STORM WATER MANAGEMENT PLAN

UPDES STORM WATER DISCHARGE PERMIT NO. UTR090049

Revised October 2025

Submitted to:

State of Utah

Department of Environmental Quality

Submitted by:

Ivins City Public Works Department

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IVINS CITY STORM WATER MANAGEMENT PLAN

FOREWORD

The Ivins City Storm Water Management Program (SWMP) as presented in this document is intended to indicate to the public and other affected stakeholders the manner in which Ivins City plans to comply with the storm water protection provisions of the Clean Water Act as enacted by the federal government in accordance with our UPDES (Utah Pollutant Discharge Elimination System) storm water discharge permit No. UTR090049.

This document, as directed by the State, is considered to be a living document that will need constant revision and updates as changes occur due to the needs of the City arising from experience in enforcing these provisions and direction from State and Federal regulators. The State permit indicates that the plan should be updated at least annually. The City Council's adoption of this plan is a legislative approval of the basic best management practices and the identified activities within each practice thereby providing an approved direction for staff to proceed with the program. The administrative details of the program, in particular the appendices, will need to be under constant flux and may be altered by City staff to address immediate needs and concerns without a legislative action.

As a means to keep an open process and allow for public and stakeholder input and participation, this document will remain current on the City's website at www.ivinsutah,gov as means to allow all interested parties to have immediate access and allow for public and stakeholder input and participation. Newsletter articles will encourage citizens to review the plan and provide input. Guidance materials provided to contractors, engineers, and developers will also encourage input into the plan.

IVINS CITY CHARACTERISTICS

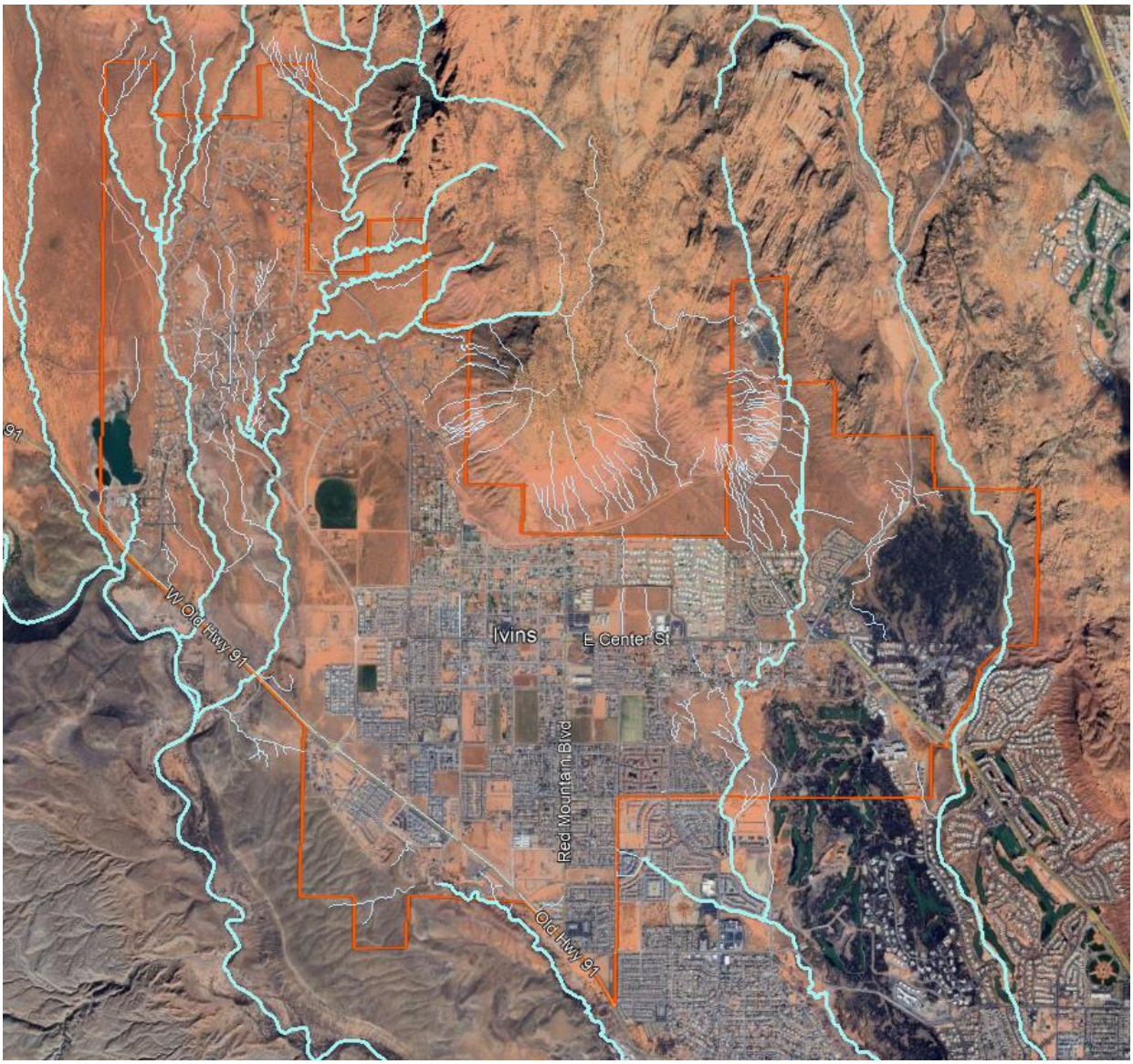
The current population of Ivins is 10,300 (2024 Estimate) with 3,971 households and a corporate boundary encompassing 10.2 square miles. Ivins is Located in Washington County, northwest of St. George, in the southwest corner of the State of Utah, approximately 266 miles southwest of Salt Lake City at an elevation of approximately 3,000 feet above sea level. Ivins is a bedroom community to St. George as it transitions from a rural/agricultural area to suburban area.

The climate is arid desert with an average annual precipitation of 8 to 9 inches. Storm water discharging from Ivins enters natural drainages and washes and eventually flows into the Santa Clara River approximately 5 miles upstream of the confluence with the Virgin River.

The Ivins City storm water system consists of with mostly curb, gutter that drops into storm drain piping or into natural washes. There are some ditches and swales along the side of roads that are in undeveloped areas. The gutters, ditches, swales, and piping all flow generally to the south and eventually drain into normally dry washes and natural drainages before emptying into the Santa Clara River. There are four main dry washes into which storm water from Ivins runs. They include the Kayenta Dry Wash; the Graveyard Wash; the Tuacahn Wash; and the Sand Hollow Wash. Approximately 90 percent of the city is served by a sanitary sewer system that is treated in St. George City. There are some existing septic tank systems in the city, but new development is phasing these systems out.

