

# **2024 Stormwater Program Annual Review**

## **CITY OF CAÑON CITY**



PREPARED BY CITY OF CAÑON CITY  
STORMWATER PROGRAM





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# CITY OF CAÑON CITY

## Stormwater

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## Introduction

In 2003, the City of Cañon City was issued a permit for “Stormwater Discharges Associated with Municipal Separate Storm Sewer Systems (MS4s)” from the Colorado Department of Public Health and Environment (CDPHE), also known as the Phase II General Stormwater Permit. This permit was renewed in 2008, with little to no change. On April 15, 2016, CDPHE issued a revised permit. This permit became effective on July 1, 2016, and is currently under administrative extension. The revised permit has a slightly different structure from the previous permits and contained several new requirements with compliance deadlines. Although the permit structure varies from the previous permit, the areas which must be addressed to minimize potential pollutants remain. An additional requirement of a Program Description Document is also included in the revised permit.

The Phase II General Stormwater permit requires Cañon City to develop, implement and enforce a Colorado Discharge Permit System (CDPS) Stormwater Management Plan. The program has to be designed to reduce the discharge of pollutants from our storm sewer system to the maximum extent practicable to protect the water quality of the Arkansas River and Four Mile Creek, and to satisfy the appropriate water quality requirements of the Colorado Water Quality Control Act and Colorado Discharge Permit Regulations. The permit also requires the City of Cañon City conduct an annual review of the program to assess the effectiveness of the program elements and to submit an annual report to the State.

The MS4 discharge permit contains six areas the City must address in its Stormwater Management Plan. These areas are:

- Public Involvement/Participation
- Public Education and Outreach
- Illicit Discharge Detection and Elimination
- Construction Sites
- Post-construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations.

Each of these areas has several program elements which have been used to meet the goals of the Stormwater Management Plan.

This annual review looks at each of these elements to assess the City of Cañon City’s compliance status and the effectiveness of our programs. This report contains a breakdown of activities completed by various City Departments during 2024 to meet the requirements of the current permit.

## Supplemental Information

### Recordkeeping

In late 2018, the City of Cañon City upgraded its asset management database from Cartegraph Navigator to Cartegraph OMS. The upgrade allows the City to not only track information and inspections on assets as was previously done but also allows for a more accurate accounting of tasks and costs associated with those assets. It

also assists with documenting citizen contacts and any tasks associated with those contacts. The database was expanded to include City assets other than just Stormwater. Recordkeeping with the OMS database began in 2019 with adjustments to the methods and information tracked continuing to provide the best information possible.

Appendix A contains a table of the time and expenses associated with the programs and operations which contribute to meeting our MS4 permit requirements. Only those tasks which are tracked through OMS are listed in the table.

## **Stormwater Management Plan**

### **Section 1. Program Description Document (PDD)**

The Program Description Document (PDD) is a requirement of the 2016 permit. To meet this requirement the City of Cañon City's Stormwater Program must develop and maintain records in the form of a program description document. The PDD must contain a list of citations for documents and electronic records used to comply with the requirements of the permit. It must contain a current organizational chart and citations for the most recent version of documents, the date of the document and the location where the documents are kept. The PDD is a fluid document, kept up to date as program documents are modified to meet permit requirements and compliance dates.

The PDD for the City of Cañon City's Stormwater Program was initially completed on December 11, 2018, and has been updated as needed to reflect any changes in documents. A statement was posted to the Stormwater webpages on the City of Cañon City's website stating:

“PUBLIC NOTICE:

The City of Cañon City administers a general permit for stormwater discharges associated with Municipal Separate Storm Systems (MS4s) in accordance with Colorado's Discharge Permit System (CDPS). The City of Cañon City maintains a Program Description Document that is available upon request to the public for review and comment.”

To date there have not been any requests from citizens to review the PDD.

### **Section 2. Public Involvement/ Participation**

The goal of the Public Involvement/ Participation area of our stormwater permit is to provide a method for the public to be involved with the City's stormwater management program by providing feedback through a variety of methods. Assessment of effectiveness in this category is a subjective evaluation as it is difficult to directly track the effect each of the elements used to meet this requirement has on public awareness and participation.

The 2016 permit clarified the public notice, feedback and recordkeeping requirements. All public notices concerning stormwater are documented in a yearly program documentation spreadsheet maintained by the Stormwater Coordinator. The public can provide feedback through email, in person, via social media and applications, or by phone. Contacts are documented in the Cartegraph OMS Requests database.

**Discussion of Elements:** All programs listed below were ongoing in 2024 and will continue to be utilized during 2025. These elements are addressed in the PDD.

**1. Public Notices:** The City of Cañon City complies with the Colorado Sunshine Act for public notice as set forth in Colorado Revised Statutes. All public meetings are posted on the City of Cañon City's website and on a

public bulletin board inside City Hall at least 24 hours in advance of any public hearing. A notice is also printed in the local newspaper and posted on social media. Meeting schedules and agendas are posted on the City of Cañon City's website. Digital copies of any public notices concerning stormwater issues are kept in a folder on the Stormwater drive and documented in the yearly annual report spreadsheet.

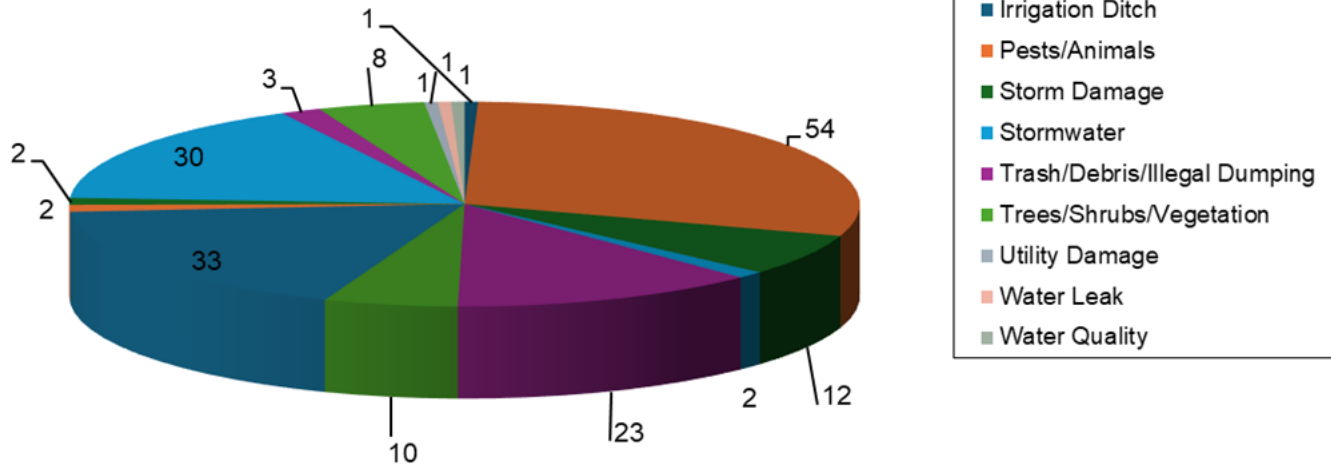
**2. Contact Information Availability:** Contact information for the City of Cañon City's Stormwater Program is available through the Stormwater Newsletters and on the web page. It is also included in any newspaper articles and public service announcements. All City of Cañon City field staff have the Stormwater Coordinator's direct line to report any suspected illicit discharges.

**3. Feedback:** The City of Cañon City introduced a web-based application known as SeeClickFix late in 2019. This application allows citizens and City employees to submit concerns they have to City departments on a wide range of City assets and allows City employees to track and address these concerns. SeeClickFix integrates with Cartegraph OMS for those departments, such as Stormwater, that use both databases. The Stormwater Newsletters also encourage everyone to get involved by calling, emailing or writing in with their questions, complaints or ideas.

A database is kept of contacts concerning stormwater issues with the intent to better track the effectiveness of the public education and outreach programs, as well as to assist in identifying areas and concerns which may need more public outreach. The database also assists in capital project planning. Contacts are broken into broader categories of issues then further assigned to narrower classifications of issues such as clogged culverts or blocked storm drains to facilitate these decisions. The log represents those contacts handled directly by the Stormwater Coordinator, submitted through SeeClickFix or handled by other departments or staff that the Coordinator is made aware of. During 2024, 183 contacts were taken by the Stormwater Coordinator, other Engineering staff or submitted through SeeClickFix concerning 169 issues (i.e. multiple calls were taken on some issues). Illicit discharges comprised 25 of the contacts. The following table and the chart show the breakdown of the narrower stormwater issue categories. Overall, calls to the Stormwater Program were down from the 208 taken in 2023.

