOT&PF Statewide Environmental Office.

DOT&PF revised its Alaska SWPPP Guide in March of 2021 to reflect changes made in the 2021 Alaska Construction general Permit. The Alaska Storm Water Pollution Prevention Plan Guide, 2017 Edition was made an official reference document and authorized for use on March 31, 2017 after receiving approval from the FHWA and FAA.

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

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

The Alaska Storm Water Pollution Prevention Guide (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)

Private and Municipal Projects. The MOA updated its Storm Water Plan Review and Treatment Guidance Manual (SWTPRGM) to reflect the current regulatory program based on the APDES permit and the current Alaska Construction General Permit. It is incorporated as Volume 2 of the Anchorage Stormwater Manual recently adopted by the Anchorage Assembly. It is available at www.anchoragestormwater.com

2.2 Plan Review and Approval

DOT&PF Projects. Sometimes, DOT&PF takes two or more projects and combines them into a single Construction Contract. DOT&PF normally files one Notice of Intent (NOI) per Construction Contract unless the projects are disconnected from each other and have vastly different site conditions/SWPPP

requirements. DOT&PF will report on the number of active or carry over 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 reported above that have multiple projects:

DOT&PF 2021 Carry Over Construction Contracts with Multiple Projects and one NOI:

1. Project No. CFAPT00498 – ANC Taxiways K, G1 and J Improvements, and Project No. CFAPT00450 – ANC FAA Taxilane Pavement Debilitation
2. Project No. CFHWY00213 – Seward Highway: MP 75-90 Road & Bridge Rehabilitation – Phase II
Project No. CFWHY00308 – Portage Curve Multimodal Connector
3. Project No. CFHWY00011 – Seward Hwy: MP 100-105 Improvements, and Project No. Z570880000 – HSIP: CR Traffic Safety Corridor Left Turning lanes

New DOT&PF 2022 Construction Contracts with Multiple Projects and One NOI:

1. Project No. CFHWYCFHWY00646 – Eagle River Loop Ped Undercrossing Nov 2018 EQ PR, and Project No. CFHWY00734 – Eagle River Loop Storm Drain Nov 2018 EQ PR, and Project No. CFHWY00786 – Briggs Bridge
2. Project No. CFHWY00132 – Minnesota Dr: Tudor to 15th Ave. Pavement Preservation, and Project No. CFHWY00366 – HSIP: Anchorage Pedestrian Lighting, Ph II

Ten (10) projects (i.e., Construction Contracts) were carried over from the 2021 construction season in the Municipality of Anchorage MS4 permit area. During 2022, DOT&PF reviewed and approved SWPPPs for fifteen (15) projects eligible to discharge construction stormwater under the requirements of the 2021 ACGP within the MS4 permit area. All fifteen projects filed for and received an NOI. All 25 projects were contracted and administered by DOT&PF. A list of these 25 projects is provided in Appendix B1.

Since 2011, DOT&PF Central Region (CR) has maintained a renewable term contract with STANTEC, Inc. to perform Quality Assurance (QA) document review for required 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 Central Region Construction and Statewide Public Facilities projects with an NOI take advantage of 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 documentation generated by the inspection, and provides comments to edit and correct documentation with the intent of preventing any permit non-compliance caused by paperwork errors. DOT&PF Central Region Construction and Statewide Public Facilities will continue using this QA contract for the foreseeable future and has no plans to terminate the service.

The DOT&PF Pre-Construction Manual requires Erosion and Sediment Control Plans (ESCP) to be developed for each project owned, designed, or administered by the DOT&PF. The DOT&PF assigns design and environmental staff, and the DOT&PF Central Region Stormwater Specialist to review the ESCP.

The review process for highway projects is:

- The ESCP writer creates a project specific ESCP at the Pre-PS&E phase

- 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 enters a response to all comments
- The Design Project Manager checks and verifies the ESCP review comments are incorporated at the time bid documents receive FHWA project certification. FHWA requires DOT&PF certification stating that the PS&E 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:

- The ESCP writer creates a project-specific ESCP at the Plans-in-Hand phase
- 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 can discuss comments or the red-lined edits with the individual who wrote the comments. DOT&PF enters all comment responses in the comment web page
- Individuals review the Revised ESCP at the Pre-PS&E phase
- Individuals review the Pre-PS&E ESCP and follow the same process as the Plans-in-Hand ESCP
- The DOT&PF Design Project Manager checks and verifies 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/have complied with statutory and FAA-imposed administrative requirements.
- The Design Project Manager files the ESCP comments after certification

