



CITY OF KIRKLAND
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MEMORANDUM

To: Dave Ramsay, City Manager

From: Jenny Gaus, Surface Water Engineering Supervisor
Daryl Grisgby, Public Works Director

Date: February 29, 2008

Subject: NPDES Phase II Municipal Stormwater Permit – Stormwater Management Program (SWMP) and Annual Compliance Report

RECOMMENDATION:

It is recommended that the City Council authorize the City Manager to sign the 2007 Annual Compliance Report.

The Stormwater Management Program is presented to Council as part of the public involvement process that is required for this document.

BACKGROUND DISCUSSION:

The Western Washington Phase II Municipal Stormwater Permit (the Permit) was issued by the State Department of Ecology on February 17, 2007. This Permit, which is part of the Nonpoint Discharge Elimination System (NPDES) permit program authorized under the Federal Clean Water Act, requires that the City control discharge of pollutants from the municipally owned stormwater system by taking and documenting actions in 5 key areas:

- Public Education and Outreach
- Public Involvement
- Illicit discharge Detention and Elimination
- Construction and Post-construction runoff controls
- Pollution Prevention and Municipal Operations and Maintenance

For further background on the Permit, please see

[WW Phase II Municipal Stormwater Permit](#)

The City is currently in compliance with the conditions of the Permit, which are phased in over the 5-year permit cycle. There were few items that had to be completed in 2007. There are also few items that will need to be complete in 2008, but work must start on many items in order to meet Permit deadlines that occur in 2009. Highlights of Permit-related work that will occur in 2008 include:

- Identification of key staff in each affected department and/or division that will be responsible for coordinating Permit compliance activities
- Development of methods for evaluating the effectiveness of existing education and outreach programs

- Beginning review and update of codes that address illicit discharges, control of runoff from new development, redevelopment, and construction sites
- Adoption of a new surface water design manual that is equivalent to the 2005 Stormwater Management Manual for Western Washington
- Development of processes and procedures for tracking and documenting Permit-related activities

Attached is a copy of the 2008 City of Kirkland Stormwater Management Program (SWMP) (Attachment A). This SWMP is part of compliance documentation required by Ecology and details current and planned activities associated with Permit compliance. The SWMP must be submitted to Ecology by March 31st, along with the 2007 Annual Compliance Report (Attachment B). The Permit requires that the City conduct a public involvement process for the SWMP, and that it be posted on the City's website.

Compliance with the NPDES permit will require actions by many City Departments. It is for this reason that staff are requesting that the City Manager be authorized to sign the 2007 Annual Compliance Report.

Several upcoming trainings are available to elected officials and City executives who would like to learn more about the NPDES program and about the Phase II municipal stormwater permits in particular. Trainings are developed by the Association of Washington Cities through a grant from Ecology. Please see [AWC - NPDES Stormwater Permit Workshops](#) for further information.

As noted previously in the 4-17-07 Council Packet (see [4-17-07 NPDES Council Item](#)), the City may need to consider increases to the surface water utility budget or looking at shifting priorities in to maintain compliance with Permit conditions in the years ahead. Other Departments including Parks, and Fire and Building may have budget impacts, but they will likely be minor in comparison. Further information on costs and needs will be presented as part of the 2009-2010 budget process.

Attachment A: 2008 city of Kirkland Stormwater Management Program
Attachment B 2007 Annual Compliance Report



CITY OF KIRKLAND

2008 STORMWATER MANAGEMENT PROGRAM (SWMP)

Prepared February, 2008



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Table of Contents

- 1. Introduction 5
 - 1.1 The Purpose of the Stormwater Management Program Document 5
 - 1.2 The NPDES Program 5
 - 1.3 The Western Washington Phase II Municipal Stormwater Permit 5
 - 1.4 Implementation Timing 6
 - 1.5 City Coordination and Responsibilities 6
 - 1.6 The Surface Water Management Utility – Other Activities 6
 - 1.7 The Permit as Document Map 6
- 2. Public Education and Outreach 7
 - 2.1 Permit Requirements 7
 - 2.2 Current Activities 7
 - 2.3 Planned Activities 8
- 3. Public Involvement and Participation 9
 - 3.1 Permit Requirements 9
 - 3.2 Current Activities 9
 - 3.3 Planned Activities 9
- 4. Illicit Discharge Detection and Elimination 10
 - 4.1 Permit Requirements 10
 - 4.2 Current Activities 10
 - 4.3 Planned Activities 11
- 5. Controlling Runoff from New Development, Redevelopment and Construction Sites 12
 - 5.1 Permit Requirements 12
 - 5.2 Current Activities 12
 - 5.3 Planned Activities 13
- 6. Pollution Prevention and Operation and Maintenance for Municipal Operations 14
 - 6.1 Permit Requirements 14
 - 6.2 Current Activities 14
 - 6.3 Planned Activities 14

APPENDIX A

Western Washington Phase II Municipal Stormwater NPDES Permit Overview

List of Tables

Table 2.1 Current Education and Outreach Programs and Activities	7
Table 2.2 Education and Outreach Work Plan for 2008	8
Table 3.1 Public Involvement Work Plan for 2008	9
Table 4.1 Illicit Discharge Detection and Elimination Work Plan for 2008	11
Table 5.1 Controlling Runoff from New Development, Redevelopment and Construction Sites Work Plan for 2008	13
Table 6.1 Pollution Prevention and Operation and Maintenance for Municipal Operations Work Plan for 2008	15

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1. Introduction

1.1 The Purpose of the Stormwater Management Program Document

This document constitutes the City of Kirkland 2008 Stormwater Management Program (SWMP) as required under condition S5 of the *Western Washington Phase II Municipal stormwater Permit* (the Permit). The purpose of the document is to detail actions that the City of Kirkland will take between February 16th, 2008 and February 16, 2009 to maintain compliance with conditions in the Permit. This SWMP will be an attachment to the Annual Compliance Report for the Permit for 2007, which is due at Ecology on March 31, 2008.