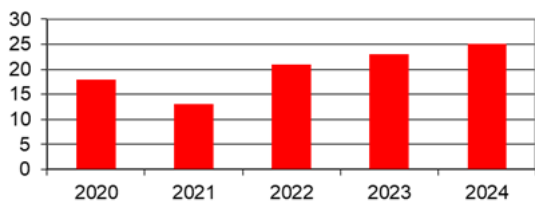
Stormwater Issue Category	# of Contacts	% of Contacts
Blocked Flowlines	1	0.5
Clogged Culvert	4	2.2
Construction	8	4.4
Debris/Trash	4	2.2
Drainage/Flooded Property	39	21.3
Erosion	2	1.1
General Information	18	9.8
Graffiti/Vandalism	2	1.1
Illicit Discharge	25	13.7
Impervious Surface/Fees	11	6.0
Inlet	1	0.5
Irrigation Ditch	45	24.6
Other	2	1.1
Pest Control	4	2.2
Sediment Accumulation	3	1.6
Storm Damage	4	2.2
Vegetation	10	5.5

## 2024 Percentage of Stormwater Contacts by Broad Issue



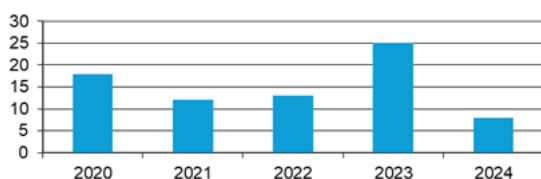
The OMS database allows for tracking trends in the number of calls received each year for each category. The following graphs show the contacts for some of the categories for the last five years. Variability in categories may be attributed to better tracking of the contacts, training of municipal employees, public education and outreach efforts and general variability of issues throughout the year.

**Illicit Discharge Contacts by Year**



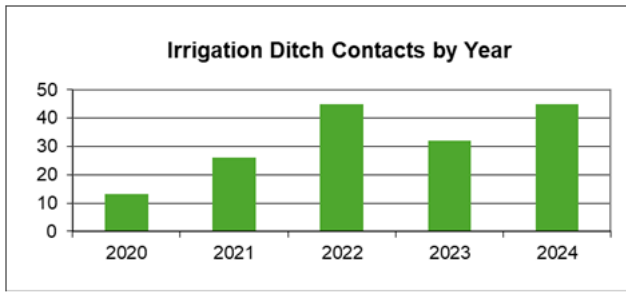
The number of illicit discharge contacts has varied in the last five years. Variability is influenced by the number of actual illicit discharges which occurred, community awareness and municipal employee training. (See Section 4 *Illicit Discharge Detection and Elimination* for a more complete discussion.)

**Construction Contacts by Year**



Construction calls also show variability over the years, mostly due to the amount and type of construction occurring during the year. These types of calls include both complaints about construction and requests for construction-related stormwater information.





the issues.

Statistical analysis of the data is not done, but the graphs generated from tracking contacts show general trends. Overall, it appears that the Public Outreach efforts of the Stormwater Program have been successful in increasing awareness of stormwater issues and in providing an avenue for the citizens and employees of Cañon City to participate in the program. Tracking also assists in determining where additional education and outreach efforts may be needed.

The database also facilitates tracking of other aspects, such as how the contact was made and how the contact information for the Stormwater Program was obtained, which assists in determining how effective our outreach efforts are. During 2024, the primary method of contact continued to be by phone, followed by the SeeClickFix app and “in-person” visits. The method of obtaining stormwater contact information primarily was through prior contacts, then via training (City employees) and through the City receptionists. The charts below show the breakdown of each. The method of contact is not consistently tracked (i.e. people are not consistently asked how they obtained the information). This is an area that has strengthened but still needs to be pursued more diligently.

Mode of Contact	Number	%
Email	27	14.8
In Person	29	15.8
Phone	88	48.1
SeeClickFix	34	18.6
Text	5	2.7

How Contact information was Obtained	Number	%
Internet/Social Media	26	14.2
Newsletter	6	3.3
Other	1	0.5
Personal Contact	9	4.9
Prior Contact	58	31.7
Receptionist	29	15.8
Referral	8	4.4
Training	31	16.9
Unknown	15	8.2

The OMS database maps the locations of received requests, which then can be exported to analyze which areas may need extra outreach and to assist in prioritizing infrastructure maintenance and capital projects.

With the upgrade to the OMS database, tasks can now be assigned to specific requests which allows various City departments to track labor and material costs associated with those requests. The data can also be analyzed to see how long tasks associated with the requests took to complete and the amount of time for the request to be closed. In 2024, 87 tasks were entered into the OMS database associated with requests (excluding those associated with illicit discharges and stormwater construction-permitted sites). Of those, 76 tasks were investigations or inspections; the rest were a combination of debris or sediment removal and general cleaning, enforcement actions and other miscellaneous tasks. Illicit discharge tasks are discussed further in Section 4.

### **Section 3. Public Education and Outreach**

The Public Education and Outreach program strives to increase the public's awareness of potential local water quality problems associated with stormwater runoff. Its goal is to give people the information and tools they need to lessen their impact on stormwater runoff, which in turn can improve our local water quality. Assessment of the effectiveness of the program elements in this category is a subjective evaluation as it is difficult to directly track the effect each of these measures has on public awareness, participation and behavioral changes.

The 2016 permit lists the following requirements:

1) The permittee must implement a public education program to promote behavior change by the public to reduce pollutants in discharges from the MS4. Education and outreach activities, individually or as a whole, must address the impacts of stormwater discharges on water bodies, the steps the target audience can take to reduce pollutants in stormwater runoff, and water quality impacts associated with illicit discharges and improper disposal of waste.

2) The permittee must provide information to businesses and the general public regarding the permittee's prohibitions of and the water quality impacts associated with illicit discharges as part of the public education program. The information must include the following:

A) The permittee must determine the targeted businesses that are likely to cause an illicit discharge or improperly dispose of waste. At a minimum, the permittee must identify at least one type of business and a list of those businesses that fit the identified type of business.

B) The permittee must develop and implement at least one education and outreach activity to those businesses identified. Educational materials and activities, individually or as a whole, must describe water quality impacts associated with illicit discharges and the improper disposal of waste, the behaviors of concern, and actions that the business can take to reduce the likelihood of illicit discharges and the improper disposal of waste.

3) The permit provides a table of education and outreach activities that the permittee must choose from to implement during the year. At least four from the table must be implemented each year with at least two of those from the Active and Interactive choices. Activities can vary from year to year as long as at least four are done.

4) As part of their public education program, the permittee must specifically address the reduction of water quality impacts associated with nitrogen and phosphorus (nutrients) in discharges from the MS4.

A) The permittee must determine the targeted sources that are contributing to, or have the potential to contribute, nutrients to the MS4's receiving waters.

B) The permittee must prioritize which targeted sources are likely to obtain a reduction in nutrient discharges through education and must distribute educational materials or equivalent outreach to these. The educational materials or outreach must describe stormwater quality impacts associated with nitrogen and phosphorus in stormwater runoff and illicit discharges, the behaviors of concern, and actions that the target source can take to reduce nutrients.

The permit also details the types of written procedures, documentation and recordkeeping that must be done to meet these requirements.

The following elements were used to meet our permit requirements during 2024.

#### **Discussion of Elements:**

##### **1. Illicit Discharge Education to Businesses and the Public:**

A) In 2018, the Stormwater Program determined that construction contractors, restaurants and window washers should be targeted as likely sources of illicit discharges or improper disposal of waste. Lists of individual businesses were created and updated as needed.

Due to an incident involving a food truck vendor in 2022, food cart/truck vendors were added to the list as a likely source of illicit discharges and improper disposal of waste. A fact sheet was developed and

distributed to 7 vendors by the Stormwater Coordinator. An additional 25 fact sheets were given to the Royal Gorge Chamber of Commerce for distribution during the Whitewater Festival. The fact sheet was also incorporated into the application packet each food vendor must submit to be licensed to operate within the City of Cañon City's limits. The fact sheet describes what illicit discharges are and provides tips for pollution prevention while operating a food cart or truck. Additionally, it describes the types of enforcement which may occur for illicit discharges. The Planning Director provides a list of those vendors which have received or renewed their license and received the fact sheet through that process.

