



**ARIZONA DEPARTMENT  
OF  
ENVIRONMENTAL QUALITY**



**AZPDES SMALL MS4 ANNUAL REPORT**

**LTF ID #: 92119**

**Report #: 155356**

**Phoenix Office**

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## AZPDES SMALL MS4 ANNUAL REPORT - SUMMARY

### **Company:**

**Name:** CITY OF COTTONWOOD - STORMWATER

### **Question: Which permit/registration/certificate is this report for?**

Answer: 07/01/2024 - 06/30/2025

### **Question: Did you assess and evaluate the Stormwater Management Program (SWMP) as part of preparing the Annual Report, per permit Section 4.0?**

Answer: Yes

### **Question: Did you have another entity implement control measures on behalf of the MS4 per permit Section 6.0(2)? If Yes, identify the entity and give a brief explanation of their involvement.**

Answer: No

### **Question: Did you provide outreach and education to the public on the stormwater program issues and requirements, per permit Section 6.1(1)?**

Answer: Yes

#### **Identify the target group for outreach and education:**

General Public

#### **Identify the topic(s) for the target group:**

Post-construction ordinances and long-term maintenance requirements for permanent stormwater controls

Illicit discharges and illegal dumping, proper management of non-stormwater discharges, and to provide information on reporting spills, dumping, and illicit discharges

Community activities (monitoring programs, environmental protection organization activities, etc.)

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**Describe how the message was conveyed to the target group:**

The City provides information on their municipal website to disseminate information about the stormwater pollution prevention program to the public. The website provides access to previous stormwater articles published in the SHOP Cottonwood newsletter as well as other relevant information such as: (1) stormwater informational fact sheets and brochures for businesses and the general public; (2) the most recent SWMP and NOI; (3) stormwater management training materials; (4) past and current versions of Annual Reports & DMRs (5) links to applicable ADEQ and EPA websites as well as sources to regional non-profit organizations; and (6) links to relevant stormwater topics (e.g. rain gardens).

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

Public feedback (via emails, phone calls, and in-person visits) serves as the best measurement on the effectiveness of the materials displayed on the municipal website.

**Identify the target group for outreach and education:**

General Public

**Identify the topic(s) for the target group:**

Stormwater runoff issues and residential stormwater management practices

Illicit discharges and illegal dumping, proper management of non-stormwater discharges, and to provide information on reporting spills, dumping, and illicit discharges

Spill prevention, proper handling and disposal of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system

Proper management and disposal of used oil

**Describe how the message was conveyed to the target group:**

On an occasional basis, public awareness campaign flyers are distributed and shared with the general public in both physical form and through social media. The flyers aim to help educate the community of stormwater and help protect the Verde River. These lessons include proper disposal methods, how to reduce the number of pollutants picked up by stormwater run-off, how stormwater run-off is one of the leading causes of water pollution in the U.S., and the combination of stormwater discharge and run-off associated with construction sites can be a major contributor of pollutants to an urban storm sewer system, a wash, or other waterways.

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

When it comes to social media, the number of reactions people give to the flyers (via reaction icons, comments, and the number of people who share these posts) are indicators of how well the message is received. As for the physical stormwater flyers, the

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effectiveness is measured based on feedback from the City staff and the public on the flyers, as well as the comments portal on the stormwater website.

**Identify the target group for outreach and education:**

General Public

**Identify the topic(s) for the target group:**

Stormwater runoff issues and residential stormwater management practices

Potential water quality impacts of application of pesticides, herbicides and fertilizer and control measures to minimize runoff of pollutants in stormwater

Potential impacts of animal waste on water quality and the need to clean up and properly dispose of pet waste to minimize runoff of pollutants in stormwater

Illicit discharges and illegal dumping, proper management of non-stormwater discharges, and to provide information on reporting spills, dumping, and illicit discharges

Spill prevention, proper handling and disposal of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system

Proper management and disposal of used oil

**Describe how the message was conveyed to the target group:**

Storm Drain brochures and Stormwater Pollution Hotline cards are distributed and shared with the general public in physical form. Both community resources are displayed at many city offices as well as being handed out occasionally. The Storm Drain brochure educates the community on stormwater, including the ways to keep it clean and protect our surface waters (esp. Verde River). As for the Stormwater Pollution Hotline cards, they aim to increase public awareness of stormwater pollution and give an alternate way to give out hotline contacts as a means of reporting potential violations (illicit discharges/illicit connections).

