

CITY OF KENMORE
STORMWATER MANAGEMENT PROGRAM PLAN

Permit # WAR 04-5519

City of Kenmore, WA



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INTRODUCTION

This document is the City of Kenmore's (City) Stormwater Management Program (SWMP) Plan. Preparation and maintenance of this SWMP Plan is required by the Washington State Department of Ecology (Ecology) as a condition of Section S5.A.2 of the Western Washington Phase II Municipal Stormwater Permit (Permit). The Permit covers discharges from regulated municipal separate stormwater sewer systems (MS4). Based on criteria outlined in the Permit, Ecology considers the City to be an operator of a MS4 and therefore required to obtain permit coverage.

The Permit authorizes the City to discharge stormwater to surface and ground waters of the state pursuant to conditions set forth in the Permit. A component of these conditions requires the City to produce and implement a SWMP as described in section S5 of the Permit. The SWMP Plan is a "living" document and requires annual updates throughout the Permit. Implementation dates of requirements contained within S5 have been staggered throughout the Permit cycle in order to promote compliance during the transition for municipalities. The SWMP Plan is included with each Annual Report due March 31st following each Permit year and is also available on the City's website. The reported year covers January 1st through December 31st.

REGULATORY BACKGROUND

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act of 1972 (as amended in 1977 & 1987), which is intended to protect and restore waters for "beneficial uses" such as fishing and swimming. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies and these agencies can set permit conditions in accordance with and in addition to the minimum federal requirements. In Washington State, the NPDES-delegated authority is Ecology.

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. While there are several types of NPDES permits, the municipal permit is intended to reduce the impacts from both point source (i.e. construction site run-off) and non-point source pollution carried by stormwater.

Ecology defined two types of municipal permits based upon census populations. Phase I permits were issued to municipalities with populations greater than 100,000 and Phase II permits were issued to municipalities with populations less than 100,000. Ecology has issued the City multiple Phase II Permits beginning in 2007, including:

- First Permit: February 16, 2007 through February 15, 2012 (extended through August 31, 2012)
- Second Permit: September 1, 2012 through July 31, 2013
- Third Permit: August 1, 2013 through July 31, 2018 (extended through July 31, 2019)
- Current Permit: August 1, 2019 through July 31, 2024

DOCUMENT ORGANIZATION

This report comprises written documentation of the City's SWMP that is required to be submitted with the Annual Report. In accordance with the Permit terms, the SWMP has been designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), meet state AKART requirements and protect water quality. The following sections describe the actions that the City has taken or will take to comply with the requirements of the Permit during the current reporting year of the SWMP.

To aid in tracking Permit requirements, this document has been organized into sections that correspond with the Special Conditions and are outlined in the Permit as follows:

- Section 1 – Stormwater Planning (S5.C.1)
- Section 2 – Public Education and Outreach (S5.C.2)
- Section 3 – Public Involvement and Participation (S5.C.3)
- Section 4 – MS4 Mapping and Documentation (S5.C.4)
- Section 5 – Illicit Discharge Detection and Elimination (S5.C.5)
- Section 6 – Controlling Runoff from New Development, Redevelopment and Construction Sites (as required by S5.C.6)
- Section 7 – Operations and Maintenance (S5.C.7)
- Section 8 – Source Control Program for Existing Development (S5.C.8)
- Section 9 – Swamp Creek TMDL (S7)
- Section 10 – Monitoring and Assessment (S8)

For ease of reading, each section is organized into four subsections:

Subsection 1 “Permit Requirements” begins with an overview of Permit requirements and includes a table that outlines specific section requirements and their associated date of compliance.

Subsection 2 “Current Activities” describes activities that the City has accomplished in meeting compliance deadlines in the Permit year being reported.

Subsection 3 “Previous Activities” describes activities that the City accomplished in meeting compliance deadlines in previous Permit years.

Subsection 4 “Planned Activities” describes activities that the City plans to accomplish in order to meet upcoming compliance deadlines. Discussion of the activities in this section do not obligate the City to conduct them and are subject to change, as needed. This section provides the public with information on upcoming Permit activities in an effort to promote public involvement and participation and receive comments and questions.

Special Conditions S1 through S4 and General Conditions G1 through G20 apply to permit holders, though they do not result in specific program activities, nor is the SWMP required to document compliance with these activities. These conditions cover topics such as Permit coverage, what discharges are authorized under the Permit and legal guidelines for transferring, revoking and appealing the Permit. Penalties for non-compliance are also included in these conditions.

SECTION 1 – STORMWATER PLANNING

1.1 PERMIT REQUIREMENTS

The SWMP shall include a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

| Table 1-1 | | | |
|---|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Convene an inter-disciplinary team to develop program | S5.C.1.a | 8/1/2020 | N/A |
| Respond to Annual Report questions regarding updates to long range plans | S5.C.1.b.i.a | 3/31/2021 | N/A |
| Submit a report describing how water quality is being addressed in long range plans and other state-mandated plans related to growth or transportation | S5.C.1.b.i.b | 1/1/2023 | N/A |
| Continue requiring LID principles and LID BMPs when updating, revising and developing codes, rules, standards, etc... and annually report any barriers and measures to address them | S5.C.1.c.i.a | Annually | YES |
| Submit a watershed inventory | S5.C.1.d.i | 3/31/2022 | N/A |
| Document prioritized and ranked list of receiving waters | S5.C.1.d.ii | 6/30/2022 | N/A |
| Develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area | S5.C.1.d.iii | 3/31/2023 | N/A |

**N/A – Requirement is not required as of current reporting period*

1.2 CURRENT ACTIVITIES

Compliance with this Permit requirement begins in the 2020 reporting cycle.

