

TOWN OF SUMMERFIELD



STAGE 1 ADAPTIVE MANAGEMENT PROGRAM FOR EXISTING DEVELOPMENT

JORDAN LAKE NUTRIENT MANAGEMENT STRATEGY NC Session Law 2009-216

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INTRODUCTION

The Town of Summerfield is located in northwest Guilford County, North Carolina. Incorporated in 1996, it has a current area of 25 square miles and a population of 7,906 (2008). The Town is immediately North of the City of Greensboro (Appendix A, Map 1).

The Town is within the Haw River sub-basin of the Cape Fear River Basin (Appendix A, Map 2), and is divided into three additional local sub-basins: Reedy Fork, Mears Fork, and the Haw River. The Reedy Fork (approximately 50% of the Town) is part of the Greensboro Water Supply Watershed. This sub-basin is further divided into a General Watershed Area and a Watershed Critical Area. A Watershed Protection Ordinance has been in effect since 1992 (originally adopted by Guilford County, now under Town jurisdiction). The Mears Fork and Haw River sub-basins have not been under watershed protection ordinances until the adoption of the Jordan Lake Nutrient Management Strategy by the State in August 2009.

The entire Town uses on-site wastewater treatment and private or community wells for domestic water supply. Summerfield is exempt from the *Phase II National Pollution Discharge Elimination System* (NPDES) permitting requirements due to size of population and absence of a municipal owned MS4 and concentrated flow of storm water from public streets and properties.

Jordan Lake

The B. Everett Jordan Reservoir is a multi-use impoundment operated by the US Army Corps of Engineers formed by the construction of a dam on the Haw River east of Pittsboro in Chatham County, NC. The lake is operated for flood control, water quality, fish and wildlife conservation, recreation, and water supply. There are two arms of the Reservoir—the Haw River and the New Hope Creek. The watershed encompasses 1,686 square miles and includes parts of Alamance, Caswell, Chatham, Durham, Forsyth, Guilford, Orange, Randolph, Rockingham, and Wake counties. The reservoir is considered to be a *nutrient sensitive watershed*, causing algae blooms, and taste and odor problems in drinking water.

The Jordan Lake Nutrient Management Strategy (“Jordan Lake Rules”) aims to restore and maintain the water quality, protect the lake’s classified uses, and maintain or enhance protections currently implemented by local governments in existing water supply watersheds. The *Total Maximum Daily Load* for nutrients was established to provide specific limits to the amount of nitrogen and phosphorus entering the lake to control the algae blooms and associated problems. This is being done through a series of rules and regulations aimed at New Development, Existing Development, Agricultural Activities, Fertilizer Management, Riparian Buffers, and Wastewater Discharge activities.

The *Stage 1 Adaptive Management Program for Existing Development* is in response to rules for existing development. Summerfield will be required to adopt additional rules to address the other areas listed above.

REQUIRED MEASURES

The following measures are required in a local government's Stage 1 Adaptive Management Program for Existing Development:

1. A public education program to inform the public of the impacts of nutrient loading and measures that can be implemented to reduce nutrient loading from stormwater runoff from existing development.
2. A mapping program that includes major components of the separate municipal storm sewer system, including the location of major outfalls as defined in 40 Code of Federal Regulations §122.26(b)(5) (July 1, 2008), and the names and location of all waters of the United States that receive discharges from those outfalls, land use types, and location of sanitary sewers.
3. A program to identify and remove illegal discharges.
4. A program to ensure maintenance of best management practices (BMPs) implemented by the local government.
5. A program to identify opportunities for retrofits and other projects to reduce nutrient loading from existing developed lands.

1. PUBLIC EDUCATION PROGRAM

The Public Education Program provides the framework for public action to identify and implement the Stage 1 Adaptive Management Program for Existing Development. The education program must include the following sections:

- Objectives
- Target Pollutant Sources
- Target Audience for Controlling Pollutants
- Best Management Practices
- Outreach Strategy
- Duties and Responsibilities

Objectives:

- Objective One: Inform the public of the impacts of nutrient loading and measures that can be implemented to reduce loading from stormwater runoff.
- Objective Two: Engage the public through educational opportunities to develop community support and active involvement in protecting the watershed.

Summerfield will approach the education program requirements by continuing its involvement in watershed education programming, and expansion of its local efforts to inform the public through workshops, advertising, and providing links to watershed issues on the Town website.