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

The brochure's effectiveness is measured based on feedback from City staff and the public on the information document itself as well as the comments portal on the City's stormwater website. As for the Stormwater Pollution Hotline card, its effectiveness is indicated by an increase in calls and emails to the Stormwater Hotline.

**Question: Did you provide outreach and education to the public on the stormwater**

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## **program issues and requirements, per permit Section 6.1(2)?**

Answer: Yes

### **Identify the target group for outreach and education:**

Construction Site Operators

### **Identify the topic(s) for the target group:**

Municipal stormwater requirements and stormwater management practices for construction sites

Illicit discharges and proper management of non-stormwater discharges

Spill prevention, proper handling of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system

Proper management and disposal of used oil and other hazardous or toxic materials, including practices to minimize exposure of materials/wastes to rainfall and minimize contamination of stormwater runoff

Stormwater management practices, pollution prevention plans, and facility maintenance procedures

### **Describe how the message was conveyed to the target group:**

When visiting new construction sites within the City's MS4, our construction activities brochures are handed out to site representatives. The brochures are even displayed at relevant City offices for the general public to see. The content in the brochures describes various Stormwater Control Measures utilized to minimize sediment and other pollutants from running off their construction sites. In addition to defining and maintaining these control measures, the brochures also contains instructions on obtaining coverage under a CGP if the site disturbs an acre or more of soil or is part of a common plan of development.

### **Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

Good practices in erosion controls, sediment controls, and pollution prevention on construction sites are indicators on how well the message is received. In addition, the presence of a SWPPP is another factor in measuring the effectiveness of the Construction Activities brochures.

### **Identify the target group for outreach and education:**

Construction Site Operators

### **Identify the topic(s) for the target group:**

Municipal stormwater requirements and stormwater management practices for construction sites

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Illicit discharges and proper management of non-stormwater discharges

Spill prevention, proper handling of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system

Proper management and disposal of used oil and other hazardous or toxic materials, including practices to minimize exposure of materials/wastes to rainfall and minimize contamination of stormwater runoff

Stormwater management practices, pollution prevention plans, and facility maintenance procedures

**Describe how the message was conveyed to the target group:**

During SWPPP inspections on active construction sites, recommendations are pointed out to site representatives as a means of improving their stormwater control measures (formerly known as BMPs).

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

Good erosion and pollution controls on construction sites are indicators of how well the message was received.

**Identify the target group for outreach and education:**

Construction Site Operators

**Identify the topic(s) for the target group:**

Planning ordinances and grading and drainage design standards for stormwater management in new developments and significant redevelopments

Illicit discharges and proper management of non-stormwater discharges

Proper management and disposal of used oil and other hazardous or toxic materials, including practices to minimize exposure of materials/wastes to rainfall and minimize contamination of stormwater runoff

Stormwater management practices, pollution prevention plans, and facility maintenance procedures

**Describe how the message was conveyed to the target group:**

This message is included with all grading and right-of-way encroachment permits.

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

Good housekeeping on construction sites is an indicator of how well the message was received.

**Identify the target group for outreach and education:**

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Targeted Sources or Types of Businesses (industrial or commercial)

**Identify the topic(s) for the target group:**

Illicit discharges and proper management of non-stormwater discharges

**Describe how the message was conveyed to the target group:**

The City engages with a wide variety of industrial/commercial businesses during illicit discharge investigations. The enforcement process of the IDDE investigations is an opportunity for the City to connect with businesses, educate them on the key pollutants that they can generate, and provide them with options on how they can achieve voluntary compliance.

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

Good pollution control measures and housekeeping practices are indicators of how well the message was received.

