City of Santa Fe, New Mexico

National Pollutant Discharge Elimination System

CITY OF SANTA FE
RIVER & WATERSHED

Draft

sMS4 Annual Report Summary

Fiscal Year 2024-2025

TABLE OF CONTENTS

Executive Summary

The City of Santa Fe's Stormwater Management Strategic Plan (SMSP) outlines the City's compliance program to meet the Environmental Protection Agency's ("EPA") Phase II mandate to improve stormwater quality per the Clean Water Act of 1972. This program serves to develop, implement, and enforce a stormwater management plan that reduces the discharge of pollutants to the maximum extent possible.

To ensure compliance, the EPA mandates that the City's stormwater plan address six minimum control measures (MCMs), and demonstrate measurable improvements in these areas:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping

Best management practices (BMPs) used to achieve the goals listed above are detailed in the summary report below. Current BMPs are based on anticipated funding levels derived from a Stormwater Utility Service Charge. If additional funds should become available through federal or state grants, loans approved by the Governing Body, or in-kind services, minimum control measures could be increased. Any additional efforts made by any department with the goal of improving the quality of stormwater will be documented and reported to the designated Stormwater Manager.

Central to the City's approach is the belief that community education and staff training on stormwater issues are crucial for achieving compliance with the National Pollutant Discharge Elimination System (NPDES) small Municipal Separate Storm Sewer Systems (sMS4) Phase II regulations. Additionally, the city promotes the use of Low Impact Development (LID) and Green Stormwater Infrastructure (GSI) to enhance stormwater infiltration where feasible, in hopes of decreasing the amount of stormwater runoff and therefore pollutants entering waterways.

Conclusion

The City's Stormwater Management Strategic Plan effectively works towards reducing stormwater pollutants in accordance with the EPA's sMS4 requirements. The City's policies are consistent with the best practices available for sediment control, water quality improvements, and training, demonstrating that Santa Fe continues to meet its goals for pollutant reduction. The City remains committed to reducing pollutants to the greatest extent practicable, given current resources.

PERMITTEE INFORMATION

Permit Number: NM (NM0040000)

Permittee:	**City of Santa Fe**
Mailing Address:	**P.O. Box 909**
City, State and Zip Code:	**Santa Fe, NM 87504-0909**
Phone Number:	**(505) 955-2107**

Have any areas been added to the sMS4 due to annexation or other legal means? No

B. REPORTING PERIOD **July 1, 2024,** to **June 30, 2025**

C. PROGRAM AREAS **(AS ATTACHED)**

D. CERTIFICATION

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

_____ _____

Mark Scott Date
City Manager
City of Santa Fe, NM

MS4 Permit - General Update

Program Leadership & Partnerships

The River & Watershed (R&W) Section manages Santa Fe's MS4 permit through a collaborative effort with key city departments such as Land Use, Streets, Parks, Water Resources, and Sustainability. This work is strengthened by active partnerships with local non-profits and businesses, including the Santa Fe Watershed Association, Full Circle, River Source, Friends of the Santa Fe River, Seeds of Wisdom, and Francos Trees and Landscaping. By investing in these local organizations and businesses, the city effectively builds community while accomplishing the permit's objectives.

Program Funding & Resources

The Stormwater Management Program (SWMP) is primarily funded through the City's Stormwater Utility Service Charge, generating approximately $2.9 million in annual revenue. In addition, the City has successfully secured third-party funding, such as state and federal grants and loans, for large-scale infrastructure projects focused on waterway stabilization, erosion control, and long-term resiliency.

Administrative & Strategic Improvements

Recent improvements to the program include the hiring of two additional staff, bringing the stormwater team to full capacity, and the ongoing development of an asset management system to monitor infrastructure condition, maintenance activities, and asset value. With expanded staff capacity, the Stormwater Management Program (SWMP) is undergoing a comprehensive review. Each Minimum Control Measure (MCM) will be supported by a formal implementation plan featuring clear, measurable goals. Additionally, the City is re-evaluating priority waterway segments using updated criteria and a newly developed scoring matrix to more effectively and equitably guide future investments.

Preparing for Future Regulatory Requirements

Although the City currently operates under the 2007 MS4 permit, R&W is proactively incorporating elements from the draft 2015 permit in anticipation of future updates. Preparatory efforts include initiating water quality monitoring and adopting more rigorous Best Management Practices (BMPs) across selected MCMs to ensure compliance with forthcoming regulations.