1.3 PREVIOUS ACTIVITIES

This is a new Permit requirement and there are no previous activities to report.

1.4 PLANNED ACTIVITIES

An inter-disciplinary team will be formed in 2020 to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

SECTION 2 - PUBLIC EDUCATION AND OUTREACH

2.1 PERMIT REQUIREMENTS

The SWMP shall include an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the City. The goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. An education program may be developed locally or regionally. Table 2-1 outlines specific Permit requirements.

| Table 2-1 | | | |
|---|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Education and Outreach Program, General Awareness | S5.C.2.a.i | 8/1/2019 | YES |
| Conduct new evaluation of ongoing behavior change program | S5.C.2.1.ii.b | 7/1/2020 | YES |
| Develop Behavior Change Program | S5.C.2.a.ii.c | 2/1/2021 | N/A |
| Implement Behavior Change Program | S5.C.2.a.ii.d | 4/1/2021 | N/A |
| Evaluate Behavior Change Program | S5.C.2.a.ii.e | 3/31/2024 | N/A |
| Stewardships & Partnerships | S5.C.2.a.iii | 8/1/2019 | YES |

**N/A – Requirement is not required as of current reporting period*

2.2 CURRENT ACTIVITIES

2019 SOG Bus Ad Campaign

As part of the Eastside Stormwater Outreach Group, Kenmore participated in a Bus Ad campaign beginning in Puget Sound Starts Here Month (May). This general awareness campaign targeting the general public was centered on the simple message that what starts in the storm drain ends in local streams and Puget Sound. The general impact of pollution ends up affecting things that the public cares for – children and orcas. The ads were seen around Kenmore and other jurisdictions for months after the campaign ended. According to Intersection, the consultant who managed the project, the campaign made 3,712,460 impressions across the region.



2019 Stormwater Awareness Regional Survey

In order to continue to measure and understand the public's knowledge of stormwater pollution and impacts on local water quality the City conducted the fourth iteration of the Stormwater Awareness survey. Because this survey has been conducted multiple times, trends can be extrapolated over the ten year span (2009, 2012, 2015, and 2019). The 2012 survey and the 2019 survey were conducted with nearly identical conditions and questions and are therefore the most comparable. Several of the behavior change programs implemented during the 2013-2018 permit were analyzed in this survey. Below is the general trend of each BMP behavior for the respective survey year with the desired behavior listed first.

| | 2019 | 2012 | Results |
|--|------|------|---|
| How often is dog poop picked up on walks? | | | |
| Every time | 84% | 76% | Desired behavior frequency increased |
| Most times | 4% | 17% | |
| Left on Ground | >1% | 1% | |
| Where is dog poop disposed of? | | | |
| Trash | 84% | 79% | Desired behavior frequency increased |
| Yard waste | 9% | 11% | |
| Other | 7% | 10% | |
| How often are cars washed at home? | | | |
| Never | 73% | 46% | Desired behavior frequency increased |
| Less than every 2 months | 8% | 28% | |
| More frequently | 11% | 25% | |
| Where does car wash water go if washed at home? | | | |
| Pervious surface | 43% | 12% | Desired behavior frequency increased |
| Impervious surface | 52% | 74% | |
| Other | 5% | 14% | |
| What would you do if you notice a vehicle leak? | | | |
| Get it checked | 89% | 91% | Desired behavior remained high with negligible change |
| Wait and watch | 9% | 7% | |
| Other | 1% | 2% | |
| How often are weed killers used? | | | |
| Never | 49% | 29% | Desired behavior frequency increased |
| Occasionally | 43% | 51% | |
| Regularly | 3% | 16% | |
| How often are pesticides used? | | | |
| Never | 65% | 62% | Undesired behavior remained low. Negligible change in desired behavior. |
| Occasionally | 29% | 32% | |
| Regularly | 3% | 3% | |

Based on these trends, it appears that the public is shifting toward the desired behaviors overall. Specific campaigns like the "Poop Toss" game and "Don't Drip and Drive" seem to be generally successful in changing behaviors. Some of the previous campaigns like Natural Yard Care and car washing outreach were also moderately successful. Many of these programs were aimed to have a far reaching message to as many target audiences as would benefit from the message. While these behaviors may have improved, the audience tended to be more variable and less concentrated. In order to apply social marketing practices, there will need to be more extensive priority audience research to truly identify barriers and fundamentally change the behavior. In accordance with social marketing principles, previous campaigns seemed to successfully reach the "show me" subset of people, but may have left out the "help me" category (See below: UW Evans School, Nancy Lee).