Target Pollutants:

Summerfield is largely a suburban residential community. There are no major industrial land uses, and limited commercial activity areas. There are several old commercial sites that have been found to have groundwater contamination or have the potential for contamination.

The types of pollutants most associated with a residential community are nitrogen and phosphorus from fertilizers applied to large lawns, animal waste from horse farms and domestic animals, sedimentation from development activities, and pollutants associated with motorized vehicle activities (spilled oil, leaks, fuel, etc.).

Receiving waters include small unnamed tributaries that flow into the Haw River, Reedy Fork, and Mears Fork streams. The Mears Fork is a tributary of the Haw River, with their confluence approximately four miles northeast of Summerfield municipal limits. The Reedy Fork drains into the Greensboro reservoirs of Lake Higgins and Lake Brandt. Downstream, the Reedy Fork drains into the Buffalo Creek, then further downstream enters the Haw River.

Target Audience for Controlling Pollutants:

The largest target group is the residential home-owner, which is also the hardest to educate as a group. Since there are over 3,000 households, an affective program of education can have a significant impact on the amount of pollution entering the natural environment.

The second largest target group is the residential and commercial lawn care companies. Numerous companies provide these services to the residents of the Town. By reaching out to this group there is an opportunity to not only modifying their business practices within Summerfield, but also wherever they do business in the region.

While the number of traditional farms is declining, over the past several years new horse farms have opened. These farms have the potential for creating a significant amount of pollution from fecal materials, run-off from erosion, and additional use of fertilizers on pasture land. The state has established a different set of regulations for agricultural producers under the Jordan Lake Rules, so this plan does not specifically address pollution created by agricultural production.

A Stakeholder Committee is proposed to help determine ways to reach various members of the community. The Committee is proposed to be made up of homeowners, commercial lawn care companies, farmers, and others that are willing to help educate the community on the importance of stormwater control and clean-up.

Best Management Practices (BMP):

In implementing this public outreach program, the Town will use BMPs that have proven to be effective in reaching the public and other target audiences. These BMPs will include links to websites from the Town website, brochures and flyers produced by collaborating government agencies, public education meetings targeted to specific stakeholders, and signage identifying constructed BMPs at public facilities.

Outreach Strategy:

The Town of Summerfield has been under contract with the Piedmont Triad Council of Governments (PTCOG) since 2007 for participation in Stormwater SMART. Stormwater SMART was originally created to support local governments in meeting and exceeding stormwater outreach and education requirements under NPDES phase 2 regulations. It has evolved to include jurisdictions impacted by Jordan Lake Rules. It is supported by member fees from 17 local governments. Members attend quarterly board meetings and guide the Stormwater SMART Education Coordinator in program development. Currently, Stormwater SMART provides stormwater outreach and education services to Davidson County, Randolph County, Archdale, Asheboro, Burlington, Elon, Gibsonville, Graham, Green Level, Haw River, High Point, Lexington, Mebane, Randleman, Summerfield, Thomasville, and Trinity.

Stormwater SMART focuses primarily on increasing of the awareness of people on how their lifestyles affect the region and the world they live in, increasing outreach efforts to minority and low income communities, and informing individuals about environmentally safe alternatives to everyday actions.

Public outreach through Stormwater SMART includes educational workshops for Boy and Girl Scout troops, K-12 classrooms, civic clubs, and concerned citizens. Stormwater SMART also works with NC Big Sweep, and NC StreamWatch, a program designed to engage citizens in water quality awareness through public participation. Stormwater SMART and Summerfield also distributed stormwater literature emphasizing nutrient reduction at the annual Founder's Day Festival, and celebrated the opening of the 2009 bio-retention BMP in 2009.

Stormwater SMART has developed a website to aid in supporting its educational mission (www.stormwatersmart.org). The Summerfield website provides a link to Stormwater SMART. Appendix B includes the latest annual report.

