

SPECIAL DISTRICTS PERMIT AREA RE-CLASSIFICATION

SEMSWA NON-STANDARD PERMIT APPLICATION FOR
ACWWA, INVERNESS, AND EAST CHERRY CREEK VALLEY

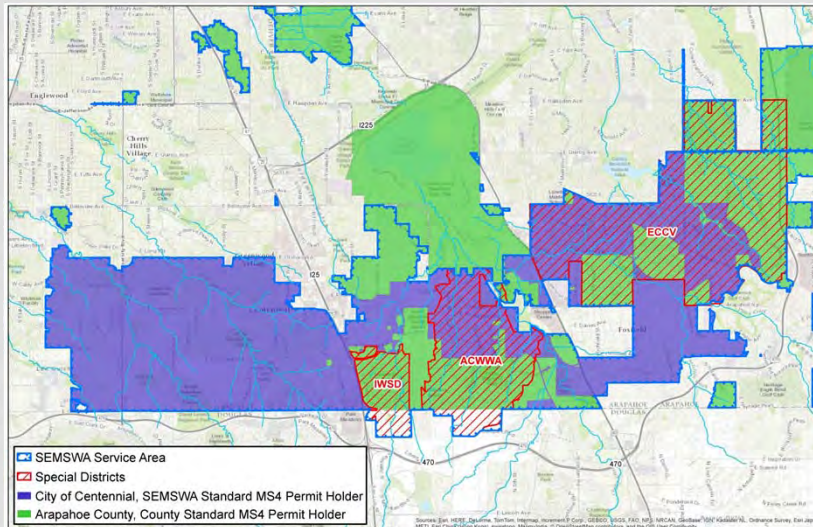
May17,
2017

TYPES OF MUNICIPAL SEPARATE STORM SEWER (MS4) PERMITS

- **Standard** MS4 Permits are issued to entities that own or operate stormwater systems and have Land Use Authority
 - SEMSWA has a **Standard** MS4 Permit in the City courtesy of the Implementing IGA that memorializes our operation of the storm system in the City and provides us the authority to implement the permit within the City.
 - Arapahoe County has a **Standard** MS4 Permit for their jurisdiction.
- **Non-Standard** MS4 Permits are issued to public entities without Land Use Authority, but who still have ownership and a stormwater management role for a daily population base greater than 1,000
 - Examples are Special Districts, Schools, Prisons, Cherry Creek State Park, CDOT
 - Our three Special Districts, Arapahoe County Water and Wastewater, Inverness, and East Cherry Creek Valley all had **Non-Standard** MS4 Permits that were transferred to SEMSWA

SEMSWA SERVICE AREA

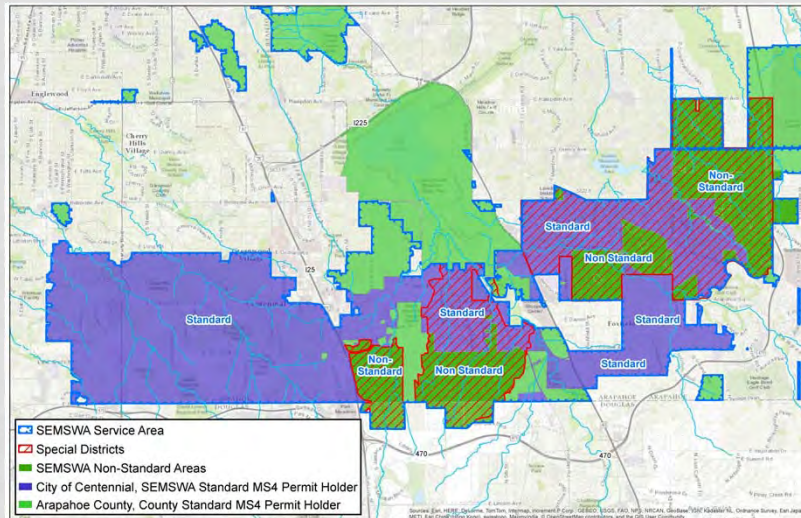
CITY OF CENTENNIAL, ARAPAHOE COUNTY, AND THE THREE SPECIAL DISTRICTS



WHAT THE ISSUE IS & HOW TO RESOLVE IT

- At the time of transfer of the Special District's **Non-Standard** permits to SEMSWA,
 - no formal differentiation from the Division in the transfer documents that one or more had Centennial, Arapahoe County and Douglas County jurisdictions
 - their permit areas were formalized into the **Standard** MS4 Permit that encompassed SEMSWA's entire Service Area.
- SEMSWA cannot be a **Standard** Permit holder in Arapahoe or Douglas County
 - no land use authority and no Implementing IGA that allows permit authorities
- This is a situation that we've known about and is being corrected at the request of the Division.
- The resolution is a **Non-Standard** MS4 Permit application for these three Special District areas within both Arapahoe County and Douglas County

SEMSWA'S TWO MS4 PERMIT AREAS



REASONS FOR ADDITIONAL MS4 PERMIT

- Characterize permit areas correctly
- Good timing to clarify in new Program Description Documents (PDD)
- Good timing to update SOPs with County
- Audit clarity

- There will be no changes in SEMSWA, Special District, or County activities or operations; this new permit application will just memorialize the SEMSWA **Non-standard** permit areas within Arapahoe County and Douglas County
- The Division is expecting this application, and supports it.
- There will be an additional permit fee of \$1,053/year
- Questions?