**Question: Did you post the SWMP and the current Annual Report on your website, per permit Section 6.2(1)?**

Answer: Yes

**Upload the SWMP.**

**File Name:** 2022 City of Cottonwood SWMP (July 2025 Update).pdf

**Question: Did you provide and publicize a reporting system to facilitate and track public reporting of spills, discharges and/or dumping to the MS4 on a continuous basis, per permit Section 6.2(4)?**

Answer: Yes

**Question: Provide a narrative description of the status of the storm sewer mapping, per permit Section 6.3(1).**

Answer: Mapping was included in a City-wide Master Drainage Plan in 2020, and is also mapped in GIS.

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Illicit Discharge Detection & Elimination (IDDE)**

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## **Program, per permit Section 6.3(2)?**

Answer: Yes

## **What is the citation of the ordinance or other regulatory mechanism to prohibit non-stormwater discharges into the MS4?**

Chapter 13.24.130 as well as Chapters 15.40.010-15.44.090 of the Cottonwood City Ordinance calls for the preservation and protection of watercourses, including the City's numerous washes and storm drain systems. Chapter 15.44.100 of the City's Code of Ordinances outlines offensive water disposal violations or penalties. Offenders found in violation of littering or polluting the washes or stormwater collection system are penalized under Chapter 15.44.100. Chapters 13.24.070-13.24.080 detail prohibited discharges and permitted non-stormwater discharges respectively. Chapter 13.24.150 covers the enforcement of the SWMP.

## **Question: Did you establish or update the Statement of IDDE Program Responsibilities, per permit Section 6.3(3)?**

Answer: Yes

## **Provide IDDE activities in a tabular format, per permit Section 6.3(4).**

**File Name:** MS4\_IDDE\_Report\_Cottonwood - 2024-25.xlsx

## **Question: Did you visually monitor at least 20% of all outfalls during the permit year, per permit Section 6.3(7)?**

Answer: Yes

## **Question: Did you identify indicators of IDDE Program progress or success, per permit Section 6.3(8)?**

Answer: Yes

## **Question: Did you provide annual staff training, per permit Section 6.3(9)?**

Answer: Yes

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**How many staff attended?:** 49

**What was the topic?:** Illicit Discharge Detection and Elimination (IDDE)

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Construction Activity Stormwater Runoff Control Program, per permit Section 6.4(2)(a)?**

Answer: Yes

**What is the citation of the ordinance or other regulatory mechanism to prohibit non-stormwater discharges into the MS4?**

Chapter 13.24.130 as well as Chapters 15.40.010-15.44.090 of the Cottonwood City Ordinance calls for the preservation and protection of watercourses, including the City's numerous washes and storm drain systems. Chapter 15.44.100 of the City's Code of Ordinances outlines offensive water disposal violations or penalties. Offenders found in violation of littering or polluting the washes or stormwater collection system are penalized under Chapter 15.44.100. In its entirety, Chapter 13.24 of the City Code of Ordinances is a requirement for construction sites operating within the City's MS4 to comply with regarding sediment and erosion control ordinances. Per Chapter 13.24.100, any person subject to an industrial or construction activity AZPDES/NPDES stormwater discharge permit must comply with the provisions said permit has to offer. Chapter 13.24.150 covers the enforcement of the SWMP.

**Question: Did you implement a construction site inventory, per permit Section 6.4(2)(b)?**

Answer: Yes

**Question: Did you develop written procedures for site plan review, per permit Section 6.4(2)(c)?**

Answer: Yes

**Question: Did you implement written procedures for site inspections and enforcement control measures, per permit Section 6.4(2)(f)?**

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Answer: Yes

**How many construction site inspections were done?: 23**

**How many follow-up actions were necessary (re-inspection, enforcement actions?): 2**

**Question: Did you develop and implement an educational program focused on erosion and sediment control for construction operators, per permit Section 6.4(2)(h)?**

Answer: Yes

**Question: Did you develop and implement a program requiring construction operators to control wastes from their sites, per permit Section 6.4(2)(i)?**

Answer: Yes

**Question: Did you implement procedures to receive and act on information submitted by the public (complaints), per permit Section 6.4(4)?**

