RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
Office of Water Resources

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RIPDES SMALL MS4 ANNUAL REPORT

GENERAL INFORMATION PAGE

RIPDES PERMIT #RIR04005

REPORTING PERIOD: ☒ **YEAR 21**
Jan 2024-Dec 2024

OPERATOR OF MS4

Name: City of Providence – Department of Public Works			
Mailing Address:700 Allens Avenue			
City: Providence	State: RI	Zip:02905	Phone: 401-680-7515
Contact Person: Craig Hochman	Title: Chief Engineer		
	Email: chochman@providenceri.gov		
Legal status (circle one): PRI - Private PUB - Public BPP - Public/Private STA - State FED – Federal Other (please specify):			

OWNER OF MS4 (if different from OPERATOR)

Name:			
Mailing Address:			
City:	State:	Zip:	Phone: ( )
Contact Person:	Title:		
	Email:		

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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, I certify that 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.

Print Name Patricia A. Coyne-Fague, Esq.

Print Title Director of Public Works

Signature _____ Date _____

MINIMUM CONTROL MEASURE #1:
PUBLIC EDUCATION AND OUTREACH (Part IV.B.1 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities, topics addressed, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for choosing the education activity to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)

Priscilla De La Cruz, Director of Sustainability (pdelacruz@providenceri.gov); Dave Everett, Principal Planner (deverett@providenceri.gov); Brian Byrnes, Deputy Superintendent of Parks (bbyrnes@providenceri.gov)

IV.B.1.b.1	Use the space below to provide a General Summary of activities implemented to educate your community on how to reduce stormwater pollution. For TMDL affected areas, with stormwater associated pollutants of concern, indicate rationale for choosing the education activity. List materials used for public education and topics addressed. Summarize implementation status and discuss if the activity is appropriate and effective.

The City of Providence is a funding partner of the Stormwater Innovation Center (SIC), with City employees serving on both the Leadership Team and the Advisory Board. The SIC is committed to improving stormwater management, promoting education and fostering partnerships to enhance water quality. Education and community engagement empowers individuals and professionals through programs such as public events, school outreach, guided tours and hands-on training. Collaborative partnerships have been formed, working with government agencies, non-profits, academic institutions and the private sector.

The SIC hosted its fifth annual Rain Harvest Festival at the Botanical Center Pavilion in 2024. Local artist Savonnara Alexander Sok, from AS220, installed a new mural located near green infrastructure adjacent to the Botanical Center. illustrating themes of aquatic life and green infrastructure. Visitors engaged in interactive tables from organizations, like Save the Bay and The Nature Conservancy, and local vendors, providing hands-on learning opportunities.

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The SIC worked with a video production company to develop a Stormwater PSA video (https://www.youtube.com/watch?v=NlCij08rtqY&t=7s), depicting a character named “Stormwater” who creates havoc all around him! The SIC created a list of contacts at local environmental nonprofits, as well as nonprofits focused on water quality and conservation in other coastal states. These contacts helped promote the PSA as it was rolled out on social media in July, to many positive reviews. The video has received nearly 10,000 views on Facebook, YouTube and Instagram! As part of this project, the SIC also created a new page for their website (https://www.stormwaterinnovation.org/athome) on how the community can take action to manage stormwater.

In 2024, the Stormwater Innovation Center strengthened its collaborations with local universities, providing students with real-world case studies and hands-on learning opportunities in stormwater and water quality management. Students from the Rhode Island School of Design (RISD) developed conceptual designs for proposed Total Maximum Daily Load (TMDL)Implementation Plan sites in Roger Williams Park, showcasing innovative approaches to addressing water quality challenges. The SIC partnered with the Metcalf Institute to engage a national cohort of journalists, offering insights into our work in stormwater management, research, and water quality monitoring. This collaboration aimed to help journalists effectively translate complex scientific concepts into accessible stories for the public. Through SIC’s ongoing collaboration with Brown University's Institute at Brown for Environment and Society (IBES) internship program, the SIC hosted an intern who contributed to projects while gaining career experience.

The City of Providence and the SIC collaborated on the City’s “Wonders of Water” Earth Month activities. The mission of our collaboration was to engage youth around stormwater concepts, as well as to engage community members by raffling barrels painted by after-school youth – a process facilitated by local teaching artists throughout the month of April. On the City’s Earth Day event, the SIC spoke alongside Mayor Brett Smiley and other representatives from the City of Providence.

The Below and Above Collective, a group of scientists, artists, and botanists in Rhode Island, worked with the SIC to obtain required permits from RIDEM, as well as funding from Narragansett Bay Estuary Program (NBEP), to install a floating wetland structure in Roger Williams Park. The floating wetland is a scientific experiment, allowing the Collective to gather information on how plant material removes harmful nutrients from water, as well as how the structure provides habitat for macroinvertebrates and other beneficial wildlife. The structure also serves as a community engagement and education site. Local community members helped gather materials for the structure, and helped to launch it, and the SIC collaborated on a

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The SIC staffed tables at a variety of events in 2024, reaching a diversity of audiences. The SIC handed out a host of outreach materials, including educational handouts, volunteer recruitment materials, postcards, and even fun freebies like native seed packages and rain gauges.

The Woonasquatucket River Watershed Council (WRWC) is another important partner in public education, outreach and participation. WRWC conducted public outreach about stormwater through various avenues in 2024. In collaboration with Groundwork RI and the Eastern RI Conservation district, WRWC developed flyers about the benefits of green infrastructure for homeowners and commercial property owners. These flyers were distributed during several presentations about stormwater and the benefits of green infrastructure, including presentations at local libraries and at Councilman Sanchez and Councilwoman Graves' community meetings. Additionally, WRWC's watershed model educational tool was used by their in-school education team and our bilingual adult-education community programs cohorts such as Nuevas Voces to demonstrate how pollution enters our waterways and harms wildlife.

WRWC facilitated the following in depth trainings for 6 Providence residents as workforce development for our River Rangers: Stormwater 101 (Groundwork RI), Clean Water Certification course (Groundwork RI), an overview of the new BMPs along the Kinsley Ave improvements and other trainings. Two trainees were hired as River Rangers at an entry level position with no prior knowledge of stormwater management and finished the season with a much greater knowledge of stormwater theory and field experience of maintenance practices.

River Rangers collaborated with WRWC's environmental education team to lead 30 students from the Met School on a tour of the Olneyville Connector GI and a litter cleanup, discussing non-point source pollution, highlighting automobile related pollutants and pet waste.

WRWC, working with Building Futures RI built 6 rain barrel planter boxes for distribution in Providence. In addition to learning how to construct the boxes the trainees also learned why they were building them and the importance of stormwater management. The cohort of 15 trainees included Providence residents.

WRWC's Campeones Climaticos (Climate Champions), a second-level cohort program composed of graduates from the Nuevas Voces (New Voices) environmental leadership program, continued their stormwater education in 2024. They continued to provide input on ongoing WRWC stormwater projects, including the green infrastructure on Promenade Street, Kinsley Ave and De Soto St.

A workforce development group, X-Cel, based in Massachusetts, visited the Woonasquatucket River Greenway to assist River Rangers in stormwater maintenance for two days. The first day was a tour of Farm Fresh Rhode Island and the team assisted weeding and clearing debris from the bio retention basin. The second day the team assisted in clearing out tree filter basins on Pleasant Valley Parkway and Manton Ave.

WRWC River Rangers find that they end up discussing stormwater in just about any public forum or interaction on and off the greenway. It is a major focus of the Ranger program and a personal passion for many of the Rangers.

Overall, this measure is effective at educating the community and leveraging connections with local non-profits with expertise in community engagement and stormwater education.

IV.B.1.b.2	Use the space below to provide a general summary of how the public education program was used to educate the community on how to become involved in the municipal or statewide stormwater program. Describe partnerships with governmental and non-governmental agencies used to involve your community.

The City of Providence conducts engagement initiatives through programs in the Parks, Sustainability, Public Works and Planning Departments, supported by the Stormwater Innovation Center (SIC). The City also collaborates with non-profit organizations including Groundwork RI, Woonasquatucket River Watershed, Seekonk River Alliance, Blackstone Park Conservancy and the Roger Williams Park Conservancy on education and outreach programs.