Figure 1. Map of Ivins.

IVINS CITY LOCATION & MAP



* The red line indicates the boundary for Ivins City.

* The blue line indicates the water surfaces for Ivins City.

Impaired Surface Water	Is this surface water impaired?	Pollutant(s) causing the impairment	Has a TMDL been completed?
Santa Clara River	Yes	Arsenic, Temperature, Total Dissolved Solids, Boron	No; currently not prioritized for TMDL Water with DWQ

LOCAL WATER QUALITY CONCERNS

The water quality in the Virgin River Watershed has been scrutinized for several years. As of 2024, both the Santa Clara River and the Virgin River are on the 303(d) list, which lists water quality impaired bodies of water. The Santa Clara River (segment from Gunlock Reservoir to Virgin River) is listed for high temperature, high levels of total dissolved solids (TDS), and boron. A TMDL study was prepared by the State and approved in 2004 that only addressed TDS. The study identified stream bank and land erosion as primary contributors to the TDS impairment as well as irrigation return flows and storm water/dry-weather flows as secondary contributors.

Based on the TMDL study, erosion control is given as an important concern to limit storm water TDS in Washington County. In Ivins City, being a desert community, a mature high to medium dense residential or commercial development will reduce sediment in storm water discharges since maintained landscaping with grasses, desert plantings, and rock mulches will generally stabilize the soils beyond the natural desert conditions. These developments, however, bring a different pollution concern from fertilizers, pesticides, yard waste materials, oils, grease, and improper disposal of household chemicals and waste materials.

Ivins City can reduce storm water pollution most effectively by stabilizing erosion in ditches and swales, controlling erosion from construction sites and new developments, and maintaining post-construction structures designed to capture pollutants while fully reaching out to the public to first inform, involve, educate, and if necessary, enforce the clean water laws.

STAFF & RESOURCE ALLOCATION & COORDINATION

Ivins City is a small city with a limited staff. The following table shows the division of responsibilities among staff to coordinate our storm water program.

Title	Name	Responsibilities in Storm Water Program
City Manager	Charles Gillette	• Oversee and manage all City operations.
Director of Finance	Cade Visser	• Conduct the annual financial analyses of the storm water utility.
City Attorney	Bryan Pack	• Ensure that administrative staff is trained for spill response procedures and other assigned duties. • Pursue enforcement of fines when notice of violations are issued.
Public Works Director	Thomas Jorgensen	• Oversee and manage all public works operations to ensure that work is completed in accordance with the SWMP. • Approve any modifications to the program. • Coordinate with the SW Utah Storm Water Coalition. • Coordinate storm drain system mapping.
City Engineer	Thomas Jorgensen	• Coordinate with Southwest Utah Storm Water Coalition. • Co-Coordinate construction. Review SWPPP documents. Conduct or delegate inspections. • Review construction plans for post-construction measures. • Coordinate inspections on post-construction measures. • Presenter for Contractor Education Trainings
Public Works Administrative Assistant	Alysha Mortensen	• Submit annual reports. • Coordinate inspections. • Coordinate public education. • Coordinate public involvement. • Coordinate training.

Title	Name	Responsibilities in Storm Water Program
		• Coordinate construction. Review SWPPP documents. Conduct or delegate inspections. • Investigate potential and enforce against illicit discharges along with the City Code Enforcement. • Conduct modifications to the Storm Water Program. • Maintain database on training. • Maintain database on catch basin cleaning. • Maintain database on inspections. • Manage public works calendar to track timing of weekly, monthly, quarterly and annual inspections.
Public Works Inspector	Jared Taylor	• Conduct construction site SWPPP inspections • Conduct post-construction follow-up inspections
Assistant Public Works Director-Operations	Shiloh Pentz	• Ensure all public works field activities are in accordance with the SWMP. • Good Housekeeping/Pollution Prevention • Be watchful of illicit discharges. • Maintain database on street sweeping.
Building and Zoning Administrator	Rob Dalley	• Coordinate with building contractors on small site SWPPPs. • Conduct (or delegate) storm water inspections on small construction sites. • Be watchful of illicit discharges.
Director of Parks & Recreation	Marc Christensen	• Ensure all parks and recreation operations are in accordance with the SWMP.
Parks Field Supervisor	Joseph Rawlinson	• Ensure all parks and recreation field activities are in accordance with the SWMP. • Good Housekeeping/Pollution Prevention of Parks Facilities.
Director of Public Safety	Jaron Studley	• Ensure all public safety operations are in accordance with the SWMP. • Ensure staff is trained on illicit discharge detection and general pollution prevention BMPs.
Police Captain	Rich Rodgers	• Ensure all police operations are in accordance with the SWMP.

Title	Name	Responsibilities in Storm Water Program
		• Good Housekeeping/Pollution Prevention of Police Station. • Be watchful of illicit discharges.
Animal Control Officer	Mackenzie Peterson	• Ensure all animal control operations are in accordance with the SWMP. • Good Housekeeping/Pollution Prevention of Animal Shelter.
Fire Chief	Dan Cazier	• Ensure all fire and EMS are in accordance with the SWMP. • Good Housekeeping/Pollution Prevention of Fire Stations and Equipment. • Be watchful of illicit discharges. • Respond and clear hazardous spills.

PROGRAM SUMMARY

OVERVIEW & BACKGROUND

Polluted storm water runoff is often transported to municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. Common pollutants include oil and grease from roadways, pesticides and fertilizers from lawns, sediment from construction sites, and carelessly discarded trash and yard waste. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging use of the resource, contaminating drinking water supplies, and interfering with the habitat for fish, other aquatic organisms, and wildlife.

In 2002, Ivins City, although a community of less than 10,000, was linked into the EPA's Storm Water Phase II Rules due to its close proximity to St. George City and is considered part of the St. George Metropolitan area along with Washington City and the City of Santa Clara.