Highlighted Projects

- Midtown Stormwater Master Plan (Design - 100% Complete)
- Santa Fe River Resiliency and Channel Stabilization Project (Design - 100% Complete)
- Arroyo Chaminos North Forks Sites 1 & 2 (Construction - 90% Complete)
- West Alameda Pilot Project & Property Assessment Rebate Program
- Grants: Cerro Gordo Culvert Replacement (FEMA Hazard Mitigation - awarded), Arroyo Torreon (FEMA Hazard Mitigation Design - application submitted), Que Linda (NMDOT, applied in FY25 awarded in FY26)
- City of Santa Fe Streets Design Guide (100% Complete)
- Love You Watershed Day Event (over 300 participants)
- River and Watershed Section Website Overhaul (Complete)
- 6th Annual River Talks Series

Minimum Control Measure 1 – Public Education and Outreach

The primary goal of MCM 1- Public Education and Outreach, is to build community support for the stormwater management program, improve citywide compliance, and raise environmental awareness about stormwater quality.

Best Management Practices (BMPs) related to Public Education and Outreach include:

- Implement a Public Education and Outreach Program
- Develop a list of target audience groups in the MS4
- Create and distribute educational materials related to stormwater management to target audiences and the public

The Public Education and Outreach efforts focus on implementing a comprehensive program, identifying key audiences, and creating targeted education materials for a variety of stakeholders including restaurant owners, car mechanics, commercial businesses, HOAs, homeowners, renters, and the unhoused. Programming of these materials focuses on common pollutants such as sediment, debris, trash, household hazardous waste, green waste, and pet waste. Additionally, a new pet waste brochure was developed and distributed communitywide.

To achieve permit objectives, staff participated in educational events, programed and hosted the 6th annual River Talks series, presented at conferences, guest lectured, and met with numerous stakeholders and HOAs. Information was also distributed through brochures, public signage, the city website, and digital media channels such as social media, radio, and email. The River & Watershed Section's webpage was completely revamped this year to improve usability and provide more specific information about the stormwater program.

The City leverages partnerships with organizations like the Santa Fe Watershed Association, Friends of the Santa Fe River, Trash Pandas and Full Circle, as well as other City departments, to ensure educational messaging reaches as many people as possible. These collaborations are essential to our efforts to protect the Santa Fe River and its surrounding environment.

<u>Assessment of Appropriateness of Identified Best Management Practices</u>

MCM 1 BMPs are considered appropriate. Target audience, target pollutants, and avenues for education should be re-evaluated each year to make sure they are still applicable. For this reporting period, these target audiences and pollutants were appropriate.

While the previous annual report stated a public survey on stormwater management would be conducted annually, to prevent public fatigue and ensure more meaningful data, the survey will now be conducted every three years.

<u>Proposed Additional BMPs and/or Changes to the Stormwater Management Program</u>

The stormwater management program will adjust its target audiences to include a new focus on property owners along arroyos.

The list of target pollutants remains largely the same, but the program is considering increased educational efforts on household materials containing PFAS (per- and polyfluoroalkyl substances).

<u>Stormwater Activities Planned for Next Reporting Period</u>

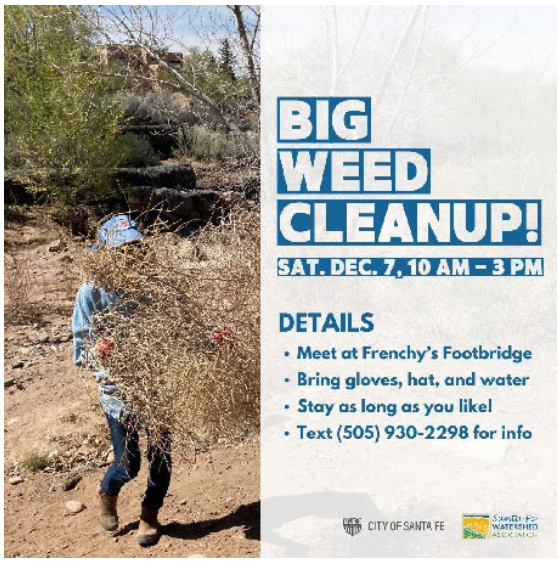
Besides continuing with existing goals, additional activities include:

- Formalize the outreach and education strategy in a written plan that includes target audiences, messaging, educational materials, and methods of dissemination
- Formalize branding and partnership with the MS4 Collaborative for effective communication

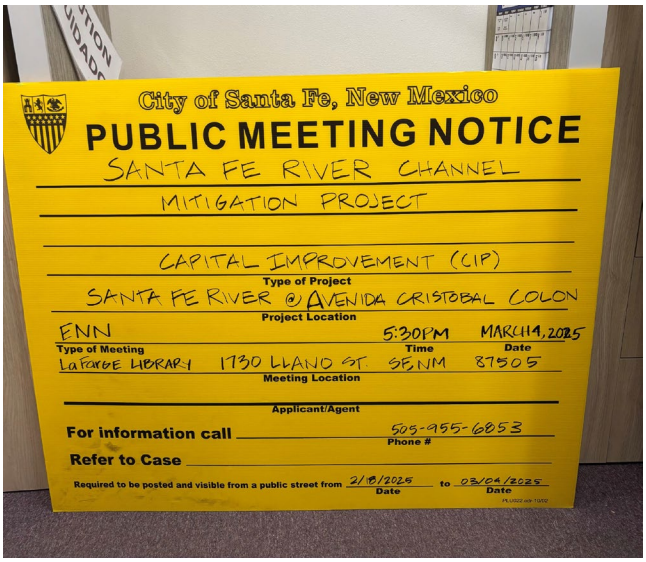
- Develop repository of past River Talk topics for the public to access
- Conduct a survey of the public to understand effectiveness of stormwater education program and reach based on demographics
- Update all brochure design and content

