

Municipal Separate Storm Sewer System (MS4) Fiscal Year 2023 Annual Report

General VPDES Permit for Small Municipal Separate Storm Sewer Systems

No. VAR040111

George Washington Memorial Parkway

Fiscal Year 2023 Annual Report July 1, 2022 – June 30, 2023

> Submittal to DEQ September 30, 2023

Submitted by:

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CERTIFICATION

Report: Municipal Separate Storm Sewer System (MS4) Fiscal Year 2023 Annual Report

Permit No.: General VPDES Permit for Small Municipal Separate Storm Sewer Systems No. VAR040111

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

Charles Cuvelier

Name

October 3, 2023

Date

Park Superintendent

Title



1.0 Introduction

This Fiscal Year 2023 (FY23) MS4 General Permit Annual Report has been prepared by the George Washington Memorial Parkway (GWMP) in accordance with General VPDES (Virginia Pollutant Discharge Elimination System) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (9VAC25-890-40 et seq.). The Virginia Department of Environmental Quality (DEQ) issued the most recent five-year permit (VAR040111) effective November 1, 2018.

Under the terms of the General Permit, the GWMP has developed a Municipal Separate Storm Sewer System (MS4) Program Plan to implement six minimum control measures (MCMs) aimed at reducing the discharge of pollutants to the "maximum extent practicable." Minimum control measures are presented below.

Six Minimum Control Measures

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

The park reviewed each MCM to determine the MS4 program's effectiveness and decided that no changes are currently needed to the MS4 Program Plan.

The MS4 Program Plan has been updated in accordance with the requirements of Part I C of the 2018 General Permit. The MS4 Program Plan is available on the GWMP web site at <u>https://www.nps.gov/gwmp/learn/scienceresearch.htm</u>. On that page, there should be a link to the MS4 park home page (<u>https://parkplanning.nps.gov/ms4va</u>) which has all the park MS4 documentation.

The General Permit requires that the GWMP submit annual reports no later than October 1 covering the preceding July 1 through June 30 reporting period. This annual report covers the period of July 1, 2022, through June 30, 2023. Part I D of the General Permit outlines the requirements for the annual report. The following is a summary of the requirements and where the information is located in this annual report.



Table 1MS4 Permit Annual Reporting Requirements			
Permit	Requirement	Location	
Part I D 2 a-b	 2. The annual report shall include the following general information: a. The permittee, system name, and permit number; b. The reporting period for which the annual report is being submitted; 	Section 2	
Part I D 2 c	c. A signed certification as per Part III K;	Certification page	
Part I D 2 d	d. Each annual reporting item as specified in an MCM in Part I E; and,	Section 3	
Part I D 2 e	e. An evaluation of the MS4 program implementation, including a review of each MCM, to determine the MS4program's effectiveness and whether or not changes to the MS4 program plan are necessary.	Section 4	
Part I D 3	3. For permittees receiving initial coverage under this general VPDES permit for the discharge of stormwater, the annual report shall include a status update on each component of the MS4 program plan being developed. Once the MS4 program plan has been updated to include implementation of a specific MCM in Part I E, the permittee shall follow the reporting requirements established in Part I D 2.	Not applicable	
Part I D 4	4. For those permittees with requirements established under Part II A, the annual report shall include a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit including any revisions to the plan.	Section 5	
Part I D 5	5. For those permittees with requirements established under Part II B, the annual report shall include a status report on the implementation of the local TMDL action plans in accordance with Part II B including any revisions to the plan.	Section 5	

2.0 Background Information

This section provides background information as required by Part I D 2 a-b of the General Permit.

Permittee:	George Washington Memorial Parkway

- System Name: George Washington Memorial Parkway MS4
- Permit Number: VAR040111
- **Reporting Period:** July 1, 2022 June 30, 2023



3.0 Status of Compliance with Fiscal Year 2023 Conditions

This section provides an overview of progress made toward meeting each MCM. Each MCM includes the specific annual reporting items as specified in Part I E of the General Permit followed by a more detailed description of each best management practice (BMP) contained in the MS4 Program Plan. Supporting materials are located in the appendices as referenced.