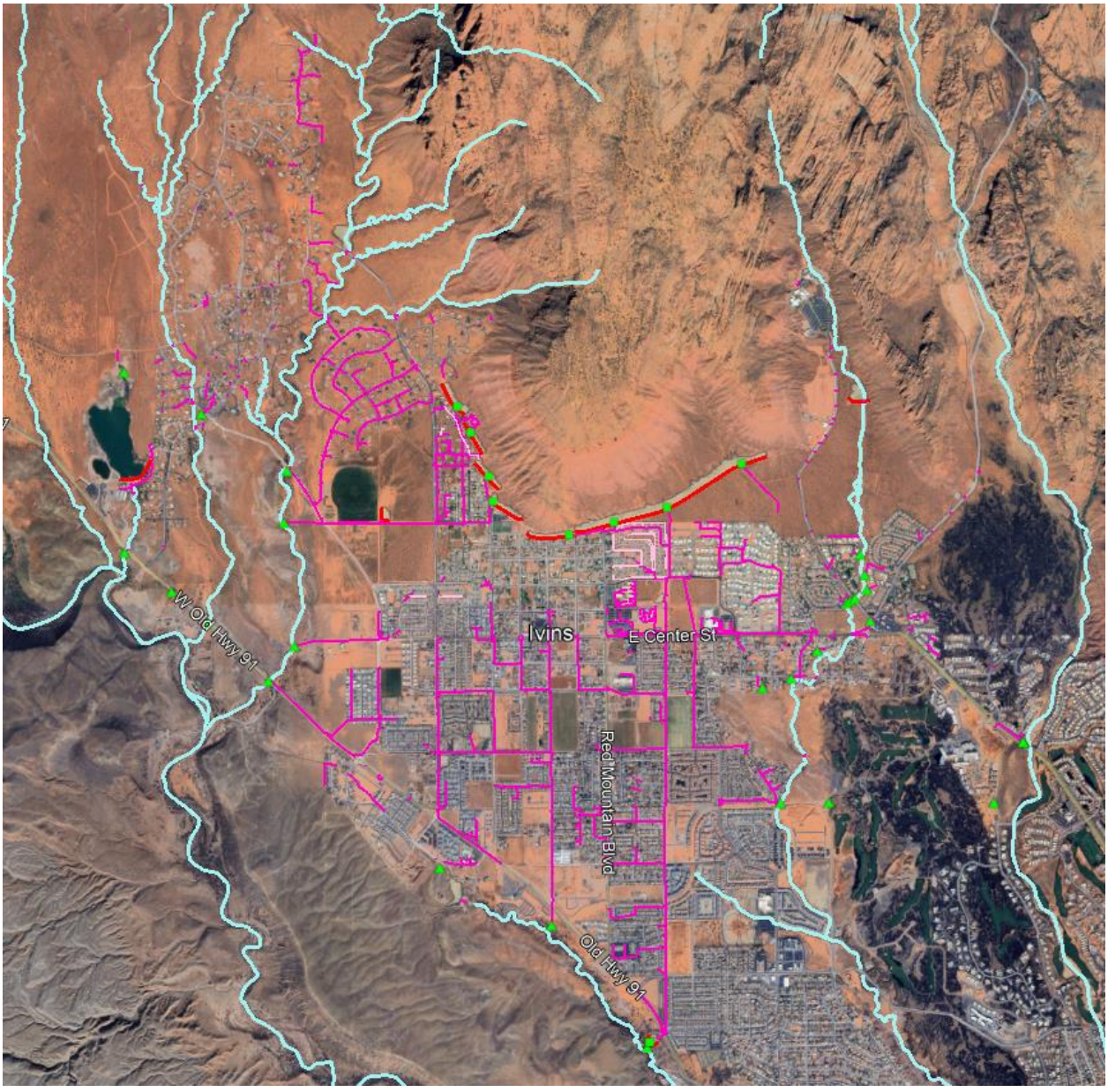
As a result Ivins is required to obtain a UPDES (Utah Pollutant Discharge Elimination System) permit from the State of Utah Division of Water Quality, Permit no. UTR090049. This permit provides authority to Ivins City to discharge storm water to the local washes and rivers. As a condition of this permit, Ivins City must comply with the requirements of the General Permit for Storm Water Discharges from Small MS4s, Permit No. UTR090000. To review these requirements, a copy of this general permit is available on the State of Utah Division of Water Quality website, which can be found here.

STORM WATER POLLUTION PREVENTION ORDINANCE

Ivins City has established a storm water pollution prevention ordinance that is in compliance with the latest permit requirements. The City is also enforcing low impact development requirement. The city is also working to strengthen language in ordinances to clarify requirements for both pollution prevention and low impact development.

STORM DRAIN SYSTEM MAPPING

Ivins City has developed a GIS mapping system as a method of keeping an inventory of all storm water facilities. This mapping is maintained and kept up to date using an ArcGIS database system. Please view the map below.



TRACKING AND DOCUMENTATION

Ivins City is using a combination of computer systems to track and document progress of meeting the requirements of the permit.

ANALYSIS OF STORM WATER SYSTEM EXPENSES

In the past, as the City has submitted annual reports to the Division of Water Quality reporting Storm Water System Expenses, these expenses have not been analyzed to the fullest extent possible. In the future, Ivins City will conduct a more detailed analysis of this information which will be included.

REPORTING

Reports are submitted annually to the Utah Division of Water Quality.

SOUTHWEST UTAH STORM WATER COALITION

Ivins City has joined the Southwest Utah Storm Water Coalition (SWUSWC) along with the City of St. George, Washington City, City of Santa Clara and recently added City of Hurricane. Periodic meetings are held to discuss ways the cities can improve the efforts to reduce pollution due to storm water runoff. The Southern Utah Home Builders Association is also participating in the SUSWC meetings.

The coalition works together to coordinate planning efforts and standards in a way that benefits everyone. The coalition also pools resources and joins efforts to educate the public and development/construction professionals.

GENERAL SWMP REQUIRED PRACTICES

Ivins City is required to develop, implement and enforce a SWMP designed to reduce the discharge of pollutants to the Maximum Extent Practicable (also known as MEP), protect water quality, and satisfy the appropriate requirements of the Utah Water Quality Act (Utah Code Title 19, Chapter 5).

MEASURABLE GOALS

- Increase our Public Education & Outreach efforts
    - Track efforts in our Public Education & Outreach log
    - Pull from the resources the MS4 provides
- Train all field personnel
    - Updated SOP Manual
    - Illicit Discharge Detection & Elimination

- Keep record of trainings and positions required in trainings, according to the MS4
- Long term stormwater post-construction
  - Utilize our LTSWPC inspection form to ensure our high-priority construction sites remain compliant after completion

SWMP CERTIFICATION

Certification Statement: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

I also herby designate the Public Works Director, City Engineer, and Stormwater Manager to be a duly authorized representatives for the purpose of overseeing compliance with environmental requirements, including in the UPDES MS4 General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4) permit. These designees are authorized to sign reports required by the MS4 permit and other information by the Director of the Utah Division of Water Quality, or by an authorized representative of the Executive.

