

Franklin County and Township
Stormwater Management Program
2014 – 2019

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Executive Summary

The Franklin County Stormwater Partnership and program were initiated in 2003 to coordinate programs related to drainage management, water quality management and stormwater regulation compliance. The partnership was formed among the County Drainage Engineer, Economic Development and Planning, Sanitary Engineer, Public Health, Franklin Soil and Water Conservation District and 17 townships. More recently, Franklin County Public Facilities Management and Fleet Management, the Mid-Ohio Regional Planning Commission, and the Village of Lockbourne have joined the partnership. The Franklin County Commissioners are the Permittee with the County Drainage Engineer and townships as Co-Permittees, for compliance with the Small MS4 general permit under the Ohio EPA Stormwater regulation program.

Stormwater regulations are authorized by the Federal Clean Water Act, mandated by the US Environmental Protection Agency and executed by the Ohio Environmental Protection Agency (OEPA), Division of Surface Water. Stormwater discharges from Municipal Separate Storm Sewer Systems (MS4s) in urbanized areas are subject to stormwater regulations. Stormwater discharges from the MS4s owned and operated by Franklin County and the Townships are permitted under OEPA General Permit # OHQ000003. The Franklin County Stormwater Program is focused on reducing the volume of and managing the pollution of stormwater that is conveyed through municipal storm sewers to community streams to meet permit requirements.

Permit requirements are organized into six minimum control measures (MCMs). The minimum control measures encompass public education, public outreach and involvement, illicit discharge detection and elimination, construction site runoff control, post construction stormwater management, and good housekeeping for municipal facilities and operations. Best Management Practices (BMPs) are outlined under each minimum control measure. This document outlines planned activities for each BMP which have been developed to meet or exceed permit requirements, and to efficiently manage pollutants of concern for the benefit of the environment and the community. These planned activities are intended to meet permit requirements while making the best use of available resources and knowledge and experience of existing agencies, partners and staff.

Highlights of targets for the stormwater program include:

- multifaceted stormwater communications and education efforts with support from all partners that are tied to current research and innovative approaches;
- continued resolution of illicit discharges including failing household sewage treatment systems (HSTS) within Franklin County;
- continued mapping of storm sewers to be added to existing drainage and stream resource maps;
- participation of all county and township building and fleet managers in pollution prevention programs; and
- Stormwater Pollution Prevention Plans (SWPPPs) are completed for county and township fleet and storage facilities as required by the stormwater permit.

Introduction and Background

1. Purpose

The purpose of the Stormwater Management Program (SWMP) is to protect and improve water quality, stream corridors and public health in accordance with federal and state stormwater regulations. Polluted stormwater runoff is often transported through municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. To address this reality, federal and state regulations require the establishment of MS4 stormwater management programs to improve the nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, pesticides from lawns, sediment from construction sites, bacteria from failing septic systems and carelessly discarded trash. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging recreational use of the resource, contaminating drinking water supplies and impairing the habitat of fish, other aquatic organisms and wildlife.

Franklin County and its townships are required by the MS4 Stormwater permit administered by the Ohio Environmental Protection Agency (Ohio EPA) to develop, implement and support a Stormwater Management Program to the maximum extent practicable (MEP) to protect water quality. The requirements of the stormwater permit are developed and administered by Ohio EPA as authorized by the Ohio Revised Code (ORC) Chapter 6111 on water pollution control and as required by the Federal Clean Water Act. The SWMP must include management practices, control techniques, system designs, and engineering methods and shall be modified to include provisions as Ohio EPA determines appropriate after its review of the program for the control of stormwater pollutants. The stormwater permit applies only to the MS4s in the urbanized area as defined by the 2010 US Census. The townships and Franklin County are each responsible for the MS4s they own and operate.

Requirements for the SWMP are outlined under the Municipal Separate Storm Sewer System NPDES Permit # OHQ000003. The MS4 Stormwater Permit outlines six minimum measures (MCMs) that a SWMP must address. These minimum measures are:

- 1) public education and outreach,
- 2) public participation / involvement,
- 3) illicit discharge detection and elimination (IDDE),
- 4) construction site runoff control,
- 5) post-construction runoff control and
- 6) pollution prevention / good housekeeping for municipal operations.

The stormwater program shall include best management practices (BMPs) for each minimum measure and a table of organization indicating lines of communication, authority and responsibility. Each minimum measure shall include statements as to legal authority and rationale.

The SWMP also overlaps with other partner agencies' objectives. Franklin County Public Health is committed to addressing household sewage treatment system (HSTS) failures, Franklin Soil and Water and Mid-Ohio Regional Planning Commission are committed to improving and expanding digital natural resource data available to land use managers and increasing the adoption of green infrastructure practices beyond minimum requirements. And all agencies share

the County Commissioners environmental goals, as stated in Resolution NO. 683-06, of ensuring environmental quality in making decisions related to transportation, growth management and economic development, and will practice environmentally responsible growth when establishing policy on land use, infrastructure development, green space and natural resource preservation. These objectives are considered when developing and managing the Franklin County Stormwater Program.

2. Stormwater Partnership

The County Stormwater Partnership was initiated on May 27, 2003 with the appointment of Dean Ringle as County Drainage Engineer under County Resolution NO. 503-03. This action was aimed at combining resources to improve communication and ideas regarding improved drainage management, water quality initiatives and stormwater regulation. This was a significant achievement which continues to speak to the cooperative relationship between county agencies and townships.

As a result of this partnership, the Franklin County Board of Commissioners and 17 townships decided to submit a joint permit as allowed by NPDES Permit # OHQ100000. All 17 townships, the Franklin County Drainage Engineer (FCDE), the Franklin County Engineer's Office (FCEO), Franklin County Public Health (FCPH), Franklin County EDP, Franklin Soil and Water Conservation District (FSWCD), and Franklin County Sanitary Engineer (FCSE) already have a strong working relationship as developed through the Franklin County Technical Review Committee. The Village of Lockbourne has also joined as a co-permittee. These organizations now make up the core of the Franklin County Stormwater Partnership. Franklin County Fleet Management and Public Facilities Management have joined the partnership to better address pollution prevention and good housekeeping requirements, and Mid-Ohio Regional Planning Commission (MORPC) has also joined the partnership as an additional resource and supporter through the Central Ohio Greenways Program.

The joint permit for the small MS4 general permit renewal in 2009 required that each co-permittee complete and submit a separate co-permittee Notice of Intent (NOI) form. There continues to be no additional application fee for co-permittees therefore reducing the overall costs for the permit application process.

The Franklin County Stormwater Partnership is organized under the Stormwater Executive Committee. This Committee has representatives from each partnership agency and a representative from the townships. The regulated agencies in this partnership are Franklin County, the 17 Townships, and the Village of Lockbourne.

Involvement of the agencies and organizations include:

- The FCDE was organized to provide oversight to the Franklin County Stormwater Program with the goal of working with existing partnerships to address stormwater quantity and quality needs through the Franklin County Stormwater Partnership. FCDE provides final oversight to permit compliance, annual reporting and stormwater management planning. FCDE also coordinates and communicates mutually beneficial objectives and projects between drainage and stormwater management efforts to the County Stormwater Partnership.
- The FCEO staff provides engineering support for all drainage and stormwater pollution prevention plan reviews and long-term post construction oversight and management. .

Additional guidance is provided to supplement township knowledge of good housekeeping and pollution prevention for government operations.

- FSWCD provides support to the program as the county's natural resource expert. Staff provides the following services: construction site plan reviews, construction site inspections and assistance with mapping and reviewing post-construction facilities as directed by Franklin County EDP for compliance with stormwater regulations. FSWCD leads programming public outreach and education, public involvement and participation, stormwater mapping, implementing green infrastructure demonstration projects, and coordinates natural resource conservation programming with stormwater objectives. FSWCD also provides support by providing information to townships, coordination for good housekeeping and assistance with annual reporting to Ohio EPA.
- Franklin County EDP is responsible for coordinating reviews and approvals from the Franklin County Technical Review Committee. EDP administers zoning for 10 of the 17 townships and subdivision regulations for all 17 townships. Seven townships are responsible for administering township zoning regulations. Franklin County EDP oversees the regulations and procedures for long-term post construction management for the townships they administer zoning for, and townships with their own zoning oversee their own regulations and procedures for long-term post construction management. They work with FCDE or FSWCD to map and manage the post-construction facilities.
- FCPH leads the Illicit Discharge Detection and Elimination (IDDE) program, providing leadership and legal authority for monitoring HSTS and addressing illicit discharge issues in partnership with the Franklin County Sanitary Engineer, the Franklin County Sheriff's Office and the Franklin County Environmental Court.
- The FCSE provides funding and political support and oversees construction of county sanitary sewer extensions.
- Franklin County Fleet Management manages two facilities that serve county agencies.
- Franklin County Public Facilities Management oversees construction of buildings and management of parking lots.
- MORPC coordinates regional planning and working groups' objectives with the Franklin County stormwater management program.

The table of organization (Appendix A), required by the MS4 NPDES Stormwater permit, outlines more specifically the individuals, positions and organization responsibilities in relation to the Unincorporated Franklin County Stormwater Management Program.

Limitations of the SWMP Plan

The activities outlined in this plan guide the County Stormwater Partnership toward implementing a comprehensive program that not only meets the minimum permit requirements but also results in improvements to water quality within unincorporated Franklin County. As county resources are limited, there may be times where the minimum requirements are met but the activities as outlined in this plan are not fully addressed.

The audience for this plan is elected officials, township and county agency staff, Ohio EPA, and the general public. Whenever possible the language and format of the plan is written for a broad audience. To understand the specifics of the MS4 storm water general permit, interested parties will need to read the most current general permit that can be located on Ohio EPA's website.

3. Development of the SWMP

The original SWMP was developed in 2003 with NPDES Permit # OHQ100000. This process started with county and township working groups facilitated by FSWCD and FCDE.

The process led to a working group involving all townships, county agencies and stakeholders. This working group developed recommendations for each minimum measure. A stormwater management program was then developed by an executive committee consisting of representatives from each of the partnership agencies and a township representative. This stormwater program coordinated the efforts of the stormwater partners, through 2008.

In 2009, the County Stormwater Partnership decided to use a similar process to revise the stormwater management program plan to comply with the new permit regulations. Again, all partnership agencies came together and divided into working groups related to the six minimum measures with a total of 28 staff participating. The comments for each group were then used, along with expertise from county agencies, to draft the SWMP plan.

The third generation of the permit came into effect in 2014. It clarified the intent of the permit related to permittees taking TMDLs into account when determining BMPs. The Stormwater Partnership decided to appoint two members from FCDE and FSWCD to evaluate how well established program BMPs matched with established TMDLs. A survey created by FSWCD was distributed to the townships to include their input when determining the stormwater problems in Franklin County. The townships selected the following sources as contributing the most to the impairment of water quality:

- Runoff from industrial areas
- Development practices
- Litter and loose trash and dumping
- Aerator treatment systems
- Leaves raked into streets

These results were taken in consideration when evaluating the themes and BMPs of the SWMP. Finding that the established BMPs were already well matched with the established TMDLs, the Stormwater Partnership decided that only minor SWMP revisions and updates were needed.

4. Community Description

Due to the dispersed nature of incorporated areas in Franklin County and the fact that watersheds and streams connect the incorporated and unincorporated lands, the community description will focus on the entire county. Ohio water quality standards, watershed plans and reports and community statistics are the basis for identifying BMPs, target audiences, targeted pollution sources and planned activities for the County's Stormwater Management Program.

Franklin County is one of Ohio's 88 counties and is centrally located in Ohio at the intersection of north/south interstate 71 and east/west interstate 70. It is home to Columbus, the most populous city and capital of the state. According to 2009 estimates made available by the Mid-Ohio Regional Planning Commission, Franklin County is comprised of an estimated 1,164,725 residents. Of this population, 91.6% live in cities and incorporated villages of Franklin County and the remaining 8.4% of the population, or 98,106 people, live in unincorporated areas of the county. A portion of those live in the urbanized area covered by this SWMP.