3.1 Public Education and Outreach (MCM #1)

In accordance with Part I E 1 g of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
√	(1) A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program.	 Chesapeake Bay Nutrients Pet Wastes Illicit Discharges
✓	(2) A list of strategies used to communicate each high priority stormwater issue.	See BMPs 3.1.A-3.1.C.

3.1. A Signage

The MS4 Program Plan establishes the following measurable goals and evaluation criteria:

- BMP Goal: The Park aims to make at least one signage focused on at least one of the high-priority topics identified above available to the public per each year of coverage under this MS4 permit.
- Intended Audience: The public audience is park visitors that utilize park facilities and grounds.
- Metric: The key metric will be the number of signs produced and posted.

BMPs from MS4 Program Plan	FY23 Activities
Temporary or permanent signage in public places or facilities, or storm drain stenciling.	There was no new signage added to the GWMP in FY 2023.
<i>This BMP is related to communicating around pet waste.</i>	Note: NPS tries to minimize signage on National Historic property as required per National Historic Preservation requirements.



3.1. B Media Materials

The MS4 Program Plan establishes the following measurable goals and evaluation criteria:

- BMP Goal: The Park aims to post at least one social media message focused on stormwater and the high-priority issues per quarter (4 messages per year) on either Twitter and/or Facebook.
- Intended Audience: The public audience is park visitors that "follow" GWMP on the social media sites of Twitter and Facebook. This audience includes both local and non-local members of the public.
- Metric: The metric will be based on the number of "Likes" and/or reposting's of the park's media messages.

BMPs from MS4 Program Plan	FY23 Activities
Social media messages	Four social media posts were made during FY 2023. North Parkway Rehabilitation-7/25/2022
This BMP is related to communicating illicit discharge and Chesapeake Bay Nutrients.	 (4 comments, and 5 shares) Clean Water Act Information – 10/25/2022 (9 Likes) Shared Friends of Dike Marsh Clean Up – 1/20/2023 (12 Likes) Information about the Dyke Marsh Wildlife Preserve – 2/2/2023 (4 Likes) See article regional staff wrote about monitoring Dyke Marsh. Long-Term Monitoring Reveals Challenges and Resilience at Dyke Marsh (U.S. National Park Service) (nps.gov)



3.2 Public Involvement/Participation (MCM #2)

Each of the activities listed in Section 3.2 were evaluated and found effective for garnering public involvement and participation in improving water quality. In accordance with Part I E 2 f of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
\checkmark	(1) A summary of any public input on the	No public input on the MS4 program was
	MS4 program received (including	received during this reporting period.
	stormwater complaints) and how the	
	permittee responded.	
\checkmark	(2) A webpage address to the permittee's	The webpage address is
	MS4 program and stormwater website.	https://parkplanning.nps.gov/ms4va
		See BMP 3.2. A.
\checkmark	(3) A description of the public involvement	See BMP 3.2. B.
	activities implemented by the permittee.	
\checkmark	(4) A report of the metric as defined for	See BMP 3.2. B.
	each activity and an evaluation as to	
	whether or not the activity is beneficial to	
	improving water quality.	
\checkmark	(5) The names of other MS4 permittees	The GWMP collaborated with Arlington
	with whom the permittee collaborated in	National Cemetery and the Arlington
	the public involvement opportunities.	County MS4 office during this reporting
		period.

3.2. A Stormwater Webpage

The objective of the stormwater webpage is to ensure that the public has readily available access to all MS4 program documents and reporting mechanisms.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "The GWMP website on which the park posts MS4 information will be the primary mechanism by which the public can review pertinent stormwater/MS4 program information as well as locate contact information for GWMP employees who will be identified as the point-of-contact(s) for stormwater issues."



