



CITY OF HARRISONBURG
**PUBLIC
WORKS**

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September 5, 2025

David Taylor
Department of Environmental Quality
1111 East Main Street, Suite 1400
Richmond, VA 23219

Subject: City of Harrisonburg General VPDES Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (VAR040075)

Mr. Taylor

Please find attached the City of Harrisonburg's MS4 Annual Report for the July 1, 2024-June 30, 2025 General VPDES Permit for Small Municipal Separate Storm Sewer Systems.


Please do not hesitate to contact Public Works should you have any questions at (540) 434-5928 or keith.thomas@harrisonburgva.gov.

Sincerely,

Keith Thomas
Public Works Sustainability and Environmental Manager

CERTIFICATION

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 gather and evaluate 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.



Responsible Official Signature



Date

VAR040075

City of Harrisonburg, VA

Permit Number

MS4 Name

Harrisonburg
VIRGINIA



MS4 Annual Report

Reporting Period: July 1, 2024 – June 30, 2025
Permit Number: VAR040075

In compliance with the Virginia Stormwater Management Program (VSMP) and General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4)

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Introduction

The City of Harrisonburg is an independent city located in the Shenandoah Valley of the Commonwealth of Virginia and is surrounded by Rockingham County. The City is an operator of a Small Municipal Separate Storm Sewer System (MS4). A *municipal separate storm sewer* means “a conveyance or system of conveyances otherwise known as a municipal separate storm sewer system, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains:

1. Owned or operated by a federal, state, city, town, county, district, association, or other public body, created by or pursuant to state law, having jurisdiction or delegated authority for erosion and sediment control and stormwater management, or a designated and approved management agency under § 208 of the CWA that discharges to surface waters;
2. Designed or used for collecting or conveying stormwater;
3. That is not a combined sewer; and
4. That is not part of a publicly owned treatment works.”

The US Census in 2010 determined the City’s population to be 48,914, that the City is within an Urbanized Area, and thus subject to the amended and reissued General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems, which became effective November 1, 2023 and will expire on October 31, 2028 when a new permit cycle is expected to become effective.

The MS4 Permit requires the City to develop an MS4 Program Plan and to submit Annual Reports (this document), for each period between July 1 through June 30. Modifications to the MS4 Program Plan are expected throughout the life of the permit as part of the iterative process to reduce pollutant loadings and to protect water quality. The City’s MS4 Program Plan and Annual Reports available on the City’s Stormwater webpages: <http://www.harrisonburgva.gov/stormwater-management-program>.

Additional information on the laws and regulations affecting the City and its operation of an MS4 can be found in:

- Virginia Stormwater Management Act, Article 2.3 (§62.1-44.15-24 et seq.) of Chapter 3.1 of Title 62.1 of the Code of Virginia
- Virginia Administrative Code, 9VAC25-870, Virginia Stormwater Management Program (VSMP) Regulations
- Virginia Administrative Code, 9VAC25-890-40, General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems
- Virginia Department of Environmental Quality, Municipal Separate Storm Sewer Systems, <https://www.deq.virginia.gov/permits-regulations/permits/water/municipal-separate-storm-sewer-system-permit-ms4s-stormwater>

Watersheds

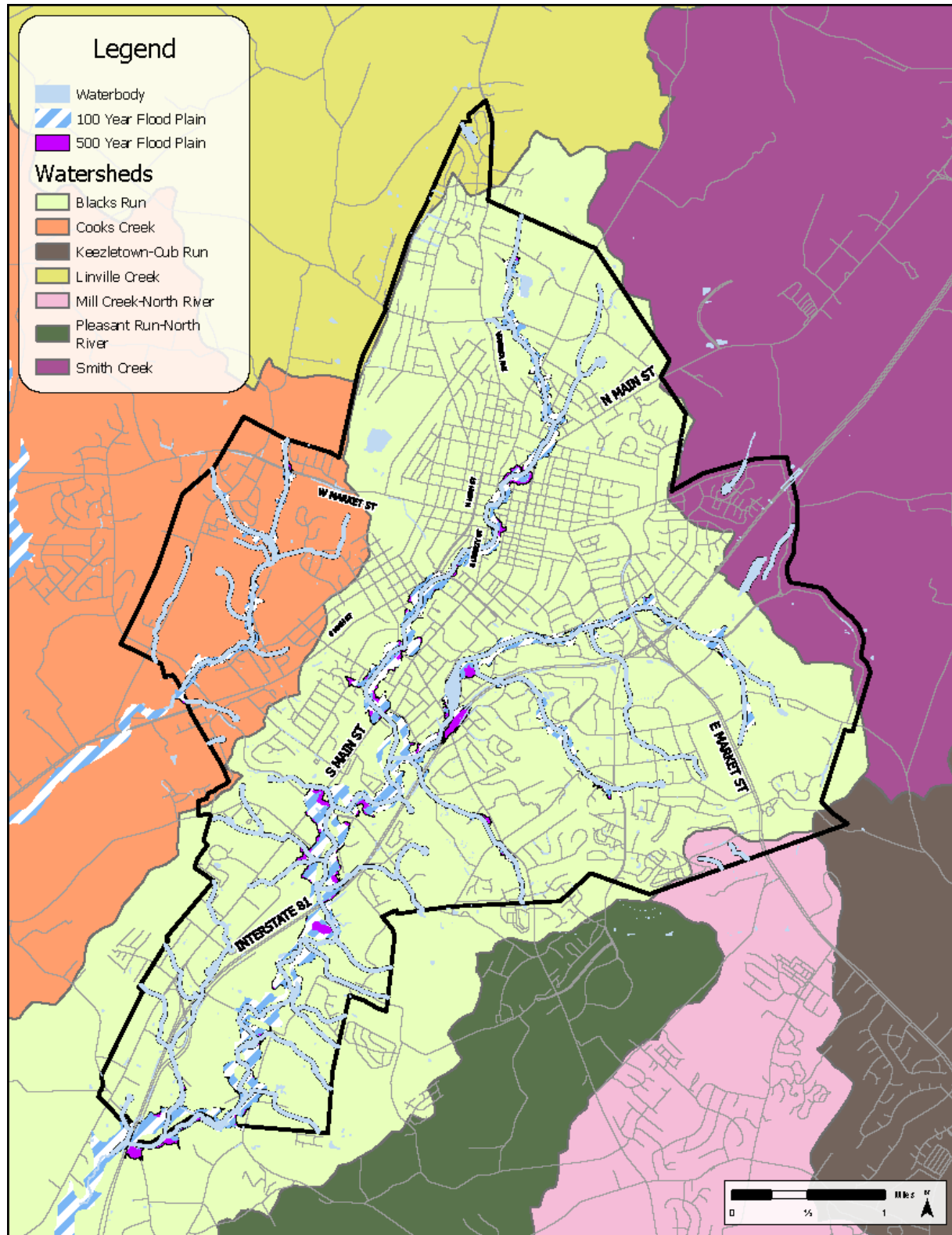
The City of Harrisonburg's 17.4 square miles is highly urbanized with substantial amounts of impervious surface. The following table describes approximate stream length, drainage areas, and impairments for each watershed within Harrisonburg city limits.

Table 1. Subwatersheds in Harrisonburg

Subwatershed Name	Hydrologic Unit Code (HUC)	Approximate Length (miles) within Harrisonburg	Approximate Drainage Area (acres)	Impairments	TMDL WLA?
Blacks Run (<i>flows into Cooks Creek</i>)	PS22	8.67	9067	Fecal Coliform, Sediment, Total Phosphorus	Yes, 2019 ¹
Sunset Heights Branch of Cooks Creek	PS23	2.09	1347.58	Fecal Coliform, Sediment, Total Phosphorus	Yes, 2019 ²
Dry Fork (<i>flows into Smith Creek</i>)	PS59	0.206	493	E. Coli, Sediment	Yes, 2004
North River-Mill Creek	PS26	No stream	87.44	E. Coli	No
Cub Run (<i>flows into South Fork of Shenandoah River</i>)	PS33	No stream	14.75	E. Coli	No
Linville Creek (<i>flows into North Fork of Shenandoah River</i>)	PS56	0.08	117.8	E. Coli, Sediment	No

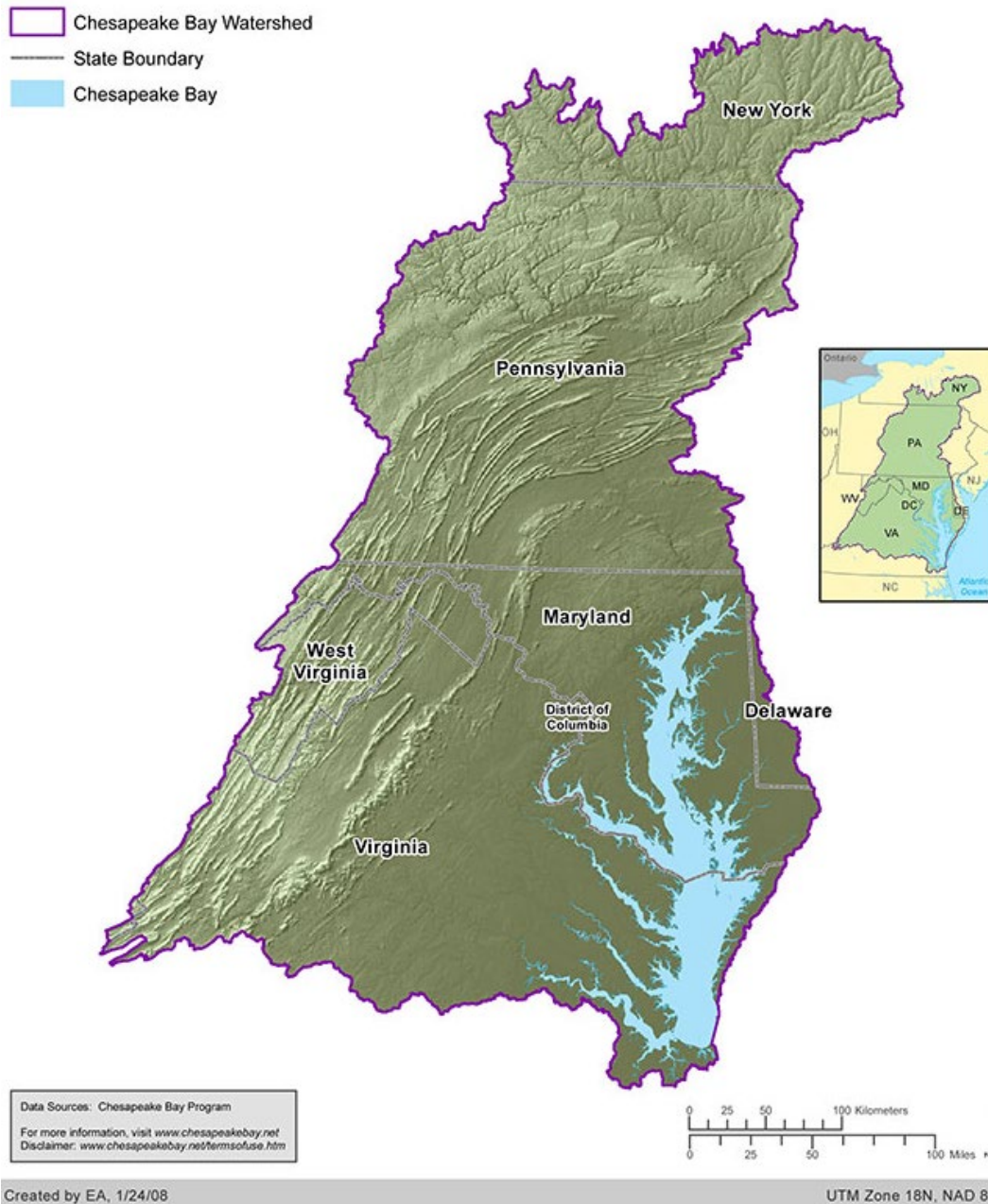
^{1, 2} The revision of the Blacks Run and Cooks Creek Watershed TMDL includes a WLA. This TMDL was approved by the EPA on July 10, 2019 and so a local TMDL Action Plan will not be developed for this permit cycle.