Franklin County is diverse in its development ranging from the densely populated urban core to the rural sections on the western, southern, and northeastern sections of the county. The Big Darby Creek is a state and national scenic river in the County and has commanded special attention. In 2000, there was a development restriction placed within lands of the Darby Watershed, and the Darby Accord was formed through participation of jurisdictions in the watershed. The resulting product was the Big Darby Watershed Master Plan developed in 2006 and adopted by all communities in 2008. The plan provides a framework for managing, development, and protecting the unique natural resources and water quality in the Big Darby Creek watershed.

Franklin County encompasses 543.9 square miles, with unincorporated Franklin County comprising 187 square miles and 46 square miles being both unincorporated and in the urbanized area covered by the permit. Unincorporated Franklin County contains the following ten primary watersheds and associated creeks and rivers comprising 177.5 miles of perennial streams:

- Alum Creek
- Big Darby Creek
- Big Walnut Creek
- Blacklick Creek
- Hellbranch Run
- Little Darby Creek
- Olentangy River
- Rocky Fork Creek
- Scioto River
- Walnut Creek.

In addition to the Big Darby Creek, the Little Darby Creek, the Olentangy River, and the Big Walnut Creek are of particular significance. The first two of these have sections designated as state scenic rivers and all of them have reaches in Franklin County that are designated as excellent warmwater habitat. The Darby Creek system is widely regarded as one of the most valuable natural resources in central Ohio and beyond, known for its biodiversity generally and its mussel populations in particular. The Big Walnut is the gem of the eastside of Franklin County, with nearly 15 miles of exceptional warmwater habitat and significant populations of freshwater mussels. An additional estimated 402 miles of headwater streams and tributaries contribute to the perennial streams as measured in the Franklin County Stream Geodatabase where surface and subsurface drainage are digitally mapped and characterized for Franklin County

Managing water quality in our streams and rivers is important to drinking water, recreation and public health. Today, three surface reservoirs provide 85% of the more than 130 million gallons of water used daily. The remaining 15% is drawn from well fields in southern Franklin County.¹ The Scioto River and Big Walnut Creek serve as sources of drinking water. The Scioto River begins as a small creek about 80 miles north in Hardin County, northwest of Kenton, Ohio. Rolling through woods and farmlands, this river remains a main water source for Columbus. The Griggs and O'Shaughnessy Reservoirs, located on the Scioto River, have a combined storage capacity of 6.2 billion gallons, holding only a small percentage of the water that flows through Columbus, and providing water for downtown, west and northwest Franklin County. Family picnics, fishing, boating and waterskiing in the recreation area surrounding and including both reservoirs are enjoyed by

¹ *Columbus Public Utilities: Water Sources* <https://www.columbus.gov/utilities/water-protection/Water-Sources/> (accessed December 2016)

thousands every summer. Big Walnut Creek forms about 20 miles northeast of Columbus and feeds Hoover Reservoir. This reservoir can hold 20.8 billion gallons of water; it supplies water for the entire northeast portion of Franklin County and provides a beautiful recreation area for boating and fishing. In the late 1960s, it became apparent that an additional water supply would be needed.

A study of southern Franklin County found a large underground water supply between the Scioto River and Big Walnut Creek. The large Ranney Collector Wells range from 68 to 109 feet deep with laterals totaling more than 6,000 feet reaching into the aquifer. These wells supply an average of 20 million gallons of water daily to residents in southern Franklin County. The southern portion of Franklin County relies on ground water as its drinking water source, and has established a source water protection area to conserve this resource.

Recreation on Franklin County streams and rivers includes fishing, kayaking, canoeing, biking, birding and hiking. In 2014, 39,613 fishing licenses were sold² and in 2015 29,828 boats were registered³ in Franklin County.

Under the Clean Water Act, every state must adopt water quality standards to protect, maintain and improve the quality of the nation's waters. Water quality standards are related to ambient standards (in-stream water quality) as opposed to end of pipe or discharge standards. Ambient standards are determined by calculating what the streams water pollution assimilative capacity is through procedures known as Total Maximum Daily Loads (TMDLs) or waste load allocations. These loads or allocations regulate the discharge of pollutants into surface waters under the National Pollutant Discharge Elimination System (NPDES) permit program. Water quality standards have three major categories which are: 1) Beneficial Use Standards, 2) Numeric Water Quality Criteria and 3) Antidegradation.

In Franklin County, the major creeks and rivers (i.e. the Big and Little Darby Creeks, the Scioto River, the Olentangy River, Alum Creek, and Big Walnut Creek) are in generally good condition. In contrast to the larger rivers and streams, the water quality of the majority of smaller waterways is largely degraded.⁴ Watersheds that have stream segments in non-attainment with Ohio water quality standards are listed by Ohio EPA as impaired waters. The TMDL program, established under Section 303(d) of the Clean Water Act ([33 U.S.C. 1313](#)), focuses on identifying and restoring polluted rivers, streams, lakes and other surface water bodies. A TMDL is a written, quantitative assessment of water quality problems in a water body and contributing sources of pollution. It specifies the amount a pollutant needs to be reduced to in order to meet water quality standards (WQS), allocates pollutant load reductions, and provides the basis for taking actions needed to restore a waterbody. Watersheds in Franklin County with a completed TMDL include Big Walnut, Walnut, Big Darby and Olentangy River watersheds. The primary TMDLs from these four watersheds are bacteria, sediment, habitat, nutrients.

Franklin Soil and Water Conservation District and the Mid-Ohio Regional Planning Commission continue to support the watershed plans and accords that are in place and designed to protect our streams. They have also supported the balanced growth plans that have been developed for Franklin

² *Ohio Department of Natural Resources Division of Wildlife: License Sales By County 2014*; Publication 5062 (R0415) http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/licenses%20&%20permits/Pub5062_2014.pdf (accessed September 2016)

³ *Ohio Department of Natural Resources Division of Water Craft: Statistics: Ohio Boat Registrations* <http://watercraft.ohiodnr.gov/watercraft-home/registrations/2015-2019-data> (accessed September 2016)

⁴ *Central Scioto Water Quality Management Plan*, Ohio Environmental Protection Agency, 2002

County and Central Ohio. In addition, they are committed to developing new plans for watersheds as time, resources, opportunities and necessities arise. The planning documents are not binding, but give direction to communities, individuals and agencies interested in taking actions that would protect and improve water quality in the County’s waterways. At this moment, there are no approved watershed action plans for watersheds in Franklin County. One is being developed for the Headwaters Blacklick Creek HUC 12 and should be completed by the end of 2016. In addition to balanced growth plans, other documents of interest include the Darby Accord, the Blacklick Rocky Fork Accord and the Olentangy River overly.

Causes of impairment in the HUC 12s in Franklin County cover the gamut, including nutrients, habitat, pathogens, suspended solids, hydrology and toxicity from urban runoff. Of the 24 HUC 12s in the county, 12 were identified as having nutrient issues, 11 with habitat problems, 10 with excessive pathogens, 9 with issues with suspended solid, sediment and/or flow, and 1 with toxicity from urban runoff (see Table 1). Individuals BMPs can address multiple causes of impairment, even as single themes can cover more than one problem.

WATER SHED	HUC12	NUTRIENT	HABITAT	HYDROLOGY	BACTERIA	SEDIMENT	TOXICITY
Big Darby Creek	Gay Run-Big Darby Creek	X		X			
Big Darby Creek	Greenbrier Creek-Big Darby Creek	X	X	X		X	
Big Darby Creek	Hellbranch Run	X	X	X	X	X	
Big Darby Creek	Silver Ditch-Big Darby Creek	X		X			
Big Darby Creek	Thomas Ditch-Little Darby Creek	X	X	X		X	
Big Darby Creek	Worthington Ditch-Big Darby Creek	X	X	X			
Big Walnut Creek	Bliss Run-Alum Creek		X		X	X	
Big Walnut Creek	Bliss Run-Alum Creek - West Spring Run		X	X			
Big Walnut Creek	City of Gahanna-Big Walnut Creek				X		
Big Walnut Creek	City of Gahanna-Big Walnut Creek - McKenna	X				X	
Big Walnut Creek	Headwaters Blacklick Creek	X			X		
Big Walnut Creek	Headwaters Blacklick Creek - French Run					X	
Big Walnut Creek	Mason Run-Big Walnut Cr.		X			X	
Big Walnut Creek	Mason Run-Big Walnut Cr. - Trib. RM 27.29		X	X			
Big Walnut Creek	Rocky Fork Creek	X			X		
Big Walnut Creek	Rocky Fork Creek - Rose Run		X				
Big Walnut Creek	Town of Brice-Blacklick Creek	X			X		
Big Walnut Creek	Town of Lockbourne-Alum Creek						
Big Walnut Creek	Westerville Reservoir-Alum Creek		X		X		
Olentangy River	Mouth Olentangy River	X				X	
Olentangy River	Rush Run-Olentangy River	X				X	
Walnut Creek	Big Run-Walnut Creek		X	X	X	X	
Walnut Creek	Georges Creek				X		X
Walnut Creek	Tussing Ditch-Walnut Creek						
TOTALS		12	11	9	9	10	1

Table 1: TMDLs in Franklin County by Watershed

For unincorporated, urbanized areas of Franklin County, the causes of impairment to water quality includes:

- 1) Nutrients from fertilizers, failing HSTSSs, and dumping of yard waste into stream corridors
- 2) Changes in habitat and hydrology due to increased impervious services and stream modifications that result in stream erosion, warmer water temperatures, reduction in ground water recharge and flooding downstream.
- 3) Bacteria from failing HSTSSs, resulting in public nuisance and potential health concerns from recreational exposure in some waterways.
- 4) Sediment from construction sites, and stream bank and bed erosion
- 5) Toxic urban runoff such as solid, hazardous, or infectious waste, chemicals, paints, solvents, cooking oils/grease, and waste materials from various industrial sources (dry cleaning chemicals, waste cement, etc.) illegally dumped into the MS4.

The combined impacts of the TMDL pollutants above result in increased drinking water treatment costs, loss of fish populations, possible public health concerns, increased algae blooms, loss of property from erosion along streams, and flooding of downstream properties. Water quality is also impacted by agricultural and urban activities upstream from Franklin County.

Challenges facing stormwater management in unincorporated Franklin County include pockets of older communities with failing septic systems due to either the age of the systems and/or the inability of the soils to manage such systems. Remaining undeveloped land has a high presence of hydric soils (soils that formed under conditions of saturation, flooding, or ponding). These areas are more likely to pose problems for infiltration of septic systems, result in future drainage complaints, and are more likely to contain wetlands. A potential wetlands layer has been developed by Franklin Soil and Water Conservation District for Franklin County to better identify wetland conservation opportunities.

5. Conclusion

Addressing stormwater issues is crucial to the present and long term protection of the streams in Franklin County. The Franklin County and Township Stormwater Partnership is committed to developing and implementing an effective Stormwater Management Program that meets the Ohio's small MS4 Stormwater Permit. This program benefits from a multi-agency and local government partnership. The County Stormwater Partnership will allow for consistent stormwater management over the full extent of the county and efficiently utilize limited local resources by reducing duplication of efforts and pooling available resources.

The Program

This Stormwater Management Program is organized by Minimum Control Measures (MCMs). The SWMP includes best management practices (BMPs), measurable goals, rationale, decision process, responsible parties, time schedules, a statement of opinion about the legal authority to implement the BMP, and other appropriate information. This section is designed to correspond with annual reporting forms provided by Ohio EPA.

1. Public Education and Outreach

A. Introduction

The first minimum control measure (MCM) requires Franklin County and its townships to distribute educational materials or provide equivalent outreach activities to the community about the impacts of stormwater discharges including the steps the public can take to reduce pollutants in stormwater runoff. An informed and knowledgeable community is important to a successful stormwater program. This lays the foundation for community participation in responsible land management, compliance with local and state regulations, resolution of failing HSTS impacts and support for community projects and programs needed for a successful stormwater program.