BMPs from MS4 Program Plan	FY23 Activities
Host the stormwater webpage with the required permit information.	 The GWMP's stormwater webpage was updated to includes the following information: Effective MS4 permit and coverage letter Most current MS4 Program Plan Annual report within 30 days of submittal to DEQ List of GWMP staff and phone numbers for the public to contact TMDL reports SWPPP MS4 maps Training materials Comment button to allow for the public to submit comments/concerns to GWMP See Appendix B for a snapshot of the webpage.

3.2. B Public Involvement Opportunities

The objective of this BMP is to increase the public's awareness and participation in the GWMP's water quality and pollution prevention efforts.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "GWMP commits to four activities per year in accordance with the park's MS4 permit." The four activities are summarized below:



BMPs from MS4 Program Plan	FY23 Activities
Volunteer Cleanups: Conduct one to two cleanups	For trash cleanup, GWMP had 3,917 volunteers
each permit year and report the number of full	contribute 8,134 hours of service. 1,423 bags of
trash bags collected.	trash were cleaned up (11,062 pounds of litter).
Public presentation of the visitor interpretation	The "Leave No Trace" video was not shown at the
video called "Leave No Trace": Conduct one to two	Great Falls Visitor Center due to the center being
viewings and report estimated number of visitors	closed.
who viewed the video.	
Representation of GWMP and Regional personnel	GWMP participated in one panel for the United
on local agency stormwater management panels:	States Regional Response Team (RRT III)
Participate in at least two meetings each permit	committee in FY 2023. This is the national
year and report the number of meetings attended.	response spill team for the region.
Work with park partners to present watershed	GWMP partners include the Alice Ferguson
and stormwater management information to	Foundation and the Friends of Dyke Marsh. There
public audiences: Update partner work plans to	were no updates to partner plans during the
incorporate information about stormwater management and report the number of people	reporting period.
receiving the information.	Regional staff presented information about the
	Inventory and Monitoring Network during a
	Friends of Dyke Marsh meeting (January 2023).
	Not specific to stormwater management, but the
	monitoring does provide the park information
	about water quality, and indicator species
	impacted by ecological changes. Natural
	Resource Monitoring at George Washington
	Memorial Parkway (U.S. National Park Service)
	(nps.gov)



3.3 Illicit Discharge Detection and Elimination (MCM #3)

In accordance with Part I E 3 e of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
	(1) A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.	GWMP made one update to the MS4 maps during the reporting period. An outfall was discovered at Daingerfield Island. The updated map is included in attachment to the report and the MS4 Program Plan.
✓	(2) The total number of outfalls screened during the reporting period as part of the dry weather screening program.	See BMP 3.3. B.
	 (3) A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows: The source of illicit discharge The dates that the discharge was observed, reported, or both Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method How the investigation was resolved A description of any follow-up activities The date the investigation was closed 	See BMP 3.3.C.



3.3. A Procedures and Forms Review

The objective of this BMP is to ensure that written procedures are in place to detect, identify, and address unauthorized non-stormwater discharges and illegal dumping to the storm sewer system. These procedures provide an added level of consistency to effectively prohibit illicit discharges and illegal dumping to the storm sewer system, and to conduct enforcement actions as necessary.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Park staff will review pertinent (illicit discharge detection and elimination) IDDE written procedures and forms once to ensure they are comprehensive and reflect any new information based on any previous year's IDDE investigations."

BMPs from MS4 Program Plan	FY23 Activities
Review and update (as needed) every two years	The IDDE written procedures and Stormwater
the IDDE written procedures and "Storm Water	Outfall Dry Weather Screening Inspection form
Outfall Dry Weather Screening Inspection Form."	were reviewed. The IDDE written procedures and
	Stormwater Outfall Dry Weather Screening
	Inspection form were reviewed and updated per
	requests made by DEQ during the 2022 audit. The
	inspection form and procedures are available on
	the MS4 website. No additional updates and/or
	changes were made to the procedures and the
	form in FY 2023.