Figure 1. Subwatersheds in Harrisonburg



The City of Harrisonburg also drains into the Chesapeake Bay Watershed. The Chesapeake Bay Watershed is 64,000 square miles and includes portions of New York, Pennsylvania, Delaware, Maryland, West Virginia, and Virginia. Altogether, more than 100,000 streams, creeks and rivers make up the Chesapeake Bay Watershed. As part of the Special Conditions for the Chesapeake Bay TMDL, the MS4 Permit requires the City of Harrisonburg to address impairments for phosphorus, nitrogen, and sediment that enter the Chesapeake Bay.

Figure 2. Chesapeake Bay Watershed Map



Roles and Responsibilities

The City of Harrisonburg's Public Works Department coordinates the City's municipal separate storm sewer system (MS4) program. The Public Works Department's Sustainability and Environmental Manager is responsible for developing and updating the MS4 Program Plan and submitting Annual Reports. The City Manager is responsible for providing the appropriate certification for documents. The Department of Community Development, Department of Public Utilities, the Department of Parks and Recreation, Police Department and Fire Department are the major contributors to Harrisonburg's MS4 Program although it is recognized that this is a citywide and community-wide program.

For MS4 Permit coverage, Harrisonburg City Public Schools (HCPS) and Harrisonburg Electric Commission (HEC) are covered by the City of Harrisonburg's MS4 Permit and their responsibilities are referenced throughout the MS4 Program Plan and associated Annual Reports.

Contact Information

Principal Executive Officer

Title: City Manager
Name: Alexander Banks VI
Address: 409 South Main Street
Harrisonburg, Virginia 22801
Phone: (540) 432-7701
Email: Ande.Banks@harrisonburgva.gov

Duly Authorized Representatives

Title: Director of Public Works
Name: Tom Hartman
Address: 320 East Mosby Road
Harrisonburg, Virginia 22801
Phone: (540) 434-5928
Email: Tom.Hartman@Harrisonburgva.gov

Title: Sustainability and Environmental Manager
Name: Keith Thomas
Address: 320 East Mosby Road
Harrisonburg, Virginia 22801
Phone: (540) 434-5928
Email: Keith.Thomas@harrisonburgva.gov

Title: Stormwater Compliance Specialist
Name: Shayna Carter
Address: 320 East Mosby Road
Harrisonburg, Virginia 22801
Phone: (540) 434-5928
Email: Shayna.Carter@harrisonburgva.gov

MS4 Annual Report

The MS4 Annual Report details the City of Harrisonburg's stormwater program to manage the quality of stormwater runoff discharged from the MS4.

Evaluations gathered while developing the 2024-2025 MS4 Annual Report will be considered during the minimum control measure evaluations throughout the document as well as in the MS4 Program Plan. This report and subsequent annual reports from the five year permit cycle will remain on file in the Public Works Department and on Harrisonburg's stormwater webpage: www.harrisonburgva.gov/stormwater-management-program.

Minimum Control Measure #1: Public Education & Outreach

BMP 1.1: Develop and Implement a Public Education and Outreach Program

Description

The City will implement a public education and outreach program designed to:

- Increase the public's knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns.
- Increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications.
- Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

The City will identify no less than three high-priority stormwater issues to meet the goal of educating the public. The high-priority public education and outreach program will:

- Clearly identify the high-priority stormwater issues.
- Explain the importance of the high-priority stormwater issues.
- Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues.
- Provide a contact name and telephone number or location where the public can find out more information.

Annual Reporting Requirements

- A list of the high-priority stormwater issues the City addressed in the public education and outreach program.
- A list of the strategies used to communicate each high-priority stormwater issue.
- Description of any changes needed to the Public Education and Outreach Plan.
- A description of public education and outreach activities conducted that included education regarding climate change.

List of High Priority Stormwater Issues

High Priority Stormwater Issue 1: Chesapeake Bay Nutrients

Strategy 1: Traditional Written Materials

- Press Release: City press releases are posted on the City's webpage and are often picked up by local news outlets who share or report on the contents.
 - *City Accepts Comments on Revised Chesapeake Bay TMDL Action Plan*. May 6th, 2025

Strategy 2: Media Materials

- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list
 - *Stream Restorations in The City*— July 2024

- *Don't Be a Poo-lluter!* -- August 2024
Harrisonburg Public Works Facebook Page: The Harrisonburg Public Works Facebook page promotes high-quality receiving waters, education about the Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.

Strategy 3: Speaking Engagements

- All speaking engagements attended by stormwater staff are focused on explaining water quality, including TMDLs, as well as Harrisonburg's role in meeting the Chesapeake Bay TMDL. Staff attended 16 educational events and reached an audience of 871 participants. These speaking engagements do not include Blacks Run Clean Up Day, Middle School Watershed Field Trips, or the annual rain barrel workshop as these events are counted as Public Involvement Activities. Our traditional reach through speaking engagements was partially reduced this permit year due to school bus driver shortage that limited school events.
- HCAP Site Visits: The City partners with the Shenandoah Valley Soil and Water Conservation District (SVSWCD) to implement the Harrisonburg Conservation Assistance Program which includes speaking to landowners about stormwater issues during site visits. The SVSWCD conducted 62 site visits this past year.

Strategy 3: Alternative Materials

- Promotional/Alternative Material: This year we had Re-usable Bags/ Magnets/Puzzles: These items were given out to Blacks Run Clean Up Day participants. The re-usable bags have the Blacks Run Clean Up Day logo on them. 550 people volunteered at this year's cleanup event. Additionally, promotional items were distributed at several other education events.

High Priority Stormwater Issue 2: High Quality Receiving Waters

Strategy 1: Traditional Written Materials

- Press Release: City press releases are posted on the City's webpage and are often picked up by local news outlets who share or report on the contents.
 - *Stormwater Improvement Plan Progress to Be Presented at Public Meeting.* October 22, 2024
- JMU Breeze Articles
 - JMU Breeze Article, by Kaiden Bridges: Public Works' 'Green Team' builds environmentally friendly Harrisonburg. April 10, 2025.

https://www.breezejmu.org/news/public-works-green-team-builds-environmentally-friendly-harrisonburg/article_7d76d566-446b-4d76-b514-37c7b4160311.html

Strategy 2: Media Materials

- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list.
 - *World Monitoring Day*. September 2024
 - *Be a Stormwater MVP*. November 2024
- WHSV TV-3 Reports
 - WHSV TV-3 Article: *Harrisonburg Public Works hosts rain barrel workshop promoting water conservation*. March 20, 2025.
<https://www.whsv.com/2025/03/20/harrisonburg-public-works-hosts-rain-barrel-workshop-promoting-water-conservation/>
- Harrisonburg Stormwater Facebook Page: The Harrisonburg Stormwater Facebook page promotes high-quality receiving waters, education about the Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year, Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.

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- HCAP Site Visits: The City partners with the Shenandoah Valley Soil and Water Conservation District (SVSWCD) to implement the Harrisonburg Conservation Assistance Program which includes speaking to landowners about stormwater issues during site visits. The SVSWCD conducted 62 site visits this past year.

Strategy 3: Alternative Materials

- Promotional/Alternative Material: This year we had Re-usable Bags/ Magnets/Puzzles: These items were given out to Blacks Run Clean Up Day participants. The re-usable bags have the Blacks Run Clean Up Day logo on them. 550 people volunteered at this year's

cleanup event. Additionally, promotional items were distributed at several other education events.

High Priority Stormwater Issue 3: Litter and Trash

Strategy 1: Traditional Written Materials

- Press Release: City press releases are posted on the City's webpage and are often picked up by local news outlets who share or report on the contents.
 - *City gears up for Blacks Run Clean Up and Arbor Day Events*. April 4, 2025
- Daily News Record Articles
 - Daily News Record Article, by Richard H. Hronik III: BRCD_Girl Scouts collect trash during annual Blacks Run Clean Up Day. April 13, 2025.
https://www.dnronline.com/news/lifestyle/outdoors/girl-scouts-collect-trash-during-annual-cleanup-of-blacks-run-in-harrisonburg/article_ff921727-da05-55ad-9b96-cd636174b447.html

Strategy 2: Media Materials

- WHSV TV-3 Reports
 - WHSV TV-3 Article, by WHSV Newsroom: *City of Harrisonburg urging locals to help with stream clean up*. July 19, 2024.
<https://www.wHSV.com/2024/07/20/city-harrisonburg-urging-locals-help-with-stream-clean-up/>
- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list.
 - *Pick Up Your Picnic*. August 2024
 - *Common Pollutants Found in Blacks Run*. November 2024
- Harrisonburg Stormwater Facebook Page: The Harrisonburg Stormwater Facebook page promotes high-quality receiving waters, education about Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year, Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.

Strategy 3: Alternative Materials

- Re-usable Bags/ Magnets/Puzzles: These items were given out to Blacks Run Clean Up Day participants. The re-usable bags have the Blacks Run Clean Up Day logo on them. 550 people volunteered at this year's cleanup event.

BMP Effectiveness

Review of BMP: A wide variety of audiences was reached through this BMP and educated about the high-priority stormwater issues.

Program Plan Revisions: Program Plan revisions were not necessary. To increase our ability to educate our community, we will begin creating educational written messages in Spanish and Arabic.

Minimum Control Measure #2: Public Involvement and Participation

BMP 2.1: Plan for, Respond to, and Document Public Input and Reports

Description

The City will develop and implement procedures for the following:

- The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns.
- The public to provide input on the city's MS4 Program Plan.
- Receiving public input or complaints.
- Responding to public input received on the MS4 Program Plan or complaints.
- Maintaining documentation of public input received on the MS4 program and associated MS4 Program Plan and the city's response.

Annual Reporting Requirements

- A summary of any public comments on the MS4 program received and how the permittee responded
- A summary of stormwater pollution complaints received under the procedures established in Part I E 2 a (1) (excluding flooding complaints) and how the permittee responded

Summary of Public Comment

No public comment on the MS4 program was received.

Summary of Stormwater Pollution Complaints

Public complaints about stormwater pollution and the City's response is detailed in MCM3.

BMP Effectiveness

The public can provide comments about the MS4 program and associated Program Plan as needed. Information about how to provide comments is listed on the stormwater webpages. A survey link (<https://arcg.is/0CjKnX>) was added to our webpage (<https://www.harrisonburgva.gov/MS4-permit-program>) to allow the public to give comments throughout the year.