1.2 The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes and stream so that they can support “beneficial uses” such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface waters regulated by the Federal Government (Waters of the US) must obtain permits and comply with certain conditions or face fines and other penalties. NPDES permits have been written for discharges from construction sites, concentrated animal feeding operations, industrial activities, publicly-owned wastewater treatment plants, and municipal stormwater systems.

In Washington State, the US Environmental Protection Agency has delegated the authority over NPDES permits to the Washington State Department of Ecology (Ecology). Ecology has issued several general permits for discharges from stormwater systems that apply to municipalities with different sizes of populations and that are located in different regions of the State (Eastern and Western Washington). Phase I refers to municipalities of >100,000, and Phase II to those with a population of less than 100,000 according to the 1990 census.

1.3 The Western Washington Phase II Municipal Stormwater Permit

Kirkland has a population of less than 100,000 and is in Western Washington. Thus our stormwater program must comply with conditions in the *Western Washington Phase II Municipal Stormwater Permit*. The Permit was issued on February 16th, 2007, and will remain in effect until February 15th of 2012. A Permit allows municipalities to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes and streams, as long as we implement programs to reduce pollutants in stormwater to the “maximum extent possible” by conducting programs and activities in the following program areas:

- Public Education and Outreach
- Public Involvement
- Illicit Discharge Detection and Elimination
- Construction and Post-construction runoff controls
- Pollution Prevention and Municipal Operations and Maintenance
- Monitoring

The SWMP must be prepared and submitted annually and must contain the planned actions and activities that will be used in the following year to gain compliance with the permit. In addition, the Permit requires the City to submit an Annual Compliance Report by March 31st of each year that details actions taken in the previous year to achieve compliance. The full text of the Permit is available at: http://www.ecy.wa.gov/Programs/wq/stormwater/municipal/phase_II_ww/ww_ph_ii-permit.html or can be viewed upon request by contacting the City of Kirkland at (425) 587-3850.

1.4 Implementation Timing

The Permit is valid for 5 years, from February 16, 2007 to February 15, 2012, and allows for phased implementation of stormwater management programs and actions. Appendix A details the timing for actions required under the Permit.

The following are required tasks and deadlines for 2008 that are relevant to Kirkland and are associated with the SWMP (as noted by Ecology in information associated with the Annual Compliance Report):

- Annual Compliance Report for activities conducted in 2007 is due March 31st, 2008
- Annual written update of Permittee’s Stormwater Management Program (SWMP, i.e. this document) must be attached to the Annual Compliance Report

- Initiate a program to develop and maintain a map of all new connections to the stormwater system allowed after the effective date of the permit (see Section 4 of this SWMP for explanation and details)
- Provide copies of the **Notice of Intent for Construction Activity** and **Notice of Intent for Industrial Activities** to representatives of proposed new development and redevelopment (see Section 5 of this SWMP for explanation and details)

The first year of the Permit is largely concerned with initiation of activities, with few deadlines. This is why most items in this report have “schedule notes” in the tables that say “beginning in 2008.” The City is collecting and analyzing information, and is preparing to maintain compliance by meeting deadlines that occur in 2009 or beyond.

1.5 City Coordination and Responsibilities

Compliance with the Permit will require coordination and documentation of activities in several City departments. The Public Works Department Surface Water Utility staff will coordinate City efforts, and will meet with staff from other departments regularly to insure that on-going and planned activities meet Permit requirements. It is anticipated that activities required for Permit compliance will be carried out largely by the Public Works, Information Technology, Planning, Parks, City Managers Office (City attorney), and Finance departments. The Fire/Building and Police departments will be involved to a lesser extent.

1.6 The Surface Water Management Utility – Other Activities

This SWMP details activities that are planned and that fall under the purview of the Permit. Stormwater management is one part of the City’s overall surface water management strategy. The Surface Water Utility conducts a suite of programs that reduce flooding, protect and improve water quality, and protect and restore aquatic habitat in the City’s streams and lakes. Although not directly required, flood reduction and aquatic habitat restoration efforts can often further stormwater management goals. For details on Surface Water Utility activities not addressed in this SWMP, see the City website at http://www.ci.kirkland.wa.us/depart/Public_Works/Storm_Surface_Water.htm or contact the Public Works Department at (425) 587-3800.

1.7 The Permit as Document Map

The remainder of this document details the required elements of the SWMP as noted in Condition S5C of the Permit, and notes current and planned compliance activities. The subsection of Condition S5C associated with each section is noted in parentheses in the section on Permit Requirements.

2. Public Education and Outreach

2.1 Permit Requirements

The Permit (Section S5C.1) requires the City to provide a stormwater education and outreach program that will:

- Prioritize and address the target audiences and subject areas listed in the Permit based on stormwater issues and practices currently existing in Kirkland.
- Develop education and outreach programs that are designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Measure changes in the understanding and adoption of behaviors by the target audience, and use that information to evaluate past programs, and to direct future programs.
- Maintain records of public education and outreach activities.
- Summarize activities in the Annual Report.

2.2 Current Activities

The City currently has activities and programs that meet the Permit requirements. Table 2.1 lists target audiences and behaviors that are currently being addressed by education and outreach programs.