3.3. B Dry Weather Outfall Screening

The objective of this BMP is to identify and eliminate illicit discharges as soon as possible to minimize impacts to water quality. The GWMP's IDDE Procedures are documented in the MS4 Program Plan.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Park staff will strive to screen 50 outfalls a year such that no more than 50% are screened in the previous 12-month period".

BMPs from MS4 Program Plan	FY23 Activities
Perform annual dry weather screening of 50 outfalls.	During FY 2023, 55 outfalls were screened. A copy of the screening forms is located in Appendix C.



3.3.C Illicit Discharge Tracking

The General Permit requires that the GWMP track and process complaints about potential illicit discharges and to coordinate an appropriate response. Potential illicit discharges are identified through public reporting in MCM #1, the dry weather outfall screening program in BMP 3.3.B, and staff reporting in MCM #6.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Investigation information will be maintained in an electronic log." At a minimum the log tracks the data in Table 4.

BMPs from MS4 Program Plan	FY23 Activities
	There were no illicit discharges reported in FY
Maintain illicit discharge tracking log.	2023. However, there were two spill events that
	occurred during FY 2023. The details of these
	events are provided below.
	 Spill Notification #1 (2/22/2023) - At
	approximately 1154 hours on 2/2/2023,
	District 2 units responded to a call from
	NPS maintenance regarding a ruptured
	hydraulic line on an NPS owned/operated
	front end loader in the area of South
	Washington Street at Gibbon Street
	(Alexandria, VA). An observed amount of
	hydraulic fluid leaked from the vehicle's
	hydraulic line on city streets. Alexandria
	Fire Department responded, contained
	the fluid and assisted with the successful
	cleanup. There were no anticipated
	environmental or economic impacts from
	the event. Units cleared by approximately
	1245hrs.
	Spill Notification #2 (2/13/2023) At
	Daingerfield Island, grass was discovered to be dark around the PEPCO manholes
	at Daingerfield island. PEPCO had an apparent overflow of UST's containing di-
	electric fluid (DF100, non-PCB). It was
	approximately 75 feet from the Potomac
	River on land with no obvious impact to
	the Potomac River. PEPCO tested and
	cleaned up the site over the course of a
	couple of weeks.



3.4 Construction Site Stormwater Runoff Control (MCM #4)

In accordance with Part I E 4 d of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	 (1) If the permittee implements a construction site stormwater runoff program in accordance with Part I E 4 a (3): A confirmation that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control. If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications. 	The GWMP is a federal entity that has not developed standards and specifications as described in Part I E 4 a (4) of the permit and thus is not required to provide the annual reporting information specified for this MCM. The GWMP MCM #4 activities are described in the MS4 Program Plan – see BMP 3.4. A.

3.4. A Procedures and Forms Review

The objective of this BMP is to ensure that the GWMP has in place processes and procedures necessary to address discharges from regulated construction site stormwater runoff.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Park staff will review stormwater management practices at construction sites affecting more than 2,500 square feet to ensure contractors are meeting contract obligations."



BMPs from MS4 Program Plan	FY23 Activities
Conduct at least two site visits per permit year at construction sites that disturb 2,500 square feet or more of soil. Identify non-compliance and require the contractor to rectify the issue(s).	There was one project that was over 2500 square feet of disturbance. The Project was the North Parkway Rehabilitation Project. The Project was conducted in accordance with the current department approved standards and specifications for erosion and sediment control. Multiple site visits and inspections are conducted (per month) during the construction period. The project is covered under Virginia Stormwater Construction General Permit.
	The park has been performing site visits every other week since May 2023. There were 15 other site visits from July 2022 to May 2023. A representative is always on-site from Federal Highways.



