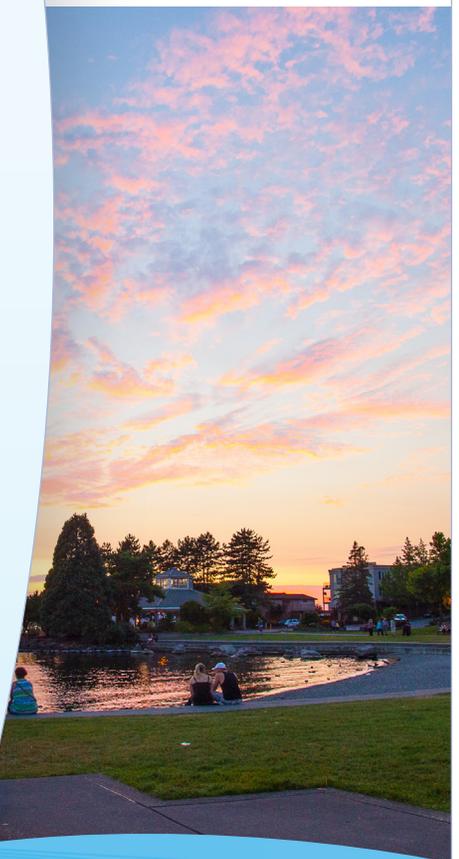




2015

NPDES COMPLIANCE STORMWATER MANAGEMENT PROGRAM PLAN

Prepared March 2015



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CITY OF KIRKLAND

2015 STORMWATER MANAGEMENT PROGRAM PLAN

Prepared March 2015

1. Introduction

1.1 The Purpose of the Stormwater Management Program Document

This document constitutes the City of Kirkland 2015 Stormwater Management Program Plan (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 January 1, 2015 and December 31, 2015 to maintain compliance with conditions in the Permit.

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 streams 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 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 and Participation
- » Illicit Discharge Detection and Elimination
- » Controlling Runoff from New Development, Redevelopment, and Construction Sites
- » Pollution Prevention and Municipal Operations and Maintenance
- » Monitoring

1.3 The Western Washington Phase II Municipal Stormwater Permit (Continued)

The SWMP Plan must be prepared and submitted annually and must contain the planned actions and activities that will be used in the current 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 (starting in 2015) that details actions taken in the previous year to achieve compliance. The full text of the Permit can be viewed upon request by contacting the City of Kirkland at (425) 587-3850 and is available at:

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phasellww/wwphiipermit.html>

1.4 Permit History and Implementation

The original Permit was valid for 5 years, from February 17, 2007 to February 15, 2012, and allowed for phased implementation of stormwater management programs and actions. In 2012, Ecology extended the existing Permit to July 31, 2013 with no new permit conditions.

The current Permit was issued on August 1, 2012, and is effective between August 1, 2013 and July 31, 2018. Like the previous Permit, it allows for phased implementation of requirements over the five year permit cycle. Table 1 provides an overall schedule timeline including implementation due dates. Kirkland continues to be in position to meet deadlines and maintain Permit compliance.

1.5 Current and Planned Activities

The SWMP Plan is a set of actions and activities comprising the components listed in the Permit and actions necessary for permit compliance. The Plan is organized to the program components noted in Condition S5C of the Permit.

The following sections of the SWMP Plan describe requirements in the Permit, followed by the current and planned activities to meet each permit component. The subsection of Permit Condition S5C associated with each section is noted in parentheses in the section on Permit Requirements.

1.6 City Coordination and Responsibilities

Compliance with the Permit requires 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 current and planned activities meet Permit requirements. Activities required for Permit compliance will be carried out by the Public Works, Information Technology, Planning and Community Development, Parks, City Manager's Office (City Attorney), Finance, Fire and Building, and Police departments.

1.7 The Surface Water Management Utility – Other Activities

This SWMP Plan details actions and activities 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.

Kirkland's Surface Water Master Plan was updated in 2014. The Master Plan sets priorities and recommends project programs and rates to support the utility over the next 5-10 years. The update included extensive public involvement in the form of open houses, mailings, and web information.