To build upon Kenmore’s citizens’ knowledge of the BMP behaviors analyzed, the programs that are ongoing are beneficial to continue. However, to take a deeper dive into the principles of social marketing, extensive research is needed to develop a successful and audience-specific campaign.



2019 Puget Sound Starts Here Outreach and STORM

Kenmore continues to participate in regional efforts through STORM (STormwater Outreach for Regional Municipalities). This year, Puget Sound Starts Here Month was a social media campaign centered on Orca health and the hashtag #OrcaHero. Kenmore participated by sharing social media posts from the Puget Sound Starts Here Facebook page and using the hashtag during the campaign to highlight local stormwater issues.

2019 Summer Event Series

Every summer, City Staff host a booth at summer events to highlight common stormwater issues geared toward school-age children. City Staff attended seven events throughout the summer and had different activities that focused on pet waste, watershed pollution, stream monitoring, and car washing. There were informational posters for parents and older children that highlighted how to reduce their water pollution and impacts on local waterbodies.



2019 Business Outreach

The City continues to work with Environmental Coalition of South Seattle (ECOSS) to provide business pollution prevention outreach and source control outreach to commercial properties in Kenmore. In 2019, they reached 26 Kenmore businesses who received spill training, a spill kit, spill plan, and site map. Because ECOSS partners with so many cities in the region, they analyzed data from across the data set and found that their services were largely well-received. They found that most employers and employees were more prepared to prevent spills and how to respond to spills after ECOSS training.

2019 Social and Print Media Outreach

Environmental Services Division output more information to Kenmore citizens via social media and the City’s printed and electronic newsletters. The social media posts included messaging like: “clear drains”, “report spills”, pressure washing BMPs, and flooding prevention and safety. The printed media is mailed to all residences quarterly, and the spring edition included a 4-page insert about Surface Water Management. It included the purpose of Surface Water Management, general BMP information, Surface Water Fees, watershed and wetland health, and pollution prevention. In the summer edition, there were articles about car washing BMPs and the importance of picking up pet waste. The City’s E-news is emailed out to a listserv and included a “Be Prepared for Storm Season” article during September.

2.3 PREVIOUS ACTIVITIES

Regional Participation

Kenmore has been actively involved with regional outreach groups, such as STORM and its sub-group ‘SOGgies’, which allow the City to participate in larger regional campaigns, such as Puget Sound Starts Here, and message its residents not only where they live, but also where they work and travel throughout Western Washington. Regional collaborations have been and continue to be an important component of the City’s education and outreach program. Examples of past events that the City participated in, which were only possible as a regional effort, have included the 2018 “Certain Things Don’t Mix” Comcast Commercial campaign and Puget Sound Starts Here night with the Seattle Mariners.

Business Source Control and Pollution Prevention Outreach

The City has contracted with Environmental Coalition of South Seattle (ECOSS) to conduct business source control outreach since 2013. The program provides local businesses with free spill kits and IDDE training. The City also receives data on outreach retention and spill kit usage.

Summer Concert Series Outreach Events

City staff have conducted surface water outreach activities at the City's annual summer concert series for many years. The following photo shows the model being used at a summer concert series event in July 2016 alongside an educational pet waste management game.



Public Participation

The City funds a Volunteer Coordinator staff position in order to accommodate Kenmore residents' desire to volunteer their time and effort for City events. Events have included riparian/wetland restorations and plantings and youth projects to construct information stations at Lake Washington and Sammamish River, which have been used for surface water outreach.

The City continued talks with Kenmore citizens interested in forming a stewardship group for a local watershed, Swamp Creek. Initial discussions have explored ideas on what roles the group and City would have, the scope of activities that the group could accomplish and how the relationship can most benefit Swamp Creek.

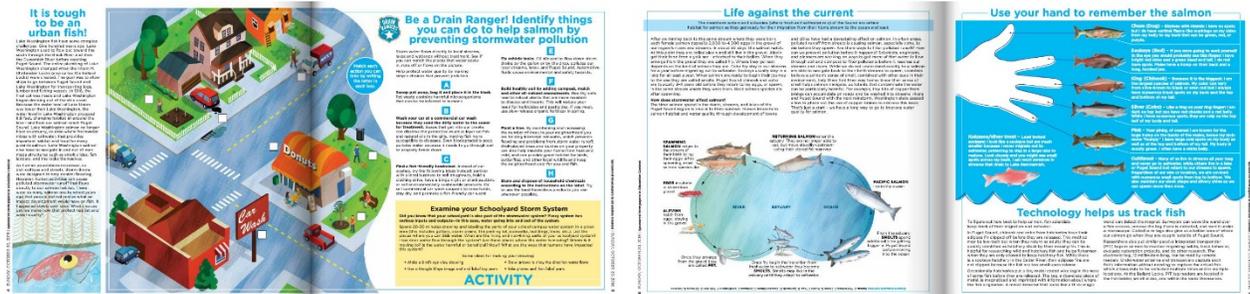
The City has received grant requests from the Sno-King Watershed Council and awarded funds to this non-profit watershed group that works to improve the health of streams and watersheds in north King and south Snohomish Counties. This group is very active in the Swamp Creek Watershed and their activities provide a beneficial service to the citizens of Kenmore.