3.5 Post Construction Stormwater Management (MCM #5)

In accordance with Part I E 5 i of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
\checkmark	(1) If the permittee implements a Virginia	The GWMP is a federal entity that has
	Stormwater Management Program in	not developed standards and
	accordance	specifications as described in Part I E 5 a
	with Part I E 5 a (1) and (2):	(4) of the permit and thus is not required
	 The number of privately owned 	to provide the annual reporting
	stormwater facility inspections	information specified.
	conducted.	
	The number of enforcement	
	actions initiated by the permittee	
	to ensure long-term maintenance	
	of privately owned stormwater	
	management facilities including	
	the type of enforcement action.	
\checkmark	(2) The total number of inspections conducted	Currently GWMP does not own or
	on stormwater management facilities owned	operate any stormwater management
	or operated by the permittee.	facilities in the MS4.
\checkmark	(3) A description of the significant	NPS operates one BMP in the park, which
	maintenance, repair, or retrofit activities	was constructed in January 2020 (Dyke
	performed on the stormwater management	Marsh Phase I). No maintenance has
	facilities owned and operated by the	been performed on this BMP. 2 site visits
	permittee to ensure it continues to perform as	were conducted in FY2023.
	designed. This does not include routine	
	activities such as grass mowing or trash	
	collection.	
\checkmark	(4) A confirmation statement that the	For the one project that was subject to
	permittee submitted stormwater	the Virginia Construction General Permit
	management facility information through the	for land disturbing activities the required
	Virginia Construction General Permit database	permitting was obtained through the
	for those land disturbing activities for which	Virginia Department of Environmental
	the permittee was required to obtain coverage	Quality.
	under the General VPDES Permit for	
	Discharges of Stormwater from Construction	
	Activities in accordance with Part I E 5 f or a	
	statement that the permittee did not	
	complete any projects requiring coverage	
	under the General VPDES Permit for	
	Discharges of Stormwater from Construction	
	Activities.	
	(5) A confirmation statement that the	There were no additional BMPs added to
	permittee electronically reported BMPs using	GWMP in FY 2023. Therefore, no report
	the DEQ BMP Warehouse in accordance with	



Annual Report Requirement	Documentation
Part I E 5 g and the date on which the	was submitted to the DEQ BMP
information was submitted.	Warehouse.

3.6 Pollution Prevention/Good Housekeeping for Municipal Operation (MCM #6)

In accordance with Part I E 6 q of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	(1) A summary of any operational proceduresdeveloped or modified in accordance with PartI E 6 a during the reporting period.	See BMP 3.6. A.
✓	 (2) A summary of any new stormwater pollution prevention plans (SWPPPs) developed in accordance with Part I E 6 c during the reporting period. 	No new SWPPPs were developed during the reporting period.
✓	(3) A summary of any SWPPPs modified in accordance with Part I E 6 f or the rationale of any high priority facilities de-listed in accordance with Part 1 E 6 h during the reporting period.	The Daingerfield Island SWPPP was updated during the FY 2023 reporting period to include the Outfall discovered during FY 2023.
✓	 (4) A summary of any new turf and landscape nutrient management plans developed that includes: Location and total acreage of each land area. The date of the approved nutrient management plan. 	No updates were made to the turf and landscape nutrient management plan (it was updated in June, 2022).
✓	 (5) A list of training events conducted in accordance with Part I E 6 m, including the following information: The date of the training event. The number of employees who attended the training event. The objective of the training event. 	See BMP 3.6. C.



3.6.A Procedures Review

The objective of this BMP is to implement pollution prevention procedures for operation and maintenance activities as required in Part I E 6 a of the General Permit.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Park staff will review stormwater good housekeeping and pollution prevention practices and make updates as appropriate."

BMPs from MS4 Program Plan	FY23 Activities
Review and update (as needed) every two years	The procedures were reviewed, and no updates
the written procedures and associated training	were made.
content for employees.	

3.6. B Stormwater Pollution Prevention Plans for High-Risk Facilities

The objective of this BMP is to reduce and prevent the discharge of pollutants from high-priority facilities through SWPPPs and other pollution prevention measures.