For details on Surface Water Utility activities not addressed in this SWMP, contact the Public Works Department at (425) 587-3800, or see the City website at: http://www.kirklandwa.gov/depart/Public_Works/Utilities/Storm_Surface_Water.htm

2. Public Education and Outreach

2.1 Permit Requirements

The Permit (Section S5C.1) requires the SWMP Plan to include a stormwater education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The program is designed to:

- » Educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- » Build general awareness for the public, including: school age children, businesses, engineers, contractors, developers, land use planners, residents, landscapers, and property owners/managers.
- » Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- » Measure the understanding and adoption of behaviors by the target audience, and use that information to evaluate past programs, and to direct future programs.
- » Track and maintain records of public education and outreach activities, and summarize these activities in the Annual Compliance Report.

2.2 Current City Activities

Kirkland has activities and programs meeting the Permit requirements. Kirkland tracks education and outreach efforts, and informally evaluates costs vs. benefits. Kirkland will continue to refine public education and outreach program, and will summarize the annual activities in the Annual Compliance Report.

Kirkland has also been an active participant in the STORM (Stormwater Outreach for Regional Municipalities) Group to help identify appropriate program evaluation techniques.

Table 2.1 lists programs, target audiences, and behaviors promoted by the Kirkland education and outreach program.

Table 2.1 Current Education and Outreach Programs and Activities

| Program | Target Audience | Goal and/or Behaviors Promoted |
|--|---|--|
| Newsletters, newspaper inserts, Twitter, Facebook, blog | General public, homeowners, residents | Increase awareness of stormwater impacts on surface waters. |
| Elementary school workshops program | General public, including school age children | Increase awareness of stormwater impacts on surface waters. |
| Booths and displays at various special and on-going events | General public, including school age children | Increase awareness of stormwater impacts on surface waters, and opportunities to become involved in stewardship activities. |
| Storm drain marking | General public | Increase awareness of stormwater impacts on surface waters, and prevention of illicit discharges. |
| Puget Sound Region Health Movie Night | General public | Increase awareness of stormwater impacts on surface waters, and opportunities to become involved in stewardship activities. |
| Residential Stormwater Audit Program | Homeowners | Increase awareness of stormwater impacts on surface waters, management of stormwater flow and volume. |
| Car wash kits for businesses and charity car wash events | Businesses, general public, including school age children | Prevention of illicit discharges, proper techniques for discharge of washwater to sanitary sewer. |
| Business license issuance/renewal inserts | Businesses, property managers | Use and storage of chemicals, cleaning supplies, and other hazardous materials, equipment maintenance, and prevention of illicit discharges. |

| | | |
|--|---|--|
| Hazardous waste management and reduction | Businesses | Use and storage of chemicals, cleaning supplies, and other hazardous materials. Reduction in creation of hazardous waste, proper disposal, and prevention of illicit discharges. |
| Source Control Technical Assistance | Businesses | Work with businesses to develop practical methods for proper use and storage of automotive chemicals, cleaning supplies, other hazardous materials, equipment maintenance, and prevention of illicit discharges. |
| Volunteer Stewardship Projects | General public | Increase awareness of stormwater impacts on surface waters, the importance of stream buffers, opportunities to become involved in stewardship activities. |
| Developers Forum | Engineers, contractors, developers, review staff, Land use planners | Increase awareness of technical standards for stormwater site and erosion control plans, LID principles and techniques, and stormwater treatment and flow control BMPs/facilities. |
| Natural Yard Care Neighbors Program | Homeowners, residents | Yard care techniques protective of water quality; proper use and storage of pesticides, fertilizers and other household chemicals. |
| Cascade/Savvy Gardener Classes | General public | Yard care techniques protective of water quality; proper use and storage of pesticides, fertilizers and other household chemicals. |
| Pet Waste Outreach | General public, dog owners and dog walkers | Proper management and disposal of pet waste. |
| Neighborhood Rain Garden Program | Residents, developers | Increase awareness of stormwater impacts on surface waters; provide education on LID principles and LID BMPs. |
| Private Drainage System Inspections and Technical Assistance Program | Businesses, property managers | Increase awareness of stormwater impacts on surface waters, proper stormwater facility maintenance, dumpster and trash compactor maintenance, and prevention of illicit discharges. |
| Don't Drip and Drive | General Public | Provide leak detection to promote awareness of vehicle maintenance and the impacts on stormwater. |
| Adopt a Storm Drain Program | General Public | Increase awareness of stormwater impacts from impervious surfaces. |

2.3 Planned City Activities

Kirkland has a Public Education and Outreach program, but will need to update current efforts in order to maintain compliance as the new requirements are phased in over the 5-year Permit term (2013-2018).