The following additional efforts at Public Outreach will be implemented:

- Working with Stormwater SMART and other local jurisdictions, Summerfield will provide an insert two times a year (Spring and Fall) in the local weekly paper that is mailed to every address in the Summerfield Zip Code (over 90% penetration rate). The insert will be timed to reach residents before the spring and fall planting/fertilizer season.
- Summerfield constructed a bio-retention cell in 2009 at the Summerfield Community Park as a demonstration project. The "Rain-Garden" is in a prominent place adjacent to the main trail. Signage (See Appendix C) has been installed to explain the purpose of the rain garden, and to explain how stormwater run-off affects the environment. This provides a 7-day-a-week information board to the public. In addition, the site is located adjacent to an elementary school that uses the park on a weekly basis for environmental studies and physical education.
- Summerfield will become more actively involved in "NC Big Sweep" and/or other litter clean-up projects to provide opportunities to clean-up streams and lakes, and provide an opportunity for educating the public regarding watershed regulations and rules.
- Working with Stormwater SMART, Summerfield will host educational programs for the commercial/residential lawn care business community, homeowners, and others to introduce

new rules regarding fertilizer use, alternatives to fertilizer, constructing small bio-retention rain-gardens, and other environmental education concepts.

- Summerfield hosts community events that provide an avenue to introduce watershed protection concepts. In partnership with Stormwater SMART, staff and volunteers of the Town will educate the public through interactive programming, promotional giveaways, and brochures.
- Summerfield will work with the local real estate industry to provide informational brochures explaining proper fertilizer applications, curbing pet waste, and maintenance of individual septic and well systems.

Duties and Responsibilities:

Summerfield has limited staff resources to accomplish the tasks necessary to implement the public education program. Therefore every effort will be made to collaborate and coordinate activities with other partner governments and agencies.

The Town Planner will be in overall charge of implementing the Stage 1 Adaptive Management Program for Existing Development. This position will oversee all elements of the program including the educational program. The Planner will:

- Work with The Piedmont Triad Council of Governments in utilizing the Stormwater SMART educational opportunities.
- Develop a citizen committee to oversee development of the outreach program, and provide support to their activities.
- Plan educational workshops with partner agencies.
- Develop advertising campaigns utilizing brochures, flyers, and information from various sources.
- Oversee a watershed protection device maintenance program that utilizes a 3rd party engineering firm for inspection and enforcement of privately owned devices.
- Ensure that publically owned watershed protection devices are properly maintained by coordinating maintenance with Parks and Recreation Staff.

2. MAPPING PROGRAM

The Town of Summerfield does not own a municipal storm sewer system and therefore requests exemption from the Mapping Program requirement.

3. ILLEGAL DISCHARGE PROGRAM

The Town of Summerfield will work with NC Department of Natural Resources, Guilford County, and other entities to locate point-source and non-point source illegal discharges within the Town of Summerfield. This program will include educational information about illegal discharges provided to the public, and a method of reporting complaints through the Town website.

4. BEST MANAGEMENT PRACTICES MAINTENANCE PROGRAM

The Town of Summerfield owns one watershed protection device and is responsible for inspecting 15 watershed BMPs within the Greensboro Water Supply Watershed Area (Appendix A, Map 1). Inspection by a contracted engineering firm includes annual review of BMPs, and the potential for fines for non-compliance. As mentioned in the above Public Education Program, the Town Planner will ensure that publically owned watershed protection devices are properly maintained by coordinating maintenance with Parks and Recreation Staff.

5. RETROFIT PROGRAM FOR EXISTING DEVELOPED AREAS

Based on Summerfield's current and anticipated population, the minimum number of existing development nutrient load-reducing projects to be identified on an annual basis is one (1).

Since 2001, Summerfield has implemented a requirement within all residential zoning districts that a percentage of the property must be maintained as "open space". This can range from as little as 10% of a site to as much as 50%. The criteria for the open space dedication is based on environmental factors such as stream and drainage easement corridors, steep slopes, floodplain areas, and other environmental factors¹. The open space requirement applies anywhere within the municipality, whether or not it is within a watershed.

This type of development pattern allows for a low density, low impact design that provides protection for stream corridors without the construction of BMPs, so retrofitting within these neighborhoods should not be required. Using "CITYgreen" software provided by Stormwater SMART, it will be possible to quantify the amount of nitrogen and phosphorus captured by the existing vegetation within these protected open spaces to demonstrate compliance with Jordan Lake rules.

For neighborhoods developed before open space requirements and without BMPs, effort will be made to analyze and locate undeveloped lots or adjacent property. These properties have the potential to be converted into BMP structures with as limited an impact to the community as possible. Appendix D provides an example *Retrofit Opportunity Report*.