Table 2.1 Current Education and Outreach Programs and Activities

Item	Target Audience	Goal and/or Behaviors Promoted
Car Wash Kits	General Public (Fundraising Groups)	Proper discharge of wastewater into the sanitary sewer
Storm Drain Stenciling	General Public	Awareness, prevention of discharge of non-stormwater materials into the stormwater system
Natural Yard Care Neighbors Program	Homeowners	Reduce or eliminate use of herbicides and pesticides, reduce water usage, develop healthy soil
Newspaper inserts and newsletters	General Public, Homeowners	General awareness of stormwater impacts and issues
Elementary schools workshops program	General Public	General awareness of stormwater impacts and issues
Business license issuance/renewal information on best management practices	Businesses, Property Managers	Use of management practices that prevent discharge of pollutants into the stormwater system
Hazardous waste management/reduction	Businesses	Reduce waste creation, and dispose properly of hazardous waste that is created
Private drainage system inspection and technical assistance	Property Managers	Reduce discharge of sediment and uncontrolled high flows into the public stormwater system
Developers Forum	Engineers, Contractors, Developers, Review Staff, Land Use Planners	Increase awareness of technical standards for stormwater site and erosion control plans, Low Impact Development (LID) techniques and tools
Booths and displays at various special and on-going events	General Public	Raise awareness of stormwater impacts and ways that citizens can reduce these impacts
Source control technical assistance	Businesses	Work with businesses to develop practical methods of reducing or eliminating discharge of non-stormwater materials into the stormwater system

In addition, the City is participating in development and funding of regional surveys and focus groups to assess awareness and existing behaviors related to stormwater.

The City tracks education and outreach efforts, and informally evaluates costs vs. benefits.

2.3 Planned Activities

The City of Kirkland's stormwater education and outreach program currently targets a variety of audiences and behaviors. Activities to maintain compliance will center around prioritizing existing programs and developing new ones based on the audiences listed in the Permit, developing methods of evaluating, understanding and adoption of behaviors and of adjusting programs based on such evaluation, and tracking and maintaining records of public education and outreach activities. Table 2.2 summarizes education and outreach activities that are planned for 2008.

Table 2.2 Education and Outreach Work Plan for 2008

Item ID	Item Title	Additional Departments Involved	Schedule Notes
EDUC-1	Develop NPDES education/outreach strategy	Planning	Begin in 2008
EDUC-2	Prioritize existing programs, develop new programs based on NPDES education/outreach strategy	none	Begin in 2008
EDUC-3	Continue coordination and collaboration with other NPDES jurisdictions to identify opportunities for regional awareness and behavior change programs	none	Continue through 2008
EDUC-4	Develop strategy and methods to evaluate changes in understanding and adoption of target behaviors	Planning	Begin in 2008
EDUC-5	Summarize annual activities for "Public Education and Outreach" portion of Annual report; update SWMP as needed	none	Complete before March 31 st of each year

3. Public Involvement and Participation

3.1 Permit Requirements

The Permit requires the City to :

- Create opportunities for public involvement through advisory councils, watershed committees, participation in developing rate-structures, stewardship programs and environmental activities of other similar activities. At a minimum, the public must be able to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, including posting on the City's website.
- Summarize activities for the Annual Compliance Report.

3.2 Current Activities

The City currently has activities and programs that meet the Permit requirements. Such activities include:

- Posting of the draft SWMP on the City's website along with an invitation to the public to submit comments on the document.
- Presentation of the SWMP to the City Council
- The City plans to post the final SWMP and Annual Compliance Report on the City website.

3.3 Planned Activities

The City plans to continue to solicit input on the SWMP and other aspects of the Stormwater Program as shown in the table below:

Table 3.1 Public Involvement Work Plan for 2008

Item ID	Item Title	Additional Departments Involved	Schedule Notes
PUB-1	Conduct public involvement process for 2008 SWMP	CMO	To be complete by March 31, 2008
PUB-2	Post SWMP and Annual Report on City website	IT	To be complete by March 31, 2008
PUB-3	Refine public involvement process for 2009 SWMP	CMO	To be complete by December 31, 2008
PUB-4	Summarize annual activities for "Public Education and Outreach" portion of Annual Compliance Report; update SWMP as needed	none	To be complete by December 31, 2008

4. Illicit Discharge Detection and Elimination

4.1 Permit Requirements

The Permit (Section 55C.3) requires that the City:

- Develop an ongoing program to detect and remove illicit connections, discharges, and improper disposal including spills into the municipal stormwater system.
- Develop a municipal storm sewer map that includes attributes of stormwater system outfalls and notes receiving waters.
- Develop and implement an ordinance to prohibit non-stormwater discharges and dumping into the stormwater system.
- Develop and implement an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the stormwater system.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, and publicize a hotline phone number for public reporting of spills dumping and illicit discharges.
- Adopt and implement procedures for program evaluation and assessment.
- Provide training for municipal field staff on the identification and reporting of illicit discharges into the stormwater system.
- Summarize activities for the Annual Compliance Report.

4.2 Current Activities

The City currently conducts activities that meet the Permit requirements. Current illicit discharge detection and elimination (IDDE) activities that are part of Permit compliance include:

- Maps and an associated GIS database have been created for the municipal separate stormwater system. Mapping of the private stormwater system is underway. Standard procedures are in place for maintaining the GIS database to document new connections, changes/alterations to existing system, and changes based on field verification. Maps are available to Ecology and to co-permittees and secondary permittees upon request in electronic format.
- Kirkland Municipal Code Chapter 15.52 prohibits illicit discharges, and provides for progressive enforcement actions and penalties.
- The city has taken steps to identify and eliminate illicit discharges including the following:
 - Completed the study *Stormwater Pollutant Hot Spots Assessment for the City of Kirkland* (Parametrix, January, 2008) that identifies potential pollutant sources based on land use, traffic volumes and other data and makes recommendations for addressing potential hot spots.
 - Field assessment and screening of outfalls is underway for the Juanita Creek watershed.
 - Water quality complaints and reports of spills or dumping are investigated on average within 7 days of receipt and are resolved by referring the call to the appropriate party and/or by tracing pollutant sources and working with the responsible party or property owner to remove the source of the discharge.
 - A phone number is publicly listed for public reporting of spills and other illicit discharges. Records are kept of calls received, and actions taken as a result of these calls.
- The City has programs to educate businesses, and the general public about the hazards associated with improper disposal of waste through the King County Local Hazardous Waste Management Program, source control visits to businesses by City staff, and general awareness campaigns.