Staff from the Planning and Public Works Departments have continued collaborating with Providence residents on a project to improve stormwater in the York Pond and Seekonk River watershed. Furthering the partnership with Groundwork RI, a project at the southern end of Blackstone Boulevard was awarded a Southern New England Program (SNEP) Watershed Implementation Grant in the amount of $282,288. The Providence City Council contributed another $40,000 to that effort and additional $120,000 grant funding to further study and analyze the hydraulics and hydrology of the southern Blackstone/York Pond watershed to mitigate urban flooding and enhance the design of the SNEP award project. The DPW Engineering Division led a field walk along York Pond and the York Pond Ravine showing and explaining stormwater infrastructure in the area and the issues faced with stormwater quantity. We also viewed flood damage along the ravine slope, which will in part be designed through the council grant funding.

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In 2024, the Stormwater Innovation Center strengthened its collaborations with local universities, providing students with real-world case studies and hands-on learning opportunities in local stormwater and water quality management. Students from the Rhode Island School of Design (RISD) developed conceptual designs for proposed Total Maximum Daily Load (TMDL)Implementation Plan sites in Roger Williams Park, showcasing innovative approaches to addressing water quality challenges.

The Below and Above Collective, a group of scientists, artists, and botanists in Rhode Island, worked with the SIC to obtain required permits from RIDEM, as well as funding from Narragansett Bay Estuary Program (NBEP), to install a floating wetland structure in Roger Williams Park. The floating wetland is a scientific experiment, allowing the Collective to gather information on how plant material removes harmful nutrients from water, as well as how the structure provides habitat for macroinvertebrates and other beneficial wildlife. The structure also serves as a community engagement and education site. Local community members helped gather materials for the structure, and helped to launch it, and the SIC collaborated on a summer program, "Floating Artlands", with students from New Urban Arts. Educational signage has also been installed by the structure so that parkgoers can learn more about its impact on local water quality and community building.

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WRWC's Campeones Climaticos (Climate Champions), a second-level cohort program composed of graduates from our Nuevas Voces (New Voices) environmental leadership program, continued their stormwater education in 2024. They continued to give input on ongoing WRWC stormwater projects, including the green infrastructure on Promenade-Kinsley and De Soto St. The City Engineer presented on the sewer/stormwater system and discussed ways to be involved in flooding and water quality initiatives.

As part of a three-year NOAA port shoreline restoration and resiliency grant received by the Department of Planning and Development for underserved communities, Groundwork RI hosted a presentation about the City's stormwater efforts to a community cohort. In addition, the cohort team participated in an exercise held by the 3CRS grant team (URI and Brown University-led) identifying nuisance flooding issues on the South Side of Providence.

The City convened a task force of city residents, business owners, developers and elected officials to explore the feasibility of stormwater and sewer revenues. The group learned about all things sewers, revenue options and operating expenses surrounding the City's sewer systems by completing a rigorous eight-month process to ultimately help address critical stormwater and sewer infrastructure needs and improve all of our neighborhoods' resilience to climate change. Throughout that time, task force members reviewed the City's existing stormwater and sewer infrastructure management programs and challenges, the legal and enforcement context of the City's programs, the existing budget and the amount needed to develop effective stormwater and sewer programs, and the potential mechanisms for the City to equitably and adequately fund stormwater and sewer management.

Overall, this measure is effective at educating the community and leveraging connections with local non-profits with expertise in community

Check all topics that were included in the Public Education and Outreach program during this reporting period. For each of the topics selected, provide:
Target Audience(s): Public Employees, Residents, General Public, Businesses, Industries, Restaurants, Contractors, Developers, Agriculture, Other (describe);
Target Pollutant(s): (e.g. pet waste, fertilizers, Total Suspended Solids, etc.);
Strategies/Media: Direct Mailings, List Servs, Kiosks or Other Displays, Newspaper Ads or Articles, Public Events or Presentations, School Programs, Printed Materials, Direct Trainings, Videos, Webpage, Other (describe)

Topic	Target Audience(s)	Target Pollutant(s)	Strategies/Media
X Construction Sites	Contractors, Developers	Sediment	Ordinance and Plan Review Meetings/Comments
X Pesticide and Fertilizer Application	Residents, Businesses	Pesticides, Nitrogen, Phosphorus	Webpage, Printed Materials, Social Media
X General Stormwater Management Info	Residents, Stakeholders, Students	General	Direct Engagement, Community Events, Webpages and Social Media
X Pet Waste Management	Residents	Pet Waste / Bacteria	Signage and Trash Bags at Dog Parks
X Household Hazardous Waste Disposal	Residents	Hazardous Waste	Eco-Depot, Webpages
X Recycling	Residents, Businesses	Floatables	Community Meeting Presentations, Mailers
X Illicit Discharge Detection and Elimination	Residents		
X Riparian Corridor Protection/Restoration	Residents	Sediment, Flooding	Non-profit partner outreach, signage
X Infrastructure Maintenance	Stakeholders	General	SIC Trainings, 311 Reporting System
X Trash Management	Residents, Businesses	Floatables	Complaint reporting and enforcement, Mailers
X Smart Growth			Ordinance and Development Plan review
☐ Vehicle Washing			
X Storm Drain Marking	Residents	General	Painted basins and signs
X Water Conservation	Students, Residents	General	Rain Barrel Distribution
X Green Infrastructure/Better Site Design/LID	Residents, Stormwater Professionals	General	SIC Trainings and Expo, Educational Programs
☐ Wetland Protection			
☐ Other:			
☐ None			

Additional Measurable Goals and Activities

Please list all stormwater training attended by your staff during the 2024 calendar year and list the name(s) and position of all staff who attended the training.

Trainings:

3/26/24 - Emerging Stormwater Technologies in Rhode Island: Cultec Separator Row and StormTech Isolator Row PLUS
Craig Hochman - Chief Engineer

5/15/24 - SIC Green Infrastructure Maintenance Training
Jose Grullon – Operator, Francisco Lora, Operator

7/31/24 - Prioritizing Nature-based Stormwater Projects to Maximize Community Co-Benefits in the Buttonwood Brook WSHD
Craig Hochman – Chief Engineer

10/16/24 - Stormwater Innovation Expo
Craig Hochman - Chief Engineer; Maureen McManus - Deputy Director; Jason Sall - Civil Engineer, Bryant Anderson – Deputy Chief Engineer

MINIMUM CONTROL MEASURE #2:
PUBLIC INVOLVEMENT/PARTICIPATION (Part IV.B.2 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as types of activities and audiences/groups engaged. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)
Priscilla De La Cruz, Director of Sustainability (pdelacruz@providenceri.gov); Dave Everett, Principal Planner (deverett@providenceri.gov); Brian Byrnes, Deputy Superintendent of Parks (bbyrnes@providenceri.gov)

IV.B.2.b.2.ii	Use the space below to describe audiences targeted for the public involvement minimum measure, include a description of the groups engaged, and activities implemented and if a particular pollutant(s) was targeted. If addressing TMDL requirements indicate how the audience(s) and/or activity address the pollutant(s) of concern. Name of person(s) and/or parties responsible for implementation of activities identified. Assess the effectiveness of BMP and measurable goal.

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Continued in “Additional Measurable Goals and Activities due to formatting error with report template.