Chuck Gillette, City Manager — Date: 10/9/2025

Tom Jorgensen, City Engineer & Public Works Director — Date: 10/9/2025

MINIMUM CONTROL MEASURES

This SWMP has been developed to meet the terms of the UPDES permit and consists of the six minimum control measures. Implementation of these control measures is expected to result in reductions of pollutants discharged into receiving waters. These six control measures are addressed in separate sections of this plan.

Section 1. Public Education and Outreach on Storm Water Impacts
Section 2. Public Participation and Involvement
Section 3. Illicit Discharge Detection and Elimination
Section 4. Construction Site Storm Water Runoff Control
Section 5. Long Term Storm Water Management in New Development and Redevelopment
Section 6. Pollution Prevention and Good Housekeeping for Municipal Operations

TARGETED POLLUTANTS

In this management plan, two tiers of targeted pollutants are established as shown in Figure 2. The first tier includes one pollutant which is sediment. Sediment is considered to be the most important of the targeted pollutants because of its potential to contribute to the prolonged impairment of the Santa Clara and Virgin Rivers. The second tier of targeted pollutants is less of concern but still considered an area where municipal efforts may improve the water quality of downstream bodies of water due to the nature of municipal storm water discharges.

Figure 2. Table of Targeted Pollutants

Pollutant	Typical Municipal Sources	Reason for selection as a targeted pollutant
Sediment	Land Disturbance, Unlined Drainage Ditches and Washes	Potentially contributes to impairment of the Santa Clara River due to high levels of boron and total dissolved solids.
Oil & Grease	Parking Lots, Streets, Vehicles, Residential, Commercial and Industrial Activities	Common pollutant for municipal storm water discharges
Industrial & Household Chemicals	Residential, Commercial and Industrial activities	Common pollutant for municipal storm water discharges
Trash & Debris	Residential, Commercial and Industrial activities	Common pollutant for municipal storm water discharges

Nitrogen & Phosphorus	Fertilizers for landscape areas, particularly grass and cultivated areas for Residential, Agricultural, Commercial and Industrial activities.	Required by MS4 permit.

PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

Ivins City must "implement a public education and outreach program to promote behavior change by the public to reduce water quality impacts associated with pollutants in storm water runoff and illicit discharges. Outreach and educational efforts must include a multimedia approach and shall be targeted and presented to specific audiences for increased effectiveness. The educational program must include documented education and outreach efforts for the following four audiences: (1) residents, (2) institutions, industrial, and commercial facilities, (3) developers and contractors (construction), and (4) MS4-owned or operated facilities."

PROGRAM DETAILS

Public education and outreach empower community members to gain awareness of stormwater pollution and its prevention. This work is supported by Ivins City and the Southwest Utah Stormwater Coalition. Outreach happens digitally (through electronic newsletters and text blasts), and in written form through "Fact Sheet" mailers to schools, businesses and construction sites.

In 2026, the city will implement the following community outreach activities:

1. Continue to implement and refine a behavior change campaign focused on commercial concrete washout. This campaign will be carried out primarily during stormwater monthly inspections and written communication to all commercial concrete businesses throughout the city.

2. Provide school-based and community focused environmental educational programs targeting specific classroom levels and cover topics such as the watershed process and "Only rain down the drain."

3. Explore opportunities to implement targeted outreach campaigns to Homeowners Associations around various stormwater pollution prevention, waste disposal, and post construction inspections.

4. Update and maintain city and coalition websites, including updates to contacts, offer helpful pollution prevention ideas to residents and visitors.

5. Continue to participate in the monthly newsletter, as well as send out educational mailers. Efforts have been focused on "Only Rain down the drain." We will focus more on proper pet waste cleanup in the future.

IMPLEMENTATION

The city is committed to providing ongoing opportunities for public education. Ivins and/or the Southwest Utah Stormwater Coalition attends a variety of stormwater related public awareness activities every year including the Transportation Expo, 4th Grade Water Fair, SWPPP Training sponsored by Southern Utah Home Builders Association (SUHBA) and Associated General Contractors (AGC), Heritage Days. Ivins City is also an active member of USWAC.

Ivins City promotes the Southern Utah Stormwater Coalition website, with topics such as yard and landscape waste disposal, pet waste, general construction information, low impact development, etc.

1. Education Program for General Public and Residential

Ivins City will utilize the website, social media, flyers, brochures, programs, fieldtrips to local schools, etc. to educate the general public on stormwater awareness, regulations and the effects of nutrient pollution.

2. Education Program for Developers, Contractors and Engineers

The Southern Utah Stormwater Coalition has created a customized SWPPP Template to assist contractors and/or owner builders giving them guidance on how to obtain a Common Plan of Development Storm Water Pollution Prevention Plan (SWPPP), Notice of Intent (NOI) and Notice of Termination (NOT) as required in the UPDES MS4 permit.

Ivins City implements online software called City Inspect. It has been utilized since 2020 and is used as regulatory mechanist to issue permits, track inspections, manage IDDE reporting & compliance, and assist with many other aspects of the city's stormwater program. Ongoing training is provided to promote the use of the software for permits and inspections, and is targeted to MS4 staff, developers, contractors and third-party inspectors. City Inspect is continually being revised to assist the city in staying in compliance with updated regulations.

3. Education Program for Businesses

The Southwest Utah Stormwater Coalition has hosted training regarding the implementation of Low Impact Development (LID). Topics discussed are DEQ requirements, Southwest Utah Coalition Low Impact Development Guidance Manual (see Appendix F), submittal requirements, standards for "technically infeasible", and long-term maintenance/inspections. Business education flyers, letters or emails will be provided throughout the year for businesses such as carpet cleaning, painters, auto repair shops, mobile cleaners, food services, fuel stations, concrete suppliers, landscape companies, waste management companies, etc. to promote stormwater awareness and potential enforcement actions.