Criteria for properties shall be as follows:

- The sub-watershed contributes nitrogen and phosphorus loading above background levels, determined by a base-line study of the watershed area.
- Property location allows for the collection, treatment, and release of nutrient sensitive runoff, including adequate size and access to the property.
- That the BMP will reduce nitrogen and phosphorus by a measurable amount based on a cost/benefit ratio.
- Property must be available for purchase or have a willing land-owner to grant an easement to locate a BMP on the property.

- Summerfield will develop a map of its jurisdiction identifying potential sites for BMP construction that will be updated as sites are reviewed and action is taken.

Mapping Requirements for Retrofit Report:

¹ Summerfield Development Ordinance Article 5-13 Subdivision Standards (www.summerfieldgov.com)

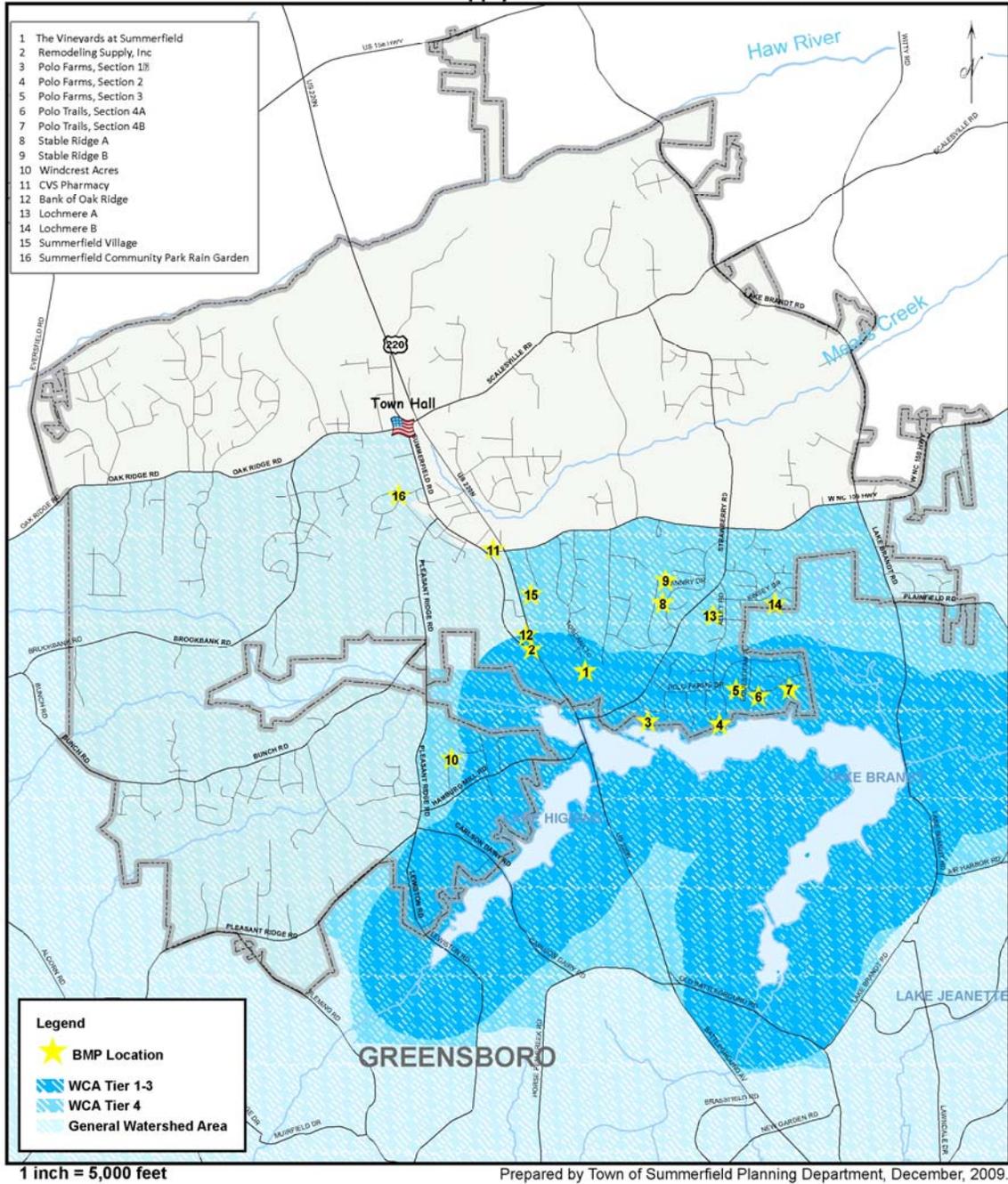
Any retrofits that are identified shall be processed using the report in Appendix D. Any required maps will display the following information:

- Drainage area to retrofit opportunity sites
- Land uses within the drainage area
- Locations of retrofit opportunities
- Property boundaries in the vicinity of the retrofit opportunities
- Significant hydrography (as depicted on U.S.G.S. topographic maps and USDA-NRCS Soil Survey maps)
- Roads
- Environmentally-sensitive areas (e.g., steep slopes, wetlands, riparian buffers, endangered/threatened species habitat, where available)
- Publicly-owned parks, recreational areas, and other open lands

Appendix A Maps

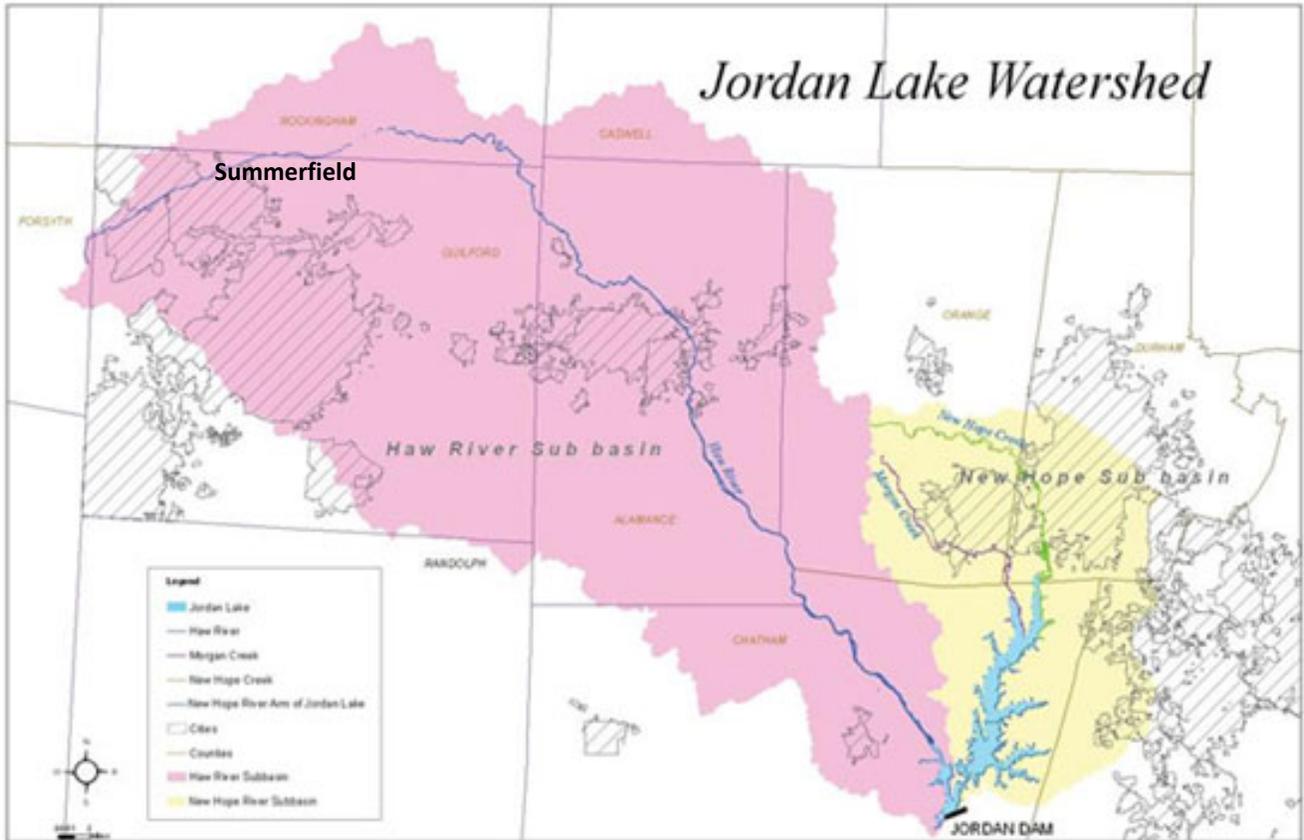
MAP 1

Town of Summerfield with Greensboro Water Supply Watershed and Current BMPs



Appendix A Maps

Map 2



Map Courtesy of Piedmont Triad Council of Governments

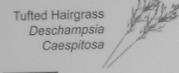
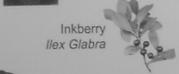
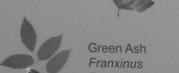
Appendix B
Stormwater SMART 2008-09 Annual Report

Please visit the Stormwater Smart website at <http://www.stormwatersmart.org> to view the report. A direct link to the report follows:
<http://www.stormwatersmart.org/assets/PDF/SMART%20Annual%20Report%202008-2009.pdf>

Appendix C

Photographs of signage at new Rain Garden BMP at Summerfield Community Park

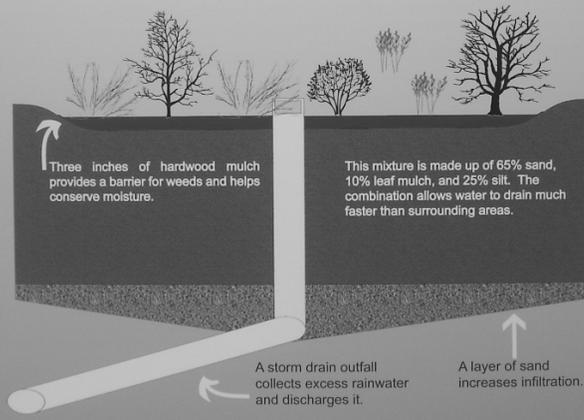
Common Rain Garden Plants

-  Large Periwinkle
Vinca Major
-  Tufted Hairgrass
Deschampsia
Caespitosa
-  Switch Grass
Panicum Veratum
-  Inkberry
Ilex Glabra
-  Red Osler Dogwood
Cornus Stolonifera
-  Spice Bush
Lindera Benzain
-  Red Maple
Acer Rubrum
-  River Birch
Betula Nigra
-  Green Ash
Frankinus
Pennsylvanica

Why Rain Gardens?

Rain gardens are just what they sound like – gardens designed to soak up rain water. A shallow depression collects a few inches of water and allows it to be absorbed into the ground or by plants instead of flowing directly into nearby streams and lakes. Plants and soil trap, absorb and filter pollutants found in stormwater runoff including fertilizers, pesticides, oil, grease and metals.