Table 2.2 is the work plan for the 2015 SWMP Public Education and Outreach activities. These tasks were developed through meetings with staff from affected City departments.

Table 2.2 Education and Outreach Work Plan for 2015

| Item ID | Item Title | Additional Departments Involved | Schedule Notes |
|---------|---|---|--|
| EDUC-1 | Continue to refine and implement Public E&O activities and programs as the new Permit's requirements are implemented. | Information Technology, Parks, City Managers Office | On-going |
| EDUC-2 | Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities. | Information Technology, Parks, City Managers Office | On-going |
| EDUC-3 | Measure and evaluate the understanding and adoption of targeted behaviors for at least one targeted audience in one subject area. | None | On-going. To be completed by February 2, 2016. |
| EDUC-4 | Use the resulting measured information to make changes and improve outreach program. | None | On-going. To be completed by August 1, 2017. |
| EDUC-5 | Summarize annual activities for "Public Education and Outreach" portion of Annual Compliance Report. | None | Begin in 2015. To be completed by March 31, 2016. |

3. Public Involvement and Participation

3.1 Permit Requirements

The Permit (Section S5C.2) requires the City to provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. The SWMP Plan includes:

- » An opportunity for the public to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- » Make the SWMP Plan and Annual Compliance Report available to the public upon request, and post on the City's website.
- » Track and maintain activities for public involvement and participation, and summarize these activities for the Annual Compliance Report.

3.2 Current City Activities

Kirkland currently implements activities and programs meeting the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the 2013-2018 Permit are implemented. Current compliance activities associated with the above Permit requirements include:

- » Posting of the draft NPDES SWMP Plan on the City's website along with an invitation to the public to submit comments on the document.
- » Kirkland makes the final NPDES SWMP Plan and Annual Compliance Reports available to the public on the City's website.

3.3 Planned City Activities

Activities planned for continued compliance are shown in the Table 3.1.

Table 3.1 Public Involvement Work Plan for 2015

| Item ID | Item Title | Additional Departments Involved | Schedule Notes |
|---------|--|---------------------------------|--|
| PUB-1 | Conduct public involvement process for 2015 Stormwater Management Program Plan, including posting of Draft Plan on City website. | City Manager's Office | To be completed by March 15, 2015. |
| PUB-2 | Post Final 2015 Stormwater Management Plan on City website | Information Technology | To be completed by May 31, 2015. |
| PUB-3 | Refine public involvement process for overall stormwater management program | City Manager's Office | On-going |
| PUB-4 | Summarize annual activities for "Public Education and Outreach" portion of Annual Compliance Report | None | Begin in 2015. To be completed by March 31, 2016. |

4. Illicit Discharge Detection and Elimination

4.1 Permit Requirements

The Permit (Section S5C.3) requires the City to have an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the municipal stormwater system. The program includes:

- » Continue mapping the municipal stormwater system, including attributes of stormwater system outfalls, discharge points, receiving waters (other than groundwater), stormwater treatment and flow control BMPs/facilities owned and operated by the City, and tributary conveyances to all known outfalls and discharge points (24 inch diameter or larger).
- » Implement an ordinance to effectively prohibit non-stormwater discharges and dumping into the stormwater system.
- » Implement a compliance strategy that includes informal compliance actions such as public education and technical assistance as well as the enforcement provisions of the ordinance.
- » Implement a field-screening methodology appropriate to the characteristics of the stormwater system and water quality concerns.
- » Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track reports of discharges and actions taken to address the reported problem.
- » Provide training for municipal field staff on the identification, reporting, and response to illicit discharges into the stormwater system. Provide follow up training as needed to provide changes in procedures, techniques, requirements, or staffing.
- » Implement program to address illicit discharges and connections, including characterization, source tracing, response and elimination.
- » Adopt and implement procedures for program evaluation and assessment.
- » Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- » Track and maintain records of IDDE program activities, and summarize these activities in the Annual Compliance Report.