The public can provide input on the permittee's MS4 program by calling Public Works at (540) 434-5928, emailing stormwater@harrisonburgva.gov or mailing comments to Harrisonburg Public Works

Department, 320 East Mosby Road, Harrisonburg VA 22801. The public can also visit the Public Works office to speak with someone in person. Comments received at City Hall will be sent to Public Works via internal mail.

The public can also attend the quarterly Stormwater Advisory Committee meetings to provide comment during the public comment period of the meeting.

The Harrisonburg City website outlines procedures for the public to report illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other pollution concerns. This information can be found at: <https://www.harrisonburgva.gov/report-pollution>.

Program Plan Revisions: Program Plan revisions were not necessary.

BMP 2.2: Develop and Maintain a Stormwater Webpage

Description

No later than three months after this permit's effective date, the City will develop and maintain a webpage dedicated to the MS4 program and stormwater pollution prevention. The following information will be posted on this webpage:

- The effective MS4 permit and coverage letter.
- The most current MS4 Program Plan or location where the MS4 Program Plan can be obtained.
- The annual report for each year of the term covered by this permit.
- A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns.
- Methods for how the public can provide input on the city's MS4 program.

Annual Reporting Requirements

A webpage link to the city's MS4 program and stormwater website.

Website Information

The City's MS4 Program Plan and Annual Reports are available on the City's Stormwater webpages: <http://www.harrisonburgva.gov/stormwater-management-program>.

The City of Harrisonburg promotes reporting of construction site issues through its website at: <http://www.harrisonburgva.gov/site-development>.

The City of Harrisonburg operates an online pollution reporting form for citizens to report illicit discharges at: <http://www.harrisonburgva.gov/report-pollution>.

BMP Effectiveness

Review of BMP: The metric for determining if the BMP is effective is if the websites are maintained and available for use. All of the websites are available for citizens to use and the City promotes the use of the websites periodically throughout the year.

Program Plan Revisions: Program Plan revisions were not necessary.

BMP 2.3: Implement Four Public Involvement Opportunities

Description

The City will implement no less than four activities per year from two or more of the categories described in the permit to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects.

Annual Reporting Requirements

- A description of the public involvement activities implemented by the City.
- A report of the metric as defined for each activity and an evaluation as to if the activity is beneficial to improving water quality.
- The name of other MS4 permittees who participated in the public involvement opportunities.

Public Involvement Activities

- **Blacks Run Clean Up Day:** Blacks Run Clean Up Day is the annual community stream clean up organized by the City of Harrisonburg. The Event is usually held in April and includes educational exhibits from participating organization. In the past, these have included the Shenandoah Valley Soil and Water Conservation District, Climate Action Alliance of the Valley, Wild Virginia, James Madison University, Virginia Master Naturalists, Potomac Appalachian Trail Club, Chesapeake Bay Foundation, Virginia Department of Forestry, Virginia Clean Cities, Harrisonburg Parks and Recreation, Harrisonburg-Rockingham Regional Sewer Authority, Bring Your Own, Virginia Department of Environmental Quality, and The Natural Garden. The website <https://www.harrisonburgva.gov/cleanstream-home> has information on past and upcoming clean up day events. Further documentation is available upon request.
- **Household Hazardous Waste Collection Days:** Household Hazardous Waste Collection Days are organized by the City of Harrisonburg and Rockingham County and are offered to residents so they can properly dispose of their household hazardous waste. The collection days were held on October 12, 2024, and May 10, 2025.
- **Middle School Watershed Field Trips:** City of Harrisonburg middle school students participate in hands-on watershed field trips as a part of their curriculum. The program introduces middle schoolers to their local watershed. 7th graders participate in “Plant-a-Seed” where they learn about river hydrology, macroinvertebrates, and water chemistry. City of Harrisonburg staff help to teach lessons during these trips. The events are usually held on multiple days.
- **Rain Barrel Workshops:** Rain Barrel workshops are organized by the Shenandoah Valley Soil and Water Conservation District and the City of Harrisonburg. Participants are taught about water conservation and watershed health and make rain barrels out of pickle barrels. One Rain Barrel Workshops will be planned for the spring and another in the fall pending enough participants signup to hold both events.
- **Public Tree Planting Events:** Tree planting events where the public is invited to help plant trees are organized throughout the year. There are multiple small group volunteer tree planting events throughout the year. Typically, at least one larger group planting event is anticipated each year in the spring around Arbor Day.

BMP Effectiveness

Review of BMP:

- **Blacks Run Clean Up Day:** The metric for determining if the activity is beneficial to water quality will be tonnage of trash picked up. The average range of pounds of trash removed from 2001 – 2018 is 3,900 pounds – 8,100 pounds. This year, 550 volunteers helped to clean stream sections

(removing 3.5 tons of trash) and 10 volunteers helped to plant trees at Thomas Harrison Middle School. In addition, 20 volunteer groups assisted with stream cleanup events throughout the year. The volunteers assisted in collection 1,755 pounds of trash. Additionally, these volunteers removed several tires, and other large miscellaneous items.

- [Household Hazardous Waste Collection Days](#): The metric for determining if the activity is beneficial to water quality will be the type and amounts of items dropped off during the collection days. Collection days were run jointly for Harrisonburg City and Rockingham County residents. Over 84 items were collected at the October event across 27 different item categories. 60 items were collected at the May event across 25 different item categories. More information is available upon request.
- [Middle School Watershed Field Trips](#): The metric for determining if the activity is beneficial to water quality will be the number of students reached through staff taught lessons. The “Plant-a-Seed” event was held October 15th and reached 200 7th grade students.
- [Rain Barrel Workshops](#): The metric for determining if the activity is beneficial to water quality will be the number of participants in the workshop and the amount of rain barrels built. At our spring workshop in March workshop, 13 people attended and 16 rain barrels were made.
- [Public Tree Planting Events](#): The metric for determining if the activity is beneficial to water quality will be the number of participants in the workshop and the amount of trees planted. This year eight public tree plantings we held and 66 trees were planted throughout the City. Volunteers for these tree plantings included groups such as; Harrisonburg City Public Schools, local Girl Scout troops, and James Madison University Students.

Program Plan Revisions: Program Plan revisions were not necessary.

Efforts to Engage all Economic and Ethnic Groups

- [Stormwater Improvement Plan](#): As part of the process to update the Cities Stormwater Improvement Plan, public surveys were made available in eight different languages to ensure participation from multiple different ethnic groups. The City also prioritized outreach for the survey and subsequent public meetings in areas indicated by EPA EJScreen Mapping Tool as Low Income, Limited English Speaking, and People of Color.
- [Public Tree Planting Events](#): Several tree plantings were held throughout the year at Public City Schools. The student population is of various ethnic and economic status.
- [Language Access](#): The City frequently translates materials into other languages. These materials include program documentation, drainage studies, and educational signs located in Purcell Park.

Public Education and Outreach Activities Regarding Climate Change

- [Rocktown Energy Festival](#): The Rocktown Energy Festival was cancelled for 2024. Staff instead participated in a tabling event the Levitt Amp Music series at the Harrisonburg Farmers Market. City staff tabled this event on September 4th, 2024, to educate the community on climate change initiatives Harrisonburg has completed and the goals of the City’s Environmental Action Plan.
- [Rocktown High School](#): Staff presented information on Urban Heat Island effect on August 30th, 2024, to a group of Rocktown High School students. This presentation educated students on the importance of trees mitigating heat and absorb stormwater.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

BMP 3.1: Develop and Maintain a Storm Drain System, Outfalls, and Information Map

Description

The City will develop and maintain an accurate MS4 map and information table, which will be submitted to the DEQ no later than July 1, 2019, and updated no later than October 1 of each year. If any physical interconnections to other MS4s are established or discovered, written notification will be provided to those MS4s.

Annual Reporting Requirements

A confirmation statement that the MS4 map and information table are up-to-date as of June 30 of the reporting year.

Confirmation Statement

The MS4 map and information table are up-to-date.

BMP Effectiveness

Review of BMP: The MS4 map and information table are up-to-date.

Program Plan Revisions: No Program Plan changes are needed at this time.

BMP 3.2: Prohibit Illicit Discharges and Connections through Ordinance Language

Description

The City shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the storm sewer system.

Annual Reporting Requirements

No requirements

BMP 3.3: Maintain and Implement Illicit Discharge Detection and Elimination Written Procedures

Description

The City will maintain and implement illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the MS4 with the goal of eliminating the unauthorized discharge. Procedures will include dry weather field screening of at least 50 outfalls per year.

Annual Reporting Requirements

- The total number of outfalls screened during the reporting period as part of the dry weather screening program.
- A list of illicit discharges to the MS4 including spills reaching the MS4.

Number of Outfalls Screened

During the 2024-2025 reporting period, 50 MS4 outfalls were inspected, and 0 active illicit discharges were observed or required follow-up.

Illicit Discharges

The incidents listed in the Illicit Discharge Summary 2024-2025 report include potential (having entered the storm sewer system but not having entered the live waterway) and actual illicit discharges (having entered the storm sewer system and the live waterway). Other suspect illicit discharges (dumping activity or spills away from the storm sewer system) are tracked and enforced as needed. Unfounded illicit discharges are incidents reported as an illicit discharge that are inspected by City Staff and determined to be an unfounded complaint. These unfounded reports are also entered into Cityworks. A summary of incident details is provided below. Further information is available by request.

InspectionId	Date Inspected	Incident Discovered By	Finish Date	Status	Narrative Description of incident	Resolution
95892	2024-07-08	Citizen notification	2024-07-08	CLOSED	A neighbor notified Public Works that a local body shop was producing fumes, likely paint fumes.	PW staff were unable to confirm any evidence of paint or other chemicals leaving the auto shop property.
95893	2024-07-08	HFD Inspection/Incident	2024-07-19	CLOSED	HFD notified PW staff of potential illicit discharge from a food truck, said that they had hoses flowing into stream	PW staff investigated potential discharge and could not find evidence of anything flowing into stream.
95945	2024-07-11	Self-Reported	2025-04-02	CLOSED	Poultry facility waste tanks began to overflow into stormwater drains directly into Blacks Run. Chicken feathers and some chicken fat was found floating near outfall with some parts making it a block and a half away. Smelled of chicken and feathers floating.	Privately hired cleanup crew set up nets in stream and swept feathers and other pollutants into nets and removed them from the stream.
96616	2024-07-31	Citizen notification	2025-02-27	CLOSED	Fluids from auto shop flowed along roadway and	Auto shop hired a cleanup crew to remove stains from parking lot. PW staff

					into DI down the street. No immediate evidence of oil or chemicals making it into DI.	later observed that site had been cleaned significantly and did not see any new stains.
96623	8/1/2024	HPW Staff	4/2/2025	CLOSED	There were multiple plastic bags filled with dog poop thrown into drop inlet.	PW staff are periodically watching the drop inlets to see if we can find who is throwing the bags in. One of the neighborhood residents also mentioned they would be keeping an eye out. Staff attempted multiple times to find the violator and inspected the site. No violator was found.
96624	2024-08-01	HFD Inspection/Incident	2025-02-27	CLOSED	HFD discovered oil leaking from tanks and barrels in covered/open area connected to main building. The ground is saturated with oil due to leakage. Business tried mitigating with hay/straw.	Collaborated with HFD to ensure corrective action was followed. Staff observed auto shop began using absorbent material for spills.
97437	2024-08-28	PU staff	2025-04-02	CLOSED	Fryer grease and fryer particles were observed being dumped into storm drain.	Collaborated with HPU to ensure corrective action was followed. Literature was sent to the restaurant on why dumping grease in the storm drain is wrong.
97610	2024-09-05	DEQ/EPA Notification	2024-09-06	CLOSED	DEQ called PW staff to notify of potential sewage in roadway. Upon investigation, PW staff found an unknown slurry.	Street sweeper came to clean up the unknown trash slurry in the roadway. PW staff notified DEQ of observation and cleanup.