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

DOT&PF is a co-operator on projects with the Construction Contractor performing the work. After construction activities begin, most DOT&PF projects with an active NOI are subject to a documentation audit and field review performed by a Central Region Stormwater Specialist. Up until June 2022, this review is based on the EPA Appendix R NPDES Industrial Storm Water Investigation and Case Development Worksheet. After June 2022, the review is based on the DEC Inspection Checklist – Construction General Permit AKR10. Eight (8) projects operating within the Anchorage MS4 permit area participated in this documentation and field audit:

1. CFAPT00704 – Lake Hood Seaplane Base LHD Runway 14 32 Rehabilitation: May 12, 2022
2. Z539350000 – AMATS: O'Malley Road Reconstruction, Phase II: May 13, 2022
3. CFAPT00498 – ANC Taxiways K, G1, and J and ANC FAA Taxilane Pavement Debilitation: May 16, 2022
4. CFHWY00675 – ANC Taxilanes E1, E3, and E G Intersection Reconstruction: May 17, 2022
5. CFHWY00359 – Dowling Rd & Seward Highway Interchange Reconstruction: June 9, 2022
6. CFHWY00236 – HSIP: C Street: Tudor and Dimond Intersections: June 10, 2022
7. CFAPT00642 – ANC Terminal Loop Road Improvements: June 23, 2022
8. CFHWY00378 – AMATS: Chugach Foothills Connector, Phase II: July 7, 2022

Private and Municipal 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 2022, WMS reviewed and approved approximately 265 Residential permits and 91 commercial buildings, and a number of commercial and government building additions. WMS also conducted Storm Water Pollution Prevention Plan reviews of 21 Municipal Projects. The Municipal Development Services Division computer-based building permit administration system continues to track and document plan reviews and approvals in 2022. 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 482 site inspections on 25 projects within the MS4 permit area. DOT&PF performed:

- 386 site inspections on twenty (20) highway projects ranging from major highway realignment to repaving arterial roads, and permanent 2018 earthquake repairs
- 96 site inspections on five (5) aviation projects at the Ted Stevens Anchorage International Airport that includes 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 performed a physical inspection of the site to confirm there were no illicit discharges or incidents of permit noncompliance. At the conclusion of 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 2022, no stop work orders were given 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.

Private and Municipal Projects: A summary of inspection activities reveals that 162 commercial site inspections and 214 residential site inspections were conducted during 2022 including 13 construction-related inspections from the illicit discharge reporting website located at:

<http://www.muni.org/Departments/OCPD/development/BSD/Pages/CodeEnforcement.aspx>

For each of these inspections the SWPPP or other site documentation was reviewed, and a physical inspection of the site was performed to confirm there were no illicit discharges. At the conclusion of the visit, an inspection report of findings and any required corrections were given 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 2022 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, 2020 Edition, Chapter 9.9 SWPPP & HMCP Implementation and Monitoring, 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) most current edition is dated December 31, 2021
- Item P-641 for Erosion Sediment and Pollution Control Airport Construction, 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 qualifications and duties, non-compliance reporting and monitoring paperwork. The standard specifications provide project and administration requirements relating to control of erosion, sedimentation, and discharge of pollutants. The work must follow applicable local, state, and federal requirements, including the CGP and the MS4 Permit. The standard specifications are contractually enforced.

The Alaska Construction Manual spells out the inspector qualifications and duties, non-compliance reporting and monitoring paperwork. The standard specifications provide project and administration requirements relating to control of erosion, sedimentation, and the discharge of pollutants. The work must follow applicable local, state, and federal requirements, including the CGP and the MS4 Permit. DOT&PF personnel enforce the stormwater specifications on each construction project.

These specifications authorize DOT&PF personnel to verbally warn 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 and Item P-641 Statewide and Regional Highway and 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 10 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 10 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 the corrective action and deduct the costs from the contract amount

- Alaska Construction Manual link is:

<http://www.dot.state.ak.us/stwddes/dcsconst/constructionmanual.shtml>

- Highway Standard Modification for Section 641 for Highways Erosion, Sedimentation and Pollution Control (identified as Standard Modification HSM20-38) link is:

https://dot.alaska.gov/stwddes/dcspecs/assets/pdf/hwyspecs/stdmods/stdmods_eng_20.pdf

- Aviation Standard Specification for Section P-641 for Airports Erosion, Sedimentation, and Pollution control link is:

<https://dot.alaska.gov/stwddes/dcspecs/airportspecifications.shtml>

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

Private and MOA Projects. The MOA updated its escalating enforcement policy for the fourth permit term. It was provided with the 2020 Annual Report.