MINIMUM CONTROL MEASURE 1: PUBLIC EDUCATION AND OUTREACH	
GOAL / TASK	**STATUS**
Create, update, and distribute educational brochures.	A new brochure focused on pet waste was created. The City continues to disseminate brochures to the public and target audiences that include information on residential stormwater management, food handling facility BMPs, pesticide precautions, and auto-industry BMPs.
Create and post multimedia education materials and PSAs.	The Stormwater StoryMap and Sustainability Dashboard continue to be available digitally on the City's website. Digital PSAs continue to be developed and released through the City of Santa Fe and River Commission.
Utilize digital platforms to educate local communities about illicit discharges, pet waste, litter, household hazardous waste, and general stormwater quality awareness.	The City's social media platforms were utilized throughout the reporting period to share educational information and promote events. A specific campaign was shared on social media and radio PSA's regarding proper disposal of green waste and household hazardous waste.
Increase outreach targeting restaurants, automotive repair shops, and commercial businesses.	Due to a lack of staffing, this goal was not fully accomplished. Brochures and illicit discharge notices (doorhangers with information) were given to restaurants and auto repair shops, but there was a greater focus this reporting period on residential polluters.
Participate in community events to provide the public with information on the City's stormwater program.	The City participated in three community events this year: Watershed Fest in the fall, Arbor Day in April, and Love Your Watershed Day in May. Watershed Fest was hosted by the Santa Fe Watershed Association and involved a tour of a restoration project, a large community cleanup, an elm thinning workshop, a film screening, a tour of wetlands, and a happy hour event. Arbor Day was hosted by the City at a public park for elementary school students. River & Watershed section had a table with activities for students to learn about stormwater pollution. The third annual Love Your Watershed Day drew over 300 participants to learn about our watershed at a local park. The River & Watershed Section had a table with various educational brochures, stormwater pollution demonstration, and signups for our Rain Watchers program.
Improve outreach activities oriented at the public such as River Talks.	The City and Santa Fe River Commission held the 6th annual River Talk public lecture series, consisting of 6 free public events about the watershed. Two trainings were held for City staff about green stormwater infrastructure (GSI) maintenance, along with several workshops hosted by the Santa Fe Watershed Association for the public about GSI. River & Watershed staff presented at the Land & Water Summit in Albuquerque about the Midtown Redevelopment Stormwater Master Plan.
Deploy piloted stormwater website for city-wide use	Through lessons learned in the pilot project, this website needs more adjustments before deploying city-wide. This will hopefully be accomplished in the next reporting period. The City River & Watershed webpage was completely updated this reporting period and includes more information for the public about stormwater pollution and the City's stormwater program.
Add and replace storm drain inlet markers to educate the public on stormwater runoff's connection with streamflow.	Markers were added or replaced on 25 storm drain inlets this reporting period. This work was mapped with Survey123.
Develop and implement a campaign program regarding illegal dumping in arroyos and drainage ways.	A digital and radio campaign was deployed this year by River & Watershed Section about green waste and hazardous household waste disposal, reminding residents the transfer station has free disposal days each month. The Environmental Services Department (ESD) also continues to run their "Toss No Mass" anti-litter campaign. More effort will be done next reporting period for targeting waterways specifically.

Post and maintain signage to educate the public.	Existing signs were maintained around the City related to illegal dumping and habitat restoration. 7 new signs were posted at two new rain gardens, Santa Fe River trail, and John Griego Park.
Coordinate with public schools to increase education with youth.	Education with public schools was conducted through the City's contract with Santa Fe Watershed Association, who operates the My Water My Watershed program with all City 5th graders.



Social media post to advertise a river cleanup.



Sign posted at project site for public meeting notice.


City River & Watershed Section at Love Your Watershed Day.

New pet waste brochure.

Minimum Control Measure 2 – Public Participation / Involvement

The goal of MCM 2- Public Participation/Involvement is to facilitate the stormwater management program by involving the public in its development and implementation. This approach seeks to build broad community support, leverage local expertise, and strengthen partnerships with both community and government organizations.