4.3 Planned Activities

Kirkland currently conducts many activities to detect and eliminate illicit discharges, but will need to document procedures and add to current efforts as Permit requirements are phased in over the next several years. The major work items for continued compliance include the following:

- Documentation of existing programs and procedures.
- Review and update the Kirkland Municipal Code.
- Document and update existing enforcement strategy.
- Continue to implement and refine outfall screening program.
- Update and augment education programs on the hazards of illicit discharges, and on reducing pollutants in permitted non-stormwater discharges.
- Develop centralized record-keeping for actions associated with illicit discharges.
- Develop IDDE training program.

Table 4.1 Illicit Discharge Detection and Elimination Work Plan for 2008

Item ID	Item Title	Additional Departments Involved	Schedule Notes
IDDE-1	Develop City-wide IDDE program per Permit conditions	Police, Fire/Building, CMO	Begin in 2008
IDDE-2	Define drainage area and other attributes as needed for each municipal separate stormwater outfall with a 24-inch nominal diameter or larger	IT	Begin in 2008
IDDE-3	Define procedure to tag connections to the municipal separate stormwater system that have occurred after February 16, 2007	IT	Procedure in place by December 31, 2008
IDDE-4	Review and update Kirkland Municipal Code as needed to comply with IDDE Permit requirements	Planning	Begin in 2008
IDDE-5	Update enforcement strategy and document existing enforcement procedures	none	Begin in 2008
IDDE-6	Review and add education programs as needed	none	Begin in 2008
IDDE-7	Develop strategy for providing education to the general public on reduction of pollutants in permitted non-stormwater discharges	none	Begin in 2009
IDDE-8	Document City-wide IDDE response procedures, and update as needed	Police, Fire/Building, Parks	Begin in 2008
IDDE-9	Review and update City-wide tracking and documentation of responses to IDDE issues	IT, Police, Fire/Building, Parks	Begin in 2008
IDDE-10	Define staff training needs, and determine whether to update existing training opportunities or add new ones.	none	Begin in 2008
IDDE-11	Participate in regional forum of NPDES municipalities to coordinate and cooperate on IDDE issues including training	none	Begin in 2008, ongoing
IDDE-12	Summarize annual activities for "Illicit Discharge Detection and Elimination" portion of Annual Compliance Report; update SWMP as needed	none	To be complete by December 31, 2008

5. Controlling Runoff from New Development, Redevelopment and Construction Sites

5.1 Permit Requirements

The Permit requires that Kirkland develop, implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. This program must include:

- Adopt an ordinance that addresses runoff from new development, redevelopment and construction sites.
- Adopt minimum stormwater design standards that are equivalent to the Department of Ecology's *2005 Stormwater Management Manual for Western Washington*.
- Implement a program (permitting process) to review plans, inspect sites during construction, and to take enforcement action against those failing to follow approved guidelines or to provide facilities as required during plan review.
- Adopt codes and standards and develop practices to allow for non-structural preventative actions and source reduction practices such as Low Impact Development Techniques (LID) that use amended or native soils and vegetation to minimize runoff and remove pollutants from stormwater.
- Adopt an ordinance, maintenance standards, inspection procedures, and enforcement provisions to verify long-term operation and maintenance of permanent stormwater control facilities constructed after the effective date of the Permit.
- Provide for training staff on new/revised regulations, standards, processes and procedures.
- Develop a process for centralized recordkeeping of activities associated with regulation of new development, redevelopment, and construction sites as required in the Permit.
- Summarize activities for the Annual Report.

5.2 Current Activities

Kirkland currently has a program that meets Permit requirements. Current activities associated with controlling runoff from new development, redevelopment, and construction sites associated with Permit compliance include:

- The City implements a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction sites.
- Kirkland Municipal Code Chapter 15.52 addresses control of stormwater runoff from new development, redevelopment and construction sites and includes a permit review and approval process, design standards, erosion control requirements, maintenance standards, inspection and maintenance of post-construction permanent stormwater controls, and enforcement provisions.
- The City maintains records of review, inspection, and enforcement actions by staff.
- Kirkland makes copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to the applicants for development permits.
- Staff have attended trainings on erosion control, low impact development techniques, and stormwater design standards and practices.

5.3 Planned Activities

Kirkland currently has a program that meets Permit requirements, but in order to maintain compliance the following further actions will be needed:

- Adopt a new stormwater design manual and revise associated codes and standards.
- Develop procedure for tracking and documenting Permit-related plan review, inspection, enforcement, and compliance activities.
- Review plan review, inspection, and enforcement procedures and make alterations if needed.

- Revise maintenance standards.
- Review and revise inspection frequencies for stormwater treatment and flow control facilities both during and after construction, or submit modified inspection frequency request for private drainage systems to Ecology.
- Determine staff training needs and develop training strategies.
- Develop programs to educate the public (including engineers and contractors) about new codes and standards and about Low Impact Development design strategies and technologies (one of the target audiences under the “Public Education and Outreach” section of the Permit).