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 2022, DOT&PF did not have any non-compliant stormwater discharges to report to ADEC on their projects within the Municipality of Anchorage.

ADEC visited four (4) DOT&PF projects located in the Anchorage MS4 permit area for CGP compliance inspections in 2022. The findings of these inspections did not result in any notices of violation being issued to the DOT&PF. See appendix B4 for a copy of these reports.

- Project No. CFAPT00704 – Lake Hood Seaplane Base LHD Runway 14 32 Rehabilitation was visited by ADEC for a compliance inspection on May 18, 2022. The project NOI Tracking No. is AKR10GP63.
- Project No. CFAPT00675 – ANC Taxilanes E1, E3, and E/G Intersection Reconstruction was visited by ADEC for a compliance inspection on May 20, 2022. The project NOI Tracking No. is AKR10GP79
- Project No. CFHWY00359 – Dowling Road & Seward Highway Interchange Reconstruction was visited by ADEC for a compliance inspection on June 28, 2022. The project NOI Tracking No. is AKR10GP98.
- Project No. Z539350000 – AMATS: O’Malley Road Reconstruction, Phase II was visited by ADEC for a compliance inspection on October 16, 2022. The project NOI Tracking No. is AKR10GO71.

Private and MOA Projects. The Permit requires the MOA to report to ADEC when they find projects that failed to comply with the Construction General Permit prior to breaking ground. In 2022, MOA did not file any reports of non-compliance to the ADEC.

2.3 Construction Program Education and Training

During the Permit’s second term, an agreement was reached by agencies and interest groups for a standardized training course targeted for construction site owners and 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, provided in the 2013 Annual Report, made some minor revisions to clarify the procedures of the training program. 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 erosion and sediment pollution control concepts and design procedures as they apply to construction projects. The refresher course is a training and certification program to comply with the Alaska CGP 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 are required to retake the two-day (16-hour) class.

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

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

- AK-CESCL and AK-CESCL Refresher Courses: The Central Region DOT&PF Construction section sponsored two (2) AK-CESCL classes and four (4) AK-CESCL Refresher training classes in 2022 using an on-line format in response to the COVID-19 public health emergency. The classes were taught by the DOT&PF Central Region Storm Water Specialist, Joshua James. AK-CESCL instruction sponsored by DOT&PF is primarily for internal staff, but certification classes are also made available free of charge to all State of Alaska agency staff as well as federal, borough and local government staff as needed. A total of 149 certifications were issued from the 2022 classes; 117 certifications issued to DOT&PF staff and 32 certifications going to non-DOT&PF individuals.
- Alaska DOT&PF Research, Development, & Technology Transfer conducted a virtual two-day, 16-hour training on the National Environmental Policy Act (NEPA) taught by Taylor Horne and Diane Nulton of HDR Engineering. It was completed on January 25, 2022 and attended by Joshua James and Renée Goentzel.
- International Erosion Control Association 2022 Virtual Annual Conference and Expo (IECA 2022 AC&E): DOT&PF enrolled regional stormwater specialist Joshua James in the IECA 2022 Virtual AC&E to further his knowledge and training as a Storm Water Specialist. The event took place on-line March 1-3, 2022. The event is the largest stormwater event and exposition in the world and attracts participants from around the globe. The four-day event has had over 220 technical and training sessions taught by industry experts.
- Spring Fling: DOT&PF Central Region Construction Section holds an annual 16-hour training event for their 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 April 12-13, 2022. The event lasted eight hours a day.

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

- 2022 Watershed Update/APDES Annual Meeting: March 2nd, 2022. 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.
- AK-CESCL Recertification Course, March 31, 2022, 8-hour course conducted by Creative Courses. It was attended by 30 municipal staff. Other staff, not meeting qualification for

recertification attended the full training course conducted by Alaska General Contractors. Their certification is good until spring of 2024.

- 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:

<http://www.dot.state.ak.us/stwddes/dcsprecon/preconmanual.shtml>

Alaska Aviation Preconstruction Manual link:

http://www.dot.state.ak.us/stwddes/dcsprecon/pop_aviation_preconstman.shtml

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

Private Projects: The MOA regulates private sector permanent stormwater controls through Anchorage Municipal Code Title 21, which refers to 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 Central Region 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 May 9, 2018 to include relevant information specific to Central Region DOT&PF. The latest version of this policy, effective August 28, 2018, applies the guidance contained within version 1.0 of the Municipality of Anchorage, Anchorage Stormwater Manual, Volume, 1 dated December 2017 to projects located within the boundaries of the Municipality of Anchorage, 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, which is referenced from AMC Title 21. *Volume I, Management and Design Criteria*, of the manual provides guidance for new development. This manual has been updated to reflect current regulations and stormwater management practices; it may be found on the WMS website, at www.anchoragewater.com.