Answer: Yes

**Question: Did you implement a program that includes a combination of structural and non-structural BMPs, per permit Section 6.5(1)?**

Answer: Yes

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Post-Construction Stormwater Management, per permit Section 6.5(2)?**

Answer: Yes

**What is the citation for the ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects?**

Chapter 12.24.130 as well as Chapters 15.40.010-15.44.090 of the Cottonwood City Ordinance calls for the preservation and protection of watercourses, including the City's numerous washes and storm drain systems. Chapter 15.44.100 of the City's Code of Ordinances outlines offensive water disposal violations or penalties. Offenders found in violation of littering or polluting the washes or stormwater collection system are penalized under Chapter 15.44.100. Lastly, Chapter 13.24.150 covers the enforcement of the City's SWMP.

**Question: Did you implement a program to prevent or minimize impacts to water quality from stormwater runoff of new development and redevelopment sites, per permit Section 6.5(2)?**

Answer: Yes

**Question: Did you implement procedures for site plan review, per permit Section 6.5(3)?**

Answer: Yes

**Question: Did you implement an inventory of post construction site structural stormwater control measures installed within the MS4, per permit Section 6.5(4)?**

Answer: Yes

**Question: Did you implement a program to ensure the long-term operation and maintenance of post construction BMPs, per permit Section 6.5(5)?**

Answer: Yes

**Question: Did you implement a program to reduce or eliminate discharges of pollutants from municipal streets, facilities, yards, etc., per permit Section 6.6(1)?**

Answer: Yes

**Question: Did you implement a program to ensure the long-term operation and**

## **maintenance of stormwater BMPs, per permit Section 6.6(2)?**

Answer: Yes

## **Question: Did you develop an inventory of facilities, prioritized based on their risk of discharging non-stormwater, per permit Section 6.6(2)(a)?**

Answer: Yes

## **Question: Did you implement an inspection schedule for prioritized facilities, per permit Section 6.6(2)(c)?**

Answer: Yes

## **Question: Did you implement an annual training program for staff that incorporates pollution prevention and good housekeeping techniques, per permit Section 6.6(2)(f)?**

Answer: Yes

**How many staff attended?:** 201

**What was the topic?:** Stormwater Awareness - General Training

**How many staff attended?:** 49

**What was the topic?:** Stormwater Management - Construction Activities

**How many staff attended?:** 49

**What was the topic?:** Illicit Discharge Detection and Elimination (IDDE)

**How many staff attended?:** 47

**What was the topic?:** Stormwater Management - Post-Construction Activities

## **Question: Did you develop maintenance activities, schedules and long-term inspections to reduce floatables, trash and other pollutants from the MS4, per permit Section 6.6(2)(g)?**

Answer: Yes

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**Question: Does the MS4 discharge to a not-attaining water, impaired water, or an Outstanding Arizona Water (OAW)?**

Answer: Yes

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## CERTIFICATION OF SUBMISSION

**JAMES R BRAMBLE**

You validated your identity by answering your personal security question and password on myDEQ at **07:27 AM** on **09/09/2025**. At this time, you certified the summary information above by checking that you agreed to the following statement:

**Pursuant to A.R.S. § 41-1030:**

An agency shall not base a licensing decision in whole or in part on a licensing requirement or condition that is not specifically authorized by statute, rule or state tribal gaming compact. A general grant of authority in statute does not constitute a basis for imposing a licensing requirement or condition unless a rule is made pursuant to that general grant of authority that specifically authorizes the requirement or condition. This section may be enforced in a private civil action and relief may be awarded against the state. The court may award reasonable attorney fees, damages and all fees associated with the license application to a party that prevails in an action against the state for a violation of this section. A state employee may not intentionally or knowingly violate this section. A violation of this section is cause for disciplinary action or dismissal pursuant to the agency's adopted personnel policy. This section does not abrogate the immunity provided by section 12-820.01 or 12-820.02.

**Certify your submission:**

By checking this box I certify under penalty of law that this submittal was prepared by me, or under my direction or supervision of personnel appropriately qualified to properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I understand that all information submitted to ADEQ is public record unless otherwise identified by law as confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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