Benefits to Franklin County and the townships include a successful stormwater program, increased pride in the community, and the recognition of Franklin County and the townships as responsible communities and great places to live.

Summarized Requirements from Ohio EPA Permit:

- Develop a plan to inform individuals and households about the steps they can take to reduce stormwater pollution including measurable goals, target audiences, target pollutants, and outreach strategy. Five different stormwater themes or messages need to be targeted over the permit term. One of the five messages will be targeted at the development community.
- Develop a rationale for target areas and pollutants that will make the greatest difference for stormwater quality.
- Utilize at least 2 mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) to reach target audiences. At least 50 percent of the population needs to be reached over the permit term.
- Evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

B. Decision Process

Water Quality and TMDL information were reviewed and best management practices identified based on known water quality issues in the county. Additionally, existing programs, agency capabilities, and our strength in partnerships is leveraged when developing activities. Several outreach programs are designed to expand to the greater Columbus area so that we have multiple opportunities to communicate to residents and businesses with similar messaging on multiple occasions through different sources and media.

The partnership in Franklin County provides some unique opportunities to provide education and outreach opportunities to unincorporated Franklin County residents. The nature of township governance allows for more direct communication with residents. Sixteen of seventeen townships have a web site where stormwater information could be published and twelve townships publish a newsletter that reaches the majority of their residents. Reaching out to the development community is being achieved by Franklin County EDP and FSWCD. The development community in Franklin County is also reached through an annual Central Ohio Stormwater and Erosion Control Expo, as well as *The Urban Review* newsletter distributed quarterly by FSWCD. Additionally, MORPC and FSWCD staff liaises with the Central Ohio Building Industries Association (BIA) Green Committee to further develop relationships with the construction /development community. Additional participation and awareness involving the development community will be provided by the seven townships that have their own zoning departments.

Local elected officials, municipal and township employees, community leaders, and interested residents have several other opportunities throughout the year to meet for surface and stormwater education, outreach, and networking. MORPC facilitates several workgroups for central Ohio, including Central Ohio Greenways, Sustainable Growth Workgroup, and Big Darby Accord Open Space Advisory Committee. MORPC also holds an annual Summit on Sustainability and the Environment which engages community leaders and stakeholders in depth on a variety of topics. FSWCD hosts several web seminars throughout the year offered by the Center for Watershed Protection, and the National Association of Soil and Water Conservation Districts on stormwater issues. FSWCD facilitates the Central Ohio Stormwater Roundtable which meets quarterly for education and networking, and the Central Ohio Stormwater Expo which is organized with MORPC, ODOT and Central Ohio SWCD's. Additional Franklin Soil and Water manages the *Central Ohio Rain Garden Initiative*, and *Terrific Resources in Environmental Education*. Both MORPC and FSWCD coordinate with and provide support to local watershed groups.

C. Best Management Practices

The following BMPs will be used for public education and outreach:

- i. Distribute educational information through articles and illustrative photographs.
- ii. Provide educational presentations and interactive displays to students K-12.

The following BMPs in Public Involvement also meet education and outreach needs:

- iii. Organize and advertise community events and demonstrations that engage residents in conservation practices and activities that benefit stormwater quality.
- iv. Provide educational information and discussion through community meetings and events.

D. Themes

Franklin County will address at least five different education themes during the duration of this permit. The themes will target existing TMDLs and potential community pollution sources as defined under community description on page 9.

Stormwater Program Themes:

- i. **Trash & Illegal Dumping (T&ID)** will focus on stormwater pollution prevention opportunities for businesses and residents. This will incorporate proper use of lawn and garden chemicals, yard waste disposal, hazardous waste disposal, recycling opportunities how to

- report illegal dumping, and stream clean-ups. This will address nutrients and urban runoff pollution.
- ii. **Streamside Buffers (SB)** will focus on protecting and establishing stream buffers through plantings and education. This will address habitat, hydrology, sediment, and nutrients.
 - iii. **Backyard Conservation & Landscape Maintenance (BC&LM)** will focus on the use of composting, rain barrels, rain gardens, native vegetation, and trees to capture stormwater, prevent erosion, and protect stream corridors on residential properties. This will address habitat, hydrology, sediment, nutrients, and urban runoff.
 - iv. **Green Infrastructure & Better Site Design (GI&BSD)**, will target the development community and focus on how to properly manage construction projects from planning through post-construction maintenance for better water quality, infiltration, and regulation compliance. This will address sediment, nutrients, bacteria, hydrology, and habitat.
 - v. **Managing your Home Sewage Treatment System (HSTS)** will focus on educating home owners on the responsibilities and proper management of an on-site sewage treatment system. This will keep nutrients, bacteria and pathogens from contaminating the water.

E. Target Audiences

- i. **Residents of townships** are targeted for improvements to general urban runoff pollution.
- ii. **Commercial and industrial businesses** are targeted for improvements in urban runoff pollution and stormwater retention and infiltration.
- iii. **Landowners** are targeted for implementation of conservation implementation that can improve urban runoff and stormwater. Specific landowner audiences that may receive particular attention include:
 - a. Stream side landowners
 - b. Homeowners with HSTS systems
 - c. Landowners considering improvements to their property
 - d. Landowners interested in conservation practices
- iv. **Development community** is targeted to reduce impacts to water quality from developing lands.
- v. **Students and Youth** are targeted because they are the future landowners and decision makers.
- vi. **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
 - a. Watershed groups
 - b. Environmental groups
 - c. Homeowner associations
 - d. Civic associations
 - e. Water Quality Partnership areas
 - f. Scout Troops

F. Responsible Party and Legal Authority

FSWCD will provide guidance and assistance with educational materials and presentations to assist the county and 17 townships with compliance. An employee designated by each township will be responsible for the overall management and implementation of the stormwater public education and outreach program in their township. These activities are well within the authority and ability of the county and townships, in partnership with FSWCD.

G. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated Audience Reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>1) Distribute educational information through articles and illustrative photographs.</p>	<p>a. Each township will publish one theme-specific educational article in a township newsletter and / or website each year. Township stormwater contact may choose theme to fit with township’s greatest need as long as five are covered during permit period.</p>	All	Township residents	49,053 (50% of) households in townships annually	<p>i. Each township will publish a stormwater education news article to be disseminated to all township residents once per year through newsletter, or web site if no newsletter.</p> <p>ii. Townships will post the article on their township web site if available.</p> <p>iii. In the one township with neither newsletter nor website, other avenues will be considered.</p>	<p>Annually</p> <p>Township Designated Staff</p> <p>FSWCD, Communications Specialist</p>
	<p>b. Most townships with a web presence will have a page or document on their web site on the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.</p>			3,750 residents (15 out of 18 townships and the Village of Lockbourne have websites) annually	<p>i. Website development and maintenance is an educational tool used by townships.</p> <p>ii. FSWCD has stormwater impacts pages. Some townships have stormwater impacts pages already.</p> <p>iii. Stormwater information will be made available on all partner websites. This activity will be documented and retained for annual reporting.</p>	<p>Annually</p> <p>Township Designated Staff</p> <p>FSWCD, Communications Specialist</p>
	<p>c. General interest quarterly conservation newsletter, <i>Frankly Speaking</i>, distributed to over 4,000 interested Franklin County residents, and to special populations including developers, consultants, and contractors.</p>		Franklin County Residents	981 (2% of) residents annually	<p>i. <i>Frankly Speaking</i> will continue to be distributed to all individuals expressing an interest in receiving conservation updates.</p>	<p>Semi Quarterly</p> <p>FSWCD, Communications Specialist</p>

G. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated Audience Reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
	d. Developing lands newsletter will be distributed to design, construction, development, and regulatory community three times each year.	GI&BSD	Development and local government professionals	733 (100% of) known professionals in unincorporated FC	i. <i>The Urban Review</i> will continue to be distributed to all parties engaged in development in unincorporated Franklin County.	Semi Quarterly FSWCD, Urban Conservation
	e. Publicize to township residents and employees.	TI&D	Township Employees and Residents	50% of Township employees	i. Develop information for brochures and websites. ii. Distribute and promote information at events, meetings and in newsletters	Annually FSWCD, Communications Specialist FCPH Staff
	f. Coordinate with Franklin County Commissioners Group, Franklin County Green Team, and Franklin County Commissioner Communication staff resulting in three opportunities to address stormwater management themes within county commissioner agencies.	All	Franklin County Agencies	150 Franklin County employees annually	i. Advertise existing outreach and education programs to staff within the County Agencies.	Annually FSWCD, Communication Specialist
	g. Social media will be used to provide information and updates to interested residents, stakeholders and partners.	T&ID BC&LM HSTS	Franklin County residents, elected officials, and conservation	At least 500 people annually	i. Social media will continue to be used to distribute updates and information by FSWCD and MORPC at least monthly.	Monthly FSWCD, Communications Specialist

G. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated Audience Reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
			professionals		ii. Documentation of occurrences, target audience, and contact numbers will be retained for annual reporting.	MORPC, Outreach Specialist
	h. Four or more press releases per year will be distributed to the media on a timely stormwater related topic for the purposes of public education and involvement.	T&ID BC&LM HSTS	Franklin County residents, elected officials, and conservation professionals	From 11,425 to 70,640 (% of population living in County times the number of estimated people to be receiving the Columbus Dispatch	i. Press releases will be distributed widely not only to the media but also to stakeholders and employees. ii. Documentation of press releases, including resulting press by the media, target audience, and contact numbers will be retained for annual reporting purposes.	Quarterly FSWCD, Communications Specialist

G. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated Audience Reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>2) Provide environmental educational presentations and interactive displays to students K-12.</p>	<p>a. Provide programming to all schools in unincorporated Franklin County.</p>	<p>T&ID BC&LM</p>	<p>K-12 Students</p>	<p>5% of students (1,000 out of 20,000)</p>	<p>i. Provide targeted stormwater education programming in coordination with state curriculum standards for students K-12 attending schools in unincorporated Franklin County. ii. With central Ohio partner organizations including Soil and Water Districts in contiguous counties, COSI, and Metro Parks, FSWCD has facilitated an annual series of workshops for both formal and non-formal teachers. iii. Advertise available resources and programs for stormwater education through education newsletter. iv. Loan out education kits, displays and materials for use by environmental educators. vi. Documentation of occurrences, target audience, and contact numbers will be retained for annual reporting.</p>	<p>Annually FSWCD, Education Specialist</p>

2. Public Participation and Involvement

A. Introduction

This minimum measure requires Franklin County to engage the public for input and involvement in the county stormwater management program (SWMP) and the county illicit discharge detection and elimination (IDDE) plan. Public participation and involvement follows good public education and outreach to ensure compliance with local and state regulations, resolution of failing HSTS impacts and support for community projects and programs needed for a successful stormwater program. The anticipated results are broader public support, improvements to the program plan and implementation, shorter implementation schedules, additional resources, and greater benefits to water quality in the county.

Benefits to the county include identification of resources and opportunities outside of existing county operations. Participation supports the county's tradition of serving the community.

Summarized Requirements from Ohio EPA Permit:

- Comply with state and local public notice requirements.
- Describe public involvement opportunities in developing and implementing your stormwater management program.
- Describe target audiences for public involvement including residents, businesses, landowners, educational organizations, and community groups.
- Five public involvement activities over the permit term.

B. Decision Process

To address this minimum control measure, the townships of Franklin County will engage in a stormwater management program that allows for and encourages community participation. In order to involve the community effectively, local elected officials' leadership and support will continue to be important. For example, township trustees who often have close ties with residents need to understand the need for and support the implementation of the stormwater program. For successful program implementation, local elected official engagement and cooperation will be integral to effective public participation.

After the first draft of the stormwater management program is developed, it will be made available to stakeholders for their comment and review. Stakeholders are identified as residents, businesses, landowners, educational organizations, and community groups, especially watershed groups. Stakeholder input will assist in further development of activities and targets. Once the program has had an opportunity for public comment, comments received will be recorded and addressed. All township trustee meetings comply with Ohio public notice and open records laws.