Best Management Practices (BMPs) related to Public Participation / Involvement include:

- Develop a Public Implementation and Participation Plan
- Provide public notice and opportunities for public review, input, and feedback
- Solicit public involvement and participation from target audience groups

The City of Santa Fe offers several avenues for public involvement in its stormwater management program, including the Santa Fe River Commission, neighborhood meetings for major projects, community cleanups, and the citizen science-based Rain Watchers and Adopt-a-Watershed programs.

A key component of the City's public involvement strategy is its contract with the Santa Fe Watershed Association (SFWA). Under this agreement, SFWA manages the Adopt-a-Watershed program, which engages volunteers in the regular maintenance of waterways. This reporting period, the program saw 1,815 volunteers contribute 2,458 hours, an in-kind value of approximately $94,274, to collect 28.4 tons of trash from local waterways. In fulfilling the scope of this contract, the SFWA also leads hands-on workshops for the public on topics such as green stormwater infrastructure maintenance and invasive species removal.

Assessment of Appropriateness of Identified Best Management Practices

The existing BMPs are sufficient for this program but will be more formalized in a public involvement plan next reporting period. Additionally, information about trash removed from waterways that was completed by City staff (such as the Park Rangers) is now reported in MCM 6, since it does not include involvement of the public.

Proposed Additional BMPs and/or Changes to the Stormwater Management Program

None.

Stormwater Activities to be Undertaken in Next Reporting Period

Besides continuing with existing goals, additional activities include:

- Formalize the public involvement strategy in a written plan that outlines specific actions for achieving more effective results.
- Continue to build partnerships with local community groups to leverage individual efforts and build capacity.
- Increase use of technological tools to such as meet-up apps, newsletters, and other media to solicit participation in community events and activities.

MINIMUM CONTROL MEASURE 2: PUBLIC PARTICIPATION AND INVOLVEMENT	
GOAL / TASK	**STATUS**
Engage the public on cleaning waterways / Document the number of volunteer and man-hours committed to volunteering for river and arroyo cleanups	The River and Watershed Section enters an annual contract with non-profits such as the Santa Fe Watershed Association, Full Circle, and Friends of the Santa Fe River, to engage volunteers in cleaning up trash and removing invasive species to keep the City's arroyo system and Santa Fe River clean. Keep Santa Fe Beautiful also runs anti-litter campaigns that encourage the public to dispose of waste property and to pick up litter. Engagement statistics: - 1,815 volunteers - 20,458 volunteer hours - $717,366.34 in-kind value - 1,875 SFWA in-kind staff hours - 82.8 tons of trash removed - 135 reaches addressed (~10 miles of waterways)
Continue to work with citizen watch group(s) to look out for and report illicit discharges.	The City's online reporting tool allows for citizens to submit reports of illicit discharge or other concerns. During this reporting period, over 3,000 submissions were made related to illegal dumping, along with thousands others related to stormwater management such as erosion, sedimentation, infrastructure maintenance, and trash.
Sustain partnerships with various youth groups and developers for the progression of the inlet marker program.	The drain inlet marker program was continued this reporting period by River and Watershed staff, instead of with volunteers. This information is reported in MCM 1 under Public Education.
Encourage neighborhood HOA's to form partnerships with the city in cleanup efforts to remove pollutants from arroyos, acequias and drainages.	Two HOA's reached out to River & Watershed Section with concerns about erosion. R&W met with the Purple Aster HOA and Cibola HOA to educate residents and provide suggestions for how to mitigate erosion with simple landscaping techniques. A culvert was installed for the Purple Aster HOA to reduce erosion.
Continue to expand the Rain Watchers program.	Approximately 8 new people signed up for the Rain Watchers citizen science program this year. There are approximately 40 active precipitation reporters across the City, using the CoCoRaHS system.
The city has been invited to participate in the Local Emergency Planning Committee and will have a staff member appointed to the board. The first meeting and appointments are not until September of 2024.	The City's Office of Emergency Management has staff sitting on this board. This group is targeted at chemical spills and large natural disasters – identifying high risk areas and deploying services.

Cleanup on the Santa Fe River in collaboration with the Santa Fe Watershed Association, Trash Pandas, and Santa Fe County. Photo credit: SFWA.

Rain garden maintenance workshop at Santa Fe High. Photo credit: SFWA.

Minimum Control Measure 3 – Illicit Discharge Detection & Elimination

The goal of MCM 3- Illicit Discharge Detection and Elimination (IDDE) is to reduce pollution in waterways through the removal of non-stormwater contributions to the storm sewer system.