97613	2024-09-05	HPW Staff	2025-04-02	CLOSED	PW staff found a 15-gallon hydrogen peroxide container in the riparian buffer. Vegetation around the leaking container was dead.	PW staff removed hydrogen peroxide container from site. Properly disposed of remaining chemicals (approximately 2 gallons remaining in container). DEQ advised that the soil in the spill site didn't need to be removed.
97950	2024-09-20	HFD	2024-09-20	COMPLETE	The fire department had a fire truck break a drive shaft on Port Republic Rd near Hunters Rd. This caused approximately 60 gallons of hydraulic fluid and an unknown quantity of transmission fluid to leak out onto the roadway and into 3 storm drains.	The fire department immediately placed socks at the 3rd storm drain as well as plugged the pipe to prevent the spill from going any further. PW crews then placed absorbent material down on the roadway. This morning PW crews used our flusher truck to clean out the three impacted storm drains as well as used our street sweeper to clean the road. Our crews also checked additional storm drains in the area to ensure no product had reach them.
98837	2024-10-17	Citizen notification	2024-10-17	COMPLETE	P.W. staff received notification of a potential illicit discharge from a spray truck behind the storage facility on S. Main St.	P.W. staff contacted Public Utilities and HRRSA. No illicit discharge associated with this investigation
101735	2025-02-04	County Landfill	2025-02-04	COMPLETE	A private trash truck broke a Transmission line on County Landfill property. The truck parked near landfill entrance off Greendale Rd near a storm water drain.	The County did not observe any sheens or evidence of the spill reaching the pond. The County put pads and absorbent material down to stop additional material from reaching the drain and placed some booms on the drain.

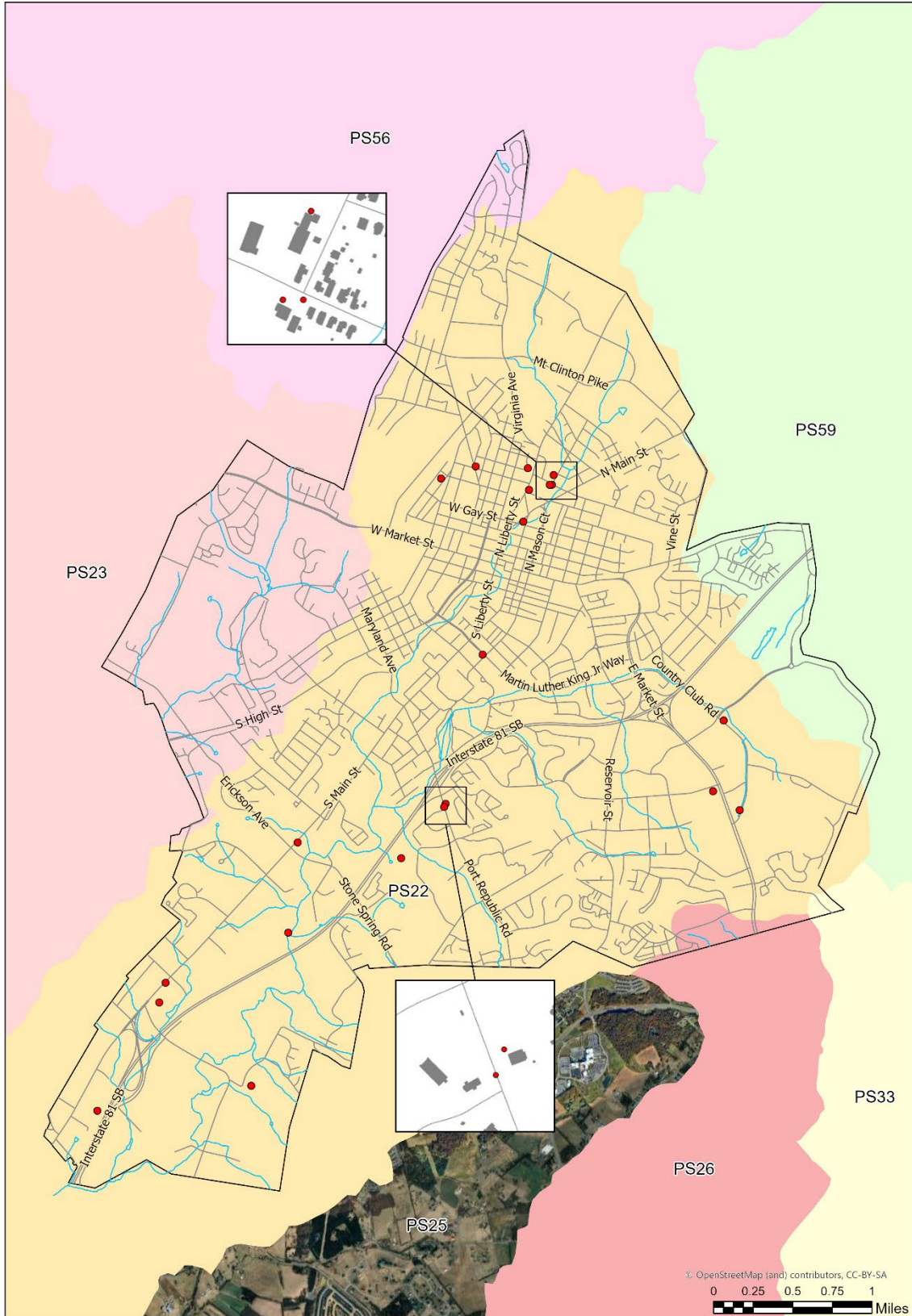
102089	2025-02-15	Citizen notification	2025-02-18	COMPLETE	Reports of a tow truck leaking diesel on roadway.	On call staff and HFD responded and put down sand on the public roadway on Saturday before the rain came. Sweeper dispatched to the site this on 2/18/25. No impact to local waterway reported.
102712	2025-03-12	Citizen notification	2025-03-25	COMPLETE	Citizen called PW to notify staff about potential pollution occurring at parking lot for trucks. Appears that vehicle work and painting was occurring on lot without being under cover. Chemicals were being stored outside.	Collaborated with HFD and Community Development to ensure corrective action was followed.
102740	2025-03-06	DEQ/EPA Notification	2025-03-06	COMPLETE	Compliant alleged pollution occurring on driveway and in backyard.	PW Staff and DEQ staff inspected the site and did not find evidence of pollution occurring. While work was being done to vehicles and tractor trailers, fluids were contained within closed containers and engine blocks were covered with tarps strapped down.
103583	2025-03-31 12:00 PM	HPW Staff	2025-04-01 07:57 AM	CLOSED	Construction material supplier had washed a vehicle on their parking lot that had had a leak. Oil was on the parking lot and a sheen could be seen in the runoff water in the gutter and storm drain.	PW staff put absorbent material down in the gutter and around the storm drain and placed two socks. Construction material supplier staff placed absorbent material down on their parking lot.

103648	2025-03-31	DEQ/EPA Notification	2025-04-04	COMPLETE	DEQ received a voicemail stating that raw sewage was being discharged behind a motel.	PW Staff went to the site this morning and there is some type of foul-smelling water that is discharging. PW Staff did not observe any solids, floatables, or other obvious indicators of raw sewage. VDH informed they inspected in previous week and saw same thing.
103689	2025-04-03	Citizen notification	2025-04-13	COMPLETE	Private sewer pipe discharging onto ground. Sewage smell was present, as well as grey sludge, and bits of toilet paper.	Called owner and explained about the broken sewer pipe. Told owner needed to get someone out to fix the leak. HPU and Community Development worked to ensure corrective action was followed.
106125	2025-06-05	Community Development	2025-06-05	CLOSED	CD stated that they observed the tenant has been leaving pans with oil out in the open, littering (including leaving containers filled with urine on their property), and acting overall belligerent to their neighbors.	PW found no evidence of an illicit discharge.

BMP Effectiveness

Review of BMP: Outfalls were screened, and illicit discharges were followed up on per the permit requirements.

Program Plan Revisions: Program Plan changes are not needed at this time.



Illicit Discharges 2024-2025 City of Harrisonburg - Public Works Department

- FY25 Illicit Discharge Reports
- Streams
- Streets
- City Limits

Watersheds

- PS23
- PS33
- PS59
- PS56
- PS26
- PS22
- PS25



Minimum Control Measure #4: Construction Site Stormwater Runoff Control

BMP 4.1: Use Legal Authority to Address Discharges Entering the MS4

Description

The City will utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4. The City will control construction site stormwater runoff by implementing its Virginia Erosion and Sediment Control Program (VESCP) consistent with the Virginia Erosion and Sediment Control Law (Sec. 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840).

Annual Reporting Requirements

- A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment.
- If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.
- Total number of inspections conducted.
- The total number and type of enforcement actions implemented and the type of enforcement actions.

Confirmation Statement

All land disturbing projects that occurred during the 2024-2025 reporting period were conducted in accordance with the current department approved standards and specification for erosion and sediment control.

Explanation of Nonconformity

All land disturbing projects were conducted in accordance with the current department approved standards and specifications.

Total Number of Inspections conducted

- Total number of land disturbing activities: 90
- Total number of acres disturbed: 241.13
- Total number of inspections conducted: 923

Enforcement Actions

During the 2024-2025 reporting period 923 land disturbing activity inspections were conducted. Of the 923 inspections, 666 potential violations were noted. The findings and corrective measures were noted in the inspection files and either discussed on site, or emails or written letters were sent to the property owners or RLDs. Of the 666 potential violations, 45 Notice to Comply letters were sent to the property owners or RLDs, and one stop work order was issued. All potential violations were resolved in a timely manner without the need for further enforcement actions.

BMP Effectiveness

Review of BMP: All land disturbing projects that occurred during the 2024-2025 reporting period were conducted in accordance with the current department approved standards and specifications. Potential

violations were noted and Notice to Comply letters were sent and all potential violations were resolved in a timely manner without the need for further enforcement actions.

Program Plan Revisions: Program Plan changes are not needed at this time.

Minimum Control Measure #5: Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

BMP 5.1: Implement the VSMP

Description

The city has an approved Virginia Stormwater Management Program (VSMP) and so shall implement the VSMP consistent with the Virginia Stormwater Management Act (Sec 62.1-44.15:24 et seq. of the Code of Virginia) and the VSMP Regulations (9VAC25-870).

Annual Reporting Requirements

None

BMP 5.2: Inspection and Maintenance Program for City Owned Stormwater Management Facilities

Description

The City will implement an inspection and maintenance program for those stormwater facilities owned or operated by the City that discharges to the MS4. The City will:

- Develop and maintain written inspection and maintenance procedures to ensure adequate long-term operation and maintenance of its stormwater management facilities.
- Inspect city owned or operated stormwater management facilities no less than once per year.
- Conduct maintenance as necessary.