As required by Stormwater Regulations and as a logical progression of the County SWMP specific focus areas for public involvement will include businesses, developers and communities impacted by HSTSs. HSTS education will include focused presentations to affected communities on the IDDE plan under development. This plan will include the identification of geographic areas of pollution discharge that present risks to public health, a prioritization of these locations, a timeframe and methods for eliminating these risks, and opportunities for public input and comment. Individuals with failing HSTS will be actively involved with FCPH in connecting to sanitary sewer or upgrading failing systems.

Participation and involvement opportunities include:

- i. Regular township trustee meetings that are open to and attended by residents.
- ii. Township open house, picnic, harvest homecoming, etc. as available.
- iii. Involvement of youth groups including after-school clubs, scouting organizations, or religious fellowship groups in watershed activities.
- iv. Involvement of adult civic or religious organizations in watershed activities.
- v. Notices in township newsletters and / or websites seeking comment on NOI and SWMP.

C. Best Management Practices

The following BMPs will be used for public education and outreach:

- i. Provide opportunity for and consideration of public input into stormwater management program.
- ii. Involve residents in implementation of stormwater program and improvement of water quality.
- iii. Support existing watershed protection efforts.

D. Themes

Franklin County will address at least five different education themes during the duration of this permit. The themes will target existing TMDLs and potential community pollution sources as defined under community description on page 9.

Stormwater Program Themes:

- i. **Trash & Illegal Dumping (T&ID)** will focus on stormwater pollution prevention opportunities for businesses and residents. This will incorporate proper use of lawn and garden chemicals, yard waste disposal, hazardous waste disposal, recycling opportunities how to report illegal dumping, and stream clean-ups. This will address nutrients and urban runoff pollution.
- ii. **Streamside Buffers (SB)** will focus on protecting and establishing stream buffers through plantings and education. This will address habitat, hydrology, sediment, and nutrients.
- iii. **Backyard Conservation & Landscape Maintenance (BC&LM)** will focus on the use of composting, rain barrels, rain gardens, native vegetation, and trees to capture stormwater, prevent erosion, and protect stream corridors on residential properties. This will address habitat, hydrology, sediment, nutrients, and urban runoff.
- iv. **Green Infrastructure & Better Site Design (GI&BSD)**, will target the development community and focus on how to properly manage construction projects from planning through post-construction maintenance for better water quality, infiltration, and regulation compliance. This will address sediment, nutrients, bacteria, hydrology, and habitat.
- v. **Managing your Home Sewage Treatment System (HSTS)** will focus on educating home owners on the responsibilities and proper management of an on-site sewage treatment system. This will keep nutrients, bacteria and pathogens from contaminating the water.

E. Target Audiences

- i. **Residents of townships** are targeted for improvements to general urban runoff pollution.
- ii. **Commercial and industrial businesses** are targeted for improvements in urban runoff pollution and stormwater retention and infiltration.

- iii. **Landowners** are targeted for implementation of conservation implementation that can improve urban runoff and stormwater. Specific landowner audiences that may receive particular attention include:
 - a. Stream side landowners
 - b. Homeowners with HSTS systems
 - c. Landowners considering improvements to their property
 - d. Landowners interested in conservation practices
- iv. **Development community** is targeted to reduce impacts to water quality from developing lands.
- v. **Students and Youth** are targeted because they are the future landowners and decision makers.
- vi. **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
 - a. Watershed groups
 - b. Environmental groups
 - c. Homeowner associations
 - d. Civic associations
 - e. Water Quality Partnership areas
 - f. Scout Troops

F. Types of Public Involvement

- i. Participation by residents and community representatives in stormwater activities and decisions through public meetings and open houses.
- ii. Updates and information provided at township trustee meetings.
- iii. Community projects and events including SWACO HHW collection days and locations, rain garden workshops and cost-share programs, stream clean-ups, storm drain stenciling, etc.
- iv. Facilitating and participating in regional forums and events that encourage discussion and shared learning among community leaders, stormwater professionals, and engaged residents.

G. Responsible Party and Legal Authority

FSWCD will provide guidance and assistance with educational materials and presentations to assist the county, 17 townships, and the Village of Lockbourne with compliance. An employee designated by each township will be responsible for the overall management and implementation of the stormwater public education and outreach program in their township. These activities are well within the authority and ability of the county and townships, in partnership with FSWCD.

H. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>1) Provide opportunity for and consideration of public input into stormwater management program.</p>	<p>a. Allow for public input into the stormwater management program through township representation.</p>	<p>All</p>	<p>Residents and landowners of township through their township representatives.</p>	<p>One township representative on County Executive Committee</p>	<p>i. Township representation on County Executive Stormwater Committee planning meetings. ii. Communication to township trustees at least annually at a township association meeting.</p>	<p>Annually Township Designated Staff</p>
	<p>b. Allow for public comment of stormwater management program.</p>	<p>All</p>	<p>All stakeholder groups including watershed groups, Sierra Club, Developers and Central Ohio Greenways.</p>	<p>Comments received from at least 3 stakeholder groups.</p>	<p>i. Post link to SWMP on websites and in newsletters as applicable. ii. Request review from targeted stakeholder groups.</p>	<p>Ongoing Township Designated Staff FSWCD, Communications Specialist FCDE, Drainage Engineer</p>
	<p>c. Put SWMP on trustee meeting agenda once each year.</p>	<p>All</p>	<p>Township trustees and residents</p>	<p>All township trustees and residents attending public meetings.</p>	<p>i. Trustees will put SWMP on their agenda and invite their representative or a representative from the County Stormwater Exec Committee member to provide update.</p>	<p>Annually Township Designated Staff FSWCD Staff FCPH Staff</p>

H. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>2) Involve residents in implementation of stormwater program.</p>	<p>a. Conduct community projects for stormwater management.</p>	<p>All</p>	<p>Township Residents Community Groups Commercial and industrial businesses</p>	<p>1 event per township over the permit term. 5% of township residents reached.</p>	<p>i. Each township will organize and participate in at least one event over the permit term. This can include public events to solicit comments for stormwater program or related regulation changes, advertising SWACO HHW collection days and locations, rain garden workshops and cost-share programs, stream clean-ups, storm drain stenciling. The same or similar events can be repeated over multiple years.</p> <p>ii. Franklin Soil and Water Conservation District will Community Backyards Program to township residents with \$50.00 rebates for compost bins, rain barrels and native plants for participation in the program.</p> <p>iii. Franklin Soil and Water will promote lawn care campaign to unincorporated residents where they can receive a rain gauge and other tools for their pledge to adopt stormwater friendly lawn care practices.</p>	<p>Annually Township Designated Representative</p>

H. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
					<p>iv. Franklin Soil and Water will support at least stormwater demonstration project within unincorporated Franklin County with public participation.</p> <p>v. Franklin Soil and Water Conservation District will promote rain garden and stormwater education information and programs through garden centers.</p>	
	<p>a. Increase homeowner awareness and knowledge of how to properly care for discharging HSTSs and report failing HSTSs.</p>	<p>HSTS</p>	<p>Residents</p>	<p>Approximately 3,000 households</p>	<p>i. Distribute an educational flier to all owners of discharging HSTSs that explains how to maintain their own discharging HSTS and how to report a failing HSTS.</p>	<p>Annually FCPH, Environmental Health Div. Manager</p>
<p>3) Support existing watershed protection efforts.</p>	<p>a. Participate in Central Ohio Watershed Council and encourage participation in common goals.</p>	<p>All</p>	<p>Watershed groups</p>	<p>Attendees at COW council meetings.</p>	<p>i. Work with citizen volunteers to educate others in the community regarding stormwater.</p>	<p>Semi Quarterly FSWCD, Watershed Coordinators</p>

H. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>4) Organize and facilitate regional forums for the purposes of involving the larger community in stormwater management.</p>	<p>a. Organize forums and/or work groups to increase collaboration, feedback and support for stormwater management efforts.</p>	<p>All</p>	<p>Franklin County residents, businesses, and stakeholders</p>	<p>Audience dependent on event</p>	<p>i. Continue facilitation of and participation of Central Ohio Stormwater & Erosion Control Expo, MORPC Summit on Sustainability and the Environment, MORPC Water Quality Working Group, Central Ohio Greenways, and Central Ohio Stormwater Roundtable.</p> <p>ii. Progress, target audience, and participation of all events will be documented and retained for annual reporting.</p>	<p>Monthly to Quarterly FSWCD, Urban Conservationist</p>

3. Illicit Discharge Detection and Elimination

A. Introduction

This minimum measure requires Franklin County to implement and enforce a program to detect and eliminate illicit discharges, and includes comprehensive mapping of the Municipal Separate Storm Sewer System (MS4). As defined by Environmental Protection Agency (EPA), an MS4 is: the conveyance or system of conveyances (including roads, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is owned or operated by a public body, designed and used for collecting Stormwater, is not a combined sewer, and is not part of a Publically Owned Treatment Works (POTW).

As defined by EPA, an illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater except discharges authorized under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from firefighting activities. Franklin County has not identified any of the following non-stormwater discharges as significant contributors of pollutants to our MS4 and as directed by the permit will not address them; waterline flushing, springs, water from crawl space and sump pumps, footer drains, landscape irrigation, lawn watering, diverted stream flows, rising ground waters, individual residential car washing, uncontaminated groundwater, foundation drains, uncontaminated pumped groundwater, air conditioning condensation, dechlorinated swimming pool waters, potable water sources, flow from riparian habitats and wetlands, street wash water, and discharges or flows from firefighting activities.

In addition, Franklin County has identified non-commercial vehicle washing as an incidental non-stormwater discharge that will not be addressed as an illicit discharge because it is not expected to be a significant source of pollutants to the MS4.

Addressing this minimum measure includes mapping, legal prohibition and enforcement of illicit discharges, and a plan to detect and address illicit discharges.

Identifying and actively addressing water quality issues at the local level supports the recognition of Franklin County as a “green” community, ensures that this remains a great place to live, and serves as a regional example for improving water quality for other counties and townships. This will address the TMDL issues of bacteria, nutrients, and toxicity in the County.

Summarized Requirements from Ohio EPA Permit:

- Develop, implement, and enforce a program to detect and eliminate illicit discharges into your small MS4.
- Complete a comprehensive storm sewer system map showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. The comprehensive storm sewer system map shall also include your MS4 system, including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality Best Management Practices (BMPs) and private post construction water quality BMPs. The map must be updated annually and as needed.
- Mapping must contain a list of all Household Sewage Treatment Systems (HSTSs) connected to discharge to your MS4. This map shall include details on the type and size of conduits/ditches

in your MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from your MS4.

- Prohibit, through ordinance, or other regulatory mechanism, illicit discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and eliminate non-stormwater discharges, including illegal dumping, to your MS4.
- Identify residences with existing individual discharging HSTSs that can be legally, feasibly, and economically connected to sanitary sewers.
- Develop or enhance an operation and maintenance program which determines if existing HSTSs are operating as designed and intended and if not, then a program that requires elimination, upgrade or replacement of the systems.
- Investigate the source of contamination in outfalls identified during the dry weather screening process.
- Work with local wastewater authorities to evaluate the planned or possible future installation of sewers for areas, which contain high densities of discharging HSTSs.
- Inform public employees, businesses and the public of hazards associated with illegal discharges and improper disposal of waste.

B. Decision Process

The Franklin County Stormwater Program is part of a progressive effort to reduce the volume of and manage the pollution of stormwater that is conveyed to community streams during storm events.

While the entirety of unincorporated Franklin County is the focus of the Stormwater Management Program, the urbanized areas, as identified in the US Census, are the focus of the NPDES stormwater permit, thus making the minimum requirements of the NPDES permit a subset of the overall effort and direction of the Franklin County Stormwater Program.

The Franklin County Stormwater Partnership agencies have had significant success in documenting and mapping natural drainage features as well as constructed stormwater infrastructure throughout Franklin County. In addition to these resources, improvements have been made in the documentation and mapping of aerators throughout Franklin County, as well as outreach to and education of county residents relative to stormwater issues and HSTS.