Best Management Practices (BMPs) related to Illicit Discharge Detection & Elimination include:

- Develop an IDDE program
- Develop and maintain a map of the MS4s storm sewer system
- Conduct outfall field screening
- Identify and remove sources of illicit discharges
- Enact a stormwater ordinance to enforce stormwater management that prohibits non-stormwater discharges
- Educate the public and municipal employees about detecting and eliminating illicit discharges

The City has an ordinance that prohibits stormwater illicit discharge (2005-3), which prohibits anything in waterways or the storm system that is not entirely comprised of stormwater runoff. The primary illicit discharge pollutants found this reporting period were grease, oil, and green waste. All illicit discharges were dealt with through verbal warnings and education. Due to the nature of illicit discharges being outside the City's jurisdiction or exceeding its enforcement capabilities, the State Environment Department (NMED) was contacted approximately five times during this reporting period.

Dry weather screening was not conducted this reporting period due to staffing shortages. Informal inspections were carried out when staff were in the field by checking outfalls and reporting any discharges (none were found) or maintenance concerns (several were found and addressed). Recognizing this lack of coverage, a standard operating procedure for dry weather screening has been formalized and will be deployed next reporting period.

A new staff member was hired in River & Watershed Section who has begun to organize, clean, and improve the stormwater GIS data across the City. This will be a multi-year project but it is now a priority, as part of our asset management software process as well. This will help track outfall screening, as well as other stormwater infrastructure inspections and repairs.

<u>Assessment of Appropriateness of Identified Best Management Practices</u>
The BMPs for Illicit Discharge Detection and Elimination identified in the City's SWMP are still considered appropriate.

<u>Proposed Additional BMPs and/or Changes to the Stormwater Management Program</u>
None.

<u>Stormwater Activities to be Undertaken in Next Reporting Period</u>
Besides continuing with existing goals, additional activities include:

- Formalize the IDDE program in a plan including SOPs for dry weather screening and sampling.
- Integrate the IDDE forms (inspection and dry weather screening) into asset management software for routine use

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION & ELIMINATION	
GOAL / TASK	**STATUS**
Expand current stormwater system map (catch basins, pipes, culverts, etc.)	A new asset management software was acquired by the Public Works Department during this reporting period but is still being launched. This program requires a complete mapping of all city assets, in order to track tasks and costs associated with them. Data cleaning of existing stormwater assets has begun this reporting period and will continue into next reporting period, along with mapping of assets that are not currently mapped. New staff was hired in River and to manage this task.
Outfall inspection program ongoing / document maintenance issues and investigate dry weather flows	Due to staff turnover, a formal dry weather screening/outfall inspection process was not conducted this reporting period. Outfalls were visually surveyed when staff were in the field for other projects; no illicit flows were found and any needed maintenance repairs were noted and addressed.
Continue commercial business inspection program and document findings; follow up on discoveries and record actions taken.	A total of 53 commercial business inspections took place. All inspections and corrective actions have been documented by Land Use Department.
Any discovered illicit discharge sources will be documented and addressed.	Approximately 30 illicit discharges were found this reporting period, primarily called in to R&W from other City departments. All were dealt with through education and verbal warnings.
Continue Illicit Discharge education and training, including potential redesign of training material.	Most education about illicit discharge happens through conversations or written materials such as brochures. The R&W Section also ran a social media and radio advertisement series on green waste and household hazardous waste this reporting period to remind citizens there is free disposal once a month. Education will relate to illegal dumping and connections in the next reporting period.

Illicit discharge mitigation from grease hood washing at a downtown restaurant.

Cooking grease illicit discharge mitigation in downtown.

Minimum Control Measure 4 – Construction Site Runoff Control

The goal of MCM 4 is to protect waterways from stormwater-related pollution resulting from construction activities.

Best management practices include:

- Enacting and enforcing an ordinance to require erosion and sediment control BMPs on construction sites
- Having BMP informational resources readily available for contractors and SWPPP operators

The most common construction site SWPPP violations this reporting period included concrete washouts and tracking sediment off-site. These violations were handled with verbal warnings only during this reporting period. River & Watershed Section does not have the authority to issue NOVs on private property; the Land Use Department is responsible for this. Land Use inspects all types of construction sites in the City, while R&W only inspects those over 1 acre with a SWPPP. R&W aims to visit the larger sites at least twice per month, and always after a rain event of over 0.25". Land Use also conducts SWPPP inspections separately but routinely.

Assessment of Appropriateness of Identified Best Management Practices

The BMPs for Construction Site Runoff Control identified in the City's SWMP are still considered appropriate.

Proposed Additional BMPs and/or Changes to the Stormwater Management Program

To meet increased demand, hire more staff and cross train Land Use inspectors and Park Rangers for stormwater inspections and how to identify MS4 violations.