- B) The Stormwater Newsletters and radio PSAs often address the issue of illicit discharges. Both are disseminated or directed to businesses as well as the general public. The newsletters and PSAs also provide tips for preventing contamination of stormwater runoff. The Stormwater Program webpages on the Cañon City website contain a section on what businesses can do to minimize and/or prevent contamination of stormwater runoff.

**2. Educational Materials and Activities (from the provided table in the permit):** The 2016 permit contains a table of the Education and Outreach Activities which must be used to meet the permit requirement. The table contains both Passive Outreach and Active/Interactive Outreach. The permittee must implement *at least* four activities each year and at least two must be from the Active/Interactive column. The activities can vary each year as long as they meet the requirements. The City of Cañon City's past and current activities are in accord with the activities contained in this table. As a whole, the activities address the impacts of stormwater discharges on our receiving waters and steps the general public and businesses can take to reduce their impact on stormwater runoff and thereby our local waterways. The following programs were utilized during 2024.

**i. Passive Outreach:**

A. **Radio/television/movie theater advertisement:** During 2024, 7 different 30-second public service announcements concerning stormwater were aired on local radio stations for a total airtime of 515.5 minutes (8.6 hours). Radio public service announcements are rotated throughout the year. Newspaper notices and radio PSAs, which include stormwater information, were also run in conjunction with the leaf pick-up program. Five stormwater/water-related programs were run on CCTV-Channel 19 with a total airtime of 168.8 hours.

B. **Newspaper Advertisement:** Media announcements were carried in the local paper for the annual Cañon Proud clean-up trash vouchers and for storm clean-up by City personnel.

C. **Distribute educational materials by brochure:** Several types of brochures are given out during events at which the Stormwater Program has a booth. See further discussion under Section 3.2.ii.G.

D. **Distribute educational materials by fact sheet:** Several types of fact sheets are given out during events at which the Stormwater Program has a booth. See further discussion under Section 3.2.ii.G.

E. **Distribute educational material by utility bill insert:** The Stormwater newsletters are sent out as a utility bill insert and contain educational material. See Section 3.2.ii.E for further discussion.

F. **Stormwater related signage:** The City of Cañon City has stormwater related signage as well as pet waste stations. A total of 107 pet waste educational and regulation signage and pet waste stations, as well as stormwater educational signage are located within the permit boundaries (City Limits). The following table lists the types and numbers of signage and waste stations.

Type of Signage/Station	Number
Pet Waste Educational Signage	55
Pet Waste Signs	4
Pet Waste Station Indicator Signs	3
Park Trailhead Signs which include pet waste regulations	6
Pet Waste Stations	38
Stormwater Educational Signage	1



**G. Publish article (hard copy or electronic):** Two articles were published in the Cañon City Shopper. While these were not written by City personnel, they did provide more public awareness about the City Stormwater Program and regulations which help protect our water quality.

**H. Website:** The City of Cañon City's Stormwater webpages contain information for the public ranging from informational brochures about water quality, illicit discharges and construction stormwater runoff control to children's activity booklets. Current editions of the newsletters, the annual program review, and other content were added or updated during 2024. Additionally, various announcements or articles were posted under the City News section. Visits to the stormwater webpages were tracked via monthly reports. Due to a change in format, the monthly reports were only generated from February through December 2024, during which time 186 views of the webpages were recorded.

## **ii. Active and Interactive Outreach**

**A. Ongoing advertisement/promotion of a stormwater hotline number or other method to report an illicit discharge:** Contact information is provided in each of the Stormwater Newsletters, on the public service announcements aired by radio and on the City's website. With the implementation of the SeeClickFix application, the public can now report issues via their phone or computer. Reports entered into the application are automatically assigned to a City department and an email notification is sent to the contact person for that department.

**B. Ongoing advertisement/promotion on how to get more information about the stormwater program:** Contact information is provided in each of the Stormwater Newsletters, on the public service announcements aired by radio and on the City's website as well as the City's social media sites.

**C. Ongoing social media program:** The City of Cañon City has social media accounts with Facebook, Twitter and NextDoor. Thirty stormwater-related posts were included on the City's social media pages during 2024. The posts covered a wide range of topics including pollution prevention information.

Additionally, City Council and Council Committee meetings are uploaded to the City's YouTube page. Stormwater announcements and conversations are sometimes included in these meetings.

**D. Web site that is interactive or contains stormwater information that includes actions that can be taken to reduce stormwater pollution:** The City of Cañon City's Stormwater webpages contain information for the public ranging from informational brochures about water quality, illicit discharges and construction stormwater runoff control to children's activity booklets. Information about what citizens and businesses can do to lessen their impact on stormwater runoff is found under the "What Can I Do To Help?" link.

**E. Newsletter (hard copy or electronic):** Stormwater Newsletters are sent out periodically with City water bills and are available on the City of Cañon City's website. Each newsletter addresses stormwater concerns and provides information about the Stormwater Program and the prevention of illicit discharges. The public is encouraged to contact us with their concerns and questions or if they have suggestions for future topics or programs (newsletters include the Stormwater Program's contact information). During 2024, 13,684 newsletters were sent to residents and 2,489 newsletters were sent to commercial establishments. Residents and businesses that receive their water bill via email also receive the stormwater newsletter by email. A total of 2,387 newsletters were emailed throughout the year. The 2024 newsletters can be viewed at: <https://www.canoncity.org/Archive.aspx?AMID=38>.

**F. Promotion of existing local stormwater/environmental events or program that help protect water quality:** The City of Cañon City promoted its Stormwater Program and various events through social media and the City's website. The City also promoted municipal, private and non-profit clean-up events, as well as the City Streets Department's annual fall leaf pick-up program.

**G. Distribute promotional items or giveaways:** Several different types of giveaways, such as reusable litter bags, pet waste dispensers and Cañon City Stormwater Program magnets were given out during in-person events which occurred in 2024. Litter bags, pet waste baggie dispensers, activity books, crayons and magnets were available in a display during National Pollution Prevention week. Brochures, activity booklets and other items given out during events are tracked in a yearly spreadsheet as per permit record-keeping requirements. The following table shows the breakdown of the types of items given out.



Litter Bag



Pet Waste Baggie Dispenser



Magnet



Lip balm and Hand Sanitizer



Type of Giveaway	Number Given Out
Brochures and flyers	82
Activity Booklets	40
Cañon City Stormwater Program Magnets	13
Biodegradable Reusable Litter Bags	92
Pet Waste Baggie Dispensers	133
Crayons with Cañon City Stormwater Logo	29
Hand Sanitizer Pens “Only Rain Down the Drain”	142
Lip Balm “Only Rain Down the Drain”	122

**H. Participate in or sponsor a waterway clean-up and trash removal event:**

1. The City of Cañon City co-sponsored and participated in the Cañon City Metro Recreational District’s annual Clean Up/Green Up Arkansas River and Riverwalk trash removal event in 2024. Despite heavy rain, 23 volunteers cleaned up a section of the riverbank, including the removal of the remainder of a homeless camp.



**I. Participate in or sponsor a household hazardous waste event:** Initial meetings and information gathering were conducted in 2024 to assess the feasibility of holding a multi-agency sponsored household hazardous waste disposal event in 2025. Various agencies expressed interest – planning meetings will be continued during 2025.

**J. Stormwater booth at a community event:**

a. The Stormwater Program had a booth during the Earth Day Celebration at the Royal Gorge Bridge and Park. Approximately 107 people visited the booth to learn about stormwater pollution prevention, receive giveaways and watch demonstrations with the EnviroScape.



b. The Cañon City Community Service Officers and the Stormwater Program had a joint booth at the 2024 Safety Jam. Approximately 108 people visited the booth, learning about pet safety and stormwater pollution prevention and flood safety. The EnviroScape was used to conduct 13 demonstrations.

**K. Pet waste stations:** The Cañon City Parks Department provides pet waste stations with bags, trash cans and signage at all City parks, along the Riverwalk and along the Hogback and Tunnel Drive Trails. Pet waste stations have also been added to the trail network in the Dawson Ranch Subdivision. See the discussion under Section 3.2.i.F. for a list of signage and pet waste stations.