The issues with HSTS are numerous and diverse throughout Franklin County and pose the largest set of problems when considering their effects on water quality. While the legal responsibilities lie with the owners of HSTSs and the legal authority lies with Franklin County Public Health, the Franklin County Stormwater Partnership agencies are working together to provide guidance and alternatives to owners of malfunctioning or failing systems. In Franklin County, this issue also involves the local municipalities (including the City of Columbus) for long term, sanitary sewer resolutions. Further understanding of the HSTSs management challenges and viable options for addressing failing or malfunctioning HSTSs is available in a separate Illicit Discharge Detection and Elimination planning document is available through Franklin County Public Health.

To this end, the core of MCM #3 efforts will be on maintaining a strong working relationship between Franklin Soil and Water Conservation District and Franklin County Public Health in the

monitoring of the MS4, continued monitoring of HSTS, and working on resolving illicit discharge issues as they are identified. In addition, coordination with the Franklin County Sanitary Engineer and the Franklin County Engineer will maintain crucial as comprehensive mapping is updated throughout the county to assist in tracking illicit discharge sources and identifying possible connections to sanitary sewer.

To this end, the core of MCM III efforts will be on maintaining a strong working relationship between Franklin Soil and Water Conservation District and Franklin County Public Health in the monitoring of the MS4, continued monitoring of HSTS, and working on resolving illicit discharge issues as they are identified. In addition, coordination with the Franklin County Sanitary Engineer and the Franklin County Engineer will maintain crucial as comprehensive mapping is updated throughout the county to assist in tracking illicit discharge sources and identifying possible connections to sanitary sewer. All activities undertaken with this MCM that relate to HSTS and other sewage related issues help to address the TMDLs of bacteria and nutrients identified in the watersheds within Franklin County.

C. Summary of Planned Activities

The following describes how Franklin County plans to proceed with the requirements for NPDES permit:

- i. Continue to ensure public and county employee awareness on how to recognize and address illicit discharges of all types through public education and proper documentation and handling of illegal dumping and pollution complaints.
- ii. Continue the dry-weather-screening throughout each of the townships and incorporate findings into existing database.
- iii. Continue active investigations of HSTS in areas identified in the analysis conducted in 2011 and highlighted in public meetings and on the FCPH website. These investigations will include an evaluation of the systems as well as consideration of various options for resolving malfunctioning systems including:
 - a. Connecting at risk unincorporated geographical areas or subdivisions with illicit discharges and/or failed HSTS causing public health nuisances to a sanitary sewer extension;
 - b. Increasing financial resources for sanitary sewer extensions and maintenance and operation;
 - c. Improving jurisdictional cooperation on annexation issues;
 - d. Providing public notice, education, and participation;
 - e. Repairing, altering or replacing illicit discharges and/or failed HSTS causing public health nuisances in unincorporated geographical areas or subdivisions with without access to sanitary sewers to operate as designed and intended;

- f. Requiring continuous inspection, operation, and maintenance programs of all existing HSTS; and
 - h. Reestablishing flexible, reasonable and transparent time-frames.
- iv. Evaluate effectiveness of existing IDDE activities and update IDDE Plan, SWMP and program activities as necessary.

D. Responsible Party and Legal Authority

NON-HSTS DISCHARGES

For non-HSTS Discharges Section 551 of the Franklin County Zoning Resolution addresses nuisances including trash, toxic and hazardous materials. Enforcement through this avenue may be a lengthy process.

Alternatively, local law enforcement as defined in ORC 2935.03 can enforce ORC 6111 which states: no person shall recklessly cause pollution or place or cause to be placed any sewage, industrial waste, or other wastes in a location where they cause pollution to any WATERS OF THE STATE without a valid or unexpired permit issued by the director of the Ohio EPA. Grab samples may be taken by the OEPA, local law enforcement or other officials during the investigations of these crimes and have them analyzed for evidence. The authority is granted to local law enforcement to file charges on violators of ORC 6111 by the authority granted under ORC 2935.03. The Franklin County Assistant Prosecutor may also file an indictment in order to obtain convictions through the Franklin County Environmental Court. The penalty for these crimes is an unclassified misdemeanor. Historically, the Environmental Court judge has issued penalties to perform community service or to educate industry on the proper methods to dispose of hazardous chemicals and wastes. All fines collected from convictions are deposited in a special “clean-up” fund administered by the Environmental Court and a committee managed from Franklin County Public Health, and used for public education and right-of-way illegal dumping clean-up.

HSTS ILLICIT DISCHARGES and PUBLIC HEALTH NUISANCES

Franklin County Public Health staff has the authority to enforce Franklin County Public Health Regulation 106, Ohio Administrative Code 3701-29 and Ohio Revised Code 3718.011 to meet the requirements of the Franklin County NPDES Phase II Permit in the area of Illicit Discharge Detection and Elimination. Franklin County Public Health has authority to regulate sewage treatment systems ("STS") under Revised Code Chapter 3718 and Franklin County Public Health Regulation 106, Ohio Administrative Code 3701-29. Neither R.C. Chapter 3718 nor Regulation 720 use the phrase "illicit discharge," however, the authority to address public health nuisance conditions is covered both by statute and rule.

When it is alleged or upon discovery that an HSTS is causing a public health nuisance as defined in R.C. 3718.011 and/or OAC 370-29, then Public Health has the authority to investigate such complaints and allegations. Sanitarians are responsible for investigating all illicit discharges and sewage nuisances. The enforcement process is summarized below:

- Water Quality Program sanitarians will investigate and issue Notice of Violation(s) if a nuisance condition(s) is verified by observation and/or water testing of effluent as defined in ORC 3718.011 and OAC 3701-29;

- If compliance is not achieved through issuing Notice(s) of Violation, staff sanitarians will provide recommendations to the Board of Health requesting an Order from the Board of Health declaring the existing condition(s) a nuisance and ordering the owner/responsible party to abate such condition(s) which may include repair or alteration of the existing HSTS or installation of a new HSTS or if applicable, connecting to sanitary sewer;
- In addition, this Order will also allow staff sanitarians to refer this matter to the Franklin County Prosecuting Attorney or Municipal Law Director for further legal action if compliance is not obtained through this Board of Health Order;
- A civil action will be filed in Franklin County Municipal Court, Environmental Division to seek injunctive relief and permanent injunction against the owner and/or responsible party and the real property where a violation is occurring;
- The court in which such an action is filed has jurisdiction to grant such relief upon showing evidence that the nuisance condition(s) exist on the real property and the defendant(s) named in the complaint is in violation of Revised Code and/or OAC 3701-29;
- Additional motions include contempt for which the penalty can be daily fines and/or jail time for the defendant(s);
- Finally, accumulated daily fines can be reduced to a judgment and assessed against the real property. As a possible last remedy, the Board of Health may also authorize the prosecutor to file foreclosure against the property in order to collect the lien and force a sheriff sale of the property.

CONNECTION TO CENTRAL SANITARY SEWER

Public Health also possesses the authority to require that whenever a central sanitary sewerage system is determined to be available and accessible to a property, the household sewage treatment system shall be abandoned and the house sewer directly connected to the central sewerage system. This authority applies regardless of the manner by which the sanitary sewerage system was constructed. A similar process of enforcement will be followed as outlined above which may include issuing to the property owner Notice(s) of Violation, a Board of Health Order and filing for injunctive relief. There are many variables in the current state of the law regarding enforcement, including but not limited to: whether or not Public Health enforces its local regulation or the existing State rules); whether or not the Public Health order is appealable under ORC Chapter 2506 for enforcement of local regulation or appealable under ORC section 3718.11 to Court of Common Pleas or Sewage Treatment System Appeals Board; and whether or not Public Health seeks injunctive relief under ORC section 3709.211 or ORC section 3718.10. Additional remedies are available when sanitary sewer is available and accessible. See ORC Chapter 6117 and NPDES Permit No. OHQ000002, Part III, B(3)(d)(i).

E. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>1) Prohibit illicit discharges through ordinance</p>	<p>a. Continue to use OAC 3701-29 and ORC 3718.011 to eliminate illicit discharge into MS4 from HSTSs and discharges that create a public health nuisance as defined in the above-cited regulation and code.</p> <p>b. Continue to inform local law enforcement of ability to address illicit discharges through ORC 2935.03 to enforce ORC 6111.</p>	<p>i. Continue to utilize established state and local codes, regulations and ordinances as needed.</p> <p>ii. Zoning regulations identified for prohibiting illicit discharges</p> <p>iii. Communicate with local law enforcement and townships on ability to use state regulations to address and stop illegal dumping into MS4 and local waterways.</p>	<p>Initiated December 31, 2010 and ongoing FCPH, Environmental Health Division Manager (EHDM)</p> <p>December 31, 2010 (completed) FCPH, EHDM</p> <p>December 31, 2010 (completed) FCPH, EHDM</p>
<p>2) Develop a comprehensive storm sewer map</p>	<p>a. A comprehensive storm sewer map (MS4) is completed and updated to reasonable extents and formats allowed by available funding.</p>	<p>i. Further development of a comprehensive storm sewer map of County and township infrastructure using GPS and GIS. If sufficient funding and resources are not available each township will be provided with paper copy base maps showing roads, hydrology, political subdivisions, and other layers needed to complete the mapping manually.</p>	<p>January 2018 FCDE, Project Manager</p> <p>FSWCD, Geomatics Group Township Designated Staff</p>

E. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>3) Complete a list and compile a map of HSTS discharging to MS4s.</p>	<p>a. Compile and maintain a database showing the addresses and Parcel ID's of aeration treatment systems connected to discharge to the MS4s.</p>	<p>i. Complete a database of aeration treatment systems connected to the MS4.</p> <p>ii. Continue to update the aerator treatment system database as directed in the IDDE Plan.</p> <p>iii. Combine GIS layers from Storm Sewer System Map and HSTS Mapping.</p>	<p>December 31, 2009 (completed) FCPH, EHDM, with assistance from FCDE and FSWCD</p> <p>Ongoing FCPH, EHDM with assistance from FCDE and FSWCD</p> <p>To be developed in conjunction with BMPs 2 and 3. 2018 FCPH, EHDM</p> <p>FSWCD, GIS Natural Resource Specialist</p>

E. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>4) Describe procedures for locating priority areas; tracing and removing illicit discharges</p>	<p>a. A completed and updateable IDDE plan that considers stormwater discharges, and significant non-stormwater discharges.</p> <p>b. Continue to investigate reports of illicit discharges, failing HSTSs and public health nuisances as directed by the IDDE Plan.</p> <p>c. Continue annual operation and maintenance program of aeration treatment unit systems.</p>	<p>i. IDDE Plan and related information can be found on the FCPH website, in outreach material or through public presentations.</p> <p>ii. Registered Sanitarians within the Water Quality Program of FCPH will investigate failed HSTS complaints and public health nuisances caused by HSTSs as defined by codes, regulations and ordinances. An outline of enforcement and abatement of failed HSTSs is outlined in the SWMP and IDDE plan.</p> <p>iii. Continue education efforts targeting residents, county employees and businesses about public health risks, prohibitions against illicit discharges, maintaining HSTSs and how to report illicit discharges and sewage nuisances as outlined in IDDE Plan.</p>	<p>Updated November 2013 FCPH, EHDM, FSWCD GIS Natural Resource Specialist</p> <p>Ongoing FCPH, EHDM</p> <p>Ongoing FCPH and FSWCD, Communication Specialist</p>
<p>6) Dry weather screening of outfalls.</p>	<p>a. Completion of ‘outfall reconnaissance inventory.’</p> <p>b. Continue mapping and dry weather screening efforts throughout Franklin County as identified in the IDDE Plan.</p> <p>c. Annual reporting of dry weather screening results including number of outfalls screened, flows identified, number of illicit discharges identified and number of illicit discharges eliminated.</p>	<p>i. Describe long-term surveillance plan for dry weather screening of MS4 in IDDE Plan.</p> <p>ii. Incorporate results into existing GIS layer.</p> <p>iii. Report results of dry weather screening including the number of outfalls screened, illicit discharged identified, and illicit discharges eliminated in annual reporting to Ohio EPA.</p>	<p>Beginning January 2012 and ongoing FCPH, EHDM, FSWCD GIS Natural Resource Specialist</p> <p>Annually & Ongoing FSWCD, GIS Natural Resource Specialist FCPH, EHDM</p>