GOALS AND ASSESSMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
General Public	Manage website for both Ivins City and the Southwest Utah Stormwater Coalition	Keep current and usable information available to the public including information on nutrient pollutants to reduce nitrogen and phosphorus. Updates are ongoing.	2025-2030
	Pet waste, landscaping, oil disposal, how to clean and/or report spills, pesticides, etc.	Track the number of views on the Southwest Utah Stormwater Coalition and city websites and continue to advertise to increase web views.	2025-2030

	General stormwater awareness	Attend the Transportation Expo, 4th Grade Water Fair, SWPPP Training, Heritage Days. Offer evaluation forms to determine audience take-a-ways and track attendance.	2025-2030
MS4 Employees, Engineers, Developers, Contractors	LID Outreach	In order to make low-impact development the used approach to site development, our codes, standards, and procedures are being utilized as our regulatory mechanism to ensure LID regulation compliance. Our software systems have been updated to allow the city to comply with LID stormwater compliance and inspection more effectively and consistently. We plan to continue the improvements to our software system and improve the accuracy and reporting portions of the program.	2025-2030
	RSI and RSW classes	Promote recertification in our community to offer a better understanding of SWPPP requirements and BMPs and inspection compliance.	2025-2030
	Information Signage	Information posted for the general public to create awareness of stormwater pollution prevention.	2025-2030
Businesses	Post Construction and LID Best Management Practices	Inform, train, and implement new regulations, for post construction and LID requirements. Ensuring long term BMPs are effectively managed.	2025-2030
	Business education flyers/letters	Develop educational materials to present to those applying for new and existing businesses, by electronic means, utilizing current computer software systems. The education materials will help to mitigate unnecessary pollutants entering our storm drain system.	2025-2030

PUBLIC INVOLVEMENT/PARTICIPATION

According to MS4 UPDES Section 4.2.2, Ivins City must "implement a program that complies with applicable State and Local public notice requirements. The SWMP shall include ongoing opportunities for public involvement and participation, but at a minimum two (2) times annually. Permittees can meet this requirement through advisory panels, public hearings, watershed committees, stewardship programs, environmental activities, volunteer opportunities, or other similar activities. The Permittee should involve potentially affected stakeholder groups, including

but is not limited to, commercial and industrial businesses, trade associations, environmental groups, homeowners' associations, and education organizations."

PROGRAM DETAILS

Ivins City engages the public to help spread the message on preventing stormwater pollution by undertaking group activities that highlight storm drain pollution, and contributions from volunteers through community events to restore and protect local water resources. The following details the outreach strategy used. Ensuring that the city's engagement is inclusive and far-reaching will be a special focus in 2026 and beyond. Stormwater staff work with the Southwest Utah Stormwater Coalition to identify and best engage the community.

The city implements at least one of the following during each year of the permit to provide fundamental support to the city's Stormwater Management Plan (SWMP). The number of complaints reported, amounts of garbage/waste collected from street sweeping, attendance at public/volunteer activities, and effectiveness and evaluation of the activity are documented in the Annual Report.

- Spring and Fall City Clean-up Days
- City employees and community volunteers to assist with clean-up prior to major city hosted events
- Encourage participation and attendance from the community in the Southwest Utah Stormwater Coalition
- The Southwest Utah Stormwater Coalition and Ivins City Stormwater websites provides residents, businesses, contractors, developers, engineers and planners with information to understand and comply with community standards, ordinances, and programs that pertain to MS4 requirements. Information is provided for fertilizers, pesticides, typical residential landscaping and maintenance pollutants and debris, garage chemicals and petrochemicals and other similar waste, as well as waste related to similar activities associated with commercial properties. The site also provides information on how to report an illicit discharge (follow this link).

IMPLEMENTATION

1. Spring And Fall Clean-Up Days

The city facilitates two citywide clean-up events a year. The events are advertised on the city website, utility billing announcements, newspaper and city staff emails. The city provides staff from several departments to assist with resident's curb-side pickup and several dumpster locations for drop off. Staff encourages residents to participate in keeping our community clean and dispose of unwanted waste or items responsibly.

2. City Events

Ivins City takes great pride in making sure our city stands out in a positive light for our local, state, national and international visitors. Prior to events such as the St. George Marathon, Iron Man, Senior Games, Hog Jog, Black Desert events, Heritage Days, etc., city employees and volunteers assist in making Ivins City shine.

3. Coalitions and Involvement

Ivins City is an active participant in the Southwest Utah Stormwater Coalition. They are there to support and encourage community involvement and awareness. In addition to MS4s from St. George, Washington, Ivin's, Santa Clara and UDOT we have participants from SUBA, AGC, ASCE, contractors, subcontractors and third party SWPPP companies.

GOALS AND ASSESSMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
General Public	Pet waste, landscaping, oil disposal, how to clean and/or report spills, pesticides, etc.	Link social media articles to the Southwest Utah Stormwater Coalition website and track the number of views and continue to advertise to increase web views.	2025-2030
	General cleanliness pre and post special events.	Work closely with city departments to use events as an opportunity to promote anti-litter information. Major events include the Iron Man, St. George Marathon and Heritage Days.	2025-2030
	Pet waste, trail cleanliness, lawn care, and general education that anything that enters the storm drain system is untreated.	Continue to attend and display stormwater awareness onsite of several different neighborhood events throughout Ivins City. Events are typically held quarterly. Track attendance and evaluations.	2025-2030
	Community cleanliness	Add additional information in the city's Fall and Spring Clean-up Days advertising and promote stormwater awareness and consequences to our environment and community when residents do not comply. Encourage more resident participation in city Cleanup Days.	2025-2030
	Storm Water Management Plan (SWMP)	Provide the SWMP on the city website. Any revisions will be made available for 180-day review period to allow for public comment. Comments can be sent to publicworks@ivinsutah.gov.	2025-2030
Community Partners	Southwest Utah Stormwater Coalition https://stormwater.sgcity.org/	Encourage participation from the community.	2025-2030
	Create SOPs for pre and post events	Work with Park and Recreation employees to establish SOPs for pre and post city events. Conduct training for city employees	2025-2030

ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

According to the MS4 UPDES Section 4.2.3, Ivins City shall "implement and enforce an Illicit Discharge and Elimination (IDDE) program to systematically find and eliminate sources of non-storm water discharges from the MS4 and to implement defined procedures to prevent illicit connections and discharges according to the minimum performance measures…the IDDE program must be described in writing, incorporated as part of the Permittee's SWMP document, and contain the elements detailed in this part of the Permit."

PROGRAM DETAILS

This program is designed to prevent contamination of groundwater and surface water by identifying and removing non-stormwater discharges into the stormwater drainage system. The IDDE program addresses pollution issues associated with the MS4 as well as water quality concerns related to storms, surface, and groundwater. In most cases where illicit discharges are identified, the city uses education and direct technical assistance to achieve voluntary compliance. City staff can access other compliance tools, if necessary, and ultimately have the authority to issue compliance orders or fines, post stop-work orders, and apply other escalating enforcement tools. This program will be integrated with all six minimum control measures to promote awareness of the importance of protecting the stormwater system from illicit discharge and the impact to receiving waters. The following items will be addressed:

- MS4 Employee Training
- Spill Prevention and Response Plan
- Outfall Inspections/Dry Weather Screening
- Illicit Discharge Elimination and Enforcement

IMPLEMENTATION

All city field staff are trained to identify and report illicit discharges or connections to the city storm system. New employees of Ivins City attend an onboarding orientation. Every employee, despite their job responsibilities, watch a video titled Stormwater IDDE Employee Training. Upon completion of the video there is a quiz to verify participation and awareness. The process is facilitated by Human Resources and all tabulations of attendance are provided annually by their office.