3. **Nutrients:** The 2016 permit has the additional requirements of determining targeted sources that are contributing to, or have the potential to contribute, nutrients to our receiving waters and to distribute educational materials or equivalent outreach to prioritized target audiences.
- A) Targeted sources of nutrients have been determined to be fertilizers, pet/animal waste and yard waste.
  - B) Information about nutrient impacts is included in most of the Stormwater Program’s brochures, presentations and PSAs. During National Pollution Prevention Week, social media posts included tips for reducing nutrient pollution.

## Section 4. Illicit Discharge Detection and Elimination

The 2016 MS4 permit clarifies the requirements for illicit discharge detection and elimination, including more detailed requirements on regulatory mechanisms, tracing and removing a discharge, enforcement responses, priority areas and training. Recordkeeping is also clarified.

The City of Cañon City’s Illicit Discharge Detection and Elimination (IDDE) program identifies sources of potential illegal discharges and actual discharges to the City’s storm sewer system in order to reduce the frequency of these discharges and to protect the water quality of the Arkansas River and Four Mile Creek. Public education and municipal employee training are important elements in this program. Inspections of the storm sewer discharge pipes (outfalls) on the Arkansas River, Four Mile Creek and various drainages throughout the City, as well as water quality testing if discharges are found are integral parts of the program.

**Discussion of Elements:** All programs listed were ongoing in 2024 and will continue during 2025.

**1. Storm Sewer System Map:** The revised permit requires the permittee to maintain a current map of the location of all MS4 outfalls within the permit boundary. The City of Cañon City maintains a map of all storm sewer infrastructure including storm drains, pipes, culverts, manholes and outfalls in ArcMap and through the Cartegraph OMS database. Outfall inspections and mapping of new outfalls continued during 2024. Outfalls are assigned to a category in the Cartegraph database based upon the *primary* type of flow. Many outfalls, though, will carry several types of flow (i.e. ground water, irrigation return and storm runoff). The categories and numbers of outfalls are listed in the table below. An outfall is the point where a municipal storm sewer discharges to waters of the United States. A major outfall is a pipe with an inside diameter of 36 inches or more or where stormwater enters waters of the United States from a drainage area of more than 50 acres. An outfall pipe with an inside diameter of 12 inches which drains land zoned for industrial activities is also considered a major outfall; these have been separated into the Industrial Discharge category. Outlets are the structural point where permanent stormwater control measures such as detention basins empty to areas other than a waterbody. Facility outlets are the point at which a municipal facility discharges to the storm sewer system (including a street). This category was added in 2016 in preparation for the new permit requirements. Footing/Foundation and Roof Drains are only mapped if they discharge directly to a drainage or waterbody.

The Cañon City Stormwater Program has mapped a total of 576 active outfalls, outlets and other drainage end points located along the Arkansas River, Four Mile Creek and the various drainages and irrigation ditches throughout the City. The City of Cañon City has jurisdiction over 263 of them; County or State Agencies have jurisdiction for 26, and 287 are under private jurisdiction. The breakdown for each category is detailed in the following table. One outfall (either new, replaced or existing but un-mapped) was added to the database during 2024 and 7 were removed due to construction or other changes.

Category	Total Number
Facility Outlet	22
Footing/Foundation Drain	59
Groundwater Drain	35
Industrial Discharge	4
Irrigation Return	150
Major Outfall	28
Outfall	196
Outlet	29
Roof Drain	53

The footing/foundation, roof and groundwater drains, and the irrigation returns do not require yearly inspections or monitoring but are often noted during annual inspections of drainage channels. The City of Cañon City is currently not required to monitor industrial discharge outfalls as these are covered under separate discharge permits; again, these are often noted during other inspections. Outlets are inspected annually with the various permanent stormwater control measures and facilities. Outfalls and major outfalls are inspected annually (time permitting). The outfall database in Cartegraph and the mapping assist in prioritizing inspections of the outfalls. During 2024, 161 inspections were conducted: 156 were routine inspections, 2 were initial inspections and 3 were conducted in response to complaints.

**2. Regulatory Mechanism:** The City of Cañon City adopted Ordinance No. 20, Series of 2005 to establish codes concerning illicit discharges. Some minor changes were made to the Ordinance, effective September 9, 2012, through Ordinance No. 14, Series of 2012 AN ORDINANCE MAKING CERTAIN MINOR AMENDMENTS TO THE CITY’S STORMWATER REGULATIONS. In 2019, the Stormwater Regulations were moved to a new section of municipal code: Title 20 Stormwater Illicit Discharges and Permits (Ordinance No. 12, Series of 2019). Some minor corrections or additions were made at that time. The Ordinance can be viewed on the City of Cañon City’s website at [www.canoncity.org](http://www.canoncity.org). During 2022, revisions to Title 20.10.160.E were proposed and adopted by City Council. Ordinance 18, Series 2022 entitled “An Ordinance of the City of Cañon City Amending Chapter 20.10 of the Cañon City Municipal Code Concerning Notice of Violation and Penalty Assessment for Stormwater Violations” allows City personnel to move straight to assessing penalties in cases of egregious violations or chronic violators.

**3. Tracing an Illicit Discharge:** The revised permit requires the permittee to implement procedures to respond to reports or identifications of illicit discharges. The procedures and tools needed to trace the illicit discharge must be documented. The City of Cañon City had previously implemented an Illicit Discharge Detection and Elimination Manual (IDDE Manual) which documented the required procedures and tools. The manual was reviewed and revised in 2017 to ensure consistency with the permit requirements and again in 2019 in keeping with the municipal code Title changes. The full manual may be viewed at: <https://www.canoncity.org/DocumentCenter/View/235/Illicit-Discharge-Detection-and-Elimination-Manual-PDF>.

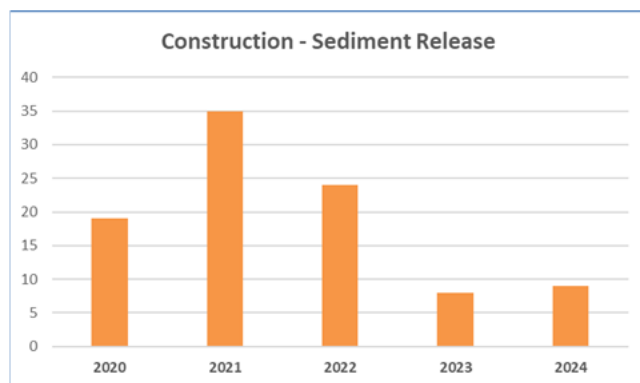
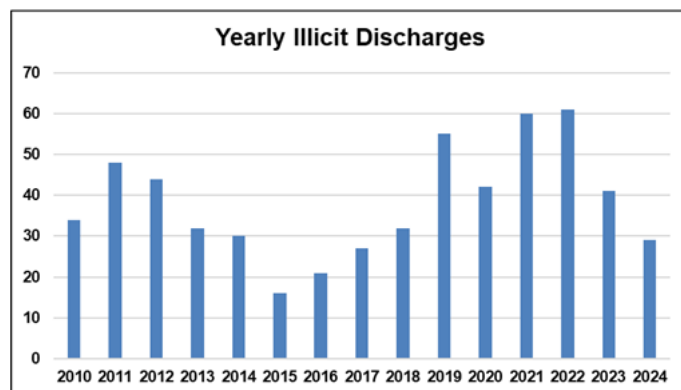
**4. Removing an Illicit Discharge:** The permit requires that the permittee must have written procedures requiring the cessation and removal of illicit discharges, including removal of any surface residue and pollutant sources. The IDDE Manual contains these procedures.

#### **i. Discussion of the Illicit Discharge Program**

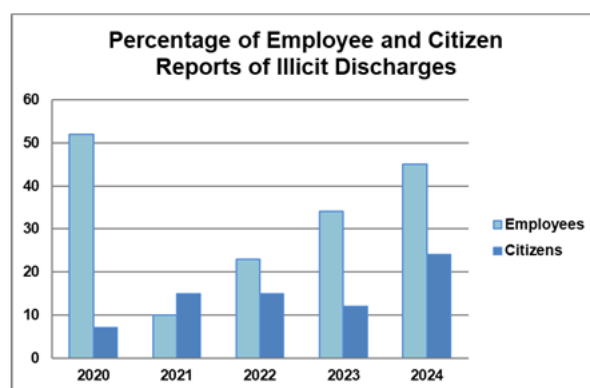
Twenty-nine incidents of potential or actual illicit discharges were investigated during 2024, resulting in 55 initial and follow-up inspections. Of the reported or discovered discharges 4 were excluded discharges,



3 were potential discharges and the rest were prohibited discharges. Reported discharges had declined between 2011 and 2015 then rose again. The increase in illicit discharges since 2015 may be due to better awareness and reporting of potential illicit discharges. The significant increase in illicit discharges from 2019 through 2022 is mainly due to increased oversight and enforcement on single family residential construction sites. Due to this increased oversight, discharges from single family residential construction sites decreased in 2023. The following graphs show the trend in overall illicit discharges and construction sites sediment release illicit discharges.