4.2 Current City Activities

Kirkland currently implements activities and programs meeting the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the 2013-2018 Permit are implemented. Current compliance activities associated with the above Permit requirements include:

- » Continue Kirkland's ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the municipal stormwater system.
- » Kirkland has maps and an associated GIS database for the municipal and private stormwater systems. Standard procedures are in place for maintaining the GIS database to document new connections, changes/alterations to the existing system, and changes based on field verification. Drainage areas and land use have been used to identify outfalls 24" or greater in size. 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 to the stormwater system.
- » Kirkland has an on-going informal compliance strategy, and strives to achieve compliance through public education and technical assistance. Kirkland Municipal Code Chapter 1.12 includes a voluntary correction agreement to achieve compliance without the issuance of fines and other penalties. When education, technical assistance, and voluntary correction agreements do not achieve compliance, Kirkland Municipal Code Chapter 15.52 provides for progressive enforcement actions and penalties.
- » A phone number 425-587-3900 is publicly listed for reporting of spills and other illicit discharges and is publicized as a reporting hotline. Records are kept of calls received, and actions taken as a result of these calls.
- » Kirkland has a training program for city staff on the identification, reporting, and response to illicit discharges into the stormwater system. The program includes periodic updates to account for changes to procedures, techniques, requirements, and new staff.

- » Kirkland has programs to educate public employees, businesses, and the general public about illicit discharges and the hazards associated with improper disposal of waste through King County Local Hazardous Waste Management Program, source control visits to businesses by City staff, and general awareness campaigns. Public feedback is tracked and compiled each year.

4.3 Planned City Activities

Activities planned for continued Permit compliance are shown in Table 4.1.

Table 4.1 Illicit Discharge Detection and Elimination Work Plan for 2015

| Item ID | Item | Additional Departments Involved | Schedule Notes |
|---------|---|---|--|
| IDDE-1 | Update maps and GIS database for the municipal stormwater system. | Information Technology | On-going |
| IDDE-2 | Continue to implement and refine the IDDE field screening methodology for identification of potential sources of non-stormwater discharges and illicit connections. Field screen at least 40% of the municipal stormwater system. | None | On-going. Field screen 40% to be completed by December 31, 2017. |
| IDDE-3 | Continue training of City staff on the identification, reporting, and response to illicit discharges into the stormwater system. | Police, Fire & Building, Planning and Community Development | On-going |
| IDDE-4 | Continue to implement and refine program to address illicit discharges and connections, including characterization, source tracing, response and elimination. | None | On-going |
| IDDE-5 | Continue program to educate businesses and the general public about the hazards associated with improper disposal of waste. | None | On-going |
| IDDE-6 | Summarize annual activities for "Illicit Discharge Detection and Elimination" portion of Annual Compliance Report. | None | Begin in 2015. To be completed by March 31, 2016. |

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

5.1 Permit Requirements

The Permit (Section 55C.4) requires Kirkland implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The program applies to private and public development, including roads. This program includes the following activities:

- » Implement and enforce an ordinance that addresses runoff from new development, redevelopment and construction sites.
- » Adopt minimum stormwater design standards that are equivalent to the minimum technical requirements in Appendix 1 of the Permit.
- » 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 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 copies of the “Notice of Intent for Construction Activity” and “Notice of Intent for Industrial Activity” to representative of proposed new development and redevelopment.
- » Review, revise, and implement development codes and standards to incorporate and require Low Impact Development (LID) construction techniques, no later than December 31, 2016.
- » Provide training for staff on new/revise regulations, standards, processes and procedures.
- » Provide training and outreach to the public including engineers and developers on the new codes, processes and procedures.
- » Track and maintain records of activities associated with the regulation of new development, redevelopment, and construction sites, and summarize these activities in the Annual Compliance Report.