Opportunities provided for public participation in implementation, development, evaluation, and improvement of the Stormwater Management Program Plan (SWMPP) during this reporting period. Check all that apply:

- ☒ Cleanup Events
- ☒ Comments on SWMPP Received
- ☒ Community Hotlines
- ☒ Community Meetings
- ☒ Other (describe) Community events, public education
- ☒ Storm Drain Markings
- ☒ Stakeholder Meetings
- ☒ Volunteer Monitoring
- ☒ Plantings

Additional Measurable Goals and Activities
Continued from IV.B.2.b.2.ii due to formatting error with report template

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SECTION II. Public Notice Information (Parts IV.G.2.h and IV.G.2.i) *Note: attach copy of public notice

Was the availability of this Annual Report and the Stormwater Management Program Plan (SWMPP) announced via public notice? ☒ YES ☐ NO	If YES, Date of Public Notice: 2/14/25

How was public notified:

- ☐ List-Serve (Enter # of names in List: _____)
- ☐ TV/Radio Notices
- ☒ Website
- ☐ Newspaper Advertising
- ☐ Town Hall posting
- ☐ Other:

Enter Web Page URL: https://www.providenceri.gov/public-works/

Was public meeting held? ☐ YES ☒ NO

Date: Where:

Summary of public comments received:
Planned responses or changes to the program:

MINIMUM CONTROL MEASURE #3:
ILLICIT DISCHARGE DETECTION AND ELIMINATION (Part IV.B.3 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS

Include information relevant to the implementation of each measurable goal, such as activities implemented (when reporting tracked and eliminated illicit discharges, please explain the rationale for targeting the illicit discharge) to comply with on-going requirements, and illicit discharge public education activities, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

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James Moore, Director, Department of Inspections and Standards. jcmoore@providenceri.gov, 401-680-5777, Craig

Hochman, Chief Engineer, Department of Public Works, chochman@providenceri.gov, 401-680-7515, *David Mambro,

Superintendent of Sewer Construction, dmambro@providenceri.gov, 401-680-7547

Has *this person* received training on Illicit Discharge Detection and Elimination (IDDE)? No

If yes, when and where? N/A

If no, who *is* trained on IDDE? The City's consultant, CDM Smith, is trained in IDDE and provides technical support and

IV.B.3.b.1:	If the outfall map was not completed, use the space below to indicate reasons why, proposed schedule for completion of requirement and person(s)/ Department responsible for completion. (The Department recommends electronic submission of updated EXCEL Tables if this information has been amended.) **Number of Outfalls Mapped within regulated area:** 151 **Percent Complete: 100%** **If 100% Complete, Provide Date of Completion:** December 2020
IV.B.3.b.2	Indicate if your MS4 chose to implement the tagging of outfalls activity under the IDDE minimum measure, activities and actions undertaken under the 2024 calendar year.
The City did not implement the tagging of outfalls under the IDDE minimum measure in the 2024 reporting year.	
IV.B.3.b.3	Use the space below to provide a summary of the implementation of recording of system additional elements (catch basins, manholes, and/or pipes). Indicate if the activity was implemented as a result of the tracing of illicit discharges, new MS4 construction projects, and inspection of catch basins required under the IDDE and Pollution Prevention and Good Housekeeping Minimum Measures, and/or as a result of TMDL related requirements and/or investigations. Assess effectiveness of the program minimizing water quality impacts.
The City maintains a sewer and stormwater GIS system which maps the entire system, including manholes, catch basins, BMPs and outfalls. IDDE investigations, and TMDL Implementation Plan work are also tracked by using GIS. This mapper is effective at tracking and clearly displaying all stormwater information in one location, and references plans, to provide information for all water quality efforts. Additionally, the city started using an asset management system to better track maintenance activities. In the reporting year, a catch basin cleaning contractor used this system. This system is critical to tracking catch basin sediment accumulation. The user is also prompted to record any suspicions of illicit connections for further investigation.	
IV.B.3.b.4	Indicate if the IDDE ordinance was **not** developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. **Date of Adoption:** 12/8/05 If the Ordinance was amended in 2024, please indicate why changes were necessary.

No amendments were made to the IDDE ordinance during the reporting year.

IV.B.3.b.5.ii, iii, iv, & v	Use the space below to provide a summary of the implementation of procedures for receipt and consideration of complaints, tracing the source of an illicit discharge, removing the source of the illicit discharge and program evaluation and assessment as a result of removing sources of illicit discharges. Identify person(s) / Department and/or parties responsible for the implementation of this requirement.

The City maintains a 311-reporting system for residents to submit complaints on potential illicit discharges. Sewer workers and contractors also inspect catch basins during cleaning to check for illicit connections. Upon locating a potential illicit discharge, the DPW Engineering and Sewer Division investigate the source through field investigations and plan reviews. If necessary, Sewer CCTV and dye testing are used to locate the source of the illicit discharge. If an illicit discharge is identified, a letter would be sent by the Director of Public Works. Non-compliant operators would be referred to the Department of Inspections and Standards for additional enforcement.

The Department of Public Works and Department of Inspections and Standards are responsible for tracing and removing the source of an illicit discharge.

IV.B.3.b.5.vi	Use the space below to provide summary of implementation of catch basin and manhole inspections for illicit connections and non-stormwater discharges. If the required measurable goal of inspecting all catch basins and manholes for this purpose was not accomplished, please indicate reasons why, the proposed schedule of completion and identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement. The operator must keep records of all inspections and corrective actions required and completed. **Number of Catch Basins and Manholes Inspected for illicit connections/IDDE:** 1884 catch basins Citywide (MS4 and non-MS4) **Percent Complete:** 22.9% **Date of Completion:** n/a

The DPW Sewer Division and vendors inspect catch basins during cleaning for illicit connections and repair needs. In the reporting year, 1884 catch basins were cleaned and inspected for IDDE in the MS4 and combined system. City catch basin cleaning is currently not delineated by MS4 versus combined catch basins, so they are currently not being counted towards this requirement. Catch basin cleaning logs are included in Appendix E.

The DPW Sewer is responsible for cleaning and inspecting for illicit discharges. The measurable goal to clean and inspect all structures has not been completed due to lack of funding, equipment, and staff.

IV.B.3.b.5.vii	If dry weather surveys including field screening for non-stormwater flows and field tests of selected parameters and bacteria were not completed, indicate reasons why, proposed schedule for the completion of this measurable goal and person(s) / Department and/or parties for the completion of this requirement. Evaluate effectiveness of the implementation of this requirement. **The results of the dry weather survey investigations should be submitted to RIDEM electronically, if not already submitted or if revised since 2009, in the RIDEM-provided EXCEL Tables and should include visual observations for all outfalls during both the high and low water table timeframes, as well as sampling results for those outfalls with flow. The EXCEL Tables must include a report of all outfalls and indicate the presence or absence of dry weather discharges.** **Number of Outfalls Surveyed Jan-Apr:** 0 **Number of Outfalls Surveyed Jul-Oct: 0** **Percent Complete:** 100% **Date of Completion:** December 2020

All 151 outfalls were inspected in 2018-2020. Of all the outfalls inspected, 22 were determined to have illicit dry weather flow and were added to the prioritization list for further investigation. In 2018, the first four prioritized outfalls (Mash02, Mosh06, Woon02, and Woon44) were investigated upstream and narrowed down to a target area for CCTV. In the 2020 reporting year another 3 High Intensity Target (HIT) outfalls (Mosh13, Seek01, and SD6) were investigated.

In 2023 work continued the twenty-three outfalls prioritized in 2022, including the remaining outfalls with dry weather flow. See Appendix A for RIDEM IDDE prioritization spreadsheet and figures updated through 2/5/25. No additional IDDE was performed in 2024. The Department of Public Works, Engineering Division and Sewer Division are responsible for dry weather outfall inspections. This measure is effective as all outfalls have been tested, and locations with suspected illicit connections are being systematically investigated and tracked.

IV.B.3.b.7	Use the space below to provide a description of efforts and actions taken as a result of for coordinating with other physically interconnected MS4s, including State and federal owned or operated MS4s, when illicit discharges were detected or reported. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
As part of drainage mapping work, the City's consultant mapped 40 interconnections between the MS4 and other parties MS4 systems. These are mapped in the TMDL mapper and summarized in Appendix B. Work is ongoing to continue mapping other system interconnections and coordinating with other parties as needed. The Department of Public Works is responsible for implementing this requirement. This measure is effective.	
IV.B.3.b.8	Use the space below to provide a description of efforts and actions taken for the referral to RIDEM of non-stormwater discharges not authorized in accordance to Part I.B.3 of this permit or another appropriate RIPDES permit, which the operator has deemed appropriate to continue discharging to the MS4, for consideration of an appropriate permit. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
In the reporting year there were no referrals to RIDEM for illicit discharge. Through the dye testing process, the City did not locate any illicit connections from buildings. The main issues found were infiltration from cracked sanitary pipes, which has or was addressed with sewer lining. A memorandum from RIDEM discusses TMDL credits for this work. In the reporting year, DPW has replaced 866' and lined 2685' of sanitary, storm and combined sewer main.	
IV.B.3.b.9	Use the space below to provide a description of efforts and actions taken to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, as well as allowable non-stormwater discharges identified as significant contributors of pollutants. Include a description on how this activity was coordinated with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.