Table 5.1 Controlling Runoff from New Development, Redevelopment and Construction Sites Work Plan for 2008

Item ID	Item Title	Additional Departments Involved	Schedule Notes
CTRL-1	Select new stormwater design manual, develop adoption strategy	none	Begin in 2008
CTRL-2	Adopt new stormwater design manual and revise Kirkland Municipal Code and Pre-Approved Plans to reflect requirements in the new stormwater design manual	none	Begin in 2008
CTRL-3	Review existing tracking procedures for plan review, inspection, and enforcement, and determine how to tag Permit-specific actions, and how to produce Permit-related reports	none	Begin in 2008
CTRL-4	Review and revise plan review, inspection, and enforcement procedures	none	Begin in 2008
CTRL-5	Revise Maintenance Standards		Begin in 2008
CTRL-6	Review and revise inspection frequencies, or request modified inspection frequency from Ecology	none	Begin in 2008
CTRL-7	Continue to provide copies of the Notice of Intent for Construction Activities and the Notice of Intent for Industrial Activities to representatives of proposal new development and redevelopment	Fire/Building	On-going
CTRL-5	Define staff training requirements and develop training strategy	none	Begin in 2008
CTRL-6	Determine the need for programs to educate the public including engineers and contractors about new codes and standards and about Low Impact Development design strategies and technologies	none	Begin in 2008
CTRL-7	Summarize annual activities for “Controlling Runoff from New Development, Redevelopment and Construction Sites” portion of Annual Compliance Report; update SWMP as needed	none	To be complete by December 31, 2008

6. Pollution Prevention and Operation and Maintenance for Municipal Operations

6.1 Permit Requirements

The Permit (Section 55C.5) requires the City to:

- Develop and implement a municipal operations and maintenance program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards that are as protecting as those noted in the *2005 Stormwater Management Manual for Western Washington*.
- Perform inspection of municipally owned and operated water quality treatment and flow control facilities and catch-basins at frequency required in the Permit.
- Establish and implement practices to reduce stormwater impacts associated with maintenance operations for streets, parking lots, roads or highways owned or maintained by the City.
- Establish and implement policies to reduce pollutants in runoff from all lands owned or maintained by the City.
- Develop and provide training to assist staff in implementing practices and policies to reduce pollutants in runoff from maintenance operations.
- Develop and implement a Stormwater Pollution Prevention Plan (SWPP) for all heavy equipment maintenance or storage yards, and material storage yards, and material storage facilities owned or operated by the City.

6.2 Current Activities

Kirkland currently has programs that meet Permit requirements including the following:

- The City Operations and Maintenance (O&M) Program takes steps to minimize pollutants in runoff from City activities as noted in the *ESA Regional Road Maintenance Program Guidelines*, which are being used though they have not been formally adopted.
- Water quality treatment and flow control facilities are inspected, and are cleaned and repaired as necessary.
- Catch-basins are inspected and cleaned at a rate that will meet Permit requirements.
- Some O&M staff have attended training associated with pollutant reduction.
- The Parks Department and Public Works Departments use Integrated Pest Management and other techniques to minimize pollutant discharge from landscaped areas on City properties; although improved documentation of these policies is needed.
- The City has a list of all publicly-owned properties for use in evaluating potential for and reducing pollutant runoff.

6.3 Planned Activities

Kirkland Currently has programs that seek to reduce pollutants in runoff from City facilities and maintenance practices, but in order to maintain continued compliance with the Permit, the following will be needed:

- Adopt maintenance standards as noted in the *2005 Stormwater Management Manual for Western Washington*
- Review and revise inspection procedures and frequencies for municipally owned or operated permanent water quality treatment and flow control facilities and catch-basins.
- Review and revise practices to reduce impacts from runoff or maintenance practices associated with municipally owned or operated streets, parking lots, and roads.
- Review and update operation and maintenance practices for municipally-owned lands in order to reduce pollutants in runoff.
- Develop and implement training programs for staff whose work could impact stormwater quality.

- Develop a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards, and materials storage facilities owned by the City.
- Update tracking and documentation methods and procedures associated with inspection, maintenance or repair activities.

Table 6.1 Pollution Prevention and Operation and Maintenance for Municipal Operations Work Plan for 2008

Item ID	Item Title	Additional Departments Involved	Schedule Notes
MUNI-1	Choose and adopt updated maintenance standards	none	Begin in 2008
MUNI-2	Review inspection frequencies for water quality treatment and flow control facilities and revise if needed.	none	Begin in 2008
MUNI-3	Review inspection frequencies for catch-basins to insure that they are on par to meet Permit requirements	none	Begin in 2008
MUNI-4	Review maintenance and operation practices to reduce pollutant runoff from City streets	none	Begin in 2008
MUNI-5	Review maintenance and operation practices for City-owned lands and revise if necessary to reduce pollutants in runoff.	none	Begin in 2008
MUNI-6	Develop and implement training program for City staff whose work could impact water quality	none	Begin in 2008
MUNI-7	Develop a Stormwater Pollution Prevention Plan (SWPP)		Begin in 2009
MUNI-3	Refine and document maintenance and operation procedures for public properties in order to reduce pollutant runoff	Parks	Begin in 2008
MUNI-4	Summarize annual activities for "Pollution Prevention and Operation and Maintenance for Municipal Operations" portion of Annual report; update SWMP as needed	none	To be complete by December 31, 2008

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Appendix A

Western Washington Phase II Municipal Stormwater NPDES Permit Overview

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Western Washington Phase II Municipal Stormwater NPDES Permit Overview

The timeline below provides an overview of major program components deadlines (“...no later than...”) for implementing permit requirements of S5 Stormwater Management Program (SWMP) for Cities, Towns and Counties. Other permit elements are listed on the next page. This is guidance only: please see the permit for additional detail and related requirements.

