

Code Section	Issue	Problem	Specific Code	Existing Language	Proposed Language	Notes/Comments/To-Do's
288	"City Engineer" should be updated to "Director of Public Works/City Engineer"	Inconsistent with current program	(throughout)	City Engineer	Director of Public Works/City Engineer	
288-9	Permit Duration	(Erosion control - Art. 1:) Currently 180 days	288-9 G.	G. Permit duration. Permits issued under this section shall be valid for a period of 180 days, or the length of the building permit or other construction authorizations, whichever is longer, from the date of issuance. The City may extend the period one or more times for up to an additional 180 days. The City may require additional BMPs as a condition of the extension if they are necessary to meet the requirements of this article.	G. Permit duration. Permits issued under this section shall be valid for a period of 3 years from the date of issuance. The City may extend the period once for up to an additional 3 years. The City may require additional BMPs as a condition of the extension if they are necessary to meet the requirements of this article.	Extend length of erosion control permit to mirror WDNR NOI.
288-11	Erosion Control Inspections by City	Inconsistent with MS4 Permit Requirements	288-11.1	Inspection. If land-disturbing construction activities are being carried out without a permit required by this article, the City may enter the land pursuant to the provisions of § 66.0119(1), (2) and (3), Wis. Stats. The City will inspect any construction site with more than one acre of land-disturbing construction activity that holds a permit under this chapter at least once a month during the period starting March 1 and ending October 31 and at least two times during the period starting November 1 and ending February 28 to ensure compliance with the approved sediment and erosion control plan. The costs of these inspections shall be billed to the responsible party.	The City will inspect any construction site with more than one acre of land-disturbing construction activity that holds a permit under this chapter as required by the current Wisconsin Department of Natural Resources Municipal Separate Storm Sewer System (MS4) Permit or within the first 2 weeks of construction, at least once a month, and again at the end of construction to ensure compliance with the approved sediment and erosion control plan. If erosion and/or sediment control Best Management Practices (BMPs) are out of compliance during inspections, the City may conduct follow-up inspections within 7 days, unless corrections are made and observed by the inspector or verified via photographs submitted to the inspector.	> 1 acre inspections are required; E-mailed Dan B. & Brooke Robinson (DNR) 10/18/22: ok to do less frequent inspections on < 1 acre sites as long as it doesn't result in backsliding.
288-15	Post-construction storm water threshold	3,000 SF too small; Revise to .5 acre (21,780 SF).	288-15 A. (1)	Where not otherwise limited by law, this article applies to a post-construction site which has 3,000 or more square feet of land-disturbing construction activity, unless the site is otherwise exempt under Subsection A(2).	Where not otherwise limited by law, this article applies to a post-construction site which has .5 or more acres of land-disturbing construction activity, unless the site is otherwise exempt under Subsection A(2).	Recommend .5 acre for post-construction stormwater runoff requirements. See spreadsheet of other municipalities' permit thresholds.
288-18	Consider Sump Connection Permit	Need to track additions of non-stormwater discharges of clean water to storm sewer system for MS4 mapping, IDDE evaluations, etc.	288-18 D (6) (e) (4) i	(currently not in code)	Where a storm sewer is available, all cistern overflows, drain tile, downspouts, roof leaders, surface or area drains may be connected to it with appropriate city permit.	Does a permit/program to connect to the storm sewer system belong in Ch. 288? Or does it belong somewhere else, as it is a drainage issue? See C of Madison Ch. 37.05 7. (a) <i>Copied proposed language from Plumbing 419-8 V</i>
288-18	Consider Sump Connection Permit	Need to track additions of non-stormwater discharges of clean water to storm sewer system for MS4 mapping, IDDE evaluations, etc.	288-18 D (6) (e) (4) ii	(currently not in code)	Where storm sewers are not available all cistern overflows, drain tile, downspouts, roof leaders, surface or area drains or other clean water may be piped separately to the street curb or other place of disposal with appropriate city permit.	<i>Copied proposed language from Plumbing 419-8 V</i>
288-18	Phosphorus Requirement on Redevelopment Sites	Required for all redevelopment, not just roads, alleys, and parking lots like rest of redevelopment.	288-18 D.(1) (a) Table 1	(TSS) 60% of load from parking areas and roads (TP) 30%	(TSS) 60% of load from parking areas and roads (TP) 30% of load from parking areas and roads	TSS & TP control is required in similar situations for ease and consistency of design.
288-18	SW BMP required to be in outlots	Ownership, responsibility, and maintenance of outlots has been problematic in the past.	288-18 E. (3)	Unless deemed not possible by City staff, stormwater facilities shall be located on outlots with direct access to adjacent public streets.	Unless deemed not possible by City staff, stormwater facilities may be located on outlots with direct access to adjacent public streets.	Leaves the option to locate BMPs in outlots available, however allows BMPs to be located in other areas, too. (Examples: permeable pavers in parking lots? BMPs on commercial/industrial property?)