The Request database in Cartegraph assists in tracking how many reports of illicit discharges the Stormwater Program receives from citizens and employees (*See Section 2. Public Participation/Involvement*). The adjacent graph shows the reports received from citizens and employees as a percentage of the total number of reported illicit discharges each year for the last 5 years. For 2024, 70% of the total illicit discharges were reported by City employees or citizens; the rest were discovered by the Stormwater Coordinator.



Illicit discharges are assigned to a category in the Cartegraph database to assist in identifying types of pollutants which may need targeting through our Public Education program. The following table shows how many discharges were reported or discovered for each category during 2024. The database in Cartegraph allows for comparisons between categories each year which enables staff to see trends and adjust outreach accordingly.

Category	Incidents	Category	Incidents
Accident	0	Illicit Connection	1
Automotive Discharge	8	Leaking Dumpster	0
Blocked Flowlines	0	Non-hazardous Spill	0
Construction – Concrete Washout	0	Other	2
Construction – No BMPs	2	Pesticide/Herbicide/Fertilizer	0
Construction – Other	0	Pet Waste	0
Construction – Sediment Release	9	Power Washing	1
Hazardous Spill	0	Prohibited Discharges – Other	0
Illegal Dumping – Drainage	2	Restaurant Oil/Grease	2
Illegal Dumping – Flowline	1	Sediment	0
Illegal Dumping – Inlet	0	Sewage	1
Illegal Dumping – Other Area	0	Yard Waste	0
Illegal Dumping – Waterbody	0		

Water quality sampling is done when needed to assist in determining the source of the discharge. No sampling events were conducted during 2024. Benthic macroinvertebrate sampling of the Arkansas River and Four Mile Creek was not conducted in 2024 due to time and budgetary constraints.

**5. Enforcement Response:** The revised permit requires that the permittee must implement written enforcement procedures and actions to eliminate the source of the illicit discharge when identified or reported, discourage responsible parties from willfully or negligently repeating or continuing illicit discharges and discourage future illicit discharges from occurring. The IDDE Manual contains these procedures which the Municipal Code allows for.

**i. Discussion of Enforcement Responses**

Investigations resulted in the illicit discharge enforcement measures shown in the following table. Most of the enforcement actions were due to sediment tracking from single-family residential construction sites. Single-family residential construction lots typically fall under the one-acre or more size requirement of the CDPHE’s Construction Stormwater Permit and the City of Cañon City’s GESC permit, and as such, discharges are handled through the City’s Illicit Discharge program. One Notice of Violation was issued with a \$9,725.32 reimbursement fee for City abatement costs in cleaning up a restaurant grease discharge.

Enforcement Action	Number
Verbal Warning	13
Notice of Non-Compliance	0
Notice of Violation & Enforcement Action w/ fine	1
Stop Work Order (Verbal)	1
Written notification detailing violation/corrective action	4

The database in Cartegraph facilitates tracking of other aspects of illicit discharge reports and investigations such as repeat violators. Three parties had more than one violation during the year, two were residential construction companies. The third party with more than one violation was a garbage disposal company. The Cartegraph OMS database also maps the locations of illicit discharges to show areas which may need extra outreach or monitoring.

**6. Priority Areas:** The permit requires that the permittee must locate priority areas with a higher likelihood of having illicit discharges. The database and mapping of illicit discharges assist in determining areas of past illicit discharges and areas where illicit discharges are concentrated. Land use is also considered when determining priority areas. Using these criteria, which are documented in the IDDE Manual, the following areas have been deemed priority areas for the City of Cañon City:

- NW Cañon from 2<sup>nd</sup> Street to 9<sup>th</sup> Street; Main Street to Pine Ave
- Businesses along the Water Street Channel from Rainbow Drive to 12<sup>th</sup> Street
- Businesses along Fremont Drive and East Main Street

Review of illicit discharges which occurred during 2024 did not result in a change of the priority areas.

**7. Training:** Training must be conducted for applicable municipal staff so they may recognize and appropriately respond to illicit discharges observed during typical duties. A video training was created in December 2020, which all applicable employees hired after July 2019, are required to complete. Seven employees completed the on-line training and passed the exam in 2024. Employees included those from Engineering, Stormwater Maintenance, the Police Department and Community Service Officers.

## **Section 5. Construction Sites**

The Construction Sites elements of our Stormwater Management Program are designed to reduce, as much as possible, sediment and other construction-related pollutants from entering our storm sewer system or from being

discharged into the Arkansas River, Four Mile Creek and other drainages throughout the city. The revised permit contained new and clarified requirements which were implemented prior to the July 1, 2019, compliance date.

**Discussion of Elements:** All programs listed were ongoing during 2024.

**1. Regulatory, Compliance and Exemption Mechanisms:** Ordinance No. 20, Series of 2005 and the City of Cañon City Grading, Erosion & Sediment Control (GESC) Manual were enacted in 2006. They have proved effective in obtaining compliance for construction site stormwater management. Some minor changes were made to the Ordinance, effective September 9, 2012, through Ordinance No. 14, Series of 2012 AN ORDINANCE MAKING CERTAIN MINOR AMENDMENTS TO THE CITY'S STORMWATER REGULATIONS. In 2019, the Stormwater Regulations were moved to a new section of municipal code: Title 20 Stormwater Illicit Discharges and Permits (Ordinance No. 12, Series of 2019). Some minor corrections and additions were made at that time. During 2022, revisions to Title 20.10.160.E were proposed and adopted by City Council. Ordinance 18, Series 2022 entitled "An Ordinance of the City of Cañon City Amending Chapter 20.10 of the Cañon City Municipal Code Concerning Notice of Violation and Penalty Assessment for Stormwater Violations" allows City personnel to move straight to assessing penalties in cases of egregious violations or chronic violators. The Municipal Code can be viewed on the City of Cañon City's website at [www.canoncity.org](http://www.canoncity.org). The City of Cañon City's GESC manual was reviewed and revised to ensure compliance with the new and updated requirements in the revised 2016 MS4 Stormwater Discharge Permit. City Council approved the revisions on June 17, 2019 (Resolution No. 18, Series 2019).

**2. Control Measure Requirements:** The City Municipal Code requires the implementation of stormwater control measures on all applicable construction sites. The City's GESC manual provides guidance for construction site operators on that implementation.

**3. Site Plan Review:** The procedures for site plan review are addressed through the City of Cañon City's Grading, Erosion and Sediment Control Manual. The Director of Public Works reviews all site plans prior to approval and issuance of any permits for construction within our permit boundaries.

**4. Procedures for Receipt and Consideration of Information Submitted by the Public:** A database is kept of all contacts concerning stormwater issues with the intent to better track the effectiveness of the public education and participation programs. (*See Section 2. Public Participation/Involvement*). All complaints and concerns are addressed promptly. Any illicit discharge or construction investigations resulting from a complaint or concern submitted by a citizen is logged into the database in Cartegraph and can be cross-referenced through the Request database.

**5. Site Inspections and Enforcement of Control Measures:** Inspections are performed at all applicable construction and post-construction sites as per the schedule provided in the 2016 MS4 permit. Appropriate enforcement actions are taken when needed. During 2024, there were 17 open Grading, Erosion and Sediment Control (GESC) permits and 1 open Drainage, Erosion and Sediment Control (DESC) permit. Six of the GESC permits were issued in 2024. Nine of the open GESC permits were completed and closed during the year. Six of the GESC permits were City construction sites of which five also had State Construction Stormwater Discharge Permits.

Due to a clarification in the permit, after July 1, 2016, Drainage, Erosion and Sediment Control (DESC) permits were no longer required for single family residences being built in subdivisions which had been stabilized; however, contractors are encouraged to still apply for the permit to ensure proper control measures and drainage are addressed for the site. DESC permits may also be required on a case-by-case basis as determined by the Director of Public Works. The DESC permit issued during 2024 was for duplex being constructed near a drainage

channel. Those single-family residential sites which do not require a DESC permit are addressed through the City's Illicit Discharge programs should there be an issue at the site.