There are a minimum of two annual employee trainings conducted each year:

- One is specific to the Stormwater staff and Streets Department. Topics include illicit discharge and detection, spill reporting and response, standard operating procedures, street sweeping and waste disposal, proper material storage, vehicle and equipment maintenance and inspections.
- The second annual training is for city Stormwater Reps. This training is conducted for the lead positions from the Police Department, Fire Department, Parks, Recreation/Golf, Facility Maintenance, Fleet Maintenance, Water, Wastewater, Energy, Public Works, Engineering and Legal Department. Topics include illicit discharge and detection, spill

reporting and response, site maintenance, inspections, standard operating procedures and our legal responsibilities as an MS4.

1. Spill Prevention and Response Plan

Ivins City has Standard Operating Procedures (SOP), used as a regulatory mechanism, to assist in facilitating the detection and elimination of a spill. Our SOP Manual can be found here. The SOP Manual is reviewed annually, or as needed, to determine necessary changes.

2. Outfall Inspections/Dry Weather Screening

The city has about 150 outfall locations. Outfall inspections are currently conducted by the Stormwater Coordinator. A service request is created for any outfalls requiring maintenance and submitted to the Streets Department. The Stormwater Manager is notified of any potential illicit discharge for further investigation and enforcement.

3. Illicit Discharge Elimination and Enforcement

The city has ordinances in (Updated ordinance incoming) which contains provisions to enforce against any party shown to have illicit connections, discharging pollutants to the storm drain system, and supports compliance to the UPDES MS4 Construction General Permit and Common Plan of Development Permit for construction activity and subsequent enforcement actions.

GOALS AND ASSESMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
MS4 Employees	Illicit discharge and detection, spill response, reporting, standard operating procedures, street sweeping and waste disposal, proper material storage, vehicle and equipment maintenance, inspections and our legal responsibilities as an MS4.	Have full participation in MS4 training. New hires receive IDDE training during the onboarding process. Current employees receive the following training: • Streets Department – Annually • Stormwater Representative (Police Department, Fire Department, Parks, Recreation/Golf, Facility Maintenance, Fleet Maintenance, Water, Wastewater, Energy, Public Works, Engineering and Legal Department) – Annually • Public Works RSI Inspectors – Stormwater issues are discussed at a weekly meeting.	2025-2030

	All six minimum control measures and outfall inspections and dry weather screening	The city hired a new Stormwater employee in 2025 to assist with all aspects of the stormwater program, but more specifically oversee the components of minimum, control measure #6 Pollution prevention and Good Housekeeping for permittee-owned or operated facilities, operations and structural stormwater controls that includes, SOP's, BMP's, SWPPP and training to prevent or reduce the runoff of pollutants to the MS4 and waters of the state. And also assisting with the enforcement of illicit discharge detection and elimination. That stormwater training can be found at this link.	2025-2030
General Public	Illicit Discharge Reporting	Encourage residents to report illicit discharges. Emphasize the resources on the website and track how many views on the site and incidents reported. Track the data to determine if illicit discharges are isolated to a specific area.	2025-2030
		City web designer is working on an online illicit discharge submittal process for the Southern Utah Stormwater Coalition website.	2025-2030
		Encourage and promote the Adopt-a-Waterway program to community members. The number of adoptions and data related to the clean-up events will be provided in the DEQ annual reports.	2025-2030
Business Owners and HOA's	Stormwater Regulation	Run reports of businesses that impact stormwater such as carpet cleaner, auto shops, food services, fuel stations, concrete suppliers, landscape companies, waste management companies, etc. and mail flyers, letters or emails that promote awareness and enforcement. Work together with city Business Licensing Department to create processes to withhold business licenses for businesses that impact stormwater until training and/or acknowledgement is obtained.	2025-2030
		Obtain Long Term Post Construction Maintenance Agreements and Plans from business.	2025-2030

CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

According to MS4 UPDES Section 4.2.4, Ivins City shall "implement and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction sites with a land disturbance of greater than or equal to one acre. This includes projects less than one acre that are

part of a larger common plan of development or sale which collectively disturbs land greater than or equal to one acre according to the minimum performance measures…"

PROGRAM DETAILS

Development and redevelopment can have a significant impact on the health of the city's waterways, both during the construction phase and once the buildings are in use. Throughout the year, the city reviews development plans and inspects construction sites to ensure stormwater facilities (including UICs) are designed, constructed, maintained, and functioning per city standards. Additionally, the city requires the use of Low Impact Development (LID) stormwater management practices and principles as required by the UPDES MS4 permit. The city plans to carry forward these policies and activities in 2026. The city requires all new development and redevelopment construction sites greater than or equal to one acre, or smaller sites that are part of a common plan of development have a Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI). The SWPPP and NOI are both required prior to obtaining a grading and/or building permit. The following measures have been put into place:

- We have software called City Inspect that prevents issuing building permits without the proper storm water documents and review process.
- The MS4 inspectors and general contractor and/or third-party inspectors log the required inspections in City Inspect.
- City Inspect has been programed not to allow a Final or Certificate of Occupancy inspection without a Notice of Termination (NOT) inspection complete. At the time of the NOT inspection, the city inspector will confirm the NOT has been requested on the CDX.
- City Inspect is our source for record keeping for the required reviews, documents, inspections and enforcement.
- The city has ordinances in Section 11.05.502 which contains prohibitions of illicit discharges. We are currently improving provisions to enforce against any party shown to discharge pollutants to the storm drain system and supports compliance to the UPDES MS4 Construction General Permit and Common Plan of Development Permit for construction activity and subsequent escalating enforcement procedures and an appeal process.

IMPLEMENTATION

1. Review Process For Construction General Permits

Development Services reviews the construction drawings and issues grading permits. Prior to issuing the grading permit they will:

- Require SWPPP and NOI documents be submitted to the Stormwater Manager or Stormwater Coordinator for review and approval.
- Review the Storm Water Quality Report and Low Impact Development drawings to determine if LID requirements have been met.
- Require Post Construction Long Term Maintenance Agreements and Plans have been submitted to the Stormwater Coordinator for review and approval.

2. Review Process for Common Plan of Development Permits

SWPPP, site map and NOI must be uploaded to City Inspect with all other required building permit documents. The SWPPP and site map will be reviewed, and the NOI will be confirmed on the CDX. Once SWPPP documents have been accepted, the Building Department is given the green light. Permits cannot be issued without having stormwater approval.