288-19	Final BMP inspection	Clarify when to notify City and what City is expected to inspect (during consturction, layers underground, photograph/document, confirm plantings have been completed)	288-19 D. (3)	The responsible party shall notify the City at least three business days before commencing any work in conjunction with the stormwater management plan, and within three business days upon completion of the stormwater management practices. If required as a special condition under Subsection E, the responsible party shall make additional notification according to a schedule set forth by the City so that practice installations can be inspected during construction	The responsible party shall notify the City at least three business days before commencing any work in conjunction with the stormwater management plan, three days prior to commencing work on the stormwater management practices, and within three business days upon completion of the stormwater management practices.	Inspections are needed during construction of stormwater BMPs to verify underground features have been installed apprpriately.
288-19	Long Term Maintenance Requirements	Need to clarify long-term maintenance requirements in Ch. 288.	288-19 D. (6), (7)	(6) The responsible party shall maintain all stormwater management practices in accordance with the stormwater management plan until the practices either become the responsibility of the City of Watertown, or are transferred to subsequent private owners as specified in the approved maintenance agreement. (7) The responsible party authorizes the City to perform any work or operations necessary to bring stormwater management measures into conformance with the approved stormwater management plan, and consents to a special assessment or charge against the property as authorized under Subch. VII of Ch. 66, Wis. Stats., or to charging such costs against the financial guarantee posted under § 288-22.	(6) The responsible party shall maintain all stormwater management practices in perpetuity in accordance with the stormwater management plan until the practices either become the responsibility...	The responsible party is responsbile for maintenance; the responsible party may change throughout and beyond the construction project.
288-19	Permit duration	Post-construction stormwater:) undefined; until the BMP is complete.	288-19 F.	F. Permit duration. Permits issued under this section shall be valid from the date of issuance through the date the City notifies the responsible party that all stormwater management practices have passed the final inspection required under Subsection D(4).	G. Permit duration. Permits issued under this section shall be valid for a period of 3 years from the date of issuance. The City may extend the period once for up to an additional 3 years or until all stormwater management practices have passed the final inspection required under Subsection D (4)	Extend length of erosion control permit to mirror WDNR NOI.
288-9 & 288-19	Permit review time for erosion control is different than for stormwater	Erosion Control & Post-Construction Stormwater Plan reviews are allowed 2 different timelines.	288-9 C. (1) & 288-19 C. (1)	Within 15 business days of the receipt of a complete permit application, as required by Subsection B, the City shall inform the applicant whether the application and plan are approved or disapproved based on the requirements of this article.	Within 20 business days of the receipt of a complete permit application, as required by Subsection B, the City shall inform the applicant whether the application and plan are approved or disapproved based on the requirements of this article.	Update erosion control plan review to match same 20 day requirement of post-construction stormwater plan review.
288-19	As-builts	Need stamped as-builts and GIS shapefiles	288-19 D. (4)	Practice installations required as part of this article shall be certified "as built" by a licensed professional engineer. Completed stormwater management practices must pass a final inspection by the City or its designee to determine if they are in accordance with the approved stormwater management plan and ordinance. The City or its designee shall notify the responsible party in writing of any changes required in such practices to bring them into compliance with the conditions of this permit.	Practice installations required as part of this article shall be certified "as built" by a licensed professional engineer <i>and furnished to the City in digital AutoCad format (.dwg or .dxf file format), in Adobe PDF format, and in ArcGIS shapefile format (.shp or FileGDB format or other format as approved by Public Works Director/City Engineer</i> . Completed stormwater management practices must pass a final inspection by the City or its designee to determine if they are in accordance with the approved stormwater management plan and ordinance. The City or its designee shall notify the responsible party in writing of any changes required in such practices to bring them into compliance with the conditions of this permit.	Allows submittal of as-built documentation in electronic form.
288-20	Small site plan requirements	Simplified Plan requirements for sites < 1 acre is not clear.	288-20 B.	Simplified plans. The City may allow simplified stormwater management plans for sites with less than one acre of land-disturbing construction activity.	(1) Erosion Control Plans are required for construction sites with 3,000 square feet or more of land disturbance. (2) Stormwater management plans including modeling or other calculations accepted for review by the Director of Public Works. City Engineer detailed construction plans and stormwater maintenance agreements and are required for construction sites with 21,780 square feet or more.	Erosion Control Plan required for 3,000 SF or more Stormwater Management Plan requirements for > 1/2 acre & < 1 acre sites.

288-20	Revised square footage of impervious area after project completion	New and redevelopment projects typically result in a different amounts of impervious area than before construction; this new calculation is needed for the stormwater utility charges/bills. This should be added to the list of requirements in the stormwater management plan.	288-20 A.	(currently not in code)	(12) Total amount of new/revised impervious area on property in square feet.	New/revised amount of impervious to be included in stormwater management plan.
288-20	Maintenance Agreement	Maintenance Plan items should be clarified.	288-20 A (6)	A maintenance plan developed for the life of each stormwater management practice including the required maintenance activities and maintenance activity schedule.	A maintenance plan developed for the life of each stormwater management practice including a map showing the BMP, access routes, easements and corresponding streets and water resources, the required maintenance activities and maintenance activity schedule. A vegetation plan should be included if applicable.	Include map and vegetation plan as part of stormwater BMP maintenance plan.
288-21	Maintenance Agreement	Inconsistent with current sample maintenance agreement document	288-21 B (4)	Requirement that the responsible party(s) shall maintain stormwater management practices in accordance with the schedule included in Subsection B(2) and shall submit an annual inspection and maintenance summary report to the City	Requirement that the responsible party(s) shall maintain stormwater management practices in accordance with the schedule included in Subsection B(2) and shall submit an inspection and maintenance summary report to the City per the inspection frequency described in the maintenance plan and at least once every three years.	Clarify ordinance and draft maintenance agreement template to grant City access to site to inspect and to do maintenance as well as charge back. Maintenance ordinance language should mirror agreement language as much as possible.