Annual Reporting Requirements

- Total number of inspections conducted on stormwater management facilities owned or operated by the City.
- A description of the significant activities performed on the stormwater management facilities owned or operated by the City to ensure they continue to perform as designed. This does not include activities such as grass mowing or trash collection.
- The most up to date prioritized stormwater management facility significant maintenance and repair schedule maintained in accordance with Part I E 5 b (4).

City Owned BMP Inspections

All city-owned BMPs were inspected once, for a total of 48 inspections.

BMP ID	BMP Name	BMP Type	Maintenance Items	Schedule	Priority (High, Medium, Low)	Status
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17	Smithland/Skyline Schools	Extended Detention Basin	Fill hole on fore bay. Replace riprap on conveyance from fore bay to basin	1-6 Months	Moderate	Not Complete
278	Early Education Center - Elon Rhodes	Underground Detention System	Seed and mulch area at intake playground and repair hole above intake pipe. Install eruption pad below roof runoff drains. Fill in around intake system drain.	1-6 Months	Moderate	Not Complete
23	Linda Lane Roundabout	Extended Detention Basin	Inlets and outlet have sediment accumulation that needs to be cleared. Exposed soil along riser structure needs to be reseeded.	1-6 Months	Moderate	Not Complete
138	HEC-Smithland Rd Right Side	Detention Basin	Riser structure has accumulated sediment and trash rack into riser is clogged. Vegetation around riprap into riser needs to be cleared to prevent clogging.	1-6 Months	Moderate	Not Complete
N/A	Smithland Rd Soccer Fields	Detention Basin	Uncap outlet pipe and remove logs from dam.	1-6 Months	Moderate	Not Complete
50	Lucy Simms School	Detention Basin	Under Active Construction	N/A	N/A	N/A
203	Park View Water Tank	Bioretention	Invasive plants present. Some vegetation needs controlled. Needs more mulch. Erosion and bare soil in side slopes; needs grass reseeded.	1 year	Low	Complete
203	Park View Water Tank	Bioretention	Cracked outflow pipes. Rocks placed in outlet pipes need removed. Mowers damaged pipes. Some erosion on slopes; need	1-6 Months	Moderate	Complete

			reseeding. Mulch needed in basin. Vegetation needs controlled at outlet pipe.			
N/A	Liberty Park	Rain Garden	Level inlet area up with soil. Mulch	1 year	Low	Complete
137	HEC-Smithland Rd Surrounding Facility	Vegetated Filter Strip	No maintenance needed.	1 year	Low	Not Complete
201	Park View Water Tank, inside bend in road	Bioretention	Overgrown vegetation needs to be cut back. Invasive species need to be removed. New layer of mulch or soil needs to be added.	1 year	Low	Complete
202	Park View Water Tank, smallest	Bioretention	Invasive plants present. Some vegetation needs controlled. Needs more mulch. Erosion and bare soil in side slopes; needs grass reseeding.	1 year	Low	Complete
174	Harrisonburg City Hall	Bioretention	Could use additional mulch.	1 year	Low	Complete
7	Harrisonburg High School	Detention Basin	Scouring through basin. Excess sediment at inlets. Overspray at overflow. Cracking on headwall needs major repair. Evidence of erosion along side slopes facing practice field.	1 Month	Critical	Not Complete
213	Bluestone Elementary - Larger Square Pond	Bioretention	No maintenance needed.	N/A	N/A	Not Complete
211	Bluestone Elementary - Triangular out front	Bioretention	River Birch mortality, needs to be replaced. Grass	1-6 Months	Moderate	Not Complete

			reseeding to help suppress thistle growth.			
TMD L2	Bluestone Elementary Meadow	Conserved Open Space	Pollinator meadow needs spraying of undesirable weeds and an overseeding of native pollinator species.	1-6 Months	Moderate	Complete
215	Bluestone Elementary	Underground Detention System	Multiple holes from tree removal that need to be filled (safety issue.) One inflow pipe is not stable and has erosion along inflow	1 year	Low	Not Complete
N/A	Heritage Oaks Golfcourse - Small Pond	Wet Pond	Continue to monitor banks, maybe regrade some areas. Remove muskrats	1 year	Moderate	Not Complete
N/A	Heritage Oaks Golfcourse - Large Pond	Wet Pond	Continue to monitor banks, maybe regrade some areas. Remove muskrats	1-6 Months	Moderate	Not Complete
12	West Market St - Concrete Conveyance	Detention Basin	Outlet has sediment accumulation and rocks blocking flow. Excess sediment along riser structure and concrete ditch.	1 Year	Low	Complete
535	Community Activities Center - Westover Park	Detention Basin	Some cracking/ exposed rebar on inlet pipe. Sediment buildup in principal spillway basin. Sediment and debris blocking overflow riser pipe. Some bare areas in basin; may need grass reseeding in small areas.	1-6 Months	Moderate	Not Complete
10	West Market St - across from Mobil-7/11	Detention Basin	No maintenance needed.	N/A	N/A	Complete

13	Thomas Harrison Middle School - Front	Detention Basin	Reconnect inlet pipe. Fill in channels in basin and add riprap below inlets. Remove inappropriate trees and invasive shrubs to allow for proper maintenance of facility.	1 Month	Critical	Not Complete
14	Thomas Harrison Middle School - Basketball Court and Track	Detention Basin	Add riprap below inlets. Regrade basin. Remove inappropriate trees and shrubs to allow for proper maintenance.	1 Month	Critical	In Progress
16	Westover - Parking Loop	Bioretention/Rain Garden	Some excess sediment going into BMP from parking lot. Some erosion occurring at outlet. Reseed area at outlet.	1 year	Low	Not Complete
15	Thomas Harrison Middle School - Bottom of Parking Lot	Bioretention/Rain Garden	Outfall needs excess vegetation removed. Inlets excess sediment and debris, needs to be removed. Invasive plants pervasive and negatively impacting site goals. Soil media is not accessible. Sign post laying on ground.	1-6 Months	Moderate	Complete
11	West Market Street - Fenced, Beside Car Wash	Detention Basin	Volunteer Cedar trees need to be removed from side slopes.	1 year	Low	Complete
9	Stone Spring Elementary - Back, Near Track	Detention Basin	Animal borrows/holes. Cracked headwall needs major repair. Silt accumulation in spillway exit. Erosion present on site. Overspray around riprap areas.	1-6 Months	Moderate	Not Complete

1	Dream Come True Playground	Detention Basin	No maintenance needed.	N/A	N/A	N/A
N/A	Reservoir St, Corner of Woodland Dr	Extended Detention Basin	Riprap causing dam effect on inlet.	1-6 Months	Moderate	Complete
43	Spotswood Elementary School - Bottom of Parking Lot	Bioretention/ Rain Garden	Excessive sediment entering BMP from parking lot. Excessive leaves in BMP need to be removed. Evidence of erosion occurring in BMP. Outlet is completely blocked by leaves and sediment. Noticeable weed growth in BMP.	1 Month	Critical	Complete
133	Erickson/Stone Spring Phase 2 - Bridge, Cattails, Wetland	Extended Detention Basin	Sediment buildup in pre-treatment, basin, and at outlet riser pipe. Evidence of oil pollutants in water. Some erosion/bare soil on side banks; needs some grass reseeding. Grown up vegetation in basin.	1-6 Months	Moderate	Complete
249	Transfer Station - Towards Blacksrn	Extended Detention Basin	Sediment buildup in basin and below inlet pipe. Some erosion points on banks. Metal cages damaged at pretreatment areas. Evidence of prolonged standing water. Blockage of outlet pipe. Evidence of erosion along one riprap inlet, water is finding its way around the riprap.	1-6 Months	Moderate	Not Complete
132	Erickson/Stone Spring Phase 2 - White House	Extended Detention Basin	Standing water in pre-treatment basin. Sediment buildup and excess vegetation in pre-treatment	1-6 Months	Moderate	Not Complete

			basin. Some bare spots in basin. Some erosion in conveyance to basin. Some buildup of sediment and debris around outlet riser.			
168	Erickson/Stone Spring Phase 3 - Top of Hill	Extended Detention Basin	Rodent holes need to be filled. Sediment around inlet needs to be cleared.	1-6 Months	Moderate	Not Complete
83	Erickson/Stone Spring Phase 1 - Fenced, Pear Street	Detention Basin	Some bare spots on side banks that need reseeding. Sediment buildup around inlet pipe. Outlet riser pipe blocked by trash/debris; needs cleared. Sediment buildup on spillway from pre-treatment into main basin.	1-6 Months	Moderate	Not Complete
406	Cale Trail Shared Use Path	Detention Basin	Vegetation needs to be mowed. Trash rack needs to be added to riser structure.	1-6 Months	Moderate	Complete
N/A	Purcell Park - Beside Tennis Courts	Rain Garden	Bare soil needs to be covered. Vegetation needs to be reestablished.	1-6 Months	Moderate	Not Complete
TMDL 1	Purcell Park Bioreactor	Bioreactor	Some sediment buildup at intake pipe; lines need flushed.	1 year	Low	Complete
167	Erickson/Stone Spring Phase 3 - Serpentine, Vegetation	Extended Detention Ponds	Some invasive plants around outlet riser pipe. Some erosion on side banks near inlet; needs reseeding. Excess sediment and trash/debris. Debris around outlet riser pipe.	1-6 Months	Moderate	Complete
8	Stone Spring Elementary - Front, Near Entrance	Detention Basin	BMP needs extensive invasive removal, surrounding area needs to have invasive species	1 Month	Critical	Complete

			removed, excessive trash present in and surrounding BMP needs to be removed.			
188	Carlton St Roundabout	Detention Basin	Sediment buildup in basin and inlets. Overgrown vegetation (cattails) needs controlled. Additional grass reseeding needed. Some trash cleanup needed.	1 year	Low	Complete
248	Transfer Station	Cistern	No maintenance needed.	N/A	N/A	N/A
134	Erickson/Stonespring Phase 2 - Across from Beery Rd	Extended Detention Basin	Sediment accumulation and erosion happening at inlet. Bare soil exposed along principle spillway that needs to be reseeded. Vegetation growing around riser needs to be cut back to allow adequate water flow into structure.	1 year	Low	Not Complete
22054	Beacon Hill Section	Detention Basin	Sediment buildup around inlet, basin, and outlet. Overgrown vegetation around inlet and outlet. Trash buildup in basin. Rodent holes on side slopes.			Complete
530	W Market St - After county line	Detention Basin	Sediment buildup in basin, inlet, and outlet. Cracking on outlet pipe. Standing water in basin/ inadequate grade to outlet. Unsure who is mowing area. Some concentrated erosion on north side of BMP banks. Overgrown vegetation in basin.	1-6 Months	Moderate	Complete
11676	Bluestone Elementary	Level Spreader Inspection	Trash rack needs removed and inlet cleaned out	1 year	Low	Not Complete

Significant Activities performed

Trapping for nuisance animals occurred on an as-needed basis in BMPs and all rodent holes were repaired after their removal. Raingardens/Bioretenion/Extended Enhanced Detention ponds were treated for invasive vegetation and mulch was added where needed. Meadows and stream restorations were treated for invasive vegetation. All Detention ponds were mowed, and woody vegetation removed.

Structural repair:

Beacon Hill Section 1 Detention Basin: Invasive vegetation was removed, new rip rap was added along emergency spillway, additional rip rap was added along inlet, outlet was cleaned of excessive sediment.

BMP Effectiveness

Review of BMP: All BMPs were inspected at least once during the permit year.