3. Site Inspections

A preconstruction meeting is required as part of the grading permit. Stormwater BMPs and inspection requirements are discussed at the preconstruction meeting.

The MS4 inspectors and general contractor and/or third-party inspectors log the required inspections during construction in City Inspect. Frequency of inspections are determined in the SWPPP.

Once the site is complete the contractor is required to request a termination of the NOI on the CDX. The city Public Works Inspectors verify the site has met the final stabilization requirements per the UPDES MS4 permit.

4. Ordinances

The ordinance in Section 11.05.502 will support compliance to the UPDES MS4 Construction General Permit and Common Plan of Development Permit for construction activity with subsequent enforcement action.

The city has ordinances to enforce against any party shown to be discharging pollutants to the storm drain system and requires the responsible party to eliminate the discharge and perform clean-up activities as needed or face enforcement action/penalties.

GOALS AND ASSESSMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
MS4 Employees	Registered Stormwater Inspectors	All MS4 inspectors that oversee stormwater compliance maintain a current RSI certification with Utah LTAP or the EPA website.	2025-2030
	Low Impact Development	Development Services, Engineering and Public Works employees have attended training on LID requirements, submittal processes and postconstruction inspections. Significant training was conducted in 2020 and is ongoing. City engineers and key stormwater staff attended LID training at APWA Conference March 2024 and will continue to attend educational trainings for new and updated LID tools. Stormwater staff attend USWAC monthly meetings to obtain training and education.	2025-2030
	Development Review	Development Review meetings are held weekly to discuss projects, special site conditions, SWPPP requirements, LID/post construction requirements, enforcement, etc.	2025-2030

Business Owners and HOA's	RSI/RSW Training	There is an online process through Utah LTAP and the EPA website for the RSI classes. The city encourages stormwater education and compliance.	2025-2030
	MS4 BMP Manual	Create a Best Management Practices (BMP) manual for all stormwater construction projects and a list of BMPs in order to be compliant to HB 507.	2025-2030
	City Inspect	The city has conducted several training opportunities to educate on the stormwater permit software, process, inspections and Notice of Termination requirement. There has been significant training since 2020 and is ongoing.	2025-2030
		The city has worked with City Inspect, our software company, to develop a development module for development plan review for sites with land disturbance of greater than or equal to one acre or less than one acre if part of a common plan of development. The software will be used by contractors, developers and engineers to upload the required documents for preliminary and final plats, site plans, LID, etc. for MS4 review and approval. Grading permits will be issued from City Inspect and all subsequent inspections (pre-construction, construction and final inspections/Notice of Termination). This program is constantly being updated and improved for convenience and compliance to UPDES MS4 permit requirements.	Software development Updates 2024-2030
	Common Plan of Development (CPOD) SWPPP Template	The Southwest Utah Stormwater Coalition created a CPOD template to be used in all MS4's. The template provides information specific to southern Utah such as the impaired waters since it was routinely missed and often a correction item during SWPPP reviews. This information can be found in our SOP Manual.	Created in 2020 & will be utilized 2020-2025

LONG-TERM STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT (POST-CONSTRUCTION STORMWATER MANAGEMENT)

According to MS4 UPDES Section 4.2.5, Ivins City shall "implement, and enforce a program to address post-construction storm water runoff to the MS4 from private and public new development and redevelopment construction sites meeting the thresholds below. The water quality considerations of this minimum control measure do not replace or substitute for water quantity or flood management requirements implemented on the local level for new development or redevelopment sites. Water quality controls may be incorporated into the design of structures intended for flow control; or water quality control may be achieved with separate control measures. The program must apply to private and public development sites."

PROGRAM DETAILS

The city requires all new development and redevelopment construction sites greater than or equal to one acre, or smaller sites that are part of a common plan of development, have a Low Impact Development (LID) engineering drawing and Stormwater Quality Report submitted to Development staff for review. Follow this link to find that information. This will ensure any storm water controls, or management practices will meet LID requirements, including managing precipitation from all rainfall events to prevent off-site discharge to less than the 80th percentile.

The city stormwater ordinance requires a long-term stormwater maintenance agreement (LTSWMA) and long-term stormwater management plan (LTSWMP) be submitted for all new development and redevelopment construction sites greater than or equal to one acre, or smaller sites that are part of a common plan of development. The LTSWMP includes BMP's and SOPs to prevent pollutants to be discharged from the site and requires site inspections every other year. The following measures have been put into place:

- The city has developed and adopted a city ordinance (Updated ordinance incoming) requiring long-term post construction stormwater controls. The ordinance requires BMP selection, design, installation, operation and maintenance standards to protect water quality and reduce the discharge of pollutants, which includes an appeal process and enforcement provisions.
- The city has software to maintain documentation for each LTSWMP, including selected BMP's, site inspections and enforcement of post-construction control measures.
- The city has implemented SOPs for site inspection and enforcement of post-construction stormwater control measures.

IMPLEMENTATION

1. Review Process for Commercial General and Common Plan of Development Long-Term Stormwater Management

A technical review with Development Services and Engineering ensures minimal impacts to water quality and LID compliance. Prior to issuing the grading permit they will:

- Review the Storm Water Quality Report and Low Impact Development drawings to determine if LID requirements have been met.
- Require Post Construction Long Term Maintenance Agreements and Plans have been submitted to the Stormwater Coordinator for review and approval.

2. Post-Construction Site Inspection Process for Commercial General and Common Plan of Development Permits

- The city has software to maintain documentation for each LTSWMP, including selected BMP's, site inspections and enforcement of post-construction control measures.
- The city has implemented SOPs for site inspection and enforcement of post-construction stormwater control measures.
- The city Public Works inspectors will inspect the site during construction and final inspection to verify long-term BMPs were constructed as designed.

- The city requires owners, managers, or associations to submit site inspections every other year, with the city Stormwater Coordinator inspecting sites every five years. These inspections will be documented in the city software program.

3. Ordinances

The city has ordinances in (Updated ordinance incoming) which contains provisions to review LID, submit LTSWMA and LTSWMP, require inspections every other year to be submitted by the property owner and city inspections to be performed every 5 years and enforcement to correct any non-compliance or violations.

4. Training and Documentation

- Human Resources requires stormwater training for all new hires at orientation.
- Annual training courses are scheduled by departments throughout the year and documented in city software.