Stormwater Activities to be Undertaken in Next Reporting Period

Besides continuing with existing goals, additional activities include:

- Formalize the construction site runoff control and inspections in a plan.
- Coordinate more with Land Use to create a system for stormwater inspections and dealing with noncompliance, including a specific training targeted to Land Use inspection staff
- Continue to offer Stormwater Inspector Certification (CGP) trainings to municipal, NMDOT and County staff
- Update in-house trainings for anticipated Land Use Code and Permit changes and provide routine trainings to inspectors

MINIMUM CONTROL MEASURE 4: CONSTRUCTION SITE RUNOFF CONTROL	
GOAL / TASK	**STATUS**
Record and track the number of stop-work orders given	No stop-work orders were issued this reporting period.
Document the number of enforcement actions/ inadequate site plans reported by inspectors	Land Use performed regular inspections on 358 active construction sites during this reporting period. No NOVs, administrative fines, or stop work orders were issued. All concerns were handled through communication.
Document the number of BMP informational brochures given to contractors	Approximately 10 educational/BMP brochures were issued this reporting period to contractors.
Develop and implement BMP training for contractors	Training for contractors has not begun, although we have educational materials about construction site BMPs that is distributed.
Cross-train City's Land Use Department staff to improve stormwater plan requirements	Not formal training but lots of work with Land Use – email communication, meetings, documentation; bring in with issue – do their own inspections

Increase participation of R&W staff at pre-construction meetings to discuss stormwater BMPs	The River & Watershed's Stormwater Inspector and Program Manager have been regularly attended pre-construction meetings to ensure stormwater BMPs are a priority throughout construction. More than 25 sites
Hire additional staff specifically trained in stormwater inspection practices	Two more staff were hired in the River & Watershed section. All 4 staff members of the R&W team are certified in construction site stormwater inspections. 15 additional people were certified at our annual CGP training, including City staff, on-call contractors, County staff, and nearby municipal staff.

Construction General Permit (CGP) training hosted by the City

Construction of erosion control structures in an arroyo.

Minimum Control Measure 5 – Post-Construction Runoff Control

The goal of MCM 5- Post Construction Runoff Control is to prevent erosion, infrastructure failures, and elevated non-point source pollution that arise from new development and the corresponding increase in impermeable surfaces.

Best Management Practices (BMPs) related to Post Construction Runoff Control include:

- Enact and enforce an ordinance to address post-construction stormwater runoff from new and re-development projects
- Develop and implement measures to encourage the use of Low Impact Development (LID) in new and re-development.
- Ensure adequate operation and maintenance (O&M) of all post-construction stormwater management BMPs installed at all development or redevelopment projects. An inventory of all BMPs shall be developed.

The City of Santa Fe strongly supports GSI and LID and is working to integrate these practices into large-scale projects. The Midtown Redevelopment Project, for example, is guided by a master plan that requires 100% of the 100-year, 24-hour storm to be captured on-site using permeable pavers, suspended pavement, and tree wells.

During this reporting period, the City was also awarded several FEMA grants to implement GSI and LID at public parks, with design and construction scheduled for the coming years.

To educate both the public and staff, the City has collaborated with partners like the Santa Fe Watershed Association and Southwest Urban Hydrology to host workshops on building and maintaining rain gardens. These efforts are part of a broader commitment to on-site stormwater capture and reuse.

The new City of Santa Fe Street Design Guide, developed this reporting period, includes a dedicated chapter on street drainage that incorporates GSI practices. Its anticipated adoption by the City Council is a significant step toward requiring GSI for all street development and redevelopment projects. The Land Use Department already requires on-site stormwater capture for any project that adds more than 250 square feet of impervious area, with larger developments required to manage up to the 100-year, 24-hr storm.

Existing rain gardens are primarily maintained by private non-profit entities unless they are located in City parks or rights-of-way. These organizations utilize volunteers and youth groups for maintenance, which also serves to educate more community members. They also install educational signs at the rain gardens to inform the public about their purpose.

The City also partners with groups like River Source and Full Circle to install smaller-scale Green Stormwater Infrastructure (GSI), such as erosion control structures along the river. These structures are crucial for preventing erosion, which can lead to gulleys and larger washouts. The locations of these structures will be mapped by staff in the next reporting period.

<u>Assessment of Appropriateness of Identified Best Management Practices</u>

Porous pavement studies are no longer relevant, since it is not ubiquitously installed in the City. Moving forward, the program's focus will be on formalizing a plan for mapping and maintenance. While non-profits currently perform much of the maintenance on private rain gardens, the City plans to map both public and private GSI assets. This will help staff better understand the scale of GSI implementation and create a new program to monitor the effectiveness of long-term infiltration.