Rain gardens are typically planted with wildflowers and other native vegetation. Native plants have roots that grow twice as deep as the plants are tall, making them very efficient at absorbing water. Each year about one-third of the roots die, leaving deep tunnels for water and oxygen to filter into the ground and nurture new plant growth. These plants are the basis for restoring natural ecosystems to open space, residential, and urban areas. Rain gardens are diverse, beautiful habitats to many animals that we don't normally see.



Three inches of hardwood mulch provides a barrier for weeds and helps conserve moisture.

This mixture is made up of 65% sand, 10% leaf mulch, and 25% silt. The combination allows water to drain much faster than surrounding areas.

A storm drain outfall collects excess rainwater and discharges it.

A layer of sand increases infiltration.

Rain Gardens help us:

- Improve water quality;
- Increase the amount of water that filters into the ground, recharging the aquifer;
- Prevent flooding, erosion and drainage problems;
- Protect streams and lakes from pollutants carried by urban stormwater;
- Enhance the beauty of our community;
- Provide valuable habitat for birds, frogs, butterflies and many beneficial insects.

To learn more about rain gardens, please visit:
www.stormwatersmart.org



What is Stormwater Runoff?

One pet may not seem like it could create a problem in our waters, but all our pets taking care of business a couple times a day is a huge problem. Left on the ground, this waste will likely be washed into our streams during the next rainfall. Be a responsible pet owner and **PICK UP THE POOP!**



Stormwater runoff from yards can have high concentrations of pesticides and fertilizers. When washed into the water, pesticides can kill fish and other aquatic organisms. Fertilizer contains nitrogen and phosphorus, which encourage algae and bacterial growth and degrade ecosystems. Use a slow-release organic fertilizer or, better yet, get a FREE soil test through Guilford County Cooperative Extension. You can save money while you save the environment! Look for natural solutions to pest control and if pesticides are necessary, don't apply before the rain and follow the manufacturer's directions!