The DCM was revised in Term III to incorporate current Permit requirements. The manual is now in full force for all development.

3.2 Green Infrastructure/LID Strategy and Demonstration Projects

3.2.1 LID Incentives Strategy

Incentives for use of LID are established for Anchorage by the 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 utilization of space 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 what was in the old criteria, where designers provide on-site detention and ensure that there is adequate capacity in the receiving system. The second option offers a pathway for increased on-site detention with no analysis of downstream capacity.
- **Local Criteria for Storm Water Controls:** The new DCM offers detailed design criteria for a menu of stormwater “tools” that have been 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 and simplified drainage reporting requirements. For small and mid-size projects, full drainage reports have been replaced with drainage certification forms to help guide the designer through 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 a difficult time 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 discretion of the MOA.

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, collectively, must construct four projects or evaluate existing projects as required by Part 3.2.3 of the Permit for incorporation of LID.

DOT&PF Projects: Central Region DOT&PF Design Section has identified two potential projects currently in the construction phase for future LID evaluations: 1) AMATS: O’Malley Rd Reconstruction: Phase II, Livingston-Hillside; and 2) Dowling Rd/Seward Hwy Interchange Reconstruction.

Municipal Projects: The Municipality of Anchorage implemented green infrastructure on four public projects in 2022. On the Chugiak Dog Park project stormwater runoff was directed to naturally vegetated areas. Landscaped depressions were incorporated in the William B. Lyon Playground Project. Soil cells were used on two road projects on 4th Avenue and on E Street. The MOA continues to find itself in the situation where the majority of programmed roadway projects are limited in scope, with few new road or roadway expansion projects.

During the past year, several subdivisions also incorporated LID/Green Infrastructure measures in road and drainage infrastructure to reduce stormwater runoff. These include:

- Spruce Terraces: Infiltration Trenches, Bioswales, Retention Basin, Natural Vegetation Retention
- Alpine View Estates: Bioswales, Natural Vegetation Retention
- Sky Ridge: Soakaway Pits, Infiltration Chambers
- Sonoma Glen Phase 4: Bioswales, Soakaway Pits, Infiltration Pipe
- Eagle Street IPP: Bioswales
- Harmony Ranch: Bioswale. Infiltration Piper

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 will be met through evaluating new projects or revisiting projects constructed in the second and third terms of the permit. Criteria for LID application will be revised based on the findings of the evaluation by the end of the fifth year.

3.3 Permanent Storm Water Controls Plan Review and Approval

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

- Local Review (approximately 30 to 50 percent complete)
- Plans-In-Hand Review (approximately 75 percent complete)
- Plans, Specification and Estimate (PS&E) Review (approximately 95 percent complete)

The Central Region Hydrologist reviews permanent drainage and erosion control features for projects at all three design phases for conformance to design criteria stated in Section 3.1.2.

Municipal Projects: The MOA performs a regulatory review of all Municipal projects 10,000 sf and greater in compliance with our MS4 Permit requirement under part 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 and are a requirement for development project permit issuance. The MOA will continue to coordinate with ADEC to ensure that our projects meet the ADEC wastewater regulations.

3.4 Permanent Storm Water Management Controls Tracking and 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 storm water controls. This inventory and tracking database allows Street Maintenance to access information about the condition and maintenance requirements of the storm water controls owned by the permittees.

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

Private Storm Water Controls. During the second term of the permit, WMS developed a database for new and existing storm water controls and, has since, updated it annually to include new development. As-built drawings of private storm water controls are required prior to closing a Municipal Building Permit for new and redeveloped properties. These as-builts are scanned and recorded into the database. The MOA also requires submittal of an Operations and Maintenance (O&M) agreement for private stormwater controls. During 2022, WMS continued to update information along with functionality and accessibility of this database using web-based GIS. The goal is to try and better integrate data input, data recall and site inspection.

3.4.2 O&M Agreements

WMS requires commercial development projects to provide a legally enforceable and transferable O&M agreement for private storm water controls on new and redeveloped properties to document regular maintenance on private stormwater controls and demonstrate it to the MOA. The location and other relevant property information for the O&M agreements are entered into a municipal database created to assist tracking and inspection of the permanent controls. Copies of the recorded agreements are kept on file by the MOA.