S5 Program Component	Feb 16, 2007	Feb 2008	Feb 2009	Aug 2009	Feb 2010	Feb 2011	Aug 2011	Feb 2012
A. Stormwater Management Plan	Set up process to track costs, actions and activities. Establish coordination among permittees as possible.		Begin tracking costs.				Program fully implemented	
C.1 Public Education and Outreach			Implement educ program. Public hotline starts. Begin to measure understanding, adoption				Distribute IDDE info to target audiences	
C.2 Public Involvement	Program begins. SWMP and annual reports are available to the public and posted on website. Create opportunities for public input.							
C.3 Illicit Discharge Detection and Elimination (IDDE)			Establish public hotline to report spills and illicit discharges.	Adopt IDDE codes & regulations to prohibit non stormwater discharge, establish escalating enforcement. Develop enforcement strategy. IDDE staff training. Recordkeeping	Train all municipal field staff. Prioritize receiving waters for visual inspection.	Storm system map is complete and maps are kept updated. Assess 3 high priority water bodies.	Program fully implemented: field assessment, inspections, procedures, process to ID priority areas. Distribute info on IDDE.	
C.4 Control Runoff from New Develop't, Redvelop't Construction Sites (generally, disturbing at least 1 acre)	Make NOIs for construction, industrial stormwater permits available. Recordkeeping (inspections, maintenance, enforcement).			Adopt regulations, implement program for runoff control, site plan review, inspection, enforcement, LID. Adopt/implement O&M regulations for post-construction BMPs & facilities. Staff training.				
C.5 Municipal Pollution Prevention, Operation and Maintenance					Adopt and implement SWPPP, inspection & maintenance schedule, procedures. Staff training.			

Other significant elements of the permit

This is guidance only: see the permit for additional detail and related requirements.

S1 Application for coverage

- Operators of small MS4s designated by Ecology as “significant contributors per S1.B.3 must submit NOIs within 120 days.
- Jurisdictions submitting NOI to Ecology after January 17, 2007 need to conduct public notification.
- Jurisdictions applying as Co-Permittees submit a joint NOI. Co-Permittees can end or amend agreements at any time.

S4.F Response to violations of Water Quality Standards

- Notification and possible corrective actions may occur at any time.

S7 Compliance with Total Maximum Daily Load (TMDL) Requirements

- Jurisdictions comply with applicable TMDL requirements listed in Appendix 2 with individual timelines.

S8 Monitoring

- Report on all new stormwater monitoring studies and assessment of BMP appropriateness in each annual report.
- By December 31, 2010 select sites for long-term discharge monitoring and questions/sites for SWMP effectiveness monitoring.
- Beginning March 2011, annual reports include the status of preparing for the future, long-term monitoring program.

S9 Reporting

- Keep all records related to the permit and the SWMP for at least five years.
- Beginning March 31, 2008 submit a report for the previous calendar year using annual report forms in Appendix 3.
- Notify of changes in jurisdictional boundary with annual report.

G3 Notification of Spill

- Report to Ecology within 24 hours a spill into the municipal storm sewer which could constitute a threat to human health, welfare or the environment.

G18 Duty to Reapply

- Apply for permit renewal no later than August 16, 2011 (180 days before permit expiration).

G20 Non-compliance Notification

- Notify Ecology with 30 days of awareness of permit non-compliance.

Department of Ecology Municipal Stormwater Permit Workshops
March 2007

VI. Status Report Covering Calendar Yr: 2007

Jurisdiction Name: City of Kirkland

PLEASE label any information in attachments with corresponding question numbers.

NOTE: Items that have future compliance dates must still be answered to indicate status.

NOTE: Some [bracketed language] is included to provide clarification or to address errors.