The DPW Environmental division works with a local organization each year to host the Eco-Depot for hazardous waste disposal. In 2024 the Department received funding to host three Eco-Depots at the DPW complex. The Environmental Division also tracks illegal dumping citywide and fines violators.

The Sustainability Department runs a monthly newsletter that includes information on proper waste disposal, waste reduction opportunities, and stormwater management and flood prevention. The Parks Department maintains signs and waste bins to collect pet waste in parks. In partnership with Save The Bay, the City has installed "Don't Dump, Drains to Waterways" signs on many storm drains citywide to inform residents of the hazards of illegal dumping. The City also launched a new website, Climate Ready PVD, to educate Providence residents on resiliency initiatives, including stormwater https://climatereadypvd.providenceri.gov/stormwater/, and a "What Can You Do" page https://climatereadypvd.providenceri.gov/what-you-can-do/ for property owners to access best practices and resources for stormwater management.

The City of Providence is a funding partner of the Stormwater Innovation Center (SIC). City employees are members of the Leadership Team and the Advisory Board. The SIC is committed to improving stormwater management, promoting education and fostering partnerships to enhance water quality. Education and community engagement empowers individuals and professionals through programs such as public events, school outreach, guided tours and hands-on training. Collaborative partnerships have been formed, working with government agencies, non-profits, academic institutions and the private sector.

The SIC hosted its fifth annual Rain Harvest Festival at the Botanical Center Pavilion in 2024. Local artist Savonnara Alexander Sok, from AS220, installed a new mural located near green infrastructure adjacent to the Botanical Center. illustrating themes of aquatic life and green infrastructure. Visitors engaged in interactive tables from organizations, like Save the Bay and The Nature Conservancy, and local vendors, providing hands-on learning opportunities.

The SIC worked with a video production company to develop a Stormwater PSA video (https://www.youtube.com/watch?v=NlCij08rtqY&t=7s), depicting a character named "Stormwater" who creates havoc all around him! The SIC created a list of contacts at local environmental nonprofits, as well as nonprofits focused on water quality and conservation in other coastal states. These contacts helped us promote the PSA as it rolled out on social media in July, to many positive reviews. The video has received nearly 10,000 views on Facebook, YouTube and Instagram! As part of this project, the SIC also created a new page for our website (https://www.stormwaterinnovation.org/athome) on how the community can take action to manage stormwater.

WRWC's Campeones Climaticos (Climate Champions), a second-level cohort program composed of graduates from our Nuevas Voces (New Voices) environmental leadership program, continued their stormwater education in 2024. They continued to give input on ongoing WRWC stormwater projects, including the green infrastructure on Promenade Street, Kinsley Ave and De Soto St.

The program is effective at informing members of the public about the hazards of discharges and conducting enforcement to prevent dumping.

Additional Measurable Goals and Activities

SECTION II.A Other Reporting Requirements - Illicit Discharge Investigation and System Mapping (Part IV.G.2.m)

# of Illicit Discharges Identified in 2024: 0	# of Illicit Discharges Tracked in 2024: 0
# of Illicit Discharges Eliminated in 2024:5	# of Complaints Received:0
# of Complaints Investigated: 0	# of Violations Issued:0
# of Violations Resolved:0	# of Unresolved Violations Referred to RIDEM: 0
Total # of Illicit Discharges Identified to Date (since 2003): 36	Total # of Illicit Discharges remaining unresolved at the end of 2024:0

Summary of Enforcement Actions:
28' of storm main was replaced on Stone Stret, draining to NBC36 CSO.
164' of storm main was UV lined on Leo Ave (MH19347-MH19348) draining to Outfall 87 (aka 211) on the West River
165' of storm main was UV lined on Dorothy Ave (MH12579-12578) draining to Outfall 87 (aka 211) on the West River
165' of storm main was UV lined on Pleasant Valley Parkway (MH2770-29314) draining to outfall Woon12 on the Woonasquatucket River
160' of sanitary main was steam cured lined on Pleasant Valley Parkway (MH24577- MH24579) which runs parallel to the UV lined storm main on Pleasant Valley Parkway.

Total # of Outfalls identified and mapped to date: 151

Total # of Interconnections with other MS4s identified and mapped to date: 40

Extent to which the MS4 system has been mapped (% complete):98

Identify how the following components of the MS4 system have been mapped:	Not mapped	GIS	Auto CAD	Paper	Other (please specify)
Catch basins	☐	☒	☐	☒	☐
Manholes	☐	☒	☐	☒	☐
Pipes, ditches, and other conduits	☐	☒	☐	☒	☐
Flow direction and connectivity	☐	☒	☐	☒	☐
Interconnections with other regulated MS4s	☐	☒	☐	☒	☐
MS4-owned stormwater controls (BMPs, not including catch basins or manholes)	☐	☒	☐	☐	☐
Delineation of outfall catchment/drainage areas	☐	☒	☐	☐	☐

SECTION II.B Interconnections (Parts IV.G.2.k and IV.G.2.l)

Interconnection:	Date Found:	Location:	Name of MS4:	Originating Source:	Planned and Coordinated Efforts and Activities with Connectee:
See Appendix B					

MINIMUM CONTROL MEASURE #4:
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL
(Part IV.B.4 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)

James Moore, Director, Department of Inspections and Standards. jcmoore@providenceri.gov, 401-680-5777, Craig Hochman, Chief Engineer, Department of Public Works, chochman@providenceri.gov, 401-680-7515

IV.B.4.b.1	Indicate if the Sediment and Erosion Control and Control of Other Wastes at Construction Sites ordinance was **not** developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. **Date of Adoption:** 12/8/05 If the Ordinance was amended in 2024, please indicate why changes were necessary and provide references to the amended portions of the local codes/ordinances.

The ordinance was not amended in 2024.

IV.B.4.b.6	Use the space below to describe actions taken as a result of receipt and consideration of information submitted by the public.

Complaints regarding construction site stormwater runoff control are typically routed to DPW or DIS. Either department may be responsive and in communication with the contractor/owner directing cleanup and/or erosion control devices. Failure to comply may result in legal enforcement actions by DIS.

IV.B.4.b.8	Use the space below to describe activities and actions taken as a result of referring to the State non-compliant construction site operators. The operator may rely on the Department for assistance in enforcing the provisions of the RIPDES General Permit for Stormwater Discharges Associated with Construction Activity to the MS4 if the operator of the construction site fails to comply with the local and State requirements of the permit and the non-compliance results or has the potential to result in significant adverse environmental impacts.

The City reviews all construction projects in its boundaries. Issues of non-compliance are dealt with on a case-by-case basis. When necessary, non-compliance issues are forwarded to RIDEM if compliance is not met following local intervention.

Additional Measurable Goals and Activities

The Soil Erosion and Sediment Control Ordinance is in place and currently enforced during site plan reviews and construction inspections.

SECTION II. A - Plan and SWPPP/SESC Plan Reviews during Year 21 (2024), Part IV.B.4.b.2: Issuance of permits and/or implementation of policies and procedures for all construction projects resulting in land disturbance of greater than 1 acre.

Part IV.B.4.b.4: Review 100% of plans and SWPPPs/SESC Plans for construction projects resulting in land disturbance of 1-5 acres, not reviewed by other State programs, must be conducted by adequately trained personnel and incorporate consideration of potential water quality impacts.

# of Construction Applications Received:3 # of Construction Reviews Completed: 3 # of Permits/Authorizations Issued: 2
Summary of Reviews and Findings, include an evaluation of the effectiveness of the program. There are very few projects within the City exceeding the 1-acre threshold. However, the City's SESC ordinance requires SESC plans if near a waterbody or at a site with steep slopes. The City's Engineering Division and Department of Inspection and Standards are responsible for reviewing the site plans as well as the SWPPP and SESC. The Department of Inspections and Standards requires the submittal of a RIDOA form 128 by the engineer of record, requiring reports certifying compliance with submitted plans and specifications. This program is reasonably effective as permits are not issued until site plans are submitted that meet all requirements under the City Stormwater and Sediment Control Ordinances and are satisfactory to the City Engineer or Department of Inspections and Standards. Identify person(s) /Department and/or parties responsible for the implementation of this requirement: DPW Engineering Division and Inspections and Standards Department Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": Reviews are conducted under the Chief Engineer, a licensed Professional Engineer and a building official plan reviewer. Experience and prior education also guide the review process.