Catch Basin Marking

The City continues to provide highly visible plastic markers for placement next to catch basins within the City. The markers display "Only Rain Down The Drain" and present the logo for Puget Sound Starts Here. Markers were provided for both public and private use.

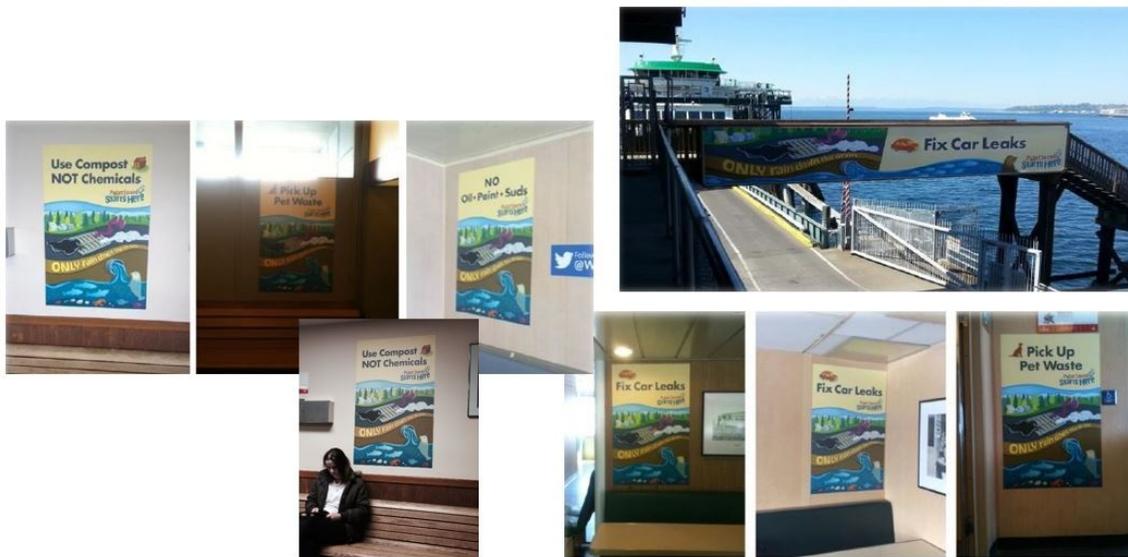
Seattle Times – Newspapers in Education 2015, 2016 & 2017

Kenmore partnered with its local Stormwater Outreach Group (SOGgies) to put together an outreach campaign with the Seattle Time’s Newspapers in Education program. The multipage inserts were published in the Seattle Times on October 1, 2015, October 30, 2016 and May 7, 2017. Each publication was unique and focused on a range of topics, including general stormwater information, low impact development, and specific behaviors such as car washing, pet waste, vehicle leaks and yard care. Each publication was provided in the print edition of the Seattle Times, on their webpage and thousands of copies were provided around the region to hundreds of participating schools all over Puget Sound, including Kenmore. Unfortunately, 2017 was the last year that the Seattle Times offered the program. A sample is shown in the photo below.



Newspaper, Online, Washington State Ferry and Metro Bus Ad Campaigns

The City, in partnership with local jurisdictions, has run numerous newspaper, online, ferry and bus stormwater education ads in recent years. The advertisements have typically been done in partnership with several other municipalities in the north Lake Washington area. The following photos show examples of the advertisements used.





Measurement and Understanding of Behavior

To measure the understanding and adoption of targeted behaviors, the City periodically conducts surveys to ask Kenmore residents about certain activities they may do and gauge their general understanding of stormwater management. The City conducted its first survey in 2009 and followed up in 2012, 2015 and most recently in 2019.

2.4 PLANNED ACTIVITIES

The City will continue implementing many of the activities described above and will continue participating regionally with the multi-jurisdictional outreach group “STORM” and the local Stormwater Outreach Group, “SOGgies”. The SOG will be running a repeat of the 2019 bus ad campaign to reach a widespread audience to educate about the direct impact of stormwater. The ads show polluted stormwater moving from the road directly into creeks and Puget Sound with the tag line “Starts Here → Ends Here”, similar to the example below. The group is planning to implement the ads in 2020 to coincide with Puget Sound Starts Here month. General awareness campaigns will continue with an increased effort focused on City print and social media. Kenmore continues to prepare for the behavior change campaign requirements by staying involved in the regional program tackling dumpster pollution. In preparation for the development and implementation of dumpster-focused outreach, Kenmore conducted a pre-program survey of dumpster condition and pollution risk throughout the commercial corridor of SR 522. The regional Dumpster Workgroup is planning to begin program development in May 2020.



SECTION 3 - PUBLIC INVOLVEMENT AND PARTICIPATION

3.1 PERMIT REQUIREMENTS

Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

| Table 3-1 | | | |
|-----------------------------|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| SWMP Public Input | S5.C.3.a | Annually | YES |
| SWMP Availability | S5.C.3.b | Annually | YES |

3.2 CURRENT ACTIVITIES

The annual report and Surface Water Management Program (SWMP) Plan is available online and comments are encouraged and accepted throughout the year. Contact information is provided for providing comment.