GOALS AND ASSESSMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
MS4 Employee	LID plan reviews & construction inspections.	LID will be reviewed by Development Services with all other construction documents. The city has created a Development Module in our software City Inspect. City Inspect will be our record keeping mechanism for SWPPP and LID review, and BMP installation inspections. We are currently working on improving the mapping and geolocating aspects of our software program and expect to complete the update by 2026. This will allow for more accuracy.	2025-2030
	Post-Construction agreements, plans, inspections & enforcement	The city has chosen to manage post-construction documents in software City Works and City Inspect as a regulatory control mechanism. We have established a computer program to track agreements, post construction LID review, inspections and enforcement. We are continually revising and improving these systems to accurately and efficiently manage postconstruction requirements.	2025-2030

Property Owners and Property Management Companies	Post-Construction maintenance	Have fewer illicit discharges by educating property owners/managers of their responsibility for a clean site. Education opportunities come with explaining and acquiring the post construction maintenance agreement and plans.	2025-2030
		Work with the city Business Licensing Department to create a process for homebased businesses that have potential negative impact on storm water such as carpet cleaners, painters, mobile detailing, etc. to have them sign an acknowledgement about proper BMPs to prevent an illicit discharge and to inform them of city ordinance/enforcement.	2025-2030
Developers, Engineers, and Contractors	LID requirements and compliance	Training was provided by the Southern Utah Stormwater Coalition and sponsored by the Southern Utah Branch of ASCE, Southern Utah Home Builders Association (SUBA), and Associated General Contractors (AGC) to discuss the LID requirements, Southern Utah Stormwater Coalition LID Guidance Manual, submittal/review processes and post-construction inspection requirements. As the program evolves the city and/or coalition will offer additional training.	2025-2030

POLLUTION PREVENTION & GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

According to the MS4 UPDES Section 4.2.6, Ivins City shall "implement a program for Permittee-owned or operated facilities, operations and structural storm water controls that includes SOPs, pollution prevention BMPs, storm water pollution prevention plans or similar type of documents, and a training component that have the ultimate goal of preventing or reducing the runoff of pollutants to the MS4 and waters of the state. All components of the program shall be included in the SWMP document and must identify the department responsible for performing each activity described in this section. The Permittee shall develop an inventory of all such Permittee-owned or operated facilities. The Permittee must review this inventory annually and update as necessary."

PROGRAM DETAILS

The city has developed a written inventory of all facilities owned or operated by the city. The properties have been assessed to determine common pollutants and how to prevent them from entering the storm drain. Based on this assessment the city has identified the "high priority" facilities and created SWPPP for each site.

The SWPPP contains BMPs to target specific pollutants generated onsite. The city applies regulatory mechanisms for maintenance standards of "high priority" sites using SWPPPs and BMPs

for each facility, establishes the regulatory framework that authorizes inspection of privately owned permanent stormwater facilities, BMP's and establishes the city's enforcement authority to require cleaning or maintenance of such facilities and structures.

All stormwater infrastructure, including water quality treatment and facilities, are inspected by city personnel. On an annual basis and as required under the UPDES MS4 permit, city inspectors inspect all city facilities and re-evaluate for possible "high-priority" site designation.

The city inspects and maintains city-owned or operated facilities such as ponds, vaults, and bioswales to ensure they are performing correctly. The stormwater crews visually inspect all facilities, identify their maintenance needs, and detail when maintenance has been completed.

Cleaning and necessary maintenance occur within the timeframe prescribed by the UPDES MS4 per, typically one year. City stormwater inspectors use City Inspect and City Works software programs to track facility inspections and prepare maintenance work orders.

IMPLEMENTATION

1. Post-Construction Site Inspection Process for City Owned Facilities

- We have obtained a list of city properties from Risk Management, created a written inventory and identified common pollutants that originated at the facilities. We determined preventative methods to implement and created SOPs.
- We have assessed the list of city properties to create a "high-priority" list. We have created a SWPPP document for each "high-priority" site. We have determined that we will have one high-priority site: our Public Works Yard located at 460 N. 200 W.
- We have scheduled monthly visual inspections of "high-priority" facilities to be assigned to city staff on site, as noted on the city Facilities High-Priority List included in the SWMP.
- Semi-Annual comprehensive inspection to be performed by the Stormwater Coordinator, records to be kept on City Inspect.
- Annual visual observation of storm water discharge inspections will be performed by the Stormwater Coordinator, records to be kept of city software.
- The city has developed and implemented SOPs at each of the facilities owned or operated by the city for buildings and facilities; material storage areas, heavy equipment storage areas and maintenance areas; parks and open space; vehicle and equipment; roads, highways and parking lots; and storm water collection and conveyance systems.
- The city maintains an inventory of all floor drains inside all city owned or operated buildings and ensures that the drains discharge to appropriate locations.
- The city will ensure contractors performing operations and maintenance activities follow SOPs.
- The city has developed and implemented a process to assess water quality impacts in the design of new flood management structural controls by requiring floodplain permits to be reviewed by a city Engineer prior to issuing any grading permit or building permit. The city Engineer reviews structural controls and determines if changes or additions should be made to minimize impacts to water quality. These structural controls are inspected by design engineers prior to obtain a certificate of occupancy.

- The city has developed an itemize project list for retrofit for existing developed sites with a ranking of retrofit sites based on permit criteria.
- The city provides training for new employees at hire and annually within each department. Documentation is kept in the city software program.

GOALS AND ASSESSMENT

TARGET AUDIENCE	TOPIC	GOALS	YEAR
MS4	All six minimum control measures and outfall inspections and dry weather screening	The city added an additional Stormwater employee in 2025 to assist with all aspects of the stormwater program, but more specifically oversee the components of minimum, control measure #6 Pollution prevention and Good Housekeeping for permittee-owned or operated facilities, operations and structural stormwater controls that includes, SOP's, BMP's, SWPPP and training to prevent or reduce the runoff of pollutants to the MS4 and waters of the state. And assisting with the enforcement of illicit discharge detection and elimination.	2025-2030
	SOPs for all City Facilities	City facility SOP's updated and added to the SWMP and city Website for city owned or operated city facility sites.	2025-2030
	High Priority Inspections	Our software, City Inspect, is constantly being updated to track and keep records of monthly visual inspections, semi-annual comprehensive inspections and annual visual inspections. High priority inspections will be assessed for consistency and quality of each inspection. Citywide compliance and inspection follow-up on corrective action items to ensure compliance.	2025-2030
New Hire MS4	Training	Annual training will continue to be conducted for staff that have primary stormwater responsibilities and those likely to impact stormwater quality. The training tools will be updated yearly and address any new stormwater concerns. Training in 2025 will be focus on SOPs and spill response plans.	2025-2030