5.2 Current City Activities

Kirkland currently implements activities and programs meeting the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the 2013-2018 Permit are implemented. Current compliance activities associated with the above Permit requirements include:

- » Kirkland Municipal Code Chapter 15.52 addresses runoff from new development, redevelopment and construction sites.
- » Kirkland adopted the 2009 King County Surface Water Design Manual effective January 1, 2010. These stormwater design standards are equivalent to the minimum technical requirements in Appendix 1 of the previous Permit.
- » Kirkland has 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.
- » Kirkland maintains records of inspections, maintenance standards, and enforcement actions by staff to verify long-term operation and maintenance of permanent stormwater control facilities.
- » Kirkland provides copies of the “Notice of Intent for Construction Activity” and “Notice of Intent for Industrial Activity” to the applicants as part of the development permit process.
- » Kirkland currently requires stormwater Low Impact Development (LID) construction techniques for a portion of runoff on development projects as feasible, as required under the 2009 King County Surface Water Design Manual.

- » Staff continues to increase their knowledge by remaining current with new/revised stormwater regulations, along with attending trainings on erosion control, LID techniques, stormwater design models, standards, and practices.
- » Through the Developer's Forum and associated listserv, Kirkland provides the development community and the public with information and updates on proposed changes to stormwater design requirements, codes, processes and procedures.

5.3 Planned City Activities

Activities planned for continued Permit compliance are shown in Table 5.1.

Table 5.1 Controlling Runoff from New Development, Redevelopment and Construction Sites Work Plan for 2015

| Item ID | Item Title | Additional Departments Involved | Schedule Notes |
|---------|--|---|--|
| CTRL-1 | Continue to provide copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to the applicants for development permits. | None | On-going |
| CTRL-2 | Adopt the <i>2012 Ecology Stormwater Management Manual for Western WA</i> (per Appendix 1 of the current Permit) or an equivalent manual. | Planning and Community Development | On-going. To be completed by December 31, 2016. |
| CTRL-3 | Implement code revisions using recommendations from <i>Integrating LID into Local Codes</i> to reduce impervious surface, protect vegetation, and minimize stormwater. | Planning and Community Development, Fire & Building | On-going. To be completed by December 31, 2016. |
| CTRL-4 | Continue to provide training for staff to increase their knowledge in stormwater regulation, design, and construction. | None | On-going |
| CTRL-5 | Implement and refine program to provide training and outreach to the public (including engineers and developers) on the new codes, processes and procedures. | Information Technology | On-going. To be completed by December 31, 2016. |
| CTRL-6 | Continue to refine and implement program for Controlling Runoff from New Development, Redevelopment and Construction Sites. | None | On-going |
| CTRL-7 | Summarize annual activities for "Controlling Runoff from New Development, Redevelopment and Construction Sites" portion of Annual Compliance Report. | None | Begin in 2015. To be completed by March 31, 2016. |

6. Municipal Operations and Maintenance

6.1 Permit Requirements

The Permit (Section 55C.5) requires the City to implement 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. The program is required to:

- » Implement maintenance standards that are as protective as those noted in the *2012 Stormwater Management Manual for Western Washington* no later than December 31, 2016.
- » Perform inspections of municipally owned and operated water quality treatment and flow control facilities and catch-basins at the frequency required in the Permit.
- » Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by Kirkland and road maintenance activities.
- » Implement training program for staff addressing the importance of protecting water quality during maintenance operations.
- » Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage yards, and material storage facilities owned or operated by the City.
- » Track and maintain records of inspections, maintenance and repair activities, and summarize these activities in the Annual Compliance Report.

6.2 Current City Activities

Kirkland currently implements activities and programs meeting the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the 2013-2018 Permit are implemented. Current compliance activities associated with the above Permit requirements include:

- » 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 although not formally adopted.
- » Municipally owned and operated water quality treatment and flow control facilities and catch-basins are inspected, cleaned and repaired at the frequency required in the Permit.
- » The City O&M Program implements practices, policies and procedures to reduce stormwater impacts associated with runoff from land owned or maintained by Kirkland and road maintenance activities. In addition, both Parks and Public Works Departments use Integrated Pest Management and other techniques to minimize pollutant discharge from landscaped areas on City property.
- » O&M staff receives training on the importance of protecting water quality during maintenance operations.
- » A SWPPP for City Maintenance Facilities that qualify as heavy equipment/material maintenance or storage yards is implemented and updated as needed.