3.3 PREVIOUS ACTIVITIES

Low Impact Development Code Integration and Surface Water Manual Adoption

Ordinance 16-0428, effective on December 31, 2016, updated several chapters of Kenmore Municipal Code and adopted the 2016 King County Surface Water Design Manual. This process was required to integrate low impact development principles and standards into the City's existing development processes. Several Council and public meetings were held through the process.

Surface Water Master Plan and Comprehensive Plan Updates

In 2015 and 2016, the City updated the Surface Water Element of the City's Comprehensive Plan and the City's Surface Water Master Plan, which included public, planning commission, and council meetings. The plan updates included changes to address low impact development requirements in the Permit. These plans are available on the City's website.

3.4 PLANNED ACTIVITIES

Each year, the city will update the SWMP and Annual Report and post it online. Citizens are encouraged to provide comment at any time throughout the year. Additional opportunities for public input will be provided as upcoming SMAP requirements are implemented.

SECTION 4 – MS4 MAPPING AND DOCUMENTATION

4.1 PERMIT REQUIREMENTS

The SWMP shall include an ongoing program for mapping and documenting the MS4

| Table 4-1 | | | |
|---|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Ongoing Mapping, including: <ul style="list-style-type: none"> • Known MS4 outfalls and discharge points • Receiving waters, other than groundwater • Stormwater FC/WQ facilities • MS4 areas that do not discharge to receiving waters • Tributary conveyances greater than 24-inches • Connections between MS4s • All connections to MS4 after February 16, 2007 | S5.C.4.a | 8/1/2019 | YES |
| Begin collecting size and material data for all known MS4 outfalls during normal course of business and update records | S5.C.4.b.i | 1/1/2020 | N/A |
| Complete mapping of all known connections from the MS4 to a privately owned stormwater system. | S5.C.4.b.ii | 8/1/2023 | N/A |
| The required format for mapping is electronic | S5.C.4.c | 8/1/2021 | N/A |

**N/A – Requirement is not required as of current reporting period*

4.2 CURRENT ACTIVITIES

The City maintains an inventory of the MS4 in an ESRI ArcGIS database, which is available to both City staff and the public (via the City’s website). The City’s MS4 GIS database is continuously updated, as needed, to reflect changes observed by inspectors or changes due to development, redevelopment and construction.

4.3 PREVIOUS ACTIVITIES

The City developed an inventory of the MS4 per requirements set forth in previous Permit cycles and has maintained this information in an ESRI ArcGIS database format.

4.4 PLANNED ACTIVITIES

The City will continue updating the MS4 GIS database, as needed, and will comply with minimum performance measures outlined in the Permit.

SECTION 5 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

5.1 PERMIT REQUIREMENTS

The SWMP shall include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

| Table 5-1 | | | |
|--|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| The program includes procedural components for reporting, correcting and removing illicit discharges, connections and spills | S5.C.5.a | 8/1/2019 | YES |
| Inform public employees, businesses and the general public of hazards associated with IDDE | S5.C.5.b | 8/1/2019 | YES |
| Implement an ordinance effectively prohibiting non-stormwater discharges into the MS4 | S5.C.5.c | 8/1/2019 | YES |
| Implement field screening program | S5.C.5.d.i | 8/1/2019 | YES |
| Field screening – 12% annually | S5.C.3.d.i.a | 12/31/2019 | YES |
| Publicly listed IDDE hotline | S5.C.5.d.ii | 8/1/2019 | YES |
| Field staff training | S5.C.5.d.iii | 8/1/2019 | YES |
| IDDE response program | S5.C.5.e | 8/1/2019 | YES |
| IDDE staff training | S5.C.5.f | 8/1/2019 | YES |
| Recordkeeping | S5.C.5.g | 8/1/2019 | YES |

5.2 CURRENT ACTIVITIES

Public Informational Outreach

The City conducts outreach throughout the year geared toward reducing illicit discharges, spills, and proper disposal of hazardous waste. City staff provides general pollution prevention outreach during events for the general public. The City also used social media to share messages about proper spill containment and reporting procedures. Environmental Coalition of South Seattle (ECOSS) supports the City with business spill prevention outreach and developed a spill plan for 26 Kenmore businesses. Public employees were informed about pollution prevention and hazards of improper procedures with informational flyers around City Hall, as well as battery and lightbulb recycling on site.

Field Screening

City staff conduct annual IDDE field screening activities during catch basin inspections. Inspection staff were trained to conduct visual inspections to identify potential illicit discharges or illicit

connections per the City's IDDE Program Manual and the Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments.

5.3 PREVIOUS ACTIVITIES

Kenmore IDDE Program Manual

The City developed a manual that outlines all IDDE program elements required by the Permit. The manual is comparable to the Center for Watershed Protection's 2004 *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*.