E. Measurable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>7) Evaluate Effectiveness of IDDE Plan</p>	<p>a. Ensure IDDE plan is up to date and meeting the existing needs within established priorities to make the best use of existing and potential resources.</p> <p>b. Report the number of aeration treatment units observed/inspected in FCPH’s annual operation and maintenance program, and the disposition of these treatment units in annual report to Ohio EPA.</p>	<p>i. Annually evaluate IDDE plan and update plan as needed.</p> <p>ii. Annual report identification and elimination of illicit discharges to Ohio EPA in Annual Report.</p> <p>iii. Annual report of activities and disposition of the aeration treatment systems in FCPH’s operation/maintenance program to Ohio EPA in Annual Report.</p>	<p>Annually during reporting FCPH, DEH, with assistance from FSWCD and FCSE</p> <p>Annually & Ongoing FSWCD, GIS Natural Resource Specialist FCPH, EHDM</p> <p>Annually & Ongoing FSWCD, GIS Natural Resource Specialist FCPH, EHDM</p>

4. Construction Site Stormwater Runoff Control

A. Introduction

This minimum control measure addresses management of stormwater runoff from construction activity that results in a land disturbance of one acre or greater. Stormwater runoff management addresses both how water is retained and released during and after stormwater events and how erosion is minimized through the use of site design techniques, the management of construction activity, and the use of erosion control practices until a site is stabilized with permanent vegetation. Sediment is one of the TMDLs for Franklin County. During a short period of time, uncontrolled construction sites can contribute more sediment to streams than would be deposited naturally during several decades.

During construction, the design and installation of long term stormwater management controls are also reviewed and inspected along with temporary erosion and sediment controls. These controls may use overlapping or separate Best Management Practices.

Benefits to Franklin County and townships include reduced erosion and sedimentation along waterways and ditches, improved quality of streams for recreation and fishing, and continued availability of a quality drinking water supply.

Requirements from Ohio EPA Permit:

- Develop an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance. The regulation will be equivalent with the technical requirements set forth in the Construction General Stormwater Permits.
- Require construction site operators to implement appropriate erosion and sediment control BMPs;
- Require construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop procedures for stormwater pollution prevention plan review which incorporate consideration of potential water quality impacts.
- Develop procedures for receipt and consideration of information submitted by the public.
- Develop procedures for site inspection and enforcement of control measures.

B. Decision Process

Franklin County has had an active construction site runoff control program since 1986. This program is coordinated and led under the authority of the Franklin County Economic Development and Planning (EDP) department with assistance from and coordination with FCEO, FSWCD, FCPH, and the townships. The Technical Review Committee reviews residential and commercial development plan proposals for compliance with the applicable Construction General Permit prior to Franklin

County EDP issuing certificates of zoning compliance. Franklin Soil and Water Conservation District staff conducts site inspections in accordance with the applicable Construction General Permit requirements.

The Franklin County Stormwater Partnership will continue to enforce stormwater runoff controls on construction projects that disturb one acre or more of land. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre shall be included if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

TMDLs are targeted in the development of programs that support the Best Management Practices prescribed in this minimum measure. Ensuring proper controls on active construction sites with frequent site inspections and communications during planning will reduce sediment entering streams. By ensuring that proper long term controls for stormwater management are in place before and during construction, there will be a reduction in nutrients, bacteria, and toxicity entering the streams. Hydrology and habitat will also be addressed with proper stormwater controls and the identification of sensitive natural areas before and during construction.

C. Responsible Party and Legal Authority

Franklin County EDP will be responsible for the overall management of this Minimum Control Measure. Implementation of this minimum control measure's requirements will be completed by various agencies including Franklin County EDP, the County Engineer's office, the County Drainage Engineer's office and the Franklin Soil and Water Conservation District. Requirements will be addressed by documenting the implementation of BMPs required by the most current OEPA construction general permit. The County Engineer and Franklin County EDP will review the success and document achievement of the measurable goals of the construction site stormwater runoff control program and BMPs.

Franklin County EDP has the legal authority to develop and enforce regulations for construction site stormwater runoff control for all major county subdivisions. The Franklin County Subdivision Regulations, adopted in 2012, address the requirements for developing major subdivisions. Section 303 and 305 of the Subdivision Regulations and Section 3.5 of the Franklin County Stormwater Drainage Manual address erosion and sediment control requirements for major subdivision and require compliance with the applicable OEPA Construction General Permit. Section 800 of the Subdivision Regulations outlines enforcement procedures for violations, including penalties for violations.

Franklin County EDP has the legal authority to develop and enforce regulations for construction site stormwater runoff control for single lot developments in 10 of the 17 townships in Franklin County. Franklin County uses zoning regulations for this purpose. Sections 705 and 710 of the Franklin County Zoning Resolution are used to ensure compliance with NPDES permit requirements; this includes requirements for the review of development proposals, inspections, enforcement and

penalties for non-compliance. Section 551 of the Franklin County Zoning Resolution addresses nuisances including trash, toxic and hazardous materials.

The remaining seven townships adopt and enforce township zoning regulations that address construction site stormwater runoff control for single lot developments. The seven townships administering their own zoning include: Blendon, Jackson, Jefferson, Perry, Plain, Prairie and Washington. These six townships have similar legal authority and requirements for development as Franklin County.

Franklin Soil and Water Conservation District has the authority to provide assistance and review for erosion and sediment control as outlined in ORC 1515.

The County Engineer's office has agreed to assist in reviewing stormwater calculations for the townships.

D. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>1) Ordinance or Other Regulatory Mechanism</p>	<p>a. Regulatory mechanism requiring implementation of proper erosion and sediment controls and Stormwater pollution prevention for all development sites disturbing over one acre and in compliance with General Construction Permit.</p>	<p>i. Enforce sediment and erosion control of one acre or more with existing regulations and state regulations meeting permit minimum requirements.</p> <p>ii. Continue reviewing and updating regulatory mechanism</p> <p>iii. Cite local code(s) being used (If available, web link for code(s)) will be reported in the annual report).</p>	<p>Ongoing, County EDP, Planning Staff Townships with own zoning, designated staff FSWCD, Urban Conservationist</p> <p>Ongoing, County EDP, Planning Staff Townships with own zoning, designated staff</p> <p>Annually, County EDP, Planning Staff Townships with own zoning, designated staff</p>
<p>2) Sediment and Erosion Control Requirements</p>	<p>a) Enforce regulatory mechanism requiring implementation of proper erosion and sediment controls.</p>	<p>i. Enforce sediment and erosion control of one acre to ensure compliance with existing regulations and state regulations.</p>	<p>Ongoing, County EDP, Planning Staff Townships with own zoning, designated staff FSWCD, Urban Conservationist</p>

D. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
		ii. Annually report inspection results.	Annually, FSWCD, Urban Conservationist
3) Complaint Process	a. All complaints documented and forwarded to correct agency to address.	i. Number of complaints received and followed-up on results recorded. ii. Complaint database results will be included in the annual report.	Annually FSWCD, Urban Conservationist FCDE, Project Manager County EDP, Planning Staff Townships with own zoning, designated staff
4) Site Plan Review Procedures	a. Continue to utilize procedures for reviewing construction plans for sites over one acre for erosion and sediment control and stormwater pollution prevention.	i. Implement existing procedures for construction site plan review. ii. Continue reviewing and updating procedures for construction site plan review to reflect changes in state and local regulations. iii. Number of sites requiring plans and number of plans reviewed will be reported in the annual report.	Ongoing, County EDP, Planning Staff Townships with own zoning, designated staff FSWCD Urban Conservationist Ongoing, County EDP, Planning Director Annually, FSWCD, Urban Conservationist

D. Measureable Goals and Planned Activities (see *limitations of plan pg. 6*)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>5) Site Inspection Procedures</p>	<p>a. Continue site inspection schedule in compliance with site inspection procedures adopted by each agency. The frequency of inspections must be no less than monthly and after major storm events.</p>	<p>i. Review procedures with relevant county and township staff.</p> <p>ii. Number of sites, number of inspections, and average frequency of inspections will be reported in the annual report.</p>	<p>Annually</p> <p>FSWCD, Urban Conservationist</p> <p>County EDP, Planning Staff</p> <p>Townships with own zoning, designated staff</p>
<p>6) Enforcement Procedures</p>	<p>a. Continue to implement enforcement procedures in regulatory mechanisms for erosion and sediment controls, construction site waste controls and stormwater pollution prevention to ensure all requirements are being met.</p>	<p>i. Continue to enforce non-compliance with existing procedures that meet minimum permit requirements.</p> <p>ii. Review and update of enforcement procedures to enhance program.</p> <p>iii. Number of violation letters and number of enforcement actions will be reported in the annual report.</p>	<p>Ongoing</p> <p>County EDP, Planning Director</p> <p>Townships with zoning, Administrator</p> <p>Ongoing</p> <p>County EDP, Planning Director</p> <p>Townships with zoning, Administrator</p> <p>Annually</p> <p>Franklin SWCD, Urban Conservationist</p>

5. Post-Construction Stormwater Management in New Development and Redevelopment

A. Introduction

These measures start at development plan review and continue through ongoing management of stormwater management practices that remain on site after construction. Well designed and maintained post construction stormwater management addresses both water quantity and quality for the long term. This includes the use of non-structural Best Management Practices (BMPs), including wise placement of green space and stream buffers which can reduce costs of ongoing maintenance. Benefits of managed stormwater runoff include increased infiltration for ground water recharge, decreased stream erosion through reduction of stormwater volumes, and improved water quality by capturing pollutants from runoff using well designed BMPs or treatment trains. These benefits will also help improve the TMDL issues of sediment, habitat, and hydrology.

Requirements from Ohio EPA Permit:

- Develop, continue to implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into our small MS4. The program will ensure that controls are in place that will prevent or minimize impacts.
- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for our community.
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. The ordinance or regulatory mechanism will, at a minimum, be equivalent with the technical requirements set forth in the applicable Ohio EPA NPDES General Stormwater Permit (s) for Construction Activities applicable for our permit area which have been issued at the time of issuance of this permit. This includes the following Ohio EPA NPDES General Stormwater Permits for Construction Activities: OHC000003, OHCD00001 and OHCO00001.
- The plan will ensure adequate long-term operation and maintenance of BMPs.

B. Decision Process

Franklin County will address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre including projects less than one acre that are part of a larger common plan of development or sale, with controls that prevent or minimize water quality impacts.

The Franklin County Stormwater Partnership will continue to enforce stormwater runoff controls on construction projects that disturb one acre or more of land. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre shall be included if that

construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

The Franklin County Stormwater Partnership will continue to promote post-construction nonstructural BMPs by recommending the adoption of appropriate policies and ordinances to regulatory authorities. Such policies and ordinances will protect environmentally sensitive areas and natural resources. The policies and ordinances may include conservation development regulations, riparian setback regulations, wetland setback regulations, and tree ordinances.

The Franklin County Stormwater Drainage Manual outlines requirements for post-construction structural BMPs including permitted types of practices, design standards, and long-term operation and maintenance requirements. Land use, potential pollution sources, existing water quality, and stormwater system information will be considered when selecting BMPs for this minimum control measure.

TMDLs are targeted in the development of programs that support the Best Management Practices prescribed in this minimum measure. By ensuring that proper long term controls for stormwater management are installed and maintained properly, there will be a reduction in nutrients, bacteria, and toxicity entering the streams. Hydrology and habitat will also be addressed with proper stormwater controls and the identification of sensitive natural areas.

C. Responsible Party and Legal Authority

Franklin County EDP, County Engineer and Drainage Engineer's office will be responsible for the overall management and implementation of the post-construction stormwater management program. Franklin Soil and Water will provide support with technical guidance and educational opportunities to assist the County in training and meeting this minimum control measure.