The 2016 MS4 permit contains more robust inspection requirements, including a timeline for conducting routine, reduced and compliance inspections. Recordkeeping requirements are also detailed in the permit. With the upgrade of our database to Cartegraph OMS, City GESC and DESC permits are tracked in the database along with all inspections, associated tasks and enforcement actions. The following tables show the number and type of inspections conducted at permitted construction sites during 2024 and any enforcement actions taken. It should be noted that the State Construction Stormwater Discharge permit has a slightly different inspection schedule than the MS4 Stormwater Discharge permit. The City sites which also had a State construction permit were inspected per the State permit schedule which also served to meet our required MS4 permit inspections.

Inspection Type	Number
Compliance	18
Final Close-Out	4
Illicit Discharge	1
Initial	7
Other	1
Reduced Frequency-Final Stabilization	15
Reduced Frequency-Inactive Site	6
Re-inspections	2
Routine	74

Enforcement Action	Number
Verbal Warning	1
Notice of Non-Compliance	1
Stop Work Order verbal	1
Notice of Violation & Enforcement Action w/ fine	0
Letter detailing violation/corrective action	0

No fines were issued for permitted construction activities during 2024.

**6. Training and Education for Construction Site Operators:** This is primarily achieved using the GESC manual and through the plan review process. New information and resources are passed to local contractors and developers when available.

#### A. Regional Stormwater Seminar

Cañon City again joined forces with the City of Pueblo, the Pueblo County Engineering and Public Works Department, the Pueblo West Metro District, CDOT-Region 2, and Colorado State University-Pueblo (Southern Colorado Stormwater Education Committee) to host a Regional Stormwater Seminar on March 26, 2024. The seminar was geared toward contractors, developers and engineers who work throughout the region, as well as municipal employees. The seminar focused on permitting, including a presentation on the CDPHE construction permit update. The seminar was held at CSU-Pueblo and was attended by 87 people, excluding organizers, speakers and vendors. The full report is kept with the MS4 permit documentation for 2024.

## Section 6. Post-construction Stormwater Management in New Development and Redevelopment

Per the City of Cañon City's MS4 permit, the Post-construction Stormwater Management program must reduce the stormwater impacts from areas of new development and significant redevelopment as much as possible through planning procedures and enforcement mechanisms. The 2016 permit contained new and clarified requirements which were implemented prior to the July 1, 2019, compliance date.

**Discussion of Elements:** All programs listed were ongoing during 2024.

**1. Regulatory Mechanisms and Exemptions:** Ordinance No. 20, Series of 2005 and the City of Cañon City Grading, Erosion & Sediment Control (GESC) Manual were enacted in 2006. Some minor changes were made to the Ordinance, effective September 9, 2012, through Ordinance No. 14, Series of 2012 AN ORDINANCE MAKING CERTAIN MINOR AMENDMENTS TO THE CITY'S STORMWATER

REGULATIONS. In 2019, the Stormwater Regulations were moved to a new section of municipal code: Title 20 Stormwater Illicit Discharges and Permits (Ordinance No. 12, Series of 2019). Some minor corrections and additions were made at that time. The Ordinance can be viewed on the City of Cañon City’s website at [www.canoncity.org](http://www.canoncity.org).

**2. Design Criteria & Standards and Review & Approval Procedures:** The City of Cañon City’s revised Grading, Erosion and Sediment Control (GESCC) manual contains a section on post-construction permanent stormwater control measures (PSWCM) design criteria. Additionally, the site plan review process assures that post-construction permanent structural control measures meet design standards. Inspections during the construction process and final inspections ensure that the control measure(s) has been properly constructed. The Director of Public Works documents all site plan reviews and approvals. Final as-built drawings are kept with the file for the post-construction permanent control measure. All construction inspections of the control measure are entered into the Cartegraph OMS database for that asset.

**3. Recordkeeping/Tracking:** Permanent stormwater control measures are mapped and recorded in the Cartegraph OMS database, including those that are under municipal jurisdiction but outside of the MS4 permit limits (City Limits). Three new permanent stormwater quality control measures were implemented in 2024. Of these, one was a detention/water quality basin and two were underground water quality structures. Procedures for documenting and mapping new permanent control measures are contained in the Stormwater Coordinator’s manual. The following table lists the number of active control measures and custodianship for maintenance.

<b>BMP Type</b>	<b>Private/Federal/County/State</b>	<b>Municipal</b>
Bioretention – Rain Garden	1	0
Detention/Water Quality Basins	65	27
Grass Buffer	2	0
Grass Swale	19	1
Porous Landscape Detention	10	2
Porous Pavement – Gravel	2	0
Rock Berm	2	0
Sand Filter	7	0
Permanent Sedimentation Basin	0	2
Underground Water Quality Structures	23	12

The 2016 MS4 permit contained an additional recordkeeping requirement of documenting which applicable development sites were subject to an exclusion and the type of exclusion (allowed by the permit) granted. Exclusions are documented in the Stormwater Construction Permits database in Cartegraph OMS. One exclusion for “Excluded Roadway Redevelopment” was granted in 2024.

**4. Monitor Long-term Compliance with Enforcement Actions:** The 2016 permit requires permanent post-construction stormwater control measures be inspected at least once a permit term (5 years) to ensure conformity with the site plan and to identify any inadequate control measures or needed maintenance. Every effort is made to inspect each control measure at least once a year, however, occasionally time constraints prevent a yearly inspection on every one. When time constraints occur, those control measures which have shown a history of needing routine maintenance are prioritized for inspection. The results of inspections are entered into the Cartegraph OMS database.

An inspection report and letter are sent to the custodian of the private control measures. The letters fall into the categories of commendation, maintenance or minor maintenance. Minor maintenance letters are sent for those that need minor, routine maintenance such as trash removal. Recipients of the minor maintenance letters have shown a history of good maintenance and a willingness to respond favorably to past maintenance letters. A follow-

up inspection is not done. Maintenance letters are sent for those control measures which need more extensive maintenance. The control measure is then re-inspected approximately 30 days later (depending upon the severity of the problem noted) and enforcement procedures are instituted if the corrective maintenance has not been done. For municipal stormwater control measures, the appropriate department receives the inspection report. Tasks are assigned in Cartegraph OMS to address any issues noted.

During 2024, a total of 100 inspections were performed on permanent stormwater control measures. Newly installed control measures were inspected during construction to ensure installation was per plan detail. As the City is a relatively small MS4, most of the private permanent control measures were driven by at least once during the year; if any issue was noted, an inspection was conducted and a report was sent to the custodian of the control measure. The following table shows the type and number of inspections performed during the year.

	Private/County/Federal/State			Municipal		
	Basins	Storm Vaults	Other PSWCMs	Basins	Storm Vaults	Other PSWCMs
<b>Annual</b>	36	4	13	26	8	5
<b>Complaint</b>	0	0	0	2	0	0
<b>Construction</b>	1	0	0	0	0	0
<b>Initial</b>	0	2	0	0	0	0
<b>Maintenance</b>	0	0	0	1	0	0
<b>Post-Storm</b>	0	0	0	0	0	0
<b>Re-inspection</b>	2	0	0	0	0	0

Sixty-two notifications were sent to non-municipal custodians indicating some level of non-compliance (e.g. needing maintenance). Of those, 5 were maintenance letters and 44 were minor maintenance letters. Thirteen of the inspections resulted in letters of commendation being sent to non-municipal custodians.

## Section 7. Pollution Prevention/Good Housekeeping For Municipal Operations

The focus of this area of the Stormwater Program is to reduce the amount and type of pollution that is generated by municipal operations or from municipally owned properties to the maximum extent practicable. The 2016 MS4 permit requires the permittee to implement a program to prevent or reduce water quality impacts from pollutants from facilities and operations that they own, operate or perform *within the permit area*. The permit conditions had a range of compliance dates from July 1, 2017, to July 1, 2021. All requirements with a compliance date were met prior to the compliance date.

**Discussion of Elements:** All programs listed were ongoing during 2024.

### 1. Municipal Facility Runoff Control Measures:

A. The permittee shall implement control measures to prevent or reduce potential discharges of pollutants to the MS4 from the following municipal facilities: vehicle maintenance facilities, asphalt and concrete batch plants which do not have a separate permit, solid-waste transfer stations and outdoor storage yards with exposed stockpiles of materials.