In 2022, the MOA received 10 legally recorded O&M agreements and performed post construction permanent controls inspections.

3.4.3 Inspection and Enforcement

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

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

Private Storm Water Management Controls: Under the updated SWTPRGM, the MOA now requires as-built (record) drawings of all constructed storm water controls that were 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 a surveyed as-built of permanent storm water 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 prior to renewal. High priority sites, requiring annual inspections, will be identified based on Checklist #3 of Building Safety Handout AG 21.

During 2022, 18 properties with private permanent stormwater controls were inspected, including sensitive sites that require annual inspection.

3.5 Permanent Storm Water Controls Training

DOT&PF: The DOT&PF conducts quarterly design meetings for all design and environmental staff, including topics related to permanent storm water controls. In addition, DOT&PF technology transfer (T2) staff set up annual training schedules with some courses specifically focused on storm water and drainage issues.

The DOT&PF CR M&O environmental analyst and other M&O headquarters staff completed the following online trainings in 2022:

- *Reduce Storm Water infrastructure with Porous Pavements* on June 21, 2022
- *Technology for increasing BMP Efficiency and Monitoring* on September 8, 2022
- *ASTM for Storm Water Professionals, Parts 1 and 2* on November 29, 2022
- *Understanding EPA's NPDES MS4 Permit Program*
- *Green Infrastructure Solutions for Wet Weather*
- *Collaborative Storm Water Management Solutions*
- *Low Impact Development: The Basics of Bioretention*

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

- 2022 Watershed Update/APDES Annual Meeting: March 2, 2022. 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. A training for implementation of Green Infrastructure in the MOA was offered. A recording of that training is available as a resource for the design community and can be found at <https://www.youtube.com/watch?v=kUih2mYfHJk>
- Storm Water Solutions, Storm Water Expo provides a variety of on-demand courses covering stormwater issues. Examples of topics WMS staff participated in were:
 - Runoff as a Resource: How it Can Bring Watershed Benefits
 - Stormwater Treatment Solutions Used on Publicly Funded projects
 - Advances in Testing Stormwater Management Measures: The new ASTM Trash Standard and the STEPP Initiative
 - Blue and Green Infrastructure for Climate Resiliency: A New Orleans Case Study
 - Making Green Storm Water Infrastructure a Success – In Urban and Suburban Settings
 - The Many Names of Low Impact Sustainable Development
 - Designing Complex Stormwater Projects: The People, Products and Tools to Solve Stormwater Problems
 - Integrated Urban Drainage Modeling; Rising to the Challenge of 21st Century Urban Flood Risk

- WMS maintains a YouTube site with trainings 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 negatively impact the MS4. The Industrial Inventory and Map were completed early during the second year and submitted in the 2021 annual report.

4.1.1 Performance Standards

Permit part 3.3.1.3 requires the permittees to identify a storm water discharge that is not adequately addressed and develop performance standards for the activity. This requirement is due by the end of the permit term. The permittees have not yet identified an activity to be the focus of this requirement during the fourth term.

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 as part of 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.” A report is due with the corresponding annual report.

4.3 Animal Facilities

The Municipality of Anchorage continues to track animal control facilities under the current program, based on Permit Part 3.3.3. An evaluation of the animal facilities program is due with the third-year annual report. This will address the areas indicated by the permit, 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 storm water 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 showing the combined DOT&PF and MOA infrastructure, are updated regularly and are available at: <http://www.anchoragestormwater.com/maps.html>

5.2 Catch Basin and Inlet Inspections and Maintenance

In compliance with Permit part 3.4.2 the permittees are required to 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 2022, DOT&PF inspected 3,441 structures and cleaned 2,092 catch basins. In addition, they inspected and cleaned 43 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 2022, 13 OGS structures and 1,140 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 45 catch basin and manhole structures are on a bi-annual cleaning schedule based on fill rates; they were cleaned in 2022.

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 2022, 272 OGS units and 2,798 catch basins were cleaned based on rate of fill schedules. An additional 2000 controls were inspected.

The Permittees collected fill rate data for their catch basins during the third permit term, and they updated their respective cleaning schedules considering both effectiveness and efficiency and implemented them for the 2022 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 effective date of the Permit. SOPs are reviewed annually by MOA and DOT&PF street maintenance agencies. Updates, when they are made, are submitted with the corresponding annual report. For 2022, there are no changes to SOPs. The fourth-year report will contain the full set.