6.3 Planned City Activities

Activities planned for continued Permit compliance are shown in Table 6.1.

Table 6.1 Municipal Operations and Maintenance Work Plan for 2015

| Item ID | Item Title | Additional Departments Involved | Schedule Notes |
|---------|---|---------------------------------|--|
| MUNI-1 | Adopt an O&M manual with standards equivalent to the 2012 Stormwater Management Manual for Western WA. | None | On-going. To be completed by December 31, 2016. |
| MUNI-2 | Continue to implement and refine the O&M Program to meet permit requirements. Annually inspect all municipal stormwater treatment and flow control facilities/BMPs. Inspect all municipal stormwater catch basins and inlets. | Information Technology | On-going. New requirements to be completed by August 1, 2017. |
| MUNI-3 | Continue to provide training to O&M staff regarding pollutant reduction from runoff during maintenance activities. | None | On-going |
| MUNI-4 | Continue to implement and update the SWPPP for qualifying City Maintenance yards/facilities. | None | On-going |
| MUNI-5 | Continue to refine and implement Municipal O&M activities and programs. | Facilities, Parks | On-going |
| MUNI-6 | Summarize annual activities for "Municipal Operations and Maintenance" portion of Annual report. | None | Begin in 2015. To be completed by March 31, 2016. |

7. Monitoring

7.1 Permit Requirements

The Permit (Section S8) requires the City to:

- » Conduct sampling or testing required for characterizing illicit discharges pursuant to the Program’s IDDE conditions.
- » Include a description of any stormwater monitoring or stormwater-related studies in the Annual Compliance Report.
- » Participate in the Regional Stormwater Monitoring Program (RSMP) for Status and Trends or implement an individual monitoring program.
- » Participate in the RSMP for Effectiveness Studies or implement an individual monitoring program.
- » Participate in the RSMP for Source Identification and Diagnostic.
- » Track and maintain records of monitoring activities, and summarize these activities in the Annual Compliance Report.

7.2 Current City Activities

Kirkland currently implements activities and programs meeting the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the 2013-2018 Permit are implemented. Current compliance activities associated with the above Permit requirements include:

- » Kirkland participated in a variety of regional and state monitoring forums to develop feasible and effective monitoring requirements for the new Permit. As a result of this work, Ecology included a regional stormwater monitoring option in the new Permit.
- » Kirkland conducts sampling or testing required for characterizing illicit discharges pursuant to the Permit’s IDDE program conditions.
- » Kirkland reports potential water quality violations to Ecology within 30 days of becoming aware of the potential violations per the Permit’s Compliance with Standards condition S4F.

7.3 Planned City Activities

Activities planned for continued Permit compliance are shown in Table 7.1.

Table 7.1 Monitoring Work Plan for 2015

| Item ID | Item Title | Additional Departments Involved | Schedule Notes |
|---------|--|---------------------------------|--|
| MNTR-1 | Participate in the Regional Stormwater Monitoring Programs (RSMP) for Status and Trends, Effectiveness Studies, and Source Identification and Diagnostic. | None | On-going |
| MNTR-2 | Submit payments to Ecology to fund the RSMP. Payments will occur annually for four years of the Permit cycle (2014-2017). | None | Second payment due August 15, 2015. |
| MNTR-3 | Participate in regional and state monitoring forums and future legislative actions as needed to ensure scientifically sound analysis and appropriate use of monitoring data in stormwater management and future Permits. | None | On-going |
| MNTR-4 | Continue to implement and refine additional monitoring activities and programs. | None | On-going |
| MNTR-5 | Summarize annual activities for “Monitoring” portion of Annual Compliance Report | None | Begin in 2015. To be completed by March 31, 2016 |

Appendix A

Public Comment:

The City of Kirkland did not receive any public comments during the public comment period.