SECTION II.B - Erosion and Sediment Control Inspections during Year 21 (2024), Parts IV.G.2.n and IV.B.4.b.7: Inspection of 100% of all construction projects within the regulated area that discharge or have the potential to discharge to the MS4. (The program must include two inspections of all construction sites, first inspection to be conducted during construction for compliance of the Erosion and Sediment controls at the site, the second to be conducted after the final stabilization of the site.) Inspections must be conducted by adequately trained personnel.

# of Active Construction Projects: 123 new building permits issued in 2024.	
# of Site Inspections: 88 – final inspections, 10 – site inspections	# of Complaints Received:2
# of Violations Issued: 2	# of Unresolved Violations Referred to RIDEM:0
The City undertakes enforcement action on private development projects when violations are observed by staff during site inspections or following complaints from the public. Current and future permits are stopped/withheld until the developer makes the necessary corrections to return to compliance. DPW staff also conduct a site inspection at the end of construction before a certificate of occupancy is issued. New development plans are required to show all sediment and erosion control measures and stockpiling locations. For municipal construction projects and public utility projects, sediment and erosion control measures are required to be installed prior to construction and are inspected throughout the construction process. The City may halt work if necessary and withhold payment until these measures are corrected. Following road paving projects, all catch basins are cleaned. These methods have been effective at resolving sediment and erosion control violations by creating enforcement mechanisms for non-compliance. Identify person(s) /Department and/or parties responsible for the implementation of this requirement: DPW Engineering Division and Inspections and Standards Department	

MINIMUM CONTROL MEASURE #5:
POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REVELOPMENT
(Part IV.B.5 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints, etc. Please indicate if any projects have incorporated the use of Low Impact Development techniques. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)

James Moore, Director, Department of Inspections and Standards. jcmoore@providenceri.gov, 401-680-5777, Craig Hochman, Chief Engineer, Department of Public Works, chochman@providenceri.gov, 401-680-7515, *Bob Azar, Deputy Director of Planning, razar@providenceri.gov, 401-680-8524, *Alexis Thompson, Zoning Official, athompson@providenceri.gov, 401-680-5376

IV.B.5.b.5	Use the space below to describe activities and actions taken to coordinate with existing State programs requiring post-construction stormwater management.

The City requires developers of parcels more than 20,000 SF to conform to the Post-Construction Storm Water Management Ordinance. Developers are required to submit RIDEM stormwater permits/submissions (if required) for projects at time of plan review with the Planning Department. Low impact development/green infrastructure is required in accordance with the Post-Construction Stormwater Ordinance. Developers are encouraged to control stormwater to the extent practicable on their site for parcels less than 20,000SF, which has seen the installation of underground infiltration chambers, rain gardens, bioswales, pervious pavement and rain barrels/infiltration basins.

Projects on parcels less than 20,00SF are encouraged to control runoff onsite to the extent possible. This could include something as minimal as redirecting a downspout from an impervious surface to a pervious surface

IV.B.5.b.6	Use the space below to describe actions taken for the referral to RIDEM of new discharges of stormwater associated with industrial activity as defined in §1.4(A)(111) in the *Regulations for the Rhode Island Pollutant Discharge Elimination System* (RIPDES Regulations) (the operator must implement procedures to identify new activities that require permitting, notify RIDEM, and refer facilities with new stormwater discharges associated with industrial activity to ensure that facilities will obtain the proper permits).

In 2024 there were 14 permitted connections to the City's stormwater network, none of which are associated with industrial activity.

IV.B.5.b.9	Indicate if the Post-Construction Runoff from New Development and Redevelopment Ordinance was **not** developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. **Date of Adoption:** 12/8/05 If the Ordinance was amended in 2024, please indicate why changes were necessary. Please also indicate if amendments have been made based on the 2010 *RI Stormwater Design and Installation Standards Manual*, and provide references to the amended portions of the local codes/ordinances.

The ordinance has not been amended since the date of adoption.

IV.B.5.b.12	Use the space below to describe activities and actions taken to identify existing stormwater structural BMPs discharging to the MS4 with a goal of ensuring long term O&M of the BMPs.

All municipally owned BMPs were mapped in the online GIS mapper in 2022. The Parks Department tracks all maintenance activities in an Asset Management tool, which also facilitates easy assignment of work orders and maintenance schedules. Maintenance completed in 2023 is included under Appendix C. In 2023, as part of the TMDL Implementation Plan project, the City's consultant collected all known Privately owned BMPs into an online mapper, and collected data on BMP type, dimensions, and catchment area to calculate treatment efficiencies. This has been collected in an online map and included in Appendix D. Upon application for stormwater permitting, BMP owners submit an Operation and Maintenance (O&M) plan agreement agreeing to maintain all BMPs constructed to their design level. When requesting a certificate of occupancy, the owner must submit an executed agreement that is recorded in the land evidence records. The agreement template is from the RISDISM.
Additional Measurable Goals and Activities

SECTION II.A. - Plan and SWPPP/SWMP Reviews during Year 21 (2024), Part IV.B.5.b.4: Review 100% of post-construction BMPs for the control of stormwater runoff from new development and redevelopment projects that result in discharges to the MS4 which incorporates consideration of potential water quality impacts (the program requires reviewing 100% of plans for development projects greater than 1 acre, not reviewed by other State programs). Plan reviews must be conducted by adequately trained personnel.

# of Post-Construction Applications Received: 1 # of Post-Construction Reviews Completed:1 # of Permits/Authorizations Issued: 1
The City's Chief Engineer is responsible for reviewing the site plans as well as the associated hydraulic models and calculations for two-year, ten-year, twenty-five-year, and one hundred-year storms. Plans are also reviewed to ensure connections to the City's sewer and MS4 system do not exceed pipe capacity and are maintainable and secure. Plans often undergo multiple review and commenting periods to ensure compliance. This measure is effective as all plans are reviewed and permitted prior to construction. Identify person(s) /Department and/or parties responsible for the implementation of this requirement: Craig Hochman, PE, DPW, Bryant Anderston, PE, DPW, Joe Angelino, DPW. Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": Reviews are conducted under the Chief Engineer, a licensed Professional Engineer. Experience and prior education also guide the review process.

SECTION II.B. - Post Construction Inspections during Year 21 (2024), Parts IV.G.2.o and IV.B.5.b.10 - Proper Installation of Structural BMPs: Inspection of BMPs, to ensure these are constructed in accordance with the approved plans (the program must include inspection of 100% of all development greater than one acre within the regulated areas that result in discharges to the MS4 regardless of whom performs the review). Inspections must be conducted by adequately trained personnel.

# of Active Construction Projects: not tracked	# of Construction Projects Completed: 1
# of Site Inspections for proper Installation of BMPs: 1	# of Complaints Received:1
# of Violations Issued:1	# of Unresolved Violations Referred to RIDEM:1

Summary of Enforcement Actions:
A retention pond was installed at Rhode Island College without permitting from the City. During overflow conditions, the retention pond overflowed and flooded neighbors on Rowley Street. Since this was permitted by RIDEM, it was referred to RIDEM for action. Ultimately, a catch basin and pipe conveyance was connected to the drain in Rowley Street. Flooding incidents have not been observed since.

Identify person(s) /Department and/or parties responsible for the implementation of this requirement:
Craig Hochman – DPW, James Moore - DIS

Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained":
No formal training has been received, City officials use experience and prior education to guide their review.

SECTION II.C. - Post Construction Inspections during Year 21 (2024), Parts IV.G.2.p and IV.B.5.b.11 - Proper Operation and Maintenance of Structural BMPs: Describe activities and actions taken to track required Operations and Maintenance (O&M) actions for site inspections and enforcement of the O&M of structural BMPs. Tracking of required O&M actions for site inspections and enforcement of the O&M of structural BMPs.

# of Site Inspections for proper O&M of BMPs: 1	# of Complaints Received:1
# of Violations Issued: 1	# of Unresolved Violations Referred to RIDEM:1

Summary of Activities and Enforcement Actions. Evaluate the effectiveness of the Program in minimizing water quality impacts.
A retention pond was installed at Rhode Island College without permitting from the City. During overflow conditions, the retention pond overflowed and flooded neighbors on Rowley Street. Since this was permitted by RIDEM, it was referred to RIDEM for action. Ultimately, a catch basin and pipe conveyance was connected to the drain in Rowley Street. Flooding incidents have not been observed since.