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 Anchorage MS4 operators include primarily winter traction enhancing materials. The types of materials used vary somewhat from agency-to-agency and from street-to-street, but mostly include application of traction-enhancing sands and a variety of deicers and anti-icers. Deicers are added by MOA operators to the sand prior to its application to the road surface to maintain sand fluidity in sanding vehicles and to help embed the sand particles in road ice. The DOT&PF applies liquid deicer directly to road surfaces or to sand prior to application to the road surface. Sand gradations vary by agency, with DOT&PF operators typically using a somewhat finer gradation for their mostly higher speed roads than MOA operators, both for safety reasons and to improve the stability of the sand on the road surface. Inventory tables of these materials are summarized in Table 5.1 below.

2: Table 5.1 – Anchorage MS4 Street Materials Inventory, 2022

Item	Type	Units	Amt. Stored	Amt. Ordered	Amt. Used	Storage Location
DOT&PF						
Sand	M&O spec.	ton	4,000	16,000	10,000	Anchorage
Sand	M&O spec.	ton	1,000	4,000	3,000	Birchwood
Sand	M&O spec.	ton	1,000	4,000	3,000	Girdwood
NaCl	granular	ton	1,500	2,000	1,500	Anchorage
NaCl	granular	ton	50	400	350	Birchwood
NaCl	granular	ton	50	400	350	Girdwood
MgCl ₂	brine	gal	-	-	-	Girdwood
CaCl ₂	brine	tons			-	Anchorage
MOA-CBERRSA						
Sand	ARDSA spec.	ton	17,500	7,500	6,098	Hiland
NaCl	granular	ton	25	0	50	Hiland
MgCl ₂	brine	gal	7,500	As needed	351	Hiland
MOA-ARDSA						
Sand	ARDSA spec.	ton	10,000		5,000	Anchorage
NaCl	Granular	Ton	150		200	Anchorage
MgCl ₂	brine	gal	30,000		14,000	Anchorage
MOA-GRSA						
Sand	E-chips	Ton	0	1,200	1,200	Girdwood

NaCl	Granular	Ton	0	0	0	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 based on 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 pollutant issues, and these are addressed and documented in the form of ditch cleaning and catch basin cleaning. Additional measures may be identified 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 2022 summaries of street sweeping activities in their sweeping reports provided in Appendices E1 and E2.

5.5 Pesticide, Herbicide, and Fertilizer Applications

DOT&PF

During 2022, pesticides were applied to control invasive weeds at specific locations within the DOT&PF Right-of-Way. In order to reduce the discharge of pollutants associated with the applications, herbicide applications by certified applicators were 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 MOA pesticide code is located in Title 15.75, available at:

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

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.

During 2022, permittees used pesticides in the MOA greenhouses and for the control of wasps.

5.6 Storm Water Pollution Prevention Plans

Stormwater 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 available at the italicized facilities for each owner in Table 5.2 and where practical at each facility site.

Inspection

In 2022 inspections indicated by Storm Water Pollution Prevention Plans were performed at the facilities indicated in Table 5.2. Corrections were made as needed. The inspection reports are on file at each of the facility offices and provided in Appendix E3.

5.7 Training

The MOA and DOT&PF coordinated monthly during 2022 to discuss their respective activities and operational issues. Street managers from DOT&PF and MOA participated in the 2022 APDES Annual Meeting held on March 2, 2022 and the semi-annual meetings held on March 24, 2022, and October 26, 2022.

DOT&PF crew members and MOA Maintenance crews participate in regular staff meetings and are given information regarding APDES permit requirements in a variety of presentations and staff meetings to assist their understanding, decisions, and record-keeping about 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. Training is provided by the DOT&PF CR M&O environmental analyst. For 2022, this training took place in person at Anchorage Maintenance Station on May 12, 2022. In addition, CR DOT&PF M&O requires that all station managers and ditch crew leads be AK-CESCL certified. In 2022, one DOT&PF M&O station manager took and passed the AK-CESCL Refresher course and one station SWPPP alternate took and passed the AK-CESCL full two-day class.

MOA

- MOA-ARDSA had 14 AK-CESCL staff in 2022
- ARDSA held a training session, conducted by PTS, to familiarize all staff on construction and facility SWPPP requirements for 48 crew members.

The MOA maintains a YouTube channel for MOA Storm Water training at: https://www.youtube.com/channel/UCdr0yQY12_mdVHTMaRVBFVw. 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.