Did you know one pint of motor oil can create an oil slick the size of a football field? Oil poured on the ground, in stormdrains, or even in trashcans can contaminate soil, groundwater, streams, and rivers. Make sure you dispose of used oil properly. Most service stations, repair shops and quick lubes will accept used oil and oil filters. The Household Hazardous Waste Collection Center in Guilford County also accepts motor oil.



Improper use and disposal of household hazardous materials, including oven cleaners, paints, paint removers, pesticides, swimming pool chemicals and drain cleaners can contaminate nearby surface waters and groundwater. Most landfills are not designed for hazardous household wastes, so NEVER dump chemicals in a residential trashcan. In Guilford County, leftover products can be taken to the hazardous waste facility. You can also choose non-hazardous products, or make your own using natural cleaners like lemon juice, vinegar, borax and baking soda.



Litter thrown on the ground ends up in our stormdrains and ditches. Rainwater picks up litter and carries it into nearby streams and lakes. Not only is litter unappealing, birds and other animals can get caught in it, or mistake it for food, and die.





Much of Summerfield's rainwater runs off hard surfaces like roofs, driveways, sidewalks, and roads. Unlike a sewer system, stormwater flows untreated into underground pipes called stormdrains, then into nearby streams, rivers, and lakes. Stormwater carries fertilizers, pesticides and herbicides from our lawns, oil and grease from our roads and driveways, pet waste, litter, and other pollutants into our waters. This rain garden is designed to prevent some of these pollutants from making their way into School House Lake, but we need your help. How can you reduce your impact on water quality and be a stormwater steward?



Appendix D Retrofit Opportunity Table

Location description, including directions from a major highway	
Type and description of retrofit opportunity	
Current Property owner	
Is the property owner willing to cooperate?	
Land area available for retrofit (sq. feet)	
Accessibility to retrofit site	
Drainage area size (acres)	
Land use in drainage area (percent each type of land use)	
Average slope in drainage area (%)	
Environmentally sensitive areas in drainage area (steep slopes, wetlands, riparian buffers, endangered /threatened species)	
Approximate annual nitrogen and phosphorus loading from drainage area (lbs/acre/year)	
Potential nitrogen reduction (lbs/ac/yr)	
Potential phosphorus reduction (lbs/ac/yr)	
Estimated cost of retrofit	
Receiving water	
DWQ classification of receiving water	
Use support rating for receiving water	
Other important information	

Appendix E BMP Summary Tables

Public Education and Outreach BMP and Measurable Goals

Objectives for Public Education and Outreach

- Inform the public of the impacts of nutrient loading and measures that can be implemented to reduce loading from stormwater runoff.
- Engage the public through educational opportunities to develop community support and active involvement in protecting the watershed.

BMP	Measurable Goals	YR 1	Yr 2	Yr 3	Yr 4	Yr 5	Responsible Position/Party
(a) Continue membership in Stormwater SMART	Budget funds for membership dues	X	X	X	X	X	Town Manager/ Town Council
(b) Provide educational inserts in local paper 2x per year	Educational inserts sent to all households within 27358 zip code 2x per year		X	X	X	X	Town Planner
(c) Rain Garden Signage	Construct and maintain educational signage at Community Park	X	X	X	X	X	Parks & Rec Supervisor
(d) Litter Clean-up Programs	Summerfield will participate annually in “Big Sweep” type litter education and clean-up efforts		X	X	X	X	Summerfield Parks & Rec. Committee
(e) Public Education Campaign	Summerfield will host educational programs targeted at residents and lawn care businesses; Summerfield will provide informational kiosks at town-sponsored events such as Founders’ Day.	X	X	X	X	X	Parks & Rec. Committee/ Founders’ Day Committee
(f) Informational Website	Summerfield will provide information on Town website and direct link to Stormwater SMART program website	X	X	X	X	X	Town Planner
(g) Public Information educational materials	The Town will utilize resources at the State and local level to produce and make available educational brochures that target specific user groups as identified in the plan.	X	X	X	X	X	Town Planner
(h) Create a Citizens Advisory Committee	Town will create a citizens advisory committee to help develop educational materials and provide outreach to the public and targeted groups.		X				Town Planner