Identify person(s) /Department and/or parties responsible for the implementation of this requirement:
Craig Hochman – DPW, James Moore, DIS

Strategies for requiring the use of non-structural Low Impact Development (LID) site design practices and techniques into stormwater management designs for new and redevelopment projects, check all that apply in your municipality/MS4:

☐ None
☐ Ordinances or by-laws requiring LID standards (e.g. reduced road widths, % conservation land, etc.)
☒ Ordinances or by-laws requiring LID design at conceptual review (i.e., Pre-application and/or Master Plan) stages for municipal review prior to plans being engineered.
☐ Ordinances or by-laws requiring LID standards only in impaired waterbody drainage areas
☒ Local development regulations requiring use of LID to the maximum extent practicable
☐ LID Guidance available in written form
☒ LID Guidance available at pre-application meetings
☐ Other strategies to ensure incorporation of LID to the maximum extent practicable, describe:

_____

_____

Person(s)/Department responsible for reviewing submissions for LID:

The Department of Planning and Development (DPD) and Department of Inspections and Standards are responsible for reviewing submissions. The DPD requires stormwater management plans for land development projects, which must be approved by the responsible agencies (DPW, RIDEM, CRMC, NBC or any combination as applicable). These approvals are wrapped in to the final approval of the project by the City Plan Commission.

Person(s)/Department/Board responsible for approving submissions for LID at Preliminary and/or Final Review, if applicable:

The Department of Public Works, Department of Inspections and Standards and the Department of Planning and Development are responsible for reviewing submissions

Are you aware of the Municipal LID Self-Assessment that was introduced by the DEM and RI NEMO in 2019 and finalized and distributed in March 2020?

☒ Yes ☐ No

A final version of the Municipal LID Self-Assessment is available on the DEM's website:
http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lid-checklist-primer.pdf

Additional guidance is also available:

http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lid-assessment-fs.pdf

http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/pdfs/lidfactsheet.pdf

http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lidplan.pdf

Did your community complete the Municipal LID Self-Assessment? ☐ Yes ☒ No

If yes and it was completed in 2024, please provide a copy as an attachment to this Annual Report, if you have not already submitted it.

If no, does your community plan to complete it?

☒ Yes ☐ No

Strategies being implemented to ensure long-term Operation and Maintenance (O&M) of privately-owned structural stormwater BMPs, check all that apply in your municipality/MS4:

- ☐ None
- ☒ Ordinances or by-laws identify BMP inspection responsible party
- ☒ Ordinances or by-laws identify BMP maintenance responsible party
- ☒ Ordinances or by-laws identify BMP inspections and maintenance requirements
- ☒ Ordinances or by-laws provide for easements or covenants for inspections and maintenance
- ☒ Ordinances or by-laws require for every constructed BMP an inspections and maintenance agreement
- ☐ Ordinances or by-laws contain requirements for documenting and detailing inspections
- ☒ Ordinances or by-laws contain requirements for documenting and detailing maintenance
- ☒ Ordinances or by-laws contain authority to enforce for lack of maintenance or BMP failure
- ☐ The MS4 is responsible for inspections of all privately-owned BMPs
- ☐ The MS4 is responsible for maintenance of all privately-owned BMPs
- ☐ Establishment of escrow account for use in case of failure of BMP
- ☐ Other strategies to ensure long-term O&M of privately-owned BMPs, describe:

_____

_____

Does your municipality/MS4 require the use BMPs Operations and Maintenance Agreements? X YES ☐ NO

If YES, please indicate if the Operations and Maintenance Agreements include the following:

a. Party responsible for the long-term O&M of permanent stormwater management BMPs	☒ YES ☐ NO
b. A description of the permanent stormwater BMPs that will be operated and maintained	☒ YES ☐ NO
c. The location of the permanent stormwater BMPs that will be operated and maintained	☒ YES ☐ NO
d. A timeframe for routine and emergency inspections and maintenance of all permanent stormwater management BMPs	☒ YES ☐ NO
e. A requirement that all inspections and maintenance activities are documented	☒ YES ☐ NO
f. Annual submission of inspection/maintenance certification/documentation to the MS4	☒ YES ☐ NO
g. Stormwater management easement for access for inspections and maintenance or the preservation of stormwater runoff conveyance, infiltration, and detention areas and other stormwater controls and BMPs by persons other than the property owner	☒ YES ☐ NO
h. Steps available for addressing a failure to maintain the stormwater controls and BMPs	☒ YES ☐ NO

Please elaborate, if appropriate:

_____

_____

Does your municipality/MS4 keep an inventory of privately-owned BMPs?	☒ YES ☐ NO

<u>For privately-owned structural BMPs</u>, does your municipality/MS4 have a system for tracking:

a. Agreements and arrangements to ensure O&M of BMPs?	☐ YES ☒ NO
b. Inspections?	☐ YES ☒ NO
c. Maintenance and schedules?	☐ YES ☒ NO
d. Complaints?	☐ YES ☒ NO
e. Non-Compliance?	☐ YES ☒ NO
f. Enforcement actions?	☐ YES ☒ NO

Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track post-construction BMPs, inspections, and maintenance? ☐ YES ☒ NO

If yes, please elaborate on which tools are used:

_____

_____

NOTE: BMP maintenance tasks can be a great way to involve and educate the community to their purpose and function. BMPs have the potential to create a highly interactive environment for community members and volunteers to get involved.

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MINIMUM CONTROL MEASURE #6:
POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS
(Part IV.B.6 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities and practices used to address on-going requirements, and personnel responsible. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)

Responsible Party Contact Name & Title: Patricia Coyne-Fague, Director of Public Works, pcoynefague@providenceri.gov; Brian Byrnes, Deputy Parks Superintendent, bbyrnes@providenceri.gov, *Sal Solomon, Highway Superintendent (ssolomon@providenceri.gov), *Dave Mambro, Sewer Superintendent (dmambro@providenceri.gov)

IV.B.6.b.1.i	Use the space below to describe activities and actions taken to identify structural BMPs (these include but are not limited to: retention/detention basins, vegetated treatment, infiltration and pre-treatment controls, etc.) owned or operated by the small MS4 operator (the program must include identification and listing of the specific location and a description of all structural BMPs in the SWMPP and update the information in the Annual Report). Evaluate appropriateness and effectiveness of this requirement. **Do you have an inventory of MS4-owned/operated BMPs?** ☒ YES ☐ NO **Total # of MS4-owned/operated BMPs** (does not include CBs or MHs):117
The City maintains a GIS layer on the City Stormwater Mapper with all MS4 owned BMPs and details. Private BMPs are included on the TMDL Implementation Plan Mapper. A list of Public and Private BMPs are also included under Appendix D.	
IV.B.6.b.1.ii	The (42) BMP's in Roger Williams Park are inspected weekly and cleaned as needed by Parks Personnel. Debris is removed from inlets and sediment forebays. Trash and sediment is removed from treatment areas as needed. **# of MS4-owned/operated BMPs inspected in 2024**: 91 **# of MS4-owned/operated BMPs maintained/cleaned in 2024**: 91 **# of MS4-owned/operated BMPs repaired in 2024**: 0 Does your municipality/MS4 have a system for tracking: a. Inspection schedules of MS4-owned BMPs? ☒ YES ☒ NO b. Maintenance/cleaning schedules of MS4-owned BMPs? ☒ YES ☒ NO c. Repairs, corrective actions needed? ☒ YES ☒ NO d. Complaints? ☒ YES ☒ NO Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track stormwater BMPs, inspections, and maintenance? ☒ YES ☐ NO
The Parks Department utilizes and asset management tracking software to schedule and track all maintenance activities on Parks owned BMPs. A spreadsheet log is included in Appendix C. Groundwork RI and the WRWC also inspected, maintained, and repaired as needed all BMNP's owned by the MS4 but maintained by them. The measure is effective as BMP's are inspected and maintained frequently to ensure proper function.	