Illicit Discharge Telephone Number "Hotline"

During business hours, illicit discharges and spills are reported to the City's main phone line (425-398-8900). The City contracts with Americall to receive phone calls after business hours (253-274-6330). These phone numbers are listed on the Surface Water Home Page on the City's website, advertised in City newsletters, and posted on social media. The City maintains records of illicit discharges and connections, response actions taken and enforcement actions.

Water Quality Ordinance

The City was required to develop and implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into Kenmore's municipal separate storm sewer system to the maximum extent allowable under State and Federal law.

On November 2, 2009 Kenmore City Council passed ordinance 09-0299 amending Kenmore Municipal Code, Chapter 13.45 "*Water Quality*". KMC 13.45 also adopted the Kenmore Stormwater Pollution Prevention Manual. Kenmore Municipal Code and the Stormwater Pollution Prevention Manual are available online.

Receiving Water Visual Inspections – Outfall Reconnaissance Inventory (ORI)

Outfall Reconnaissance Inventories (ORI) were conducted on Swamp Creek, Muck Creek, Little Swamp Creek, Sammamish River, Lake Washington and Tributary 0057 during previous Permit cycles. The ORI consisted of dry weather outfall screening in an effort to identify potential illicit discharges from the MS4.

Training

City staff responsible for identification, investigation, termination, cleanup and reporting of illicit discharges, including spills and illicit connections were trained to conduct these activities.

5.4 PLANNED ACTIVITIES

The City will continue to implement the Kenmore IDDE Manual and update as needed.

The City will continue to conduct annual field screening of the MS4. Field screening is conducted in conjunction with annual maintenance inspections.

SECTION 6 – CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

6.1 PERMIT REQUIREMENTS

The City shall implement and enforce a program to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects.

| Table 6-1 | | | |
|---|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Continue implementing existing programs developed under previous Permits | S5.C.6 *17 | 8/1/2019 | YES |
| Implement an ordinance | S5.C.6.a | 6/30/2022 | N/A |
| Ordinance shall include equivalent language to Appendix 1 of the Permit | S5.C.6.b.i | 6/30/2022 | N/A |
| Ordinance shall include a site planning process and BMP selection/design criteria | S5.C.6.b.ii | 6/30/2022 | N/A |
| Ordinance shall provide legal authority to inspect | S5.C.6.b.iii | 6/30/2022 | N/A |
| Review all applicable site plans | S5.C.6.c.i | 6/30/2022 | N/A |
| Pre-inspect high sediment transport sites | S5.C.6.c.ii | 6/30/2022 | N/A |
| Inspect and enforce ESC | S5.C.6.c.iii | 6/30/2022 | N/A |
| Inspect stormwater facilities and catch basins in new residential developments every six months until 90% of lots are completed | S5.C.6.c.iv | 6/30/2022 | N/A |
| Inspect permanent stormwater facilities upon completion of construction and verify maintenance responsibility | S5.C.6.c.v | 8/1/2019 | YES |
| Achieve at least 80% inspections | S5.C.4.b.vi | 8/1/2019 | YES |
| Maintain records of inspections and enforcement actions | S5.C.6.c.vii | 8/1/2019 | YES |
| Implement enforcement strategy to respond to issues of non-compliance | S5.C.6.c.viii | 8/1/2019 | YES |
| NOIs for construction and industrial activity are available | S5.C.6.d | 8/1/2019 | YES |
| Applicable staff are trained | S5.C.6.e | 8/1/2019 | YES |

**N/A – Requirement is not required as of current reporting period*

6.2 CURRENT ACTIVITIES

The City adopted (via Ordinance 16-0428) and implements Chapter 13.35 Kenmore Municipal Code (Surface Water Runoff Policy), which establishes enforceable mechanisms addressing runoff from new development, redevelopment and construction projects. This chapter also adopts the 2016

King County Surface Water Design Manual (SWDM), which is deemed equivalent to the minimum requirements, thresholds, and definitions in Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington through June 30, 2022.

The City implements a permitting process for all development, redevelopment and construction activities within the City that includes plan review, inspection and enforcement of all applicable development standards. For projects meeting the minimum requirements, thresholds, and definitions in Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington, the City utilizes a mix of in-house staff and professional consultants during the development process, including:

- Stormwater site plans are reviewed by a licensed professional engineer. Depending on the project, the reviewer may include the City’s Development Review Engineer, the City Engineer, the City Senior Engineer or a consulting licensed professional engineer hired by the City.
- All development sites are inspected beginning at pre-construction and continue through construction until completion. City inspectors, engineers and the Code Enforcement Officer are trained on erosion and sediment control through the Certified Erosion and Sediment Control Lead (CESCL) program.
- The City has developed a process for inspection and acceptance of stormwater facilities, including treatment and flow control BMPs/facilities and catch basins at each stage of development. These stages include preconstruction, construction, final construction acceptance (prior to final approval), and a maintenance defect period to ensure proper function. Upon final acceptance of a stormwater facility after the maintenance defect period, ongoing maintenance is clearly defined and continues to either the City’s private facility maintenance program or the City’s public facility maintenance program.