Program Plan Revisions: Program Plan changes are not needed at this time. However, our SOP for post-construction BMP inspections was modified to better clarify expectations and requirements for maintenance items to be completed within the schedule noted. The SOP was also modified to note the need for staff to follow up on the status of maintenance items. In future annual reports, the status of the maintenance item will be included. The inspection forms were also modified to clearly denote maintenance schedules.

BMP 5.3: Inspection and Maintenance Program for Privately Owned Stormwater Management Facilities

Description

The City will implement an inspection and maintenance program for privately owned stormwater facilities that includes:

- An inspection frequency of no less than once per five years.
- Adequate long-term operation and maintenance by the owner by requiring the owner to develop a recorded inspection schedule and maintenance agreement.
- Enforcement of maintenance as needed.

Annual Reporting Requirements

- The number of privately owned stormwater management facility inspections conducted.
- The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately owned stormwater management facilities including the type of enforcement action.

Private Stormwater BMP Inspections and Enforcement Actions

During this reporting period, there were 18 inspections and there were 0 enforcement actions for privately owned stormwater management facilities.

BMP Effectiveness

Review of BMP: The inspection and maintenance program were implemented per permit requirements.

Program Plan Revisions: Program Plan changes are not needed at this time.

BMP 5.4: Track and Report Stormwater Management Facilities

Description

The City will maintain an electronic database or spreadsheet of all known city owned or city operated and privately owned stormwater management facilities that discharge into the MS4. The database shall also include all BMPs implemented by the city to meet the Chesapeake Bay TMDL load reduction required. The database will be updated when new stormwater management facilities are brought on-line, or existing stormwater management facilities are discovered.

The City will use the DEQ Construction Stormwater Database to report stormwater management facilities installed to address the control of post-construction runoff from land disturbing activities for which the city is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.

Historical BMPs will be reported using the DEQ Construction Stormwater Database, and new BMPs will be added to the DEQ BMP Warehouse on a yearly basis.

Annual Reporting Requirements

- A confirmation statement that the City submitted stormwater management facility information through the Virginia Construction Stormwater General Permit Database for those land disturbing activities for which the city was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities or a statement that the city did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
- A confirmation statement that the City electronically reported BMPs using the DEQ BMP Warehouse in accordance with the permit and the date on which the information was submitted.
- A confirmation statement that the permittee electronically reported stormwater management facilities using the DEQ BMP Warehouse in accordance with Part III B 1 and 2; and
- A confirmation statement that the permittee electronically reported stormwater management facilities inspected using BMP Warehouse in accordance with Part III B 5.

Confirmation of VPDES Project Submittal

The permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f

Confirmation of BMP Project Reporting

The permittee submitted BMPs using the DEQ BMP Warehouse in accordance with the permit on 9/3/2025. The permittee submitted Inspection Log using the DEQ BMP Warehouse in accordance with the permit on 9/3/2025.

BMP Effectiveness

Review of BMP: The remaining BMPs were not able to be reported on the DEQ BMP Warehouse and include:

1. Homeowner BMPs

2. Land Conversion
3. Permanent Credit Purchases

Program Plan Revisions: Program Plan changes are not needed at this time.

Minimum Control Measure #6: Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee

BMP 6.1: Maintain and Implement Written Procedures for Pollution Prevention and Good Housekeeping

Description

The City shall maintain and implement written procedures for those activities at facilities owned or operated by the City, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:

1. Prevent illicit discharges
2. Ensure the proper disposal of waste materials, including landscape wastes.
3. Prevent the discharge of wastewater or city vehicle washwater into the MS4 without authorization under a separate VPDES permit
4. Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities
5. Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) using best management practices
6. Prevent pollutant discharge into the MS4 from leaking municipal automobiles and
7. Ensure the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations

Written pollution prevention and good housekeeping procedures shall be utilized as a part of the employee training program.

Annual Reporting Requirements

A summary of any daily operational procedures developed or modified in accordance with the permit requirements during the reporting period.

Summary of new or modified operational procedures

Standard operational procedures were created for Anti-Icing and Deicing and Exterior Washing.

Existing Standard Operating Procedures

- Bulk Storage Areas (Stockpiles)
- Dewatering Operations
- Discharge of Wastewater
- Disposal of Waste Materials (Landscaping)
- Equipment Maintenance
- Fertilizer and Pesticide Applications
- Leaking Automobiles & Equipment

- Municipal Wash Water
- Prevent Illicit Discharges
- Road & Street Maintenance
- Spill Kits
- Sweeper Pad

BMP Effectiveness

Review of BMP: Operational procedures are available on the City intranet (C2) system accessible by all City of Harrisonburg employees and are distributed to site supervisors in hardcopy form to be stored in accessible location for employees to reference as needed.

Program Plan Revisions: Program Plan changes are not needed at this time. New SOPs for anti-icing and deicing agent application, transport, and storage have been developed prior to the November 2025 deadline and SOPs for renovation and significant exterior maintenance activities will be developed by November 2026 in compliance with the requirements of Part I E 6 a (1) and (2).

BMP 6.2: Pollution Prevention by Contractors

Description

The City will require through the use of contract language, training, standard operating procedures, etc., that contractors employed by the city and engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.

Annual Reporting Requirements

None

BMP 6.3: Stormwater Pollution Prevention Training Plan

Description

The City will develop a training plan in writing for applicable staff. The City will maintain documentation of each training event conducted for a minimum of three years after the training event.

Annual Reporting Requirements

A list of the training events conducted in accordance with the permit requirements including the following information:

- The date of the training event.
- The number of employees who attended the training event.
- The objective of the training event.

Training Event Summaries

Trainings are posted on the City's online training platform, VectorSolutions (formally TargetSolutions). Trainings were assigned in June to departments in this year's rotation per training plan. For departments not within the City's organization, but covered under the City's MS4, trainings are given either in person or through PowerPoint distribution. A record of employee completion and training sign-ins are available upon request.

Training Presentation Topics:

Basic Pollution Prevention Training (PP)

- An overview of water quality and local waterway impairments.
- Definition of MS4
- Basic pollution prevention procedures and spill response procedures.
- Illicit discharge detection

Advanced Pollution Prevention with SWPPP Training (PP w/ SWPPP)

- An overview of water quality and local waterway impairments.
- Definition of MS4
- Basic pollution prevention procedures and spill response procedures.
- Illicit discharge detection
- Information on what is in a SWPPP and one short video on maintenance

Type of Training	Attendees	Department	Date
PP w/ SWPPP	19	HEC	5/27/25-6/20/25
PP w/ SWPPP	11	HCPS	5/27/25-6/20/25
PP w/ SWPPP	39	Department of Public Utilities	5/27/25-6/20/25
PP w/ SWPPP	97	Department of Parks and Recreation	5/27/25-6/20/25

BMP Effectiveness

Review of BMP: Online or in person training was given for this year's rotation per training plan.

Program Plan Revisions: Program Plan changes are not needed at this time.

BMP 6.4: Stormwater Pollution Prevention Plans

Description

Identify High-Priority, High-Potential Sites and Implement Stormwater Pollution Prevention Plans - The City will maintain and implement a site pollution prevention plan for each high-priority facility owned or operated by the permittee with a high potential to discharge pollutants that are not covered under a separate VPDES permit. SWPPP facilities will be inspected. Facilities without SWPPPs will be reviewed annually and added as necessary.

SWPPP Development for High-Priority, High-Potential Sites - Each SWPPP will contain information about the site and potential pollutants, written procedures designed to reduce and prevent pollutant discharge, procedures for training, an inspection and maintenance schedule, an inspection log, a log of unauthorized discharges, releases or spills.

Non-SWPPP Site Review - No later than June 30 of each year, the City will review any high-priority facility owned or operated by the City for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the City will develop a SWPPP no later than December 31 of that same year.

SWPPP Site Review - The City will review the contents of any site specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill is reported to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP will be updated no later than 90 days after the unauthorized discharge.

SWPPP Documentation - The SWPPP shall be kept at the high-priority facility with a high potential to discharge and utilized as part of staff training. The SWPPP and associated documents may be maintained as a hard copy or electronically if the documents are available to employees at the applicable site.

Facility Removal - If activities change at a facility such that the facility no longer meets the criteria of a high-priority facility with a high potential to discharge pollutants, the City may remove the facility from the high-priority, high-potential list.

Annual Reporting Requirements

- A summary of any new SWPPPs developed in accordance with the permit requirements during the reporting period
- A summary of any SWPPPs modified in accordance with the permit requirements during the reporting period.
- A confirmation statement that all high-priority facilities were reviewed to determine if SWPPP coverage is needed during the reporting period
- The rationale of any high-priority facilities delisted in accordance with Part I E 6 l or m during the reporting period

Summary of new SWPPP Development

High-priority facilities were reviewed by June 30, 2025 to determine if there were any facilities meeting the high-priority, high-potential criteria requiring a SWPPP. Four facilities were identified:

1. Smithland Athletic Complex – 1542 Smithland Road

SWPPPS will be developed and implemented on these facilities by December 31, 2022.

No SWPPP facility were de-listed to a high priority facility in this permit cycle.

Summary of SWPPP Modifications

Fall 2024 Inspections

Public Works and Old Quarry SWPPP October 2024 Map Changes

1. Added outdoor material storage for active construction.

Fire Station 1 2024 Map Changes

1. Updated operator name to Fire Station 1 Captain

Fire Station 2 2024 Map Changes

1. Updated operator name to Fire Station 2 Captain

Fire Station 3 2024 Map Changes

1. Updated operator name to Fire Station 3 Captain

Fire Station 4 2024 Map Changes

1. Updated operator name to Fire Station 4 Captain

Spring 2025 Inspections

Public Utilities SWPPP May 2025 Map Changes

1. Added addition to building.
2. Added new outfall.
3. Added new BMP.

Public Works and Old Quarry SWPPP May 2025 Map Changes

1. Updated map to reflect changes due to completed building construction.

Transfer Station SWPPP May 2025 Map Changes

1. Added propane tanks.

Heritage Oaks Golf Course May 2025 Map Changes

1. Developed SWPPP map as this facility was classified as a High Priority, High Potential facility in previous permit year.

Harrisonburg Department of Public Transportation May 2025 Map Changes

1. Developed SWPPP map as this facility was classified as a High Priority, High Potential facility in previous permit year.

Confirmation statement that all high-priority facilities were reviewed

All high-priority facilities were reviewed to determine if SWPPP coverage were needed during the reporting period. Additional information or inspection forms are available upon request.

Delisted High-Priority Facilities

No SWPPP facility were de-listed to a high priority facility in this permit cycle.

BMP Effectiveness

Review of BMP:

- **New SWPPP Development:** High-priority facilities were reviewed to determine if new SWPPP development would be necessary by December 31.

- **SWPPP Modifications:** SWPPP modifications were made as necessary.

Program Plan Revisions: Program Plan changes are not needed at this time.

BMP 6.5: Turf and Landscape Nutrient Management Plans

Description

The City will maintain and implement turf and landscape nutrient management plans developed by a certified nutrient management planner on all lands owned or operated by the City where nutrients are applied to a contiguous area greater than one acre.