Appendix E BMP Summary Tables

Mapping Program BMP and Measurable Goals

Objectives for Mapping Program

- Summerfield does not have an MS4 sewer treatment plant, therefore requests exemption from mapping requirement
- Summerfield does not own or maintain any significant storm sewer systems, therefore requests exemption from mapping requirement

Illicit Discharge Detection and Elimination BMP and Measureable Goals

Objectives for Illicit Discharge Detection and Elimination

- Develop and implement illicit discharge detection and elimination program with Guilford County
- Detect and eliminate illicit discharges, including spills and illegal dumping
- Address significant contributors of pollutants
- Inform employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

BMP	Measurable Goals	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Responsible Position/Party
(a) Develop common enforcement program with Guilford County	Create legal agreements to share enforcement authority for enforcement of an approved illicit discharge detection and elimination program		X				Town Planner/Town Attorney/ Town Council
(b) Implement illicit discharge detection procedures	Create joint inspection program and implement as required	X	X	X	X	X	Town Planner
(c) Employee Training	Municipal staff trained on detecting and reporting illicit discharges from town owned properties.			X	X	x	Stormwater Smart/ Town of Summerfield
(d) Public Education	Residents and businesses will be informed of hazards associated with illegal discharges and improper disposal of waste.	X	X	X	X	X	Stormwater Smart/ Town of Summerfield
(e) Public reporting mechanism	Establish and publicize reporting mechanism for the public to report illicit discharges		X	X	X	X	Town Planner

Appendix E BMP Summary Tables

Best Management Practices (BMP) Maintenance Program BMP and Measurable Goals

Objectives for a Best Management Practices (BMP) Maintenance Program

- Prevent or reduce stormwater pollution
- Provide a mechanism to require long term operation and maintenance of BMPs
- Ensure controls are in place to minimize water quality impacts
- Allow the local government to be reimbursed for inspections performed by the local government on private BMP devices
- Standardize watershed protection rules throughout Summerfield municipal boundaries for ease of regulation and enforcement

BMP	Measurable Goals	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Responsible Position/Party
(a) Mechanism to require long term operation and maintenance of BMPs	Continue and improve inspections program for BMPs required by the Summerfield Development Ordinance	X	X	X	X	X	Town Engineer/ Town Planner
(b) Mechanism to require annual inspections of BMPs	Continue and improve inspections program for BMPs required by the Summerfield Development Ordinance	X	X	X	X	X	Town Engineer/ Town Planner
(c) Training Program	Coordinate a training program for communities and owners of BMPs to ensure their long term maintenance. Training to be done in conjunction with other stormwater education programs	X	X	X	X	X	Stormwater Smart / Town Planner /Town Engineer
(d) Mechanism to require and maintain an inventory of BMPs	Create and update inventory of public and private BMPs in the Town	X	X	X	X	X	Town Planner
(e) Local government financial support for program	Investigate and implement program to require private entities to pay for inspections program of private BMPs		X	X	X	X	Town Planner/ Town Manager
(f) Annual review of watershed protection program	Annual review of the watershed protection program	X	X	X	X	X	Town Planner/ Town Engineer/ Town Manager
(g) Adopt new watershed regulations for all of Summerfield jurisdiction to establish standardized rules and enforcement	Town will adopt new watershed regulations that implement requirements of state Jordan Lake buffer rules, and other protection regulations.	X					Town Council

Appendix E BMP Summary Tables

Retrofit Program for Developed Areas

Objectives for Retrofit Program for Developed Areas

- Identify areas where retrofit opportunities exist
- Submit opportunities to State for possible construction by other agencies

BMP	Measurable Goals	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Responsible Position/Party
a) identify at least one retrofit opportunity per year	Identify one location and prepare Retrofit Opportunity Table	X	X	X	X	X	Town Planner
b) submit annual report to State for listing retrofit opportunity	Submit Retrofit Opportunity Table to State	X	X	X	X	X	Town Planner
c) Use of CITYgreen software to determine methods of compliance with retrofit BMPS	Analyze potential properties for ability to capture and store nitrogen and phosphorus from stormwater run-off.		X	X	X	X	Stormwater Smart/ Town Planner