IV.B.6.b.1.iii	Use the space below to describe activities and actions taken to support the requirement of yearly inspection and cleaning of all catch basins (a lesser frequency of inspection based on at least two consecutive years of operational data indicating the system does not require annual cleaning might be acceptable). Evaluate appropriateness and effectiveness of this requirement. **Total # of CBs within regulated area (including SRPW and TMDL areas):** 7120 **# of CBs inspected in 2024:** 1884 citywide **% of Total inspected:** 22.9% **# of CBs cleaned in 2024:** 1884 citywide **% of Total cleaned:** 22.9% If determined, approximate quantity of sand/debris collected by cleaning of catch basins:950 Location used for the disposal of debris: Rhode Island Resource Recovery Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track the inspections and cleaning of catch basins? ☒ YES ☐ NO

As part of the TMDL Implementation Plan contract which began in 2023, the City contracted a catch basin cleaning contractor to clean a representative sample of catch basins in the TMDL Regulated area. Under the contract, 1,805 catch basins in the MS4 area were inspected, cleaned, and measured to determine sediment accumulation levels. In 2024 the contractor returned to clean and measure these catch basins to determine sediment accumulation rates, with the second round wrapping up in 2025. Additionally, the City's sewer department cleans catch basins in both the MS4 and combined watersheds citywide, however the numbers in MS4 are not tracked to differentiate between the MS4 and combined system. Catch basin cleaning logs are included in Appendix E.

In 2023 the City also began using Asset Essentials, a GIS-based asset tracking software, to manage the catch basin cleaning by the TMDL IP vendor, and record sediment accumulation levels. This software will allow tracking of sediment levels and cleaning frequency. It is hoped that the Sewer Division will begin using this system in CY25.

IV.B.6.b.1.iv	Use the space below to describe activities and actions taken to minimize erosion of road shoulders and roadside ditches by requiring stabilization of those areas. Evaluate the appropriateness and effectiveness of this requirement.

The overwhelming majority of the City is comprised of a curb and gutter system. Road shoulder erosion is not an issue.

IV.B.6.b.1.v	Use the space below to describe activities and actions taken to identify and report known discharges causing scouring at outfall pipes or outfalls with excessive sedimentation, for the Department to determine on a case-by-case basis if the scouring or sedimentation is a significant and continuous source of sediments. Evaluate appropriateness and effectiveness of this requirement.

The energy dissipator at York Pond has seen significant sedimentation and erosion along the left bank of the stone stream bank.

The City was notified of significant erosion from a granite stormwater outfall at the Atwells Ave bridge over the Woonasquatucket. The outfall is NBC-owned. NBC has chosen to take no action. The City is actively designing repair plans for the bridge abutment.

IV.B.6.b.1.vi	Use the space below to indicate if all streets and roads within the urbanized area were swept annually and if not indicate reason(s). The operator is required to sweep all streets and roads within the regulated area annually unless a lesser frequency can be justified based on at least two consecutive years of data indicating the street or road does not require annual sweeping. Evaluate appropriateness and effectiveness of this requirement. **Total roadway miles within regulated area (including SRPW and TMDL areas):** Not tracked **Roadway miles that were swept in 2024:** 6047 total miles, including actual sweeping and transit **% of Total swept:** 100% Type of sweeper used: ☒ Rotary brush street sweeper ☐ Vacuum street sweeper If determined, approximate quantity of sand/debris collected by sweeping of streets and roads: 530 Tons Location used for the disposal of debris: Rhode Island Resource Recovery Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track the annual sweeping of streets and roads? ☐ YES ☒ NO
The City sweeps all streets at least 4 times per year, and additional times in response to citizen requests. Sweeping is tracked using paper logs.	
IV.B.6.b.1.vii	Use the space below to describe activities and actions taken for controls to reduce floatables and other pollutants from the MS4. Evaluate appropriateness and effectiveness of this requirement.
The City maintains trash receptacles Downtown, in parks, and in commercial areas. Pickups are made daily or weekly depending on volume. DPW also offers a free weekly mattress disposal service for all Providence residents. The Environmental Division of DPW works to prevent littering and illegal dumping citywide. City inspectors locate sites of illegal dumping, clean them, and fine violators. DPW also replaces broken trash and recycling bins to prevent trash from escaping to City streets.	
IV.B.6.b.1.viii	Use the space below to describe the method for disposal of waste removed from MS4s and waste from other municipal operations, including accumulated sediments, floatables and other debris and methods for record-keeping and tracking of this information. Do you have a system for tracking actions to remove and dispose of waste? X YES ☐ NO
Sediment from catch basin cleaning, mattresses collected from the City disposal program, and trash from public receptacles is collected and disposed of at Rhode Island Resource Recovery. Tonnage slips are collected and tracked, and the RIRRC issues statements with monthly tipping totals by category.	
IV.B.6.b.2	Use the space below to describe any operations under the MS4's legal control, including activities and facilities, that have the potential to introduce pollutants into stormwater runoff, such as pesticide/herbicide/fertilizer application, chemical and waste handling and storage, vehicle fueling, vehicle washing, vehicle maintenance, sand/salt storage, snow disposal, facilities such as public works facilities with maintenance and storage yards, waste transfer stations, municipal wastewater and water treatment facilities, and municipal parking owned and operated by the MS4. Does your MS4 have any salt piles, or piles containing salt, used for deicing? ☒ YES NO If yes: Are these piles covered to prevent exposure to rain, snow, snowmelt and/or runoff? ☐ YES ☒ NO If yes, check the type of cover used: ☐ Weatherproof permanent structure/shelter ☐ A temporary, secured, durable, waterproof covering (e.g., tarpaulin, polyethylene, polyurethane) Are these piles located on impermeable surfaces? ☒ YES ☐ NO

The Parks Department has developed the following non-structural best management practices for Roger Williams and other City Parks:

- In contract with the USDA Canada Geese egg are coddled yearly to reduce fowl waste products.
- No turf fertilizers are used in Roger Williams Park and fertilizers are limited to only athletic fields in other City parks.
- Park hills and selected nature areas are left unmowed to trap stormwater.
- Pesticide use has been significantly reduced and is tracked following the City Pesticide Use Policy.

Additionally, this year the City continued a sewer cleaning and CCTV project. Significant deposits of sediments and trash were removed from the combined system in Roger Williams Park and citywide.

IV.B.6.b.5	For all facilities with discharges of stormwater associated with industrial activity, use the space below to describe and indicate activities and corrective actions for the evaluation of compliance. This evaluation must include visual quarterly monitoring; routine visual inspections of designated equipment, processes, and material handling areas for evidence of, or the potential for, pollutants entering the drainage system or point source discharges to waters of the State; and inspection of the entire facility at least once a year for evidence of pollution, evaluation of BMPs that have been implemented, and inspection of equipment. A Compliance Evaluation report summarizing the scope of the inspection, personnel making the inspection, major observations related to the implementation of the Stormwater Management Plan (formerly known as a Stormwater Pollution Prevention Plan), and any actions taken to amend the Plan must be kept for record-keeping purposes.

The Public Works facility has floor drains connecting to the combined sewer system and the NBC treatment plant, and as such does not discharge to waterbodies. Efforts have been made to remove chemical storage and maintain a clean house. No reports or inspections have been completed.

IV.B.6.b.6	Use the space below to describe all employee training programs used to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance for the past calendar year, including MS4 staff participation in trainings offered by other parties (e.g. SNEP, EPA) and all in-house training conducted by the municipality/MS4. Evaluate appropriateness and effectiveness of this requirement. How many stormwater management trainings have been provided to *municipal/MS4 employees* during this reporting period? 2 What was the date of the training? 5/6/24 Training Topic(s): Dirty Water 101: Stormwater and Sewer Basics How many *municipal/MS4 employees* attended this training? 2 What was the date of the training? 6/7/24 Training Topic(s): Dirty Water 201: Stormwater and Sewer Compliance Issues How many *municipal/MS4 employees* attended this training? 2 What percent of *municipal/MS4 employees* in relevant positions and departments received stormwater management training? Unknown Have *municipal/MS4 employees* that are responsible for inspecting or cleaning catch basins also been trained to detect and report illicit connections or non-stormwater discharges? ☐ YES ☒ NO
IV.B.6.b.7	Use the space below to describe actions taken to ensure that new flow management projects undertaken by the operator are assessed for potential water quality impacts and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluate appropriateness and effectiveness of this requirement.