Nutrient management plans that are expired as of the effective date of this permit shall be submitted to DCR for renewal no later than six months after the effective date of this permit. Thereafter, all nutrient management plans shall be submitted to DCR at least 30 days prior to nutrient management plan expiration. Within 36 months of permit coverage, no nutrient management plans maintained by the permittee in accordance with Part I E 6 n shall be expired due to DCR documented noncompliance with 4VAC50-85-130 provided to the permittee.

Annual Reporting Requirements

A summary of any new turf and landscape nutrient management plans developed that includes:

- Location and total acreage of each land area.
- The date of the approved nutrient management plan.
- The status of each nutrient management plan as of June 30 of the reporting year (e.g. approved, submitted and pending approval, and expired)

Summary of new nutrient management plans

No new plans were developed.

Existing Nutrient Management Plans

Facility Name	Lat/Long	Acreage	Approval Date	Expiration Date	Status	Location of Plan
Heritage Oaks Golf Course	38°26'49.97"N, 78°54'15.82"W	66.42 acres	11/1/2022	11/1/2027	Approved	"U:\Stormwater\Pollution Prevention - Good Housekeeping\Nutrient Management Plans\Nutrient Management Plans"
Smithland Park	38°26'55"N, 78°50'02"W	5 acres, 2.5 acres, 10 acres	5/25/2023	5/25/2026	Approved	"U:\Stormwater\Pollution Prevention - Good Housekeeping\Nutrient Management Plans\Nutrient Management Plans"

Purcell Park	38°25'33"N, 78°52'53"W	1 acre, 5.0 acres	5/25/2023	5/25/2026	Approved	"U:\Stormwater\Pollution Prevention - Good Housekeeping\Nutrient Management Plans\Nutrient Management Plans"
Ramblewood Fields	38°24'44"N, 78°53'13"W	3.6 acres	5/25/2023	5/25/2026	Approved	"U:\Stormwater\Pollution Prevention - Good Housekeeping\Nutrient Management Plans\Nutrient Management Plans"
Harrisonburg High School	38°26'30"N, 78°54'37"W	11.14 acres	9/26/2023	9/23/2026	Approved	"U:\Stormwater\Pollution Prevention - Good Housekeeping\Nutrient Management Plans\Nutrient Management Plans"

BMP Effectiveness

Review of BMP: Nutrient management plans are in place and up to date at the required facilities.

Program Plan Revisions: Program Plan changes are not needed at this time.

TMDL Special Conditions

Chesapeake Bay TMDL Special Condition

Description

In its Phase I and Phase II Chesapeake Bay TMDL Watershed Implementation Plans (WIP), the Commonwealth committed to a phased approach for MS4s to implement necessary pollutant reductions (phosphorus, nitrogen, and sediment). This permit (2023-2028) requires implementation of an additional 35% pollutant reductions as specified in the 2010 Phase I and II WIPs. In combination with the 40% pollutant reductions that have already been achieved, the total reduction at the end of this permit term is 100%.

The City developed the draft Chesapeake Bay TMDL Action Plan which was submitted to the Virginia Department of Environmental Quality with the Registration Statement.

The City will implement its Chesapeake Bay TMDL Action Plan and submit progress reports in its MS4 Annual Report in accordance with the permit requirements. Any updates to the Chesapeake Bay TMDL Action Plan will be submitted with each MS4 Annual Report.

Program Plan Requirements

The Chesapeake Bay TMDL Action Plan will be incorporated by reference into the program plan.

Anticipated BMPs or Strategies

The Chesapeake Bay TMDL Action Plan is available at: <https://www.harrisonburgva.gov/MS4-permit-program>

Annual Reporting Requirements

Once the Chesapeake Bay TMDL Action Plan is developed, each subsequent annual report shall include:

- A list of BMPs implemented during the reporting period but not reported to the DEQ Warehouse and the estimated reduction of pollutants of concern achieved by each and reported in pounds per year;
- If the permittee acquired credits during the reporting period to meet all or a portion of the required reductions, a statement that credits were acquired,
- The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen, total phosphorous, and total suspended solids; and,
- A list of BMPs that are planned to be implemented during the next reporting period.

BMPs Implemented during the reporting period but not reported to the DEQ Warehouse

None.

Type of BMP	Project Name	Location	Reductions (lbs/yr)		
			TP	TN	TSS

Annual Practices Implemented during the reporting period

Type of BMP	Project Name	Location	Reductions (lbs/yr)		
			TP	TN	TSS
Street Sweeping	Street Sweeping (annual)	Harrisonburg, VA	13.06	46.19	19,071.67
Storm Drain Cleaning	Storm Drain Cleaning (annual)	Harrisonburg, VA	94.61	425.74	47,304.60
Various Proprietary & Non-Proprietary Clearinghouse BMPs	HCAP Program	Harrisonburg, VA	0.648	12.215	2,802.718
Residential BMPs	Homeowner BMPs (annual)	Harrisonburg, VA	11.15	140.31	0

Homeowner BMPs are part of the stormwater utility fee credit program and represent tree planting/cover, rain barrel, and nutrient management practices. The HCAP Program BMPs are tree planting or post construction BMPs found chapter 8 of the Virginia Stormwater Management Handbook. Both of these programs track individual practices. Due to the number and various types of practices as well as different lifespan cycles, all practices are combined and reported as one number. Spot check inspection are used to establish a compliance factor and the resulting calculation is reported as an annual practice.

Acquired Credits

No credits were acquired during this permit year.

Progress towards Chesapeake Bay TMDL

TMDL Action Plan: The City of Harrisonburg has developed a Chesapeake Bay TMDL Action Plan and it is available at <http://www.harrisonburgva.gov/MS4-permit-program>.

List of Control Measures Implemented During the Reporting Period: Street Sweeping, Homeowner BMPs, HCAP Program BMPs, Septic to Sanitary Sewer Connections, Land Conversion, Bioreactor (Pending DEQ Approval)

Estimate Reduction Achieved by Each Control:

Summary of Completed BMPs				
Type of BMP	Project Name	Location	Reductions (lbs/yr)	
			TP	TN
Permanent Water Quality Trading Credits	As Needed	Nutrient Credit Market	8	59.44
North End Greenway – Permanent Water Quality Credits	North End Greenway Stream Restoration	North End Greenway	117.90	256.10
Stream Restoration	Mountain View Drive Stream Restoration	Harrisonburg, VA	144.97	415.90
Stream Restoration	Blacks Run South Stream Restoration- Phase 1	Harrisonburg, VA	711.99	1,546.03
Street Sweeping	Street Sweeping (annual)	Harrisonburg, VA	13.06	46.19
Storm Drain Cleaning	Storm Drain Cleaning (annual)	Harrisonburg, VA	94.61	425.74
Septic to Sanitary Sewer Connections	Septic to Sanitary Sewer Connections (since 2006)	Harrisonburg, VA	0	584.66
Homeowner BMPs	Homeowner BMPs (annual)	Harrisonburg, VA	11.15	140.31
Bioreactor ¹	Bioreactor	Purcell Park	0	0
Urban Tree Canopy Expansion	New Tree Planting	Harrisonburg, VA	4.41	19.70
Land Conversion: Turf to Mixed Open	Pollinator Habitats (1.60 ac)	Harrisonburg, VA	0.7	3.19
Total			1106.79	3,497.26
Amount Needed by 2028			885	6,711

¹ The City installed a denitrifying woodchip bioreactor (DNBR) in 2020. Monitored results since 2020 from Virginia Tech, James Madison University, City Staff, and USGS have shown the bioreactor reduces TN between 175 – 300 lbs/yr. Within the agricultural sector of the Chesapeake Bay Model, there is a methodology to allow for taking the measured results and applying it as an annual practice. However, the methodology only refers to the agricultural sector. Without DEQ approving a methodology for urban uses, the City cannot receive credit for the measured reductions provided by this practice. This practice is listed in the BMPs to be implemented table to acknowledge this potentially innovative urban stormwater practice even though crediting isn't applied at this time due to no methodology being officially established for developed/MS4 purposes.

BMPs to be implemented during next reporting period

The anticipated BMPs to be implemented during the next reporting period include (but are not limited to): Storm Drain Cleaning Practice, Septic to Sanitary Sewer Connections, Tree Planting, Permanent Credit Purchases, Stream Restoration, Pollinator Habitat Conversion, Homeowner BMPs, BMP Retrofits, and Bioreactor projects.

Below is a table with the estimated projects and any estimated reduction values for the remainder of the permit period.

Summary of Planned BMPs for 2023-2028 Permit Cycle				
Planned Type of BMP	Project Name	Planned Location	Estimated Reductions (lbs/yr)	
			TP	TN
Stream Restoration	Blacks Run South Stream Restoration – Phase 2	Harrisonburg, VA	390.96	848.65
Permanent Water Quality Trading Credits	Dependent on credit bank	Nutrient Credit Market	200	1,830
Wet Pond- Level One	Wet Pond W Market THMS entrance	38°27'13.0"N 78°53'39.8"W	15.00	139.20
Wet Pond- Level One	Wet Pond W Market Old Quarry	38°27'06.5"N 78°53'05.4"W	10.50	108.50
Wet Pond- Level One	Wet Pond Reservoir/ South Carlton	38°26'34.5"N 78°51'31.3"W	8.0	96.0
Land Conversion: Pasture/Crop to Forest	Saufley Farm	Rockingham, VA	152.62	1053.93
Urban Tree Canopy Expansion*	New Tree Planting	Harrisonburg, VA ¹	1.13	0.3
Total			778.21	4,076.58
Base Amount from Existing Sources			531	4027
Additional Loads From New Sources			5.349	36.908
Total Amount Needed by 2028			536.35	4063.91

¹ Denoting a location is not feasible since project locations are selected closer to the planting window.

*Assumes planting an average of 50 trees per year.

Local TMDL Special Conditions

Description

The City will develop a local TMDL action plan designed to reduce loadings for pollutants of concern if the permittee discharges the pollutants of concern to an impaired water for which a TMDL has been approved by the U.S. Environmental Protection Agency (EPA) as described below:

1. For TMDLS approved by the EPA prior to July 1, 2013, and in which an individual or aggregate wasteload has been allocated to the permittee, the permittee shall update the previously approved local TMDL action plans to meet the conditions of the new permit as applicable, no later than 18 months after the permit effective date and continue implementation of the action plan; and
2. For TMDLs approved by EPA on or after July 1, 2013, and prior to June 30, 2018, and in which an individual or aggregate wasteload has been allocated to the permittee, the permittee shall develop and initiate implementation of action plans to meet the conditions of the new permit as applicable for each pollutant for which wasteloads have been allocated to the city's MS4 no later than 30 months after the permit effective date.

Annual Reporting Requirements

For each reporting period, each annual report shall include a summary of actions conducted to implement each local TMDL action plan.

Smith Creek TMDL

Smith Creek watershed has a TMDL that was approved by the EPA prior to July 1, 2013 and has an associated wasteload allocation. The Smith Creek Action Plan was updated and submitted to DEQ no later than 18 months after the permit effective date. The Action Plan was updated and submitted to DEQ on 4/29/2024. It is available at <http://www.harrisonburgva.gov/MS4-permit-program>.

Best Management Practices to Reduce Bacteria

BMP Strategy 1: Domestic Pets (Cats and Dogs)

- Provide signage to pick up dog waste, provide pet waste bags and disposal containers.
 - There are 20 pet waste stations with signage throughout city parks. Approximately 72,000 bags are used at the stations every year.
- Maintain dog parks by removing disposed of pet waste bags.
 - Smithland Road Dog Park was constructed in early 2015 and includes four pet waste stations. Park rules include that pet waste must be picked up and properly disposed of. City of Harrisonburg Parks and Recreation staff will continue maintaining these pet waste stations on a regular basis and additional stations will be installed on an as needed basis.

