

Agenda for Municipal Stormwater Management Programs

Urban stormwater runoff is generated from rainfall and snowmelt as it flows over land and impervious surfaces directly into our local waterways and Lake Erie. As it moves, runoff picks up trash, chemicals, sediment, oils, nutrients, and other pollutants. Increasing impervious area increases pollution and it also increases the volume and velocity of stormwater entering waterways, leading to stream bank erosion, sediment transport, and deposition. Stormwater runoff directly impacts aquatic communities and the beneficial uses of rivers, streams, and Lake Erie.

Historically, water pollution control focused on obvious point sources: municipal wastewater treatment plants and industrial discharges that flow from a pipe directly to a water body. Most point source pollutants were addressed through the early focus of the 1972 Clean Water Act, resulting in immediate improvements to water quality. Since that time, additional regulations have been put in place to address the significant water quality issues caused by runoff from the built environment.

As point source discharges were improved under the National Pollutant Discharge Elimination System (NPDES) permitting program, the impact of non-point source pollutants from urban runoff became apparent. By 1987, the NPDES program was extended to stormwater runoff and included regulation of urban areas. Under these regulations, local governments with municipal separate storm sewer systems (MS4s) must address five main issues with their stormwater management programs – (i) detecting and eliminating illegal discharges to stormwater systems, (ii) ensuring that municipal operations and maintenance activities do not contribute to stormwater pollution, (iii) regulating runoff from construction sites, (iv) preventing long-term stormwater pollution resulting from development, and (v) educating the public on ways they can prevent stormwater pollution. TMACOG members recognize the value of these stormwater regulations. TMACOG governmental members that are regulated under the NPDES MS4 Stormwater Permit recommend improvements and local initiatives to improve the stormwater permitting process and improve regional water quality.

Recommended Stormwater Policies

Federal and State

- Encourage federal and state agencies to write stormwater regulations that detail clear expectations for compliance and that contain standards that are enforceable by state and local agencies.
- Under the Ohio Revised Code (ORC), counties face many hurdles to inspecting and enforcing required sediment and erosion control measures on construction sites. TMACOG recommends that ORC 307.79 be amended to give incorporated and unincorporated areas equal authority to enforce Ohio EPA regulations required by the Stormwater Permit for MS4s.
- Ohio EPA should actively engage regulated MS4s in the entire Stormwater NPDES rule-making process via early stakeholder outreach (ESO) for the MS4 General Permit and the Construction General Permit. Improve the ESO process by providing clear, consistent, and timely notification of the permit drafting process and opportunities for stakeholder involvement. Ohio EPA should also ensure an equitable ESO process that provides ample opportunities for meaningful input across all regulated communities in Ohio.

Regional

- Promote consistent construction site plan review procedures and improve consistency in sediment and erosion control regulations and enforcement across TMACOG member jurisdictions.
- Promote regional integration and standardization for stormwater management and green stormwater infrastructure across the TMACOG region.
- Local governments should work in partnership with Ohio EPA on the implementation of the Construction General Permit.

Funding

- Encourage the use of stormwater utilities to fund local stormwater management programs and the installation and long-term maintenance of all stormwater infrastructure.