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y			2008 City of Kirkland Stormwater Management Program
2. Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	NA		No annexations occurred in 2007	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	N		Requirement deadline is not yet due.	
4. Began tracking costs or estimated costs of the development and implementation of the SWMP? (<i>Required</i> no later than January 1, 2009, S5.A.3.a)	N		Requirement deadline is not yet due.	
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? (S5.C.1)	N		Requirement deadline is not yet due.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
6.	Distributed appropriate information to target audiences identified in the area served by the MS4? (<i>Required</i> by February 15, 2009, S5.C.1.a)	N		Requirement deadline is not yet due.	
6b.	Please mark a Y next to audiences targeted in Y/N/NA box:				
i	General Public	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
ii	Home-based business	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
iii	Elected officials	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
iv	Developers	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
v	Contractors	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
vi	Permittee Employees	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
vii	Residents	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
viii	Businesses	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
ix	Policy makers	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
x	Engineers	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xi	Property managers	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xii	Homeowners	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xiii	Mobile businesses	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xiv	Industries	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xv	Landscapers	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	
xvi	Planning Staff	N		Requirement deadline is not yet due. See 2008 SWMP for progress and details	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>	
7.	Tracked the types of public education and outreach activities implemented? (<i>Required</i> by February 15, 2009, S5.C.1.b and S5.A.3.b)	N		Requirement deadline is not yet due	
7b.	Number of activities implemented:		0		
8.	Measured the understanding and adoption of the targeted behaviors among targeted audiences? (<i>Required</i> by February 15, 2009, S5.C.1.b)	N			
9.	Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? (<i>Required</i> by February 15, 2008, S5.C.2.a)	Y		Put draft SWMP on City website and solicited public comment via news release and presentation at City Council meeting on 3/18/08	
10.	Developed and implemented a process for public involvement and consideration of public comments on the SWMP? (<i>Required</i> by February 15, 2008, S5.C.2.a)	Y			
11.	Made the most current version of the SWMP available to the public? (S5.C.2.b)	Y			
12.	Posted the SWMP on your website? (S5.C.2.b)	Y			
12b.	NOTE website address in <i>Attachment</i> field:	Y			www.ci.kirkland.wa.us
13.	Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? (<i>Required</i> August 19, 2011, S5.C.3)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
14. Developed and currently maintain a map of your MS4? (<i>Required</i> by February 15, 2011, S5.C.3.a)	N		Requirement deadline not yet due	
14b. [Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? (S5.C.3.a.ii)]	Y		Program initiated.	
15. Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? (<i>Required</i> by February 15, 2011, S5.C.3.a.i)	N		Requirement deadline not yet due	
16. Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? (<i>Required</i> by February 15, 2011, S5.C.3.a.i)	N		Requirement deadline not yet due	
17. Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? (<i>Required</i> by February 15, 2011, S5.C.3.a.iii)	N		Requirement deadline not yet due	
18. Map has been made available upon request? (S5.C.3.a.iv)	N		Requirement deadline not yet due	
19. Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illegal discharges, and/or dumping into the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.3.b)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
20. Developed and implemented an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the Permittee's MS4? (<i>Required</i> by August 19, 2011, S5.C.3.c)	N		Requirement deadline not yet due	
21. Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in spills? (<i>Required</i> by August 19, 2011, S5.C.3.c.i)	N		Requirement deadline not yet due	
22. Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? (<i>Required</i> by August 19, 2011, S5.C.3.c.ii)	N		Requirement deadline not yet due	
23. Prioritized receiving waters for visual inspection? (<i>Required</i> by February 15, 2010, S5.C.3.c.ii)	N		Requirement deadline not yet due	
24. Conducted field assessments for three high priority water bodies? (<i>Required</i> by February 15, 2011, S5.C.3.c.ii)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
25. Conducted field assessments on at least one high priority water body? (<i>Required</i> annually after February 15, 2011, S5.C.3.c.ii)	N		Requirement deadline not yet due	
26. Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? (<i>Required</i> by August 19, 2011, S5.C.3.c.iii)	N		Requirement deadline not yet due	
27. Developed and implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? (<i>Required</i> by August 19, 2011, S5.C.3.c.iv)	N		Requirement deadline not yet due	
28. Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? (<i>Required</i> by August 19, 2011, S5.C.3.c.v.)	N		Requirement deadline not yet due	
29. Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? (<i>Required</i> by August 19, 2011, S5.C.3.d)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
30. Distributed appropriate information to target audiences identified pursuant to S5.C.1? <i>(Required by August 19, 2011, S5.C.3.d.i)</i>	N		Requirement deadline not yet due	
31. Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? <i>(Required by February 15, 2009, S5.C.3.d.ii)</i>	N		Requirement deadline not yet due	
31b. Number of calls received:		0	Requirement deadline not yet due	
31c. Number of follow-up actions taken:		0	Requirement deadline not yet due	
32. Tracked the number and type of spills? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N			
32b. Number of spills:		0	Requirement deadline not yet due	
33. Tracked the number of illicit discharges identified? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N			
33b. Number of illicit discharges identified:		0	Requirement deadline not yet due	
34. Tracked the number inspections made for illicit connections? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N			
34b. Number of inspections:		0	Requirement deadline not yet due	
35. Received feedback from [IDDE] public education efforts? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N		Requirement deadline not yet due	
36. Attached report on [IDDE] public education efforts? <i>(Required by August 19, 2011, S5.C.3.d, S5.C.3.e)</i>	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
37 Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? <i>(Required by August 15, 2009, S5.C.3.f.i)</i>	N		Requirement deadline not yet due	
37b. Number of trainings provided:		0	Requirement deadline not yet due	
37c. Number of staff trained:		0	Requirement deadline not yet due	
38 Provided follow-up training as needed to address changes in procedures, techniques or requirements? <i>(Required by August 15, 2009, S5.C.3.f.i)</i>	N		Requirement deadline not yet due	
38b. Number of trainings provided:		0	Requirement deadline not yet due	
38c. Number of staff trained:		0	Requirement deadline not yet due	
39 Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? <i>(Required by February 15, 2010, S5.C.3.f.ii.)</i>	N		Requirement deadline not yet due	
39b. Number of trainings provided:		0	Requirement deadline not yet due	
39c. Number of staff trained:		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
40 Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? (<i>Required by August 15, 2009, S5.C.4</i>)	N		Requirement deadline not yet due	
41 Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (<i>Required by August 15, 2009, S5.C.4</i>)	N		Requirement deadline not yet due	
42 Applied stormwater runoff program to private and public development, including roads? (<i>Required by August 15, 2009, S5.C.4</i>)	N		Requirement deadline not yet due	
43 Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (<i>Required by August 15, 2009, S5.C.4</i>)	N		Requirement deadline not yet due	
44 Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? (<i>Required by August 15, 2009, S5.C.4.a</i>)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
45	Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4?	Y			
46	The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? (<i>Required</i> by August 15, 2009, S5.C.4.a.i)	N		Requirement deadline not yet due	