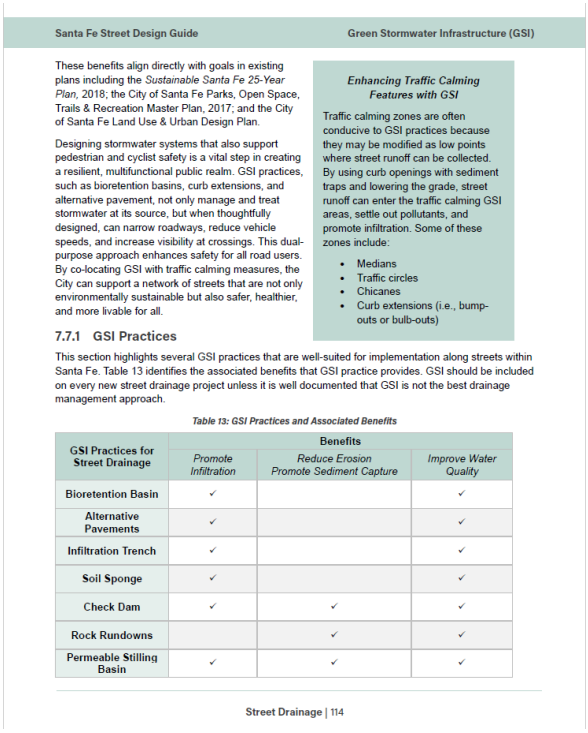
Proposed Additional BMPs and/or Changes to the Stormwater Management Program
None.

Stormwater Activities to be Undertaken in Next Reporting Period
Besides continuing with existing goals, additional activities include:

- Formalize long term BMP mapping and maintenance in a plan
- Map long-term BMPs and create inspection plan
- Start a program to monitor long-term infiltration effectiveness

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION RUNOFF CONTROL	
GOAL / TASK	**STATUS**
Continue to track post construction control measures	Due to staffing capacity, post-construction control measures were not formally tracked this reporting period, but were addressed as requests came in regarding detention pond maintenance.
Promote/install Low-Impact Development and Green Infrastructure Practices throughout the City	While the City did not install new rain gardens this reporting period, a lot of progress was made in requiring GSI in City policy. The Midtown Stormwater Master Plan and Streets Design Guide both require GSI to capture stormwater runoff up to the 100-yr 24-hr storm. The City was also awarded several FEMA grants to install large-scale GSI in parks.
Continue monitoring the effectiveness of infiltration gardens	The City does not have a program or staff to monitor the effectiveness of infiltration and GSI, but this work is sometimes monitored by non-profits that install and maintenance rain gardens. A more concentrated effort to start this program will be a focus for next reporting period.

Training of City parks staff on rain garden maintenance.



Santa Fe Street Design Guide — Green Stormwater Infrastructure (GSI)

These benefits align directly with goals in existing plans including the *Sustainable Santa Fe 25-Year Plan*, 2018; the City of Santa Fe Parks, Open Space, Trails & Recreation Master Plan, 2017; and the City of Santa Fe Land Use & Urban Design Plan.

Designing stormwater systems that also support pedestrian and cyclist safety is a vital step in creating a resilient, multifunctional public realm. GSI practices, such as bioretention basins, curb extensions, and alternative pavement, not only manage and treat stormwater at its source, but when thoughtfully designed, can narrow roadways, reduce vehicle speeds, and increase visibility at crossings. This dual-purpose approach enhances safety for all road users. By co-locating GSI with traffic calming measures, the City can support a network of streets that are not only environmentally sustainable but also safer, healthier, and more livable for all.

Enhancing Traffic Calming Features with GSI

Traffic calming zones are often conducive to GSI practices because they may be modified as low points where street runoff can be collected. By using curb openings with sediment traps and lowering the grade, street runoff can enter the traffic calming GSI areas, settle out pollutants, and promote infiltration. Some of these zones include:

- Medians
- Traffic circles
- Chicanes
- Curb extensions (i.e., bump-outs or bulb-outs)

7.7.1 GSI Practices

This section highlights several GSI practices that are well-suited for implementation along streets within Santa Fe. Table 13 identifies the associated benefits that GSI practice provides. GSI should be included on every new street drainage project unless it is well documented that GSI is not the best drainage management approach.

Table 13: GSI Practices and Associated Benefits

GSI Practices for Street Drainage	Benefits		
	Promote Infiltration	*Reduce Erosion Promote Sediment Capture*	*Improve Water Quality*
Bioretention Basin	✓		✓
Alternative Pavements	✓		✓
Infiltration Trench	✓		✓
Soil Sponge	✓		✓
Check Dam	✓	✓	✓
Rock Rundowns		✓	✓
Permeable Stilling Basin	✓	✓	✓

Street Drainage | 114

GSI practices encouraged in the new City Street Design Guide.

Minimum Control Measure 6: Pollution Prevention & Good Housekeeping

The goal of Minimum Control Measure 6, Pollution Prevention and Good Housekeeping, is to reduce the amount and types of pollution originating from municipally owned and maintained facilities that could ultimately discharge into local waterways.