The following table summarizes all reportable projects active in 2019. Reportable projects include any project subject to Permit requirements (beginning with the 2007 Permit), including:

- Meets the minimum thresholds equivalent to Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington. The City has adopted the King County Surface Water Design Manual (currently the 2016 edition), which has been deemed equivalent to Ecology’s required standards.
- Projects over 1-acre initiated (approved permit) on or after February 16, 2010 through December 31, 2016 that trigger the minimum thresholds equivalent to Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington.
- Projects initiated (approved permit) on or after January 1, 2017, including projects under 1-acre, that trigger the minimum thresholds equivalent to Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington.
- Projects initiated (approved permit) before January 1, 2017 that haven’t started construction by January 1, 2022 that trigger the minimum thresholds equivalent to Appendix 1 of the Permit and Ecology’s Stormwater Management Manual for Western Washington.

| Project Type | Active Projects | 2019 Status (Jan 1 – Dec 31) |
|---------------------|------------------------|--|
| Residential | 46 | 28 Construction Started 18 Under Review |
| Townhomes | 10 | 7 Construction Started 3 Under Review |
| Apartments | 1 | 0 Construction Started 1 Under Review |
| Commercial | 6 | 5 Construction Started 1 Under Review |
| Land Division | 23 | 13 Construction Started 10 Under Review |
| Park Project | 5 | 2 Construction Started 3 Under Review |
| Road Project | 6 | 3 Construction Started 3 Under Review |
| Drainage Project | 2 | 1 Construction Started 1 Under Review |
| Total | 99 | 59 Under Construction 40 Under Review |

6.3 PREVIOUS ACTIVITIES

LID Integration and Surface Water Design Manual Adoption

Beginning in 2014, the City reviewed and updated long range plans relevant to integrating LID into the City’s development programs, including the Comprehensive Plan and the Surface Water Master Plan. In late 2015, the City hired a consultant (AHBL, Inc.) to assist the City with the review and update of codes and standards. AHBL was the consultant used by the Puget Sound Partnership to prepare the region’s primary LID integration guidebook referenced in the Permit (Integrating LID into Local Codes: A Guidebook for Local Governments) and they are a trusted expert in this field. In late 2016, the City Council passed Ordinance 16-0428, which made changes to several sections of Kenmore’s Municipal Code and adopted the 2016 King County Surface Water Design Manual, which is deemed equivalent to Ecology’s Surface Water Design Manual, as required by the Permit. A copy of Ordinance 16-0428 can be found on the City’s website and both Ecology and King County design manuals are available on their respective websites.

Surface Water Runoff Ordinance

The City council passed Ordinance 10-0305 on January 11, 2010 amending Kenmore Municipal Code 13.35 *Surface Water Runoff Policy*. The ordinance also adopted the King County 2009 Surface Water Design Manual.

The City conducted plan review, inspection and enforcement on applicable projects. Post project inspections for long term operations and maintenance were conducted.

Prior to 2010, the City utilized the 1998 King County Surface Water Design Manual.

6.4 PLANNED ACTIVITIES

The City will continue implementing the 2016 King County Surface Water Design Manual and all other relevant standards required by the 2019 Western Washington Phase II Municipal Stormwater Permit. Any updates to the current King County Surface Water Design Manual or Ecology's Stormwater Management Manual for Western Washington will be reviewed and adopted, as necessary, to comply with future Permit requirements.

SECTION 7 - POLLUTION PREVENTION AND OPERATIONS AND MAINTENANCE FOR MUNICIPAL OPERATIONS

7.1 PERMIT REQUIREMENTS

The City shall implement and document a program to regulate private maintenance activities and to conduct City maintenance activities to prevent or reduce stormwater impacts.

| Table 7-1 | | | |
|--|-----------------------|--------------------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Continue implementing existing programs developed under previous Permits | S5.C.7 | 8/1/2019 | YES |
| Adoption of maintenance standards as protective of SMMWW | *S5.C.5.a S5.C.7.a | 12/31/2016 6/30/2022 | YES N/A |
| Annual inspection of facilities regulated by the City | S5.C.7.b | 8/1/2019 | YES |
| Annual inspection of facilities owned and operated by the City | S5.C.7.c.i | 8/1/2019 | YES |
| Spot check facilities after major storms | S5.C.7.c.ii | 8/1/2019 | YES |
| Inspect and clean all applicable catch basins | S5.C.7.c.iii | 8/1/2019 | YES |
| Achieve 95% inspection rate | S5.C.7.c.iv | 8/1/2019 | YES |
| Implement practices and policies to reduce stormwater impacts | *S5.C.5.f S5.C.7.d | 12/31/2016 12/31/2022 | YES N/A |
| Implement an ongoing training program | S5.C.7.e | 8/1/2019 | YES |
| Develop a SWPPP for applicable sites | *S5.C.5.h S5.C.7.f | 12/31/2016 12/31/2022 | YES N/A |
| Maintain records of inspections and maintenance | S5.C.5.i | 8/1/2019 | YES |

*2013 Permit requirements

*N/A – Requirement is not required as of current reporting period

7.2 CURRENT ACTIVITIES

The City continues to implement the Operations & Maintenance Practices and Policies Manual, which describes the City’s operations & maintenance program in detail. To briefly summarize, the City conducts the following program activities:

- Annually inspect all stormwater facilities (treatment and flow control BMPs/facilities) regulated by the City and enforce maintenance. In the current reporting period, this included 138 facilities.