B. The permittee shall implement the following categories as necessary to prevent or reduce the pollutant sources present: preventative maintenance, good housekeeping, spill prevention and response procedures, structural control measures, evaluation of non-stormwater discharges and employee training.

C. The permittee shall implement written municipal facility inspection procedures which, at a minimum, must include:

- An annual visual inspection of each applicable municipal facility
- Verification that written facility procedures and documentation reflect current conditions

- Observation of locations and areas where stormwater is discharged from a facility
- Observation of facility conditions, including pollutant sources and control measures.

The recordkeeping requirements for the above permit requirements include the following for each facility:

- Facility identification
- Description of all pollutant sources
- Control measures implemented
- Staff responsible for implemented control measures
- Description of control measures implemented for bulk storage structures
- Inspection records which contain the following: Inspection date, Inspector, Facility ID, Inspection findings including any evidence of polluted discharges leaving the facility and a list of follow-up actions if needed.

Most of these requirements were already being met through the previous permit's requirements. A Pollution Prevention Operations and Maintenance Manual had been created and implemented on January 1, 2010. The manual was reviewed and revised prior to the July 1, 2017, deadline and again in 2020. Copies were distributed to all applicable City employees.

A database of all municipal facilities is kept in Cartegraph. Currently there are 65 municipal facilities of which 12 are outside of the permit area. All the required information is tracked in the database, including inspections. The forms in Cartegraph have been reviewed and revised to ensure that all required data is recorded. Two new forms were created to address pollutant sources and pollution potential for each facility in 2017. The following table shows the number of facilities under each City department.

<b>Department</b>	<b>Total # of Facilities</b>	<b># outside of Permit Area</b>
<b>Facilities</b>	2	1
<b>Parks</b>	40	4
<b>Stormwater</b>	8	2
<b>Streets</b>	1	1
<b>Water Distribution</b>	12	4
<b>Water Treatment</b>	2	0

Every effort is made to inspect all municipally owned facilities (including parks) annually. In the event of time constraints, priority is given those facilities which rate higher on the pollution source and pollution potential evaluations. Courtesy inspections are conducted on those facilities outside of the permit area. The results of the inspections are sent to the appropriate department heads. In 2024, 46 inspections were conducted.

**2. Municipal Operations and Maintenance Procedures:** The permit requires the implementation of control measures that prevent or reduce discharges from applicable municipal operations (activities). The minimum municipal operations that must be addressed include:

- Operation and maintenance of streets, roads, highways
- Operation and maintenance of municipal parking lots
- Operations at maintenance storage yards
- Operations at maintenance shops with outdoor storage areas
- Operation and maintenance of snow dumps/snow disposal areas
- Operation and maintenance of sites used for temporary storage of sweeper tailings or other waste piles
- Park and open space maintenance

- Building maintenance
- New construction of municipal facilities
- Application of pesticides, herbicides and fertilizers
- Large outdoor festivals and events
- Municipal construction activities
- Maintenance, replacement and construction of utilities and the storm system

The Pollution Prevention Operations and Maintenance Manual covers each of these areas in detail, providing standard operating procedures for each department to reduce or eliminate any pollutants which may be discharged during municipal activities.

The City of Cañon City conducts inspections and maintenance on other stormwater infrastructure such as drainage channels, storm drains, manholes, culverts and pipes. Each type of asset has its own database in Cartegraph in which base data, inspections and tasks are recorded for each individual asset.

**i. Drainage Channels:** The City of Cañon City has custodianship over 60 drainage channels; 35 are under private custodianship. The City of Cañon City participates in the FEMA Community Rating System to provide our citizens with reduced flood insurance rates. As part of this system, drainage channels are inspected and maintenance is conducted (e.g. vegetation management, trash removal, sediment removal and repairs). During 2024, 42 inspections were conducted on channels. Maintenance was conducted on 24 channels throughout the year, including vegetation management, debris removal, herbicide application and excavation of sediment.

**ii. Storm Drains:** Storm drains are mapped and categorized as part of our Stormwater Program. A percentage of those are inspected yearly. A total of 1,267 storm drains have been identified and mapped to date. Of these, 767 are under municipal jurisdiction, 101 are under county/state/federal jurisdiction and 399 are under private jurisdiction. Like outfalls, inlets are assigned to a primary category in the Cartegraph database. The categories are Irrigation, Irrigation Box, Irrigation Clean-out, Overflow, Storm Clean-out and Storm Inlet. Irrigation boxes/clean-outs and overflows are only mapped when they have the potential to also receive stormwater runoff or are connected to pipes under City streets. The breakdown for each category as well as the number mapped during 2024 (new, previously identified but unmapped and rebuilt or moved inlets) is detailed in the following table.

Category	Total Number	Number Mapped in 2024
Irrigation	8	0
Irrigation Box	37	0
Irrigation Clean-out	217	2
Overflow	19	0
Storm Clean-out	56	0
Storm Inlet	930	17

One hundred twenty-one inlet inspections were conducted during 2024. The adjacent table shows the types of inspections conducted.

Inspection Type	Number
Complaint	6
Initial	35
Routine	80



**iii. Storm Manholes:** Storm manholes are also mapped and categorized as part of our Stormwater Program. A percentage of those are inspected yearly. A total of 247 storm manholes have been identified and mapped to date, but additional data still needs to be collected for many of them. Of these, 191 are under municipal jurisdiction, 14 are under county/state/federal jurisdiction and 42 are under private jurisdiction. Like outfalls and inlets, manholes are assigned to a primary category in the Cartegraph database. The breakdown for each category is detailed in the following table.

Category	Total Number	Number Mapped in 2024
Combination Irrigation/Storm	16	0
Dry Well/Clean-out	8	0
Irrigation Clean-out	19	0
Storm Manhole	197	4
Storm Sump Manhole	3	1
Vault Access	1	0
Vault Clean-out	3	0

Eight initial manhole inspections and two routine inspections were conducted during 2024.

**iv. Culverts:** The culverts database currently contains 612 culverts. The City of Cañon City has jurisdiction of 448; 51 are under county/state/federal jurisdiction and 113 are under private jurisdiction. Culverts are divided into two categories based upon the primary type of flow they carry: drainage or irrigation flow. Of the culverts in the database, 444 are classified as drainage and 168 are irrigation. During 2024, one new culvert was added to the database and 107 inspections were conducted.

**v. Pipes:** Data entry into the storm pipe database began in 2016. Pipes are assigned to a category based on the primary type of flow they carry. The categories are Groundwater, Irrigation, Non-Potable, Potable, Stormwater, Stormwater Siphon and Waste. Currently the database contains 2,160 pipes. The City of Cañon City has jurisdiction over 981 of the pipes; 176 are under county/state/federal jurisdiction and 1,003 are under private jurisdiction.

**vi. Maintenance:** Beginning in January 2021, the City acquired a new vac truck and created two new full-time positions for the express purpose of cleaning and maintaining our storm sewer system. The Streets Department also performs maintenance, repair, replacement and installation of stormwater infrastructure throughout the City. Some vegetation management and other tasks are conducted by City contractors. Fremont County Weed Management performs weed control on City properties. Tasks and costs associated with the maintenance of the storm sewer system, whether by City personnel, contractors or Fremont County Weed Management, are tracked in the Cartegraph database. These costs are shown in the table in Appendix A.

During 2024, the Stormwater Maintenance Crew cleaned and maintained the following which resulted in the removal of 90 cubic yards of debris and sediment:

- 427 storm drains and irrigation boxes/clean-outs
- 70 storm manholes
- 4 water quality vaults
- 66 culverts
- 198 storm pipes
- 6 storm outfalls
- Cleaning of storm drain grates only City-wide, primarily after storm events

- Debris removal from other City stormwater assets
- Sediment removal and bank stabilization of 4 City detention basins.

Stormwater infrastructure projects during 2024:

- Installation and replacement of storm water and irrigation infrastructure in conjunction with the 2A Streets Project on Pear Street.
- Continuation of the Abbey-Rhodes Avenue drainage stormwater capital improvements funded through the Certificates of Participation issued in 2019.
- The US 50 Pedestrian Crossing project included some minor stormwater improvements.