47	The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		Requirement deadline not yet due	
48	Were exceptions or variances to the minimum requirements in Appendix 1 granted? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		Requirement deadline not yet due	
48b.	If so, how many were granted?		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
49 The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? (<i>Required</i> by August 15, 2009, S5.C.4.a.ii)	N		Requirement deadline not yet due	
49b. Cite documentation to meet this requirement in <i>Attachment</i> field:	y		Requirement deadline not yet due	
50 The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.4.a.iii)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51 The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? (<i>Required</i> by August 15, 2009, S5.C.4.a.iv)	N		Requirement deadline not yet due	
52 If the ordinance or regulatory mechanism allows construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is <i>required</i> by August 15, 2009, S5.C.4.a.v)	N		Requirement deadline not yet due	
53 Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (<i>Required</i> by August 15, 2009, S5.C.4.b)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
54 Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4.b)</i>	N			
55 Reviewed Stormwater Site Plans for new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.b.i)</i>	N			
55b. Number of site plans reviewed during the reporting period:		0	Requirement deadline not yet due	
56 Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Potential? <i>(Required by August 15, 2009, S5.C.4.b.ii)</i>	N		Requirement deadline not yet due	
56b. Number of [qualifying] sites inspected [prior to clearing and construction] during the reporting period:		0	Requirement deadline not yet due	
57 Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? <i>(Required by August 15, 2009, S5.C.4.b.iii)</i>	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57b. Number of sites inspected during [the construction phase for] the reporting period:		0	Requirement deadline not yet due	
58. Enforced as necessary based on the inspection at new development and redevelopment projects? (Required by August 15, 2009, S5.C.4.b.iii)	N		Requirement deadline not yet due	
58b. Number of enforcement actions taken during the reporting period:		0	Requirement deadline not yet due	
59. Inspected [qualifying] permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? (Required by August 15, 2009, S5.C.4.b.iv and v)	N		Requirement deadline not yet due	
59b. Number of [qualifying] sites known during the reporting period:		0	Requirement deadline not yet due	
59c. Number of [qualifying] sites inspected during the reporting period:		0	Requirement deadline not yet due	
60. Verified a maintenance plan is completed and responsibility for maintenance is assigned [for qualifying projects]? (Required by August 15, 2009, S5.C.4.b.iv)	N		Requirement deadline not yet due	
61. Enforced [regulations] as necessary based on the inspection? (Required by August 15, 2009, S5.C.4.b.iv)	N		Requirement deadline not yet due	
61b. Number of enforcement actions taken during the reporting period:		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
62 Developed and implemented an enforcement strategy to respond to issues of non-compliance [with the regulations for qualifying projects]? (Required by August 15, 2009, S5.C.4.b.vi)	N		Requirement deadline not yet due	
63 Did the Permittee choose to allow construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2? (S5.C.4.b.vii)	N		Requirement deadline not yet due	
63b. If yes, how many waivers were allowed ?		0	Requirement deadline not yet due	
64 Developed and implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities and BMPs? (Required by August 15, 2009, S5.C.4.c)	N		Requirement deadline not yet due	
65 Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? (Required by August 15, 2009, S5.C.4.c.i)	N		Requirement deadline not yet due	
66 Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? (Required by August 15, 2009, S5.C.4.c)	N		Requirement deadline not yet due	
66b. Number of sites inspected during the reporting period:		0	Requirement deadline not yet due	
66c. Number of structural BMPs inspected during the reporting period:		0	Requirement deadline not yet due	
66d. Number of enforcement actions taken during the reporting period:		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
67 Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington ? (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Requirement deadline not yet due	
68 Performed timely maintenance as per S5.C.4.c.ii? (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Requirement deadline not yet due	
68b. Attached documentation of any maintenance delays. (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Requirement deadline not yet due	
69 Annually inspected all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? (<i>Required</i> by August 15, 2009, S5.C.4.c.iii)	N		Requirement deadline not yet due	
70 If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii? (<i>Required</i> by August 15, 2009, S5.C.4.c.iii)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
71 Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? (<i>Required</i> by August 15, 2009, S5.C.4.c.iv)	N		Requirement deadline not yet due	
71b. Number of facilities inspected during the reporting period:		0	Requirement deadline not yet due	
72 Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? (<i>Required</i> by August 15, 2009, S5.C.4.d)	N		Requirement deadline not yet due	
73 Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74 All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (<i>Required</i> by August 15, 2009, S5.C.4.f)	N		Requirement deadline not yet due	
74b. Number of trainings provided:		0	Requirement deadline not yet due	
74c. Number of staff trained:		0	Requirement deadline not yet due	
75 Developed and implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (<i>Required</i> by February 15, 2010, S5.C.5)	N		Requirement deadline not yet due	
76 Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington ? (<i>Required</i> by February 15, 2010, S5.C.5.a)	N		Requirement deadline not yet due	
77 Performed timely maintenance as per S5.C.5.a.ii? (<i>Required</i> by February 15, 2010, S5.C.5.a.ii)	N		Requirement deadline not yet due	
77b. Attached documentation of any maintenance delays. (<i>Required</i> by February 15, 2010, S5.C.5.a.ii)	N		Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78	N			
78b.		0	Requirement deadline not yet due	
78c.		0	Requirement deadline not yet due	
79	N		Requirement deadline not yet due	
80	N		Requirement deadline not yet due	
80b.		0	Requirement deadline not yet due	
80c.		0	Requirement deadline not yet due	
81	N		Requirement deadline not yet due	
81b.		0	Requirement deadline not yet due	
81c.		0	Requirement deadline not yet due	
81d.		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
82 Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? (<i>Required by February 15, 2010, S5.C.5.f</i>)	N		Requirement deadline not yet due	
83 Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? (<i>Required by February 15, 2010, S5.C.5.g</i>)	N		Requirement deadline not yet due	
84 Initiated or implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (<i>Required by February 15, 2010, S5.C.5.h.</i>)	N		Requirement deadline not yet due	
84b. Number of trainings provided:		0	Requirement deadline not yet due	
84c. Number of staff trained:		0	Requirement deadline not yet due	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
85 Initiated or implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit? (<i>Required by February 15, 2010, S5.C.5.i</i>)	N		Requirement deadline not yet due	
86 Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N		No TMDL	
87 Complied with the specific requirements identified in Appendix 2? (S7.A)	NA		No TMDL	
88 Attached status report of TMDL implementation? (S7.A)	NA		No TMDL	
89 Where monitoring was required in Appendix 2, did you conduct the monitoring according to a Quality Assurance Project Plan? (S7.A)	NA		No TMDL	
90 Took appropriate action to correct or minimize the threat to human health or the environment or otherwise stop or correct the condition of any instances of non-compliance with any of the terms and conditions of this Permit, including discharges from the Permittee's MS4 which may cause a threat to human health or the environment? (G20 and S4.F)	NA			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>	
90b.	[Attached a summary of the status of implementation of any actions taken pursuant to S4.F and any information from an assessment and evaluation procedures collected during the reporting period. (S4.F.2.d)]	NA			
91	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20 and S4.F)	NA			
92	Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an eminent threat to human health or the environment? (G20 and S4.F)	NA			