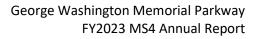
The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "Two locations are considered high-priority facilities that have the potential to discharge pollutants in accordance with the MS4 permit. Both locations have a written SWPPP in place (GWMP Maintenance Complex and Daingerfield Island)."

BMPs from MS4 Program Plan	FY23 Activities
Implement SWPPPs.	The GWMP continued to implement SWPPPs for
	the Maintenance Complex and Daingerfield
	Island. The Annual Inspection at the
	Maintenance complex and Daingerfield Island
	occurred in June 2023.
	The annual inspections are included in Appendix
	D.
Review high-priority sites after incidents and	Two spill incidents occurred during the FY 2023
update SWPPPs, if necessary.	reporting period. See 3.3.C above for further
	details.

3.6.C Training

The purpose of this BMP is to implement a training plan in accordance with Part I E 6 m-o of the General Permit.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "GWMP will maintain documentation of each training event for a minimum of 3 years, including date, number of attendees, and objective."





BMPs from MS4 Program Plan	FY23 Activities
Recognition and reporting of illicit	Twenty-five GWMP employees (dates vary) took
discharges.	the illicit discharge and good housekeeping
	training. The link to training presentation is
	located <u>here</u> .
	The objective of the training is for staff to know
	their roles and responsibilities in illicit discharge
	recognition, understand what actions can be
	taken, and how to recognize and report
	discharges.
Pollution prevention and good	See above. The copy of the presentation contains
housekeeping training.	the objective of the training.
Virginia Pesticide Control Act, Virginia Erosion and	GWMP has one licensed applicator who applies
Sediment Control Law, and Virginia Stormwater	herbicide along the parkway. GWMP also
Management Act.	requires contractors performing these services to
	be trained as required. A copy of licensure for
	the GWMP licensed applicator is located in
	Appendix D.
Spill response	See Appendix D for presentation.

4.0 MS4 Program Plan Assessment

In accordance with the General Permit, the GWMP has evaluated the MS4 Program Plan in FY 2023, including a review of each MCM. The GWMP finds that the BMPs established to implement the MCMs are effective and that no changes are required at this time.

5.0 Special Conditions Associated with TMDLs

The General Permit requires the GWMP to develop action plans to address TMDLs where a wasteload allocation (WLA) has been assigned to the MS4.

The following provides an update on the status of the GWMP's Chesapeake Bay TMDL compliance activities. The Chesapeake Bay TMDL Action Plan was certified on January 2021 after public comment and submitted to the DEQ. Approval of the plan was received on July 13, 2021. Implementation status of that plan is as follows:

- The Roaches Run Water Sanctuary was a wetland enhancement involving planting native vegetation in the Roaches Run Waterfowl Sanctuary to enhance the function of freshwater wetlands. The wetland enhancement is still ongoing. In Year 2, larger specimens and plants were replanted to have a better success rate. In FY 2023, the success of Year 2 plantings will be documented.
- There were no BMPs added during this reporting period. After the completion of the North Parkway Rehabilitation Project, the cumulative reduction of criteria pollutants will be updated.

The park TMDL plan demonstrates that the park has achieved the 40% reductions for the 2018-2023 permit, and has almost reached the 100% reduction levels needed for the 2023-2028 permit



A Comprehensive Local TMDL Action Plan has been prepared to address bacteria and PCB TMDLs assigned to the GWMP. This document was certified in January 2021 after public comment and submitted to the DEQ. Approval of the plan was received on July 13, 2021. Implementation status of that plan is as follows:

- The park continues to enforce the cleaning up of pet excrements in the parkway.
- All necessary training was conducted in accordance to the TMDL Action Plan.
- The public outreach conducted is listed above in the Annual Report.
- There were 55 illicit discharges inspections conducted during this period.
- There were no BMPs added during this reporting period. After the completion of the North Parkway Rehabilitation Project, the cumulative reduction of criteria pollutants will be updated.