- Annually inspect and maintain all stormwater facilities (treatment and flow control BMPs/facilities) owned and operated by the City. In the current reporting period, this included 196 facilities.
- Spot checks facilities and other critical drainage areas before and after significant storm events.
- Annually inspect all catch basins owned and operated by the City and cleans them, if needed. The current reporting year was the City's tenth consecutive year of annual catch basin inspections.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City and road maintenance activities under the control of the City. These are documented in the City's Operations & Maintenance Practices and Policies Manual.
- City staff responsible for operations, maintenance or construction activities are trained on applicable procedures and standards, which include erosion sediment control and IDDE.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for the City's two storage yards, which currently includes two sites.
- Maintain records of operations and maintenance activities, which is primarily accomplished through the City's asset/inspection/work order management system (Cityworks).

In the current reporting period, the City hired five additional operations and maintenance staff to continue meeting the requirements of the Permit. These staff received applicable training, including spill response, IDDE and CESCL. A temporary Public Works yard was established, and the City plans to develop a permanent Public Works shop as soon as possible.

7.3 PREVIOUS ACTIVITIES

The City hired a second Surface Water Technician to meet growing demand for facility inspections and work order management for operations & maintenance and support implementation of other programs within the SWMP Plan.

The City council passed Ordinance 16-0428 on December 31, 2016 amending Kenmore Municipal Code 13.35 *Surface Water Runoff Policy*. The ordinance also adopted the 2016 King County Surface Water Design Manual, which contains the City's maintenance standards (Appendix A). The manual can be found on King County's website and the City's Addendum can be found on the City's website.

In order to comply with many of the O&M requirements set forth in the Permit, the City developed the Operations & Maintenance Practices and Policies Manual (OMPPM). The OMPPM contains inspection program details, O&M practices, O&M policies, SWPPPs, maintenance standards, nutrient management plan, integrated pest management plan and information regarding current O&M contracts. The OMPPM can be found on the City's website. The OMPPM is updated as needed to stay current with Permit requirements and the SWMP Plan.

7.4 PLANNED ACTIVITIES

The City will continue implementing applicable operations & maintenance policies and procedures and to comply with the requirements set forth in the Permit and plans to update accordingly, as needed.

SECTION 8 – SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

8.1 PERMIT REQUIREMENTS

The City shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.

| Table 8-1 | | | |
|---|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Implement an ordinance, or other enforceable mechanism, requiring source for pollution generating sources associated with identified land uses. | S5.C.7.b.i | 8/1/2022 | N/A |
| Establish an inventory of institutional, commercial and industrial sites. | S5.C.7.b.ii | 8/1/2022 | N/A |
| Implement an inspection program. | S5.C.7.b.iii | 1/1/2023 | N/A |
| Annually complete a number of inspections equal to 20% of the number of sites listed in the inventory. | S5.C.7.b.iii.b | 12/31/2023 | N/A |
| Inspect 100% of sites identified through credible complaints. | S5.C.7.b.iii.c | 1/1/2023 | N/A |
| Implement a progressive enforcement policy | S5.C.7.b.iv | 1/1/2023 | N/A |
| Train staff responsible for implementing the source control program | S5.C.7.b.v | 1/1/2023 | N/A |

**N/A – Requirement is not required as of current reporting period*

8.2 CURRENT ACTIVITIES

Implementation of this program is not required in the current reporting period.

8.3 PREVIOUS ACTIVITIES

Implementation of this program is not required in the current reporting period.

8.4 PLANNED ACTIVITIES

The City plans to develop and implement program requirements per Permit deadlines.

SECTION 9 – SWAMP CREEK TMDL

9.1 PERMIT REQUIREMENTS

The City has an applicable TMDL as described under Special Condition S7 (TMDL) of the Permit. The *Swamp Creek Fecal Coliform Bacteria TMDL Water Quality Improvement Report and Implementation Plan*, dated May 2006, identified Swamp Creek as a TMDL for fecal coliform. The Permit requires that TMDL implementation activities be annually reported by the City. Implementation activities are described in Appendix 2 of the Permit.

| Table 9-1 | | | |
|---------------------------------------|----------------|-----------------|------------|
| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
| Business Inspections | Appendix 2 | 8/1/2019 | YES |
| Public Education and Outreach | Appendix 2 | 8/1/2019 | YES |
| Operations and Maintenance | Appendix 2 | 8/1/2019 | YES |
| IDDE | Appendix 2 | 12/31/2019 | YES |
| Targeted Source Control & Elimination | Appendix 2 | 1/1/2021 | N/A |
| Surface Water Monitoring | Appendix 2 | 8/1/2019 | YES |

**N/A – Requirement is not required as of current reporting period*

9.2 CURRENT ACTIVITIES

2019 Sampling Results