To the extent allowable under state and local law, Franklin County and townships have adopted regulations complimentary to the OEPA NPDES General Construction Permit requirements, for addressing post-construction runoff from new development and redevelopment projects. The regulatory mechanisms address implementation, maintenance, inspection and enforcement.

Franklin County EDP has developed and enforces regulations for post-construction stormwater management for all major county subdivisions. Section 300 of the Franklin County Subdivision Regulations addresses requirements for the development of a major subdivision. Section 307 of the Subdivision Regulations and Section 3.3 of the Franklin County Stormwater Drainage Manual specifically address post construction requirements.

Franklin County EDP has developed and enforces regulations for post-construction stormwater management for single lot developments in 10 of the 17 townships in Franklin County. Sections 705 and 710 of the Franklin County Zoning Resolution are used to ensure compliance with NPDES permit requirements; this includes requirements for the review of development proposals, inspections, enforcement and penalties for non-compliance.

The remaining seven townships have adopted and enforce township zoning regulations that address post-construction stormwater management for single lot developments. The seven townships administering their own zoning include: Blendon, Jackson, Jefferson, Perry, Plain, Prairie and Washington.

Franklin Soil and Water Conservation District has the authority to provide assistance and review for erosion and sediment control as outlined in ORC 1515.

D. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>1) Ordinance or Other Regulatory Mechanism</p>	<p>a. Regulatory mechanism requiring implementation of post-construction runoff controls for all development sites over 1one acre, including redevelopment sites.</p>	<p>i. Continue reviewing and updating regulatory mechanisms to enhance program.</p> <p>ii. Cite local code(s) being used.</p>	<p>Ongoing</p> <p>County EDP, Planning Director</p> <p>Townships with zoning, Administrators</p> <p>Annually</p> <p>FSWCD, Urban Conservationist</p> <p>FCDE, Project Engineer</p>
<p>2) Post-Construction Requirements</p>	<p>a. Continue to support nonstructural BMPs such as policies and ordinances that direct growth away from environmentally sensitive areas and protect valuable natural resources.</p>	<p>i. Adopt policies or ordinances such as riparian ordinances, tree ordinances, wetland ordinances, and conservation development.</p>	<p>Ongoing</p> <p>County EDP, Planning Director</p> <p>FSWCD, Urban Conservationist</p> <p>Townships with zoning, Administrators</p>

D. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
	<p>b. Provide guidance for structural BMPs using the Franklin County Stormwater Drainage Manual.</p>	<p>i. Structural and nonstructural standards being used will be listed in the annual report.</p>	<p>Annually FSWCD, Urban Conservationist County EDP, Planning Staff Townships with own zoning, designated staff</p>
<p>3) Site Plan Review Procedures</p>	<p>a. Continued implementation of procedures for reviewing stormwater pollution prevention plans for sites over 1one acre for post-construction BMPs, both structural and nonstructural, including commercial sites.</p>	<p>i. Review and enhance procedures for reviewing stormwater pollution prevention plans.</p> <p>ii. Number of sites requiring plans and number of plan reviews will be reported in the annual report.</p>	<p>Ongoing County EDP, Planning Director Township with zoning, Administrators FSWCD, Urban Conservationist FCDE, Project Manager</p> <p>Annually FSWCD, Urban Conservationist</p>

D. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>4) Site Inspection Procedures</p>	<p>a. All post construction structural and non-structural BMPs will be inspected during implementation and prior to acceptance to ensure the BMP will function as intended to reduce stormwater runoff from new development and redevelopment projects.</p>	<p>i. Ensure all post-construction BMPs are functioning as intended at the time of acceptance.</p> <p>ii. Number of sites, number of inspections, and average frequency of inspections will be reported in the annual report.</p>	<p>January 2011 FCDE, Project Manager</p> <p>Annually FCDE, Project Manager County EDP Planning Staff Townships with own zoning, designated staff FSWCD, Urban Conservationist</p>
<p>5) Enforcement Procedures</p>	<p>a. Enforcement procedures that ensure post construction BMPs are in place as intended and according to the general stormwater permit for construction activities applicable to either the County or the Darby Watershed, whichever area the project is located.</p>	<p>i. Continue implementing regulatory enforcement mechanism.</p> <p>ii. Number of violation letters and enforcement actions will be reported in the annual report.</p>	<p>Ongoing and Annually County EDP, Planning Director Township with Zoning, Administrators FCDE, Project Manger FSWCD, Urban Conservationist</p>

6. Pollution Prevention and Good Housekeeping

A. Introduction

The Pollution Prevention and Good Housekeeping Minimum Control Measure (MCM) requires the operator of a permitted Municipal Separate Storm Sewer System (MS4) to develop and implement an operation and maintenance program with the ultimate goal of reducing pollutant runoff from municipal operations such as park and open space maintenance, fleet and building maintenance, MS4 maintenance, new construction and land disturbances. TMDLs that may be addressed under MCM #6 are nutrients (from salt and fertilizers), and urban runoff (from the chemicals, paints, solvents, etc. used in the maintenance facilities.)

Applicable Requirements from Ohio EPA Permit:

- i. Required employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and stormwater system maintenance.
- ii. For facilities not requiring a separate NPDES Industrial Permit that conduct activities described in 40 CFR 122.26 (b)(14) such as vehicle maintenance facilities, fueling stations, salt storage, waste transfer stations, composting facilities and bus terminals, a Stormwater Pollution Prevention Plan (SWP3), shall be developed and implemented using the industrial permit SWP3 as a guide.
- iii. MS4 must adopt maintenance activities, schedules, inspection procedures, and proper waste disposal for controls to reduce pollutants.
- iv. New flood management projects must be assessed for impacts on water quality. Existing projects should also be evaluated for opportunities to incorporate additional water quality protection devices and practices.

B. Decision Process

The application of the NPDES permit requirements to Phase II communities presents some significant challenges for some agency partners participating in the Franklin county NPDES program. Employees of agencies with small staff resources are responsible for more diverse group of tasks. However, the nature of MCM #6 is specific to each agency partner and facility. It was determined that the most effective way to meet the intended program goals of MCM #6 was to utilize the greater NPDES program staff resources to provide training and guidance to Agency partners and facility managers. Agency partners and facility managers could develop appropriate procedures or controls after evaluating their operations, resources and facilities. They could also draw on resources and expertise available through the Franklin County NPDES program to for guidance and assistance when needed.

Actions completed under this MCM have included facilitating training and communication with partner agencies and providing guidance for the evaluation of municipal facilities and the development of SWPPPs where appropriate. The goal and intent has been to efficiently provide to the key personnel for each partner agency, the knowledge to examine and manage their own actions and facilities to reduce stormwater pollution discharging from streets, parking lots, open spaces, salt storage area, fueling stations and vehicle maintenance facilities to local waterways.

It is recommended that agency partners have appropriate operation and maintenance programs which include procedures, maintenance schedules and inspection schedules designed prevent or reduce pollutant runoff from municipal operations. Items covered may include but are not limited to:

- a. Storing potential pollutants inside or under cover,
- b. proper disposal of waste,
- c. salt storage and handling,
- d. oil water separator maintenance
- e. MS4 maintenance and waste disposal
- f. street sweeping,
- g. trash pickup along roads
- h. minimization and safe use of herbicides and pesticides

The NPDES program group also provides training each year for employees of co-permittees, and facility managers are encouraged to provide in house training specific to their operations and SWPPP if applicable. In house training should include facility specific information on reducing and preventing stormwater runoff from the facility. Some examples are:

- i. emergency spill procedures,
- j. maintenance activities and schedules,
- k. record keeping,
- l. stormwater flow path and
- m. proper disposal of waste.

Facility managers are also encouraged to share ideas and training opportunities with other facility managers who are co-permittees.

It is recommended that agency partners reduce or eliminate the discharge of pollutants from streets, roads, municipal parking lots, storage yards, maintenance facilities and salt storage facilities by storing potential pollutants indoors and/or in secondary containment, keeping exposed impervious surface clean and free from potential pollutants, minimizing the use of pesticides and herbicides, implementing street sweeping and trash pick-up programs and implementing BMPs which reduce runoff and or pollutant load.

Salt usage and conservation have not been a focus point because related decisions are driven by the need to provide for the safety of the traveling public while at the same time conserving limited financial resources. However, facility managers are encouraged to store salt under cover and to ensure handling areas are well cleaned after salt handling activities.

To further enhance the program, the township representative on the NPDES committee will continue to communicate with individual townships and work with them to improve stormwater quality efficiencies in facility and operation management, employee training, record keeping and annual reporting. Opportunities will be sought for shared training between co-permittees, facility evaluations will be reviewed and the need for regular inspection and recordkeeping emphasized.

The MS4 permit does require the county and townships to assess new flood management projects for water quality impacts and consider retrofits for existing projects. There are currently no facilities that fit this definition under county or township ownership at this time.

C. Description of Facilities Owned and Operated by Co-Permittees

County and Township Facilities							
Co-permittee Agency or Department Facility Name Address	Contact, & Phone	Located in the Urbanized Area? (Y/N)	Activities Conducted			Industrial SWP3	
			Salt Storage (Y/N)	Vehicle Maintenance (Y/N)	Vehicle Fueling (Y/N)	Required (Y/N)	Developed (Y/N)
Franklin County Engineer's Office East Outpost 4801 Hendron Road Groveport, OH 43215	Jerry Mitchell Safety Coord. 614-525-4895	Y	Y	Y	Y	Y	Y
West Outpost 4444 Fisher Road Columbus, OH 43291	Jerry Mitchell Safety Coord. 614-525-4895	N	Y	Y	Y	N	Y
Main Office Facility 970 Dublin Road Columbus OH 43215	Jerry Mitchell Safety Coord. 614-525-4895	Y	Y	Y	Y	Y	Y
Fleet Maintenance 1721 Alum Creek Drive, Columbus, OH 43207	Charlotte Ashcraft 614-525-3412	Y	N	Y	Y	Y	Y
Primary Facility Maintenance Court House 373 South High St. Columbus, OH 43215	Mark Hunter 614-525-5580	Y	N	N	N	N	N
Dog Shelter 4340 Tamarack Boulevard Columbus, OH 43224	Mark Hunter 614-525-5580	Y	N	N	N	N	N
Blendon Township Service Department 6360 S. Hempstead Road Westerville, OH 43081	John Giamarco Road Sup. 614-882-2673	Y	Y	Y	N	Y	

County and Township Facilities

Co-permittee Agency or Department Facility Name Address	Contact, & Phone	Located in the Urbanized Area? (Y/N)	Activities Conducted			Industrial SWP3	
			Salt Storage (Y/N)	Vehicle Maintenance (Y/N)	Vehicle Fueling (Y/N)	Required (Y/N)	Developed (Y/N)
Brown Township 2495 Walker Road Hilliard Oh. 43026	Joe Martin Twp. Trustee 614-876-2133	N	N	Y	N	N	
Clinton Township Road Department 3820 Cleveland Avenue Columbus Oh., 43224	Dan Klopfenstein Road Sup. 614-471-6854	Y	Y	Y	N	Y	
Franklin Township Road Department 2193 Frank Road Columbus, OH 43223	Jim Stevens Road Sup. 614-279-9411	Y	N	Y	N	Y	
Hamilton Township Storage Facility 317 Lockbourne Road Lockbourne, OH 43137	Don Smith Road Sup. 614-491-8550	N	N	N	N	N	N
Jackson Township Service Garage 3756 Hoover Road Grove City, OH 43123	Bob Snyder Road Sup. 614-871-1119	Y	Y	?	N	Y	