BMP Strategy 2: Urban Wildlife

- Clean out storm drains to remove wildlife waste.
 - The City provides maintenance and repair to the storm drain system that is located on the public street right-of-way or in easements specifically assigned to the City and designated

for drainage. One flusher truck cleans outfalls from approximately April – October, as weather allows.

- Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops.
 - The Stormwater Utility Fee Credit Program provides incentives for homeowners who disconnect roof drains from the storm sewer system. The program provides best practice and site design specifications for this practice.

BMP Strategy 3: Illicit Connections or Illicit Discharges to the MS4

- Implement a program to identify potentially failing septic systems. Implement a septic tank inspection and maintenance program.
 - Sec. 7-3-1 to 7-3-80 of the sewer ordinance requires septic systems to be inspected and pumped out every five years. The sewer ordinance was updated to include this requirement in August 2018.

Best Management Practices to Reduce Sediment

The BMPs designed to reduce the pollutants of concerns, as well as any calculations. Reduce the loads associated with sediment through implementation of one or more of the following:

- One or more of the BMPs from the Virginia Stormwater BMP Clearinghouse.
- One or more BMPs approved by the Chesapeake Bay Program.
- Land disturbance thresholds lower than Virginia’s regulatory requirements for erosion and sediment control and post development stormwater management.

No later than 36 months after the effective date of the permit, the City will submit the anticipated end dates by which the City will meet the WLA for sediment.

Response

Based on the following BMPs implemented in the Smith Creek Watershed, the City of Harrisonburg has not yet met the required TSS reductions. The City was previously in compliance with the TSS Waste Load Allocation; however, the 2020 change to the credit methodology of street sweeping significantly reduced the amount of TSS reductions.

- Street Sweeping: The Public Works Department is responsible for clearing debris from public roadways. This includes litter, gravel, and accident debris. By removing this debris, the City is also actively reducing the sediment, bacteria, and pollutants that flow through the storm drain system and eventually into local streams. Using Market Street and Main Street as a divider, the Public Works Department routinely sweeps city streets in a counterclockwise rotation.
 - The street sweeping program annually removes an estimated 391.76 lbs of TSS from the Smith Creek Watershed per year. Calculations for reductions associated with street sweeping are attached in Appendix A.
- Storm Drain Cleaning: The Public Works Department is responsible for cleaning publicly owned drop inlets once every two to three years as a part of storm drain maintenance. A flusher truck is used to remove sediment and debris from the storm drain system.
 - The storm drain cleaning program annually removes an estimated 94.81 lbs TSS from the Smith Creek Watershed per year. Calculations for reductions associated with storm drain

cleaning, as well as the storm drain cleaning standard operating procedures, are attached in Appendix B.

- **New Tree Planting:** The Public Works Department is responsible for greenspace management in City Right of Ways (ROW). In addition, the Parks and Recreation Department is responsible for management of park facilities in the city. New trees are planted annual in both park facilities and in City ROW.
 - The New Tree Planting program annually removes an estimated 21.00 lbs TSS from the Smith Creek Watershed every year. Calculations for reductions associated with new tree planting are attached in Appendix C. (Smith Creek watershed is 4.43% of the City's total area).
- **HCAP Program BMPs-** only BMPs implemented in Smith Creek: voluntary installation of certain stormwater Best Management Practices (BMPs) within City limits on private property with a 10 year maintenance agreement. BMPs based on the Virginia Stormwater Best Management Practice Clearinghouse specifications and pollutant reduction values.
 - These BMPs are intended to capture and/or infiltrate surface runoff produced immediately following a 1-inch rainfall event, on average. An estimated annual amount of 0.00 lbs TSS is collected during this process.

Summary of Completed BMPs in Smith Creek			
Type of BMP	Project Name	Location	TSS Reduction (lbs/yr)
Street Sweeping	Street Sweeping (annual)	Harrisonburg, VA	425.89
Storm Drain Cleaning	Storm Drain Cleaning (annual)	Harrisonburg, VA	1097.47
BMP Retrofits	HCAP Program	Harrisonburg, VA	0
Urban Tree Canopy Expansion	New Tree Planting	Harrisonburg, VA	24.54
Total			1,271.17
Amount Needed			5,583.93

Note the City is currently updating our Stormwater Implementation Plan (SWIP) to identify additional BMPs needed to reach the target.

Pollutants of Concern: Nutrients

Strategy 1: Traditional Written Materials

- Daily News Record Article, by RICHARD H. HRONIK III : Harrisonburg officials reveal new stormwater plan. November 5, 2024.
https://www.dnronline.com/places/local/rockingham_county/harrisonburg/harrisonburg-officials-reveal-new-stormwater-plan/article_37b7c0bc-5e0d-5178-b449-4e29a7fae3aa.html

- Press Release:
 - *City Accepting Comments on Revised Chesapeake Bay TMDL Action Plan*. May 6th, 2025

Strategy 2: Media Materials

- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list.
 - *Harrisonburg Conservation Assistance Program Meadows*. July 2024
- Harrisonburg Public Works Facebook Page: The Harrisonburg Public Works Facebook page promotes high-quality receiving waters, education about the Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.
- Augusta Free Press
 - Augusta Free Press Article, by Crystal Graham: Harrisonburg's stormwater team to host public meeting to discuss improvement plan. October 23, 2024.
<https://augustafreepress.com/news/harrisonburgs-stormwater-team-to-host-public-meeting-to-discuss-improvement-plan/>

Strategy 3: Speaking Engagements

- All speaking engagements attended by stormwater staff are focused on explaining water quality, including TMDLs, as well as Harrisonburg's role in meeting the Chesapeake Bay TMDL. These speaking engagements do not include Blacks Run Clean Up Day, Middle School Watershed Field Trips, or the annual rain barrel workshop as these events are counted as Public Involvement Activities.

Strategy 4: Workshops/City Programs

- As part of advertising city programs aimed at installing or promoting stormwater BMP installation (Harrisonburg Conservation Assistance Program, Stormwater Utility Fee Program), city staff communicate the reasons why nutrients are an issue in local water quality as well as ways for landowners to reduce impacts from their property.
- HCAP Site Visits: The City partners with the Shenandoah Valley Soil and Water Conservation District (SVSWCD) to implement the Harrisonburg Conservation Assistance Program which includes speaking to landowners about stormwater issues during site visits. The SVSWCD conducted 62 site visits this past year.

Strategy 5: Staff Training

- As part of the Good Housekeeping / Illicit Discharge training, city staff are trained bi-annually on stormwater issues. This training includes information about Harrisonburg's watersheds, water quality impairments, and TMDLs. The training is given to field staff through an online training

platform called VectorSolutions (formerly TargetSolutions). Copies of the training material can be provided upon request.

Pollutant of Concern 2: Sediment

Strategy 1: Traditional Written Materials

- Local News Media: Includes press releases shared to Daily News Record or the James Madison University Newspaper The Breeze. Messaging will occur when there is an important stormwater project or program taking place within Harrisonburg.

Strategy 2: Media Materials

- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list.
 - *How Bad Can Soil Be?*. December 2024
- Harrisonburg Public Works Facebook Page: The Harrisonburg Public Works Facebook page promotes high-quality receiving waters, education about the Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.
- Rocktown Now
 - Rocktown Now Article, by Mario Retrosi: Harrisonburg Public works gathering community feedback on Stormwater Improvement Plan. October 22, 2024.
<https://augustafreepress.com/news/harrisonburgs-stormwater-team-to-host-public-meeting-to-discuss-improvement-plan/>

Strategy 3: Speaking Engagements

- All speaking engagements attended by stormwater staff are focused on explaining water quality, including TMDLs, as well as Harrisonburg's role in meeting the Chesapeake Bay TMDL. These speaking engagements do not include Blacks Run Clean Up Day, Middle School Watershed Field Trips, or the annual rain barrel workshop as these events are counted as Public Involvement Activities.

Strategy 4: Workshops/City Programs

- As part of advertising city programs aimed at installing or promoting stormwater BMP installation (Harrisonburg Conservation Assistance Program, Stormwater Utility Fee Program), city staff communicate the reasons why nutrients are an issue in local water quality as well as ways for landowners to reduce impacts from their property.
- HCAP Site Visits: The City partners with the Shenandoah Valley Soil and Water Conservation District (SVSWCD) to implement the Harrisonburg Conservation Assistance Program which includes speaking to landowners about stormwater issues during site visits. The SVSWCD conducted 62 site visits this past year.

Strategy 5: Staff Training

- As part of the Good Housekeeping / Illicit Discharge training, city staff are trained bi-annually on stormwater issues. This training includes information about Harrisonburg's watersheds, water quality impairments, and TMDLs. The training is given to field staff through an online training platform called VectorSolutions (formerly TargetSolutions). Copies of the training material can be provided upon request.

Pollutant of Concern 3: Bacteria

Strategy 1: Traditional Written Materials

- Local News Media: Includes press releases shared to Daily News Record or the James Madison University Newspaper The Breeze. Messaging will occur when there is an important stormwater project or program taking place within Harrisonburg.

Strategy 2: Media Materials

- Stormwater and Environmental Newsletters: This email newsletter has a subscription list of around 1057 contacts and each newsletter is opened by around 60% of the subscription list. Newsletters are typically sent out monthly on various stormwater topics.
 - *Stormwater Awareness Week – What is an MS4?* September 2024
- Harrisonburg Public Works Facebook Page: The Harrisonburg Public Works Facebook page promotes high-quality receiving waters, education about the Chesapeake Bay and local TMDLs, and information about local events and projects. During this permit year Harrisonburg Stormwater Facebook Page became Harrisonburg Public Works. This switch was made to capture more of the activities that occur at Public Works as well as to increase the number of people following our page. During this permit year, 83 posts were made to the Harrisonburg Stormwater Facebook page. Each post reached an average of 7,251 people.
- Rocktown Now
 - Rocktown Now Article, by Carolynn Unger: City gears up for Blacks Run Clean Up & Arbor Day Events. April 7, 2025.
<https://rocktownnow.com/news/218812-city-gears-up-for-blacks-run-clean-up-arbor-day-events/>

Strategy 3: Speaking Engagements

- All speaking engagements attended by stormwater staff are focused on explaining water quality, including TMDLs, as well as Harrisonburg's role in meeting TMDLs. These speaking engagements do not include Blacks Run Clean Up Day, 6th and 7th grade Plant a Seed Field Trips, and the annual rain barrel workshop as these events are counted as Public Involvement Activities.

Strategy 4: Workshops/City Programs

- As part of advertising city programs aimed at installing or promoting stormwater BMP installation, city staff communicate the reasons why bacteria are an issue in local water quality as well as ways for landowners to reduce impacts from their property.

Strategy 5: Staff Training

- As part of the Good Housekeeping / Illicit Discharge training, city staff are trained bi-annually on stormwater issues. In addition to the requirements identified in Part I E 6 m, 53his training also includes information about Harrisonburg's watersheds and water quality impairments, and TMDLs. The training is given to staff through an online training platform called VectorSolutions (formerly TargetSolutions).