3: Table 5.2 – MS4 Facilities with Storm Water Pollution Prevention Plans

Facility	Location	Activities
DOT&PF		
<i>Birchwood Maintenance Station and Birchwood Airport</i>	20651 Birchwood Spur Rd., Birchwood; SWPPP located at 5300 E. Tudor Rd., Anchorage	Equipment & Materials Storage
<i>Girdwood Maintenance Station and Girdwood Airport</i>	MP 90 Seward Hwy./ 888 Toad Stool Drive, Girdwood	Equipment & Materials Storage, Maintenance
<i>Anchorage Maintenance</i>	5300 E. Tudor Rd., Anchorage	Equipment & Materials Storage, Maintenance

<i>O'Malley Snow Disposal Site</i>	10675 Old Seward Hwy, Anchorage; SWPPP located at 5300 E. Tudor Rd., Anchorage	Snow Storage
Tudor Snow Disposal	6110 Tudor Road, Anchorage	Snow Storage (operating under ARDSA SWPPP)
<i>Hiland Road Snow Disposal Site</i>	8500 Hiland Road, Eagle River; SWPPP located at 5300 E. Tudor Rd., Anchorage	Snow Storage
CBERRRSA		
<i>Eagle River Maintenance</i>	8501 Hesterberg Ln, Eagle River	Equipment & Materials Storage
Chugiak Maintenance Facility	19200 Kerbow Ln., Chugiak	Equipment & Materials Storage
ARDSA		
<i>Kloop Maintenance Facility</i>	5701 Northwood Drive, Anchorage	Equipment Maintenance, Materials Storage & Snow Storage
Muldoon Maintenance & Storage Facility	7909 Boundary Ave., Anchorage	Equipment Maintenance & Materials Storage
Native Heritage Snow Disposal	8902 Heritage Center Drive, Anchorage	Snow Storage
Commercial Dr. Snow Disposal	2941 Commercial Drive, Anchorage	Snow Storage
Mountain View Snow Disposal	5100 Mountain View Drive, Anchorage	Snow Storage
Sitka Street Snow Disposal	1525 Sitka Street, Anchorage	Snow Storage
Tudor Snow Disposal	5300 Tudor Road, Anchorage	Snow Storage
C Street Snow Disposal	395 W 100 th Avenue, Anchorage	Snow Storage
Dowling Snow Disposal Site	6531 Spruce Street, Anchorage	Snow Storage

6 Illicit Discharge Management

6.1 Illicit Discharge Regulatory Strategy

The Municipal regulatory authority for stormwater pollution control is found in Title 21.07.040, https://library.municode.com/ak/anchorage/codes/code_of_ordinances?nodetid=TIT21LAUSPLNECOFFJA12014_CH21.07DEDESTNECOFFJA12014_21.07.040DRSTWATRERCOPRDI. This code provides the basis for managing discharges to the storm sewer system and to waters of the U.S. It conforms to Permit requirements consistent with Part 3.5.1.1, provides a storm water permit for discharges not covered under building permits, and accommodates CGP review authorities. It is up-to-date for current Permit requirements.

6.2 Illicit Discharge Reporting and Response

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

The Infor Public Sector System (a new version of the Hansen System software, implemented in 2015) is also available to community members on the Municipal Development Services Building Safety Land Use Code Enforcement website at:

<http://www.muni.org/anchorageworks/CRM/ServiceRequest/ServiceRequestCategory> for on-line complaint recording and tracking.

Table 6.1 tallies complaints recorded through the on-line 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 with the inspections in the Construction Site Management Program. *Prohibited Discharges* complaints were handled as illicit discharge complaints.

4: Table 6.1 – Service Requests by Complaint Type, 2022

Department	Complaint Type	Number of Requests		Number Resolved
Private Development	Storm water – Construction	16		16
WMS	Prohibited Discharges – Private property	10		10
WMS	Prohibited Discharges – ROW/Public Property	14		14

Illicit Discharge mapping

Appendix F1 contains a location map of 2022 Anchorage prohibited discharge complaints. Inspectors visited all sites and, where appropriate, initiated clean up. There were no recurrences associated with any of the other discharges.

6.3 Dry Weather Screening

The permittees continued to implement the dry weather screening program in compliance with Permit requirements. The 2022 report is provided in Appendix F2. In 2022, none of the outfalls chosen for screening exceeded thresholds for program parameters.

6.4 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 was provided in the 2021 report.

2022 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 that were contained and isolated to ground surfaces, but did not enter the storm drain system, are not included.

In 2022, WMS Staff responded to two spills. The first occurred on August 25, 2022 when a vehicle accident at the intersection of 5th Avenue and Ingra Street resulted in a spill of 50-75 gallons of diesel fuel to the road surface and into the storm drain system. APD, AFD, MOA Street Maintenance, and the MOA ROW Department all initially responded shortly after the crash and deployed absorbents to the street and containment booms in the storm drain catch basins in the area. Contractor US Ecology was hired to clean out the affected storm drain structures, which included two drains, four catch basins, and the OGS at 3rd Ave. Clean up took place and was completed on 8/25/2022, the same day as the spill.

The second spill occurred on September 2, 2022 when motor oil was spilled on the street in front of the residence at 2000 W. Marston Dr. MOA ROW staff member Frank Kelly initially responded to the spill and engaged contractor US Ecology to clean up the street and any affected storm drain structures. Paperwork from US Ecology stated that they removed 58 gallons of oily water and 165 lbs. of oil absorbents and rags from the area on September 2, 2022.

6.5 Used Oil and Toxic Materials

The permittees have an ongoing program for accepting hazardous materials including used oil and toxic waste at the Anchorage Regional Landfill and Central Transfer Station. Those locations will accept 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>

6.6 Training

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

Staff training was supported by:

- 2022 Watershed Update/APDES Annual Meeting: March 2022. 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 training session on Green Infrastructure implementation was held. A link to that training can be found at <https://www.youtube.com/watch?v=kUih2mYfHJk>
- Storm Water Solutions- provided a variety of on-demand courses covering storm water issues.
- WMS meets for regular staff meetings where members share information about watershed activities and discuss relevant topics and videos covering related to stormwater management. They include illicit discharge identification, cleanup, and education. A list of the videos on WMS's YouTube Training Channel are 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, entered into an agreement with the Anchorage Waterways Council (AWC) to conduct the ongoing public education required by the Permit. A full account of education activities for 2022 is provided in Appendix G1.

In addition to the AWC activities, the MOA conducted these additional activities:

- Scoop the Poop Day, April 23, 2022: The traditional Anchorage Scoop the Poop day was held on April 24, 2022. AWC, in conjunction with MOA WMS, hosted in-person Scoop the Poop Day events at the University Lake and Connors Bog dog parks, as well as encouraging other DIY events. WMS staffed one of the University Lake tables and assisted in handing out trash bags, trowels, shovels, other equipment, and snacks and dog treats to members of the public in order to facilitate dog poop clean up. Overall, the event was very successful, with over 150 volunteers participating.
- During 2022, WMS started planning a new storm drain stenciling program with the Anchorage Waldorf School that is planned for 2023.

7.2 Targeted Education and Training

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

- Construction - Section 2.4
- New and Redevelopment - Section 3.5
- Storm Water Infrastructure - Section 4.10
- Illicit Discharge - Section 5.6

7.3 Annual Meeting

The 2022 Annual Meeting provided information to participants about the activities related to the MS4 Permit. The meeting was held the morning of March 2, 2022 via MSTeams and was attended by over 50 people with an interest in stormwater management. Information was presented about relevant topics including a proposed stormwater utility, watershed mapping, illicit discharge, monitoring, and storm sewer master planning. A description of the planned 2023 activities was provided. The MOA, DOT&PF, and contractors participated in the meeting and answered questions from attendees. The presentation slides, program agenda, and poster summary are available in Appendix G2.

7.4 Bi-Annual Meetings

Bi-annual meetings between the permittees and ADEC were conducted in 2022 to provide a forum of discussion regarding permit activities and issues. These meeting summaries are available in Appendix G3.

7.5 Storm Water Website

In 2022, the permittees provided access to their website, found at:

anchoragewatershed.com or anchoragestormwater.com

This homepage 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 Anchorage 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:

- Storm water 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 8.1. The Updated QAP was presented in the 2020 Annual Report.

5: Table 8.1 – 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 is a continuation of the program started in the first permit term. Sampling is to be conducted in the second and fourth years of the permit term. Pesticide screening was performed in 2022; the report is provided in Appendix H1.

8.2.2 Storm Water Outfall Monitoring

Storm Water Outfall Monitoring was continued in 2022 according to the plan approved for the fourth term. Results are provided in Appendix H2.

8.2.2.1 Storm Water Outfall Monitoring Evaluation

An evaluation of monitoring results is required in year four of the Permit term with results provided with the applicable annual report. The evaluation will discuss the effectiveness of street sweeping to reduce turbidity and fecal coliform bacteria in outfalls and public education to reduce fecal coliform bacteria and other relevant control measures.