The City continues to assess potential water quality impacts to existing and new flow management projects as areas are being developed or redeveloped and as potential water quality impacts arise during the permitting process. This proves to be an effective and appropriate means to review water quality impacts. If detrimental water quality impacts are foreseen, a permit will not be issued to move forward.
Additional Measurable Goals and Activities

SECTION II.A - Structural BMPs (Part IV.B.6.b.1.i) These include but are not limited to: retention/detention basins, vegetated treatment, infiltration, and pre-treatment controls, etc.

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:	Frequency of Inspection:
	See List included in Appendix D			

SECTION II.B - Discharges Causing Scouring or Excessive Sedimentation (Part IV.B.6.b.1.v)

Outfall ID:	Location:	Description of Problem:	Description of Remediation Taken, include dates:	Receiving Water Body Name/Description:
Woon-08 (NBC Outfall)	Atwells Ave Bridge	Outfall causing loss of bridge abutment stones	Project in design to extend outfall pipe and replace dislodged	Woonasquatucket River
Surface Runoff	Salmon St at Manton Heights Housing Project	Street flooding caused significant erosion on hill leading to bike lane	Rip-rap installed 10/19/23. Catch basins scheduled for upgrades of high velocity frame and grate to better collect runoff.	Woonasquatucket River
Woon-02	Storm Line on Manton Ave	Excessive scouring and sedimentation	Replacement of sewer cover and eroded areas	Woonasquatucket River
York01	York Pond	Erosion around energy dissipator and channel, sedimentation at forebay of York Pond	Clear debris (trees, branches, leaves, sediment) from channel and dissipator	York Pond/Seekonk River

SECTION II.C - Note any planned municipal/MS4-owned construction projects/opportunities to incorporate water quality BMPs, low impact development, or activities to promote infiltration and recharge (Part IV.G.2.j).

Construction is beginning in early 2024 on the Woonasquatucket River Greenway project. By redesigning existing City infrastructure using nature-based solutions, this project will reduce the amount of impervious surface by 26,150 square feet (8%) and provide treatment of 125,800 square feet of stormwater runoff through new bioswales and landscaped areas. These planted areas will also provide opportunities for 55 new street trees between the road and shared use path, which will cool and beautify the area, provide traffic calming, and absorb stormwater through transpiration, interception, and increased infiltration.

The Planning Department is also in the design process for improvements at Waterplace Park in Providence. This project will aim to restore the cove area to a more natural system, replacing existing concrete with natural plantings and green infrastructure. Also, the City was recently awarded a 27-million-dollar grant for Safe Streets from USDOT. These funds will be used for traffic calming and safety improvements, and green infrastructure and pavement reduction will be targeted for inclusion in all projects.

The Parks Department completed construction for the Roger Williams Park Treatment Train in 2024. This project will treat drainage from Route 10 and Mashapaug Pond using a Contech Jellyfish Filter. This will also serve as a testing and educational center for the Jellyfish filter for applications statewide.

The City has continued collaborating with the Blackstone Park Collaborative on several projects in the York Pond and Seekonk River Watershed. A NBEP grant was awarded to design stormwater infiltration and traffic calming improvements at the South Gateway to Blackstone Boulevard. The City assisted with community outreach workshops to residents and aided in design work. Furthermore, the City has contributed $120,000 toward a hydrologic and hydraulic study of this watershed and points downstream to ensure long term viability of the project.

Design is also underway for the Public Street Waterfront Access project, which was awarded a $500,000 EPA SNEP grant for design and construction in 2023. This project will serve to create a pocket park at the recently designated Public Access point at Public Street in South Providence. Design will seek to include tree planting and Green Infrastructure and treat stormwater on-site.

SECTION II.D - Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data (Part IV.G.2.e).

Data collected by volunteer monitoring at the Stormwater Innovation Center is available on the project dashboard: https://www.stormwaterinnovation.org/data. Data collected and representative maps on catch basin measurements, street sweeping, and BMP maintenance are included in the Appendices.

TOTAL MAXIMUM DAILY LOAD (TMDL) or other Water Quality Determination REQUIREMENTS

SECTION I. If you have been notified that discharges from your MS4 require non-structural or structural stormwater controls based on an approved TMDL or other water quality determination, please provide an assessment of the progress towards meeting the requirements for the control of stormwater identified in the approved TMDL (Part IV.G.2.d). Please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)

Responsible Party Contact Name & Title: Patricia Coyne-Fague, Director of Public Works, pcoynefague@providenceri.gov, Brian Byrnes, Deputy Parks Superintendent, bbyrnes@providenceri.gov

LIST OF IMPAIRED WATERS:

Impaired Water Body: Mashapaug Pond WBID: RI0006017L-06	Pollutants Causing Impairments: Total Phosphorus and Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☐ NO ☒ YES ☐ NO ☐ YES ☒ NO
Impaired Water Body: Roger Williams Parks Ponds WBID: RI0006017L-05	Pollutants Causing Impairments: Total Phosphorus and Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☐ NO ☒ YES ☐ NO ☐ YES ☒ NO
Impaired Water Body: Woonasquatucket River WBID: RI0002007R-10A-D RI0002007R-01	Pollutants Causing Impairments: Bacteria, Metals	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☐ NO ☒ YES ☐ NO ☐ YES ☒ NO
Impaired Water Body: West River WBID: RI0003008R-03B	Pollutants Causing Impairments: Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☐ NO ☒ YES ☐ NO ☐ YES ☒ NO

What kind of public education and outreach strategy does the MS4 implement to target each pollutant of concern? (e.g., signage on installed stormwater controls, resources on website, pamphlets about litter, pet waste, grass clippings, fertilizer use, etc.)

Pollutant of Concern:	Strategy:	Target Audience:
Bacteria	Pet Waste Collection at Parks, Signage discouraging feeding wildlife	Residents
Phosphorus	Pesticide/Fertilizer Educational Materials	Homeowners
Metals	Information on recycling and proper waste disposal, civilian reporting, and environmental enforcement	Residents, Industry

Has the MS4 installed stormwater BMPs or required the installation of stormwater BMPs on private property to address impairments? ☐ YES ☒ NO

If yes, indicate the name of the impaired water body associated with the stormwater control, type of stormwater control, date installed, ownership, and who is responsible for maintenance:

Impaired water body	Type of Stormwater Control:	Date Installed:	☐ Municipally/MS4-Owned ☐ Privately-Owned	Who maintains it?

TOTAL MAXIMUM DAILY LOAD (TMDL) OR OTHER WATER QUALITY DETERMINATION REQUIREMENTS cont'd

[add as necessary]				

Additional enhanced minimum measures used to address water quality issues (e.g., increased street sweeping or catch basin cleaning in areas with high pollutant loading, installation of floatable traps/screens, etc.):

At the time of this report, TMDL Implementation Plans are in final draft form and undergoing review for submission to RIDEM.

SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

SECTION I. In accordance with Title 250 RICR-150-10-1 ("RIPDES Regulations") §1.32(A)(5)(a)(7), on or after March 10, 2008, any discharge from a small municipal separate storm sewer system to any Special Resource Protection Waters (SRPWs) or impaired water bodies within its jurisdiction must obtain permits if a waiver has not been granted in accordance with RIPDES Regulations §1.32(G)(5)(c). A list of SRPWs can be found in Title 250-RICR-150-05-1 ("Water Quality Regulations") §1.28 at this link:
https://rules.sos.ri.gov/regulations/part/250-150-05-1
The State of Rhode Island 2024 Impaired Waters Report (April 2024) can be found here:
https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-10/ridem-impaired-waters-report-24.pdf

If you have discharges from your MS4 (regardless of its location) to any of the listed SRPWs or impaired waters (including impaired waters when a TMDL has not been approved), please provide an assessment of the progress towards expanding the MS4 Phase II Stormwater Program to include the discharges to the aforementioned waters and adapting the Six Minimum Control Measures to include the control of stormwater in these areas. Please indicate a rationale for the activities chosen to protect these waters. Please note that all of the measurable goals and BMPs required by the 2003 MS4 General Permit may not be applicable to these discharges.

Providence does not have any discharges to SRPWs as defined by the Water Quality Regulations 1.28. The water bodies under Providence jurisdiction all currently have an approved TMDL and an Implementation Plan under development.