Best Management Practices (BMPs) associated with Pollution Prevention and Good Housekeeping include:

- Identify and document all municipally owned facilities and activities that have the potential for generating stormwater runoff
- Develop and implement a written operation and maintenance plan for all municipal operations and facilities that could contribute to the discharge of pollutants
- Develop and implement an employee training program that addresses topics to prevent discharge of pollutants from municipal operations

Since they transport runoff during storms to the Santa Fe River, arroyos and other waterways are considered a part of the City's stormwater conveyance system. The River & Watershed Section maintains these waterways through debris removal, vegetation management, and small and large infrastructure projects that mitigate erosion and provide flood protection. Vegetation and erosion are also critically important to surface water quality. River & Watershed spent over $360,000 on vegetation management in waterways this reporting period, cleaning 17 stretches (22 acres) of debris and excess invasive species.

Training is vital to maintaining our stormwater system's function and water quality. The River and Watershed Section is responsible for developing and providing these trainings to relevant city staff. This reporting period, we focused on updating our presentations and plan to begin a new training series next period. Our goal is to provide at least one training per year for all staff actively involved in our MS4 program.

Photo point monitoring at sites along major waterways was also restarted after several years of no photos. This will help us measure changes in the condition of waterways over time.

The Complete Streets Department (Streets & Drainage) handles the majority of the maintenance of the City's stormwater infrastructure. River & Watershed Section handles debris removal and vegetation management in the waterways only. Streets & Drainage cleaned 23 outfalls, 2452 inlets, and 15 bridge culverts this reporting period for a total of 1750 tons of trash/debris removed. The sweeper removed an additional 1722 tons of trash and sediment from roadways.

Park Rangers remove and clean unhoused encampments, which are a major source of stormwater pollution in the City. This reporting period, 849 camps were cleaned with a total of 305 tons of trash removed. Pursuing more housing solutions in Santa Fe is very important to mitigating pollution from this target audience.

Fleet, Parks, and Environmental Services Departments all perform preventative maintenance and work on equipment. 869 preventative work orders were completed on City vehicles, primarily oil changes. 161 dead batteries were recycled properly.

While there are no formal SWPPPs for municipal facilities and activities that could cause stormwater pollution, several facilities have hazardous storage and handling practices to comply with other regulations such as OSHA. Formal SWPPPs and regular inspections are a priority for next reporting period. Due to lack of stormwater staffing this reporting period, formal trainings did not occur with

municipal staff but we began updating the presentations to have accurate and informative trainings for next reporting period.

Siler Yard is the largest potential stormwater polluter of the municipal facilities, due to Streets, Parks, and Environmental Services Departments being housed there. Proper maintenance and collaboration between departments is a priority for next reporting period.

Assessment of Appropriateness of Identified Best Management Practices
BMPs related to MCM 6 are still considered appropriate. Last annual report mentioned an additional BMP of "regular meetings with Streets & Drainage Section for development of routine maintenance schedule and collaboration." This is still relevant and will continue in next reporting period.

Proposed Additional BMPs and/or Changes to the Stormwater Management Program
None.

Stormwater Activities to be Undertaken in Next Reporting Period
Besides continuing with existing goals, additional activities include:

- Formalize the municipal stormwater training information and SWPPP inspections in a plan
- Create SWPPPs for each municipal facility and activity that can cause stormwater pollution
- Perform inspections on municipal facilities
- Post signage in municipal facilities about stormwater pollution
- Use new presentations to conduct annual training for each relevant City department
- Implement solutions for improving municipal facilities that are found to have stormwater pollution

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
GOAL / TASK	**STATUS**
Continue implementing the Parks IPM program.	IPM continued a pesticides program to limit use of hazardous chemicals; the City of Santa Fe does not use herbicides or pesticides containing hazardous chemicals.
Clean and maintain municipal stormwater system outfalls and the amount of trash/unsheltered encampment removed.	23 outfalls, 15 bridge culverts, and 2,452 inlets were cleaned this reporting period, totally 1752 tons of trash/debris removed.
Remove and clean unhoused encampments to prevent floatables and other pollutants in waterways.	849 encampments were cleaned this reporting period, for a total of 223 tons of trash removed.
Remove excess sediment and trash from roadways with street sweeping.	Approximately 1722 tons of sediment and trash were removed from roadways this reporting period.
Conduct preventative maintenance on City-owned vehicles.	During this reporting period Fleet Management performed 869 preventative work orders. This includes 869 oil changes, 231 tire repairs, and 442 other repairs.
Improve BMPs at the Siler Yard Facility to meet the latest stormwater regulations.	Work continues to ensure good housekeeping practices are in order until the suggested grading and drainage plan from the 2021 Weston Engineered Study can be implemented. Stormwater pollution from slicer, scoria, and salt were identified and solutions are in design. New detention ponds have been dug to capture more sheet flow on site during storms.

Maintenance of city culvert and waterway.

Sheetflow across Siler Yard during heavy rainstorm shows the importance of proper storage at City facilities.