**vii. Good Housekeeping:** The Street Sweeping Program through the City Streets Department is also partially funded through the Stormwater Program as it removes sediment and trash from the streets which otherwise would enter our storm sewer system and eventually our waterways. In 2024, the street sweeper removed 389.92 cubic yards of sediment and debris from the City streets. The Streets Department's annual leaf pick-up program also benefits stormwater quality by removing yard waste (and potential nutrients) that has the potential of entering our storm sewer system. The 2024 event collected 233 cubic yards of leaves (2,554 bags), of which 162 cubic yards were recycled.

**3. Nutrient Source Reductions:** The permittee must implement a program to prevent or reduce nitrogen and phosphorus in stormwater runoff associated with municipal facilities and operations. The City of Cañon City must evaluate, identify and document municipal operations and facilities that have the potential to contribute nitrogen and phosphorus to stormwater runoff and ultimately to the Arkansas River and Four Mile Creek. The City must then implement control measures to prevent or reduce this from happening. These requirements had a compliance deadline of July 1, 2020.

The Pollution Prevention Operations and Maintenance Manual addresses operations and procedures to reduce or prevent nitrogen and phosphorus in stormwater runoff from municipal facilities and operations. The Cartegraph database forms provide for the evaluation, identification and documentation of the facilities with the potential to contribute nutrients to runoff, as well as the types of control measures implemented to prevent or reduce pollutants from leaving the facility. The manual was created and implemented on January 1, 2010. The manual was reviewed and revised in 2017 and again in 2020. No new control measures needed to be implemented to address nitrogen and phosphorus in stormwater runoff from municipal facilities or operations.

**4. Outdoor Bulk Storage Structures of More Than 55 Gallons for Petroleum Products and Other Liquid Chemicals:** The permit requires secondary containment or equivalent protection for any municipal bulk storage structures within our permit boundaries (City Limits). Currently, municipal facilities within the permit area do not have any bulk storage structures which meet the permit requirements. If at any time such structures are installed within the permit area, secondary containment or equivalent protection will be provided. This requirement had a compliance deadline of July 1, 2021. Secondary containment was installed around the Magnesium Chloride container at the Public Works facility on October 3, 2018, which is outside of the permit limits.

**5. Training:** The permit requires that applicable municipal staff be trained to implement good housekeeping and pollution prevention during their regular duties. The training must also include information on trash and its effects on water quality. A video training was created in December, 2020, which all applicable employees hired after July, 2019, are required to complete. Seven employees completed the on-line training and passed the exam in 2024. Employees included those from Engineering, stormwater maintenance and police/code enforcement. Each received a copy of the Pollution Prevention Operations and Maintenance Manual upon completion of the training.

## **Other Duties, Trainings and Meetings**

In addition to duties conducted to meet the City of Cañon City's Stormwater Discharge Permit requirements, Stormwater and Engineering personnel also perform additional duties and attend trainings, conferences and association meetings in which the City has a membership. Cost information is not tracked in the OMS database for all of these activities; for those that are, the cost information is included in Appendix A. Information on these items follows:

### **Other Duties:**

1. Stormwater and GIS personnel maintain and update the impervious areas for all parcels within the City limits for the assessment of the Stormwater Utility Fee.
2. Assistance with projects as assigned by the Director of Public Works.
3. Staying informed on other types of State permits and actions which may affect the City's Stormwater Program.

### **Trainings and Conferences:**

1. Rapid Stream Assessment Techniques
2. One Water - Water Education Colorado
3. Effects of Wildfires on Air and Water Quality
4. State Construction Stormwater Permit Renewal Compliance Training
5. Wetlands Regulations 101
6. Introduction to stormwater planning – Mile High Flood District
7. Role of stormwater in land planning - Mile High Flood District
8. Harassment and Discrimination Training - City
9. Springbrook Accounting Training - City
10. HR and IT trainings - City
11. Climate-Smart BMPs; Building resilient stormwater quality measures
12. Colorado Stormwater Center Annual Stormwater Symposium
13. Stormwater Conveyed Litter and How to Manage it
14. Engaging Stormwater Communications; Crowdsourcing

**Memberships/Partnerships:** The City of Cañon City is a member of, or involved in, several councils and associations. The following meetings were attended during 2024:

1. Colorado Stormwater Council (CSC): Cañon City's representative to the CSC attended 8 virtual general membership meetings and 2 Monitoring Workgroup meetings.
2. MS4 Permit Workgroup Quarterly Meetings with CDPHE, hosted by Mile High Flood District: two meetings were attended during the year.
3. Two Water Quality Control Division meetings.
4. One Public Utilities for Fremont County meeting.
5. Two City Council Water Committee meetings
6. The Stormwater Program is also a member of the Southern Colorado Stormwater Education Committee, along with the City of Pueblo, Pueblo County, Pueblo West Metro District and CSU-Pueblo. The committee hosts a seminar each year for construction stormwater education and training of contractors, developers, engineers and municipal employees. During 2024, 5 meetings were attended concerning the 2024 and 2025 regional seminars.



## **APPENDIX A**

### **TRACKED COSTS**



Tracked Time and Costs from Cartegraph OMS Database						
	Labor (Hrs)	Labor (Cost)	Equipment (Cost)	Material (Cost)	Other (Cost)	Total Cost
<b>Public Involvement/Participation</b>						
Requests - non-Illicit Discharge/Construction	131.36	\$6,552.80	\$1,349.57	\$3.90	\$8.62	\$7,914.89
<b>Public Education and Outreach</b>	114.50	\$5,436.85	\$972.30	\$0.00	\$2,034.44	\$8,443.59
<b>Illicit Discharge and Detection</b>						
Non-Enforcement Tasks (including site clean-up by City)	36.62	\$1,750.20	\$1,224.55	\$56.00	\$7,853.12	\$10,883.87
Enforcement Tasks (Costs are often rolled into inspection costs)	13.69	\$677.39	\$62.47	\$0.00	\$53.84	\$793.70
<b>Construction Sites</b>						
Non-Enforcement Tasks	69.36	\$3,314.97	\$1,266.75	\$0.00	\$0.69	\$4,582.41
Enforcement Tasks (Costs are often rolled into inspection costs)	0.25	\$11.88	\$0.00	\$0.00	\$0.00	\$11.88
<b>Post-Construction Permanent Stormwater Control Measures</b>						
Inspections (Municipal and Private)	206.51	\$9,806.22	\$521.18	\$0.00	\$63.69	\$10,391.09
<b>Municipal Pollution Prevention/Good Housekeeping</b>						
Facilities Inspections	5.86	\$278.45	\$162.81	\$0.00	\$0.00	\$441.26
Stormwater Infrastructure and Channel Inspections	50.30	\$2,390.10	\$1,397.58	\$0.00	\$0.00	\$3,787.68
Stormwater Infrastructure Maintenance Crew	1005.40	\$45,115.58	\$49,786.24	\$539.35	\$4,582.78	\$100,023.95
Street Sweeping (Stormwater contribution 55% of cost)						\$166,154.24
<b>Other Permit Compliance Duties, Misc. Projects, Committees</b>	162.75	\$7,726.00	\$90.29	\$0.00	\$27.90	\$7,844.19
<b>Annual Program Review and State Report</b>	33.75	\$1,563.94	\$0.00	\$0.00	\$0.00	\$1,563.94
<b>Public Works Street Dept Stormwater Tasks</b>	1843.00	\$72,558.77	\$32,477.35	\$14,455.60	\$9,739.07	\$129,230.79
<b>City Contractor - Vegetation Management*</b>	79.75	\$3,847.32	\$576.42	\$0.00	\$89,715.50	\$94,139.24
*Labor and Equipment Costs are for City personnel						
<b>Fremont County Weed Control on City Stormwater Properties</b>	4.00	\$190.04	\$27.78	\$0.00	\$3,091.31	\$3,309.13
*Labor and Equipment Costs are for City personnel						
<b>Stormwater Utility Impervious Area Updates</b>	121.00	\$5,748.30	\$1,388.98	\$0.00	\$0.00	\$7,137.28

\$556,653.13 **Total**

<b>Streets Department Annual Leaf Pick-up Program</b>		\$18,463.54	\$11,842.20	\$0.00	\$1,015.00	\$31,320.74
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Costs provided through the Streets Department

<b>Parks Department - Maintaining Pet Waste Stations</b>	104.00	\$3,900.00		\$2,388.00		\$6,288.00
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Costs provided through the Parks Department Budget

This table does not include Capitial Improvement Projects costs or budgetary expenditures not tracked in Cartegraph.