County and Township Facilities

Co-permittee Agency or Department Facility Name Address	Contact, & Phone	Located in the Urbanized Area? (Y/N)	Activities Conducted			Industrial SWP3	
			Salt Storage (Y/N)	Vehicle Maintenance (Y/N)	Vehicle Fueling (Y/N)	Required (Y/N)	Developed (Y/N)
Jefferson Township Service Department 6620 Havens Corners Road, Blacklick, Oh. 43004	Joe Gerhardt Service Sup. 614-861-2440	Y	Y	N	N	Y	
Madison Township Groveport Facility 4585 Madison Lane, Groveport, OH 43125	Dave Weaver Public Works Sup. 614-836-4467	Y	N	Y	N	Y	
Mifflin Township Service Department 218 Agler Rd. Gahanna Ohio, 43230	Daril "D.J." Tharp Road Sup. 614-471-4494	Y	?	Y	N	Y	
Norwich Township Wesley Chapel Cemetery 3225 Dublin Road, Hilliard, OH 43026	Robbie Thomas Road Sup. 614-876-7694	Y	Y	Y	N	Y	
Perry Township Road Department 7125 Sawmill Road Dublin, OH 43016	Bryan Shonkwiler Road Sup. 614-889-8781	Y	Y	Y	Y	Y	
Plain Township Maintenance Building (at township cemetery) 4585 Reynoldsburg New Albany Road New Albany, OH 43054	Bob Pharris Maintenance Sup. 614-855-9015	Y	?	Y	N	Y	

County and Township Facilities

Co-permittee Agency or Department Facility Name Address	Contact, & Phone	Located in the Urbanized Area? (Y/N)	Activities Conducted			Industrial SWP3	
			Salt Storage (Y/N)	Vehicle Maintenance (Y/N)	Vehicle Fueling (Y/N)	Required (Y/N)	Developed (Y/N)
Prairie Township 6725 Alkire Road Galloway, OH 43119	David McAninch Road Sup. 614-878-3316	N	Y	Y	N	N	
Sharon Township Maintenance Facility 5561 Milton Avenue Worthington, OH 43085	Thomas Kayati Road Sup. 614-885-5933	Y	Y	Y	N	Y	
Truro Township 6900 East Main Street Reynoldsburg, OH 43068	Stan Knoderer Road Sup. 614-759-1447	Y					
Washington Township Maintenance Barn 4675 Cosgray Road Hilliard, OH 43026	Janelle Thomas Parks, Recreation and Roads Director 614-652-3922	N	N	N	N	N	

D. Other Considerations: Green Infrastructure

The Franklin County Stormwater Partnership has long recognized the responsibility and need to set the example for water quality management and stormwater retention. Township and County agencies have committed to locating opportunities for stormwater retention and demonstration projects. These opportunities include bioswales, rain gardens, wetland restoration and conservation easements. Existing green infrastructure demonstrations include a bioswale on the County Engineers West Outpost, a rain garden at Washington Township Community Center, A rain garden at the Clinton Township maintenance facility and conservation easements.

E. Responsible Party and Legal Authority

Responsible Parties are in the table below. Each township and county agency has the authority to manage and make decisions for their facility.

F. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>1) Employee Training Program</p>	<p>a. Annual training related to reduction of pollutant runoff from municipal facilities and operations will be provided for road superintendents, facility managers, and staff who participate in fleet, road or drainage maintenance.</p>	<p>i) Provide one training session open to all applicable employees of co-permittees. ii) Provide facility specific training to applicable employees at each facility required to have a SWPPP.</p>	<p>i) Annually FSWCD Urban Conservationist ii) Annually Townships-Road Superintendents Fleet Management-Director FCEO-Safety Coordinator.</p>
<p>2) Facilities Subject to Program</p>	<p>a. In 2012, the facility list will be improved to include all facilities operated by agency partners and the criteria used to determine if each facility required a SWPPP.</p>	<p>List of facilities including responsible parties and operations conducted at each facility.</p>	<p>June 30, 2012 FCEO-FCDE Project Manager Townships-Road Superintendents Fleet Management-Director PFM-Mark Hunter FCSE-Director</p>
	<p>b. An industrial SWPPP developed for each facility when required</p>	<p>i) County facility SWPPP template developed based on industrial SWPPP guidance. ii) SWPPP completed for each facility. iii) Agency partners will evaluate any changes in operations at their facilities that necessitate the development of a SWPPP and develop SWPPPs as needed.</p>	<p>i) Complete FCEO-Safety Coordinator ii) Complete Fleet Management-Director FCEO-Safety Coordinator Townships-Road Superintendents iii) October 30, 2012 FCDE-Project Manager and Township Representative</p>

F. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>2) Continued Facilities Subject to the Program</p>	<p>c. SWPPP implementation evaluations.</p>	<p>i) Contact facilities with SWPPPs and determine if each SWPPP is up to date, inspection schedules and procedures have been included, inspection reports are on file and if employees have been trained. ii) Streamline annual reporting by developing and quarterly Good Housekeeping report form.</p>	<p>i) December 31, 2012 Franklin County -Project Manager (FCDE) Townships-Twp. Representative ii) June 30, 2012 FCDE-Project Manager FSWCD-Urban Conservationist Townships-Twp. Representative</p>
<p>3) MS4 Maintenance</p>	<p>a. Agency partners operating MS4 systems, maintain and clean MS4 infrastructure as needed.</p>	<p>Record and report: i) New storm tile installed, ii) storm tile repaired or replaced, iii) storm tile cleaned, iv) open ditches constructed, v) open ditch cleaned or repaired, vi) catch basins installed, vii) catch basins repaired or replaced, viii) catch basins cleaned</p>	<p>Annually, FCEO-Maintenance Department Supervisor FCDE-Drainage Technician Townships-Road Superintendents</p>
<p>4) Disposal of Wastes</p>	<p>a. Facility managers are responsible for the responsible disposal of waste from the facility they manage. Training and guidance have been provided through the NPDES program.</p>	<p>i) Each agency partner report if they have developed waste disposal procedures. ii) Record and Report the waste disposal and quantity for each of the applicable wastes listed below: Construction and Demolition Waste Vector Waste Used oil Oil spill pigs Oil water separators Yard waste</p>	<p>December 31, 2010, FCEO, Safety Coordinator Annually, Townships, Road Superintendents Fleet Management, Director PFM FCDE, Safety Coordinator</p>

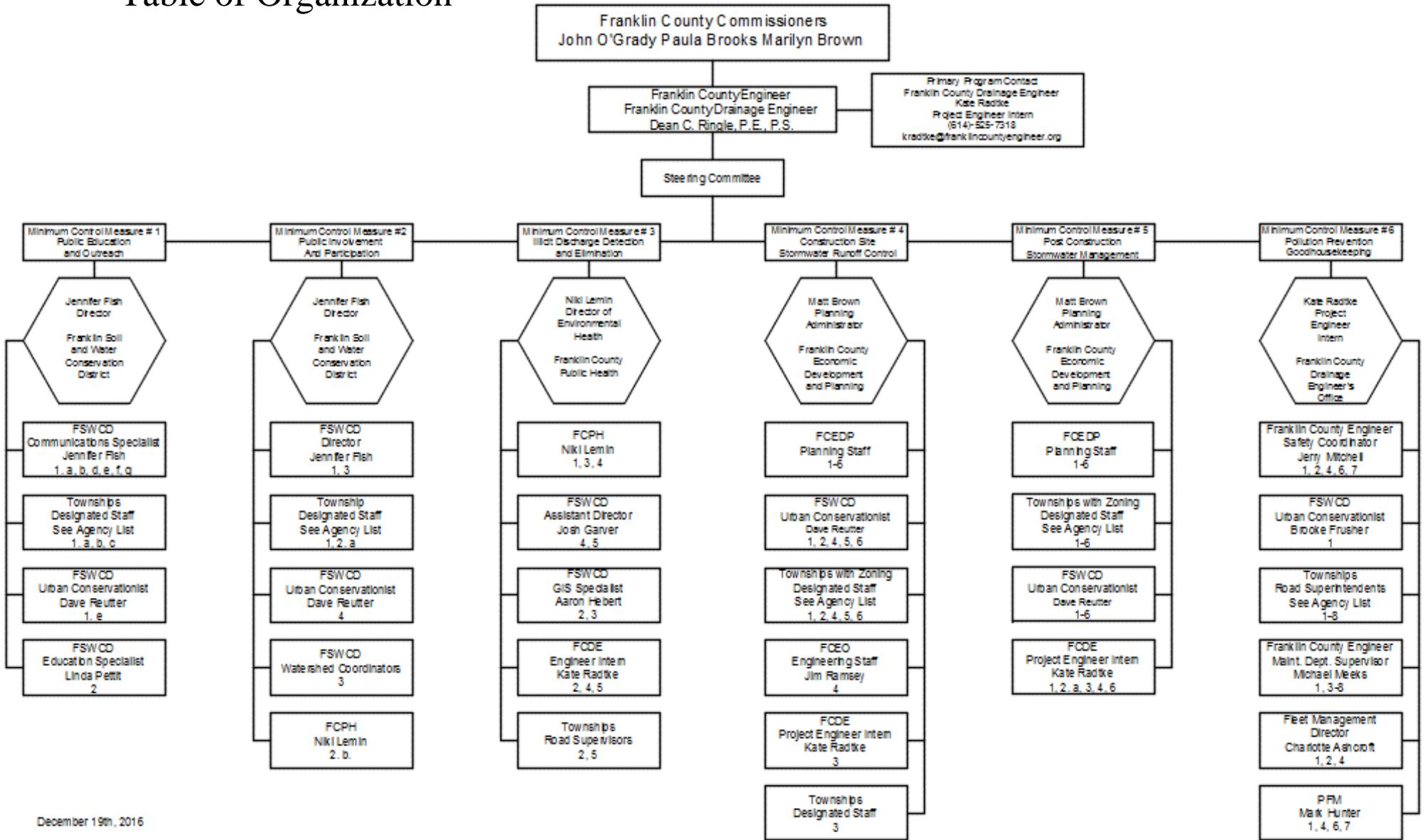
F. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
		Recyclables Solvents Septic Tank Waste House Hold Hazardous Waste collected at a community event (reported by quantity and type)	
5) Road Salt	a. Managers of facilities with salt storage should ensure that the facility SWPPP includes provisions to prevent stormwater pollution with high concentrations of salt and to prevent groundwater contamination with highly saline stormwater.	i. Keep stored salt dry to prevent contamination of ground and surface water. ii. Locate salt storage and handling areas away from stormwater flow paths. iii. Clean and inspect salt handling areas after each salt handling event. iv. Report tons of salt used by each agency partner and if each agency operates a salt storage facility or purchases salt from another agency.	i-iii) Ongoing Townships-Road Superintendents FCEO-Maint. Dept. Supervisor iv) Annually Townships-Road Superintendents FCEO-Maint. Dept. Supervisor
6) Pesticide & Herbicide Usage	a. It is recommended that all partner agencies utilize procedures which minimize the use of herbicides and pesticides.	i. Use properly trained and licensed applicators. ii. Develop procedures to minimize the use of herbicides and pesticides. Report if procedures are developed (yes or no). iii. Document the quantity and type of each herbicide and pesticide purchased.	i) Ongoing Townships-Road Superintendents Fleet Management-Director FCEO-Safety Coordinator PFM-Mark Hunter ii-iii) Annually, Townships-Road Superintendents Fleet Management-Director FCEO-Safety Coordinator PFM-Mark Hunter

F. Measureable Goals and Planned Activities (see *limitations of plan* pg. 6)

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
7) Fertilizer Usage	a. It is recommended that all partner agencies utilize procedures which minimize the use of fertilizer.	i. Develop procedures to minimize the use of herbicides and pesticides. Report if procedures are developed (yes or no). ii. Document the quantity and type of each herbicide and pesticide purchased.	i-ii) Annually, Townships-Road Superintendents Fleet Management-Director FCEO-Safety Coordinator PFM-Mark Hunter
8) Street Sweeping	a. It is recommended that all partner agencies operating and maintain roadways, conduct street sweeping on curb and gutter streets and trash pick-up on other roads where appropriate.	i. Report the number of road miles swept, frequency of sweeping and the method of waste disposal. ii. Document the amount of trash picked up from roadways and disposed of.	i-ii) Annually Townships-Road Superintendents FCEO-Maint. Dept. Supervisor

Table of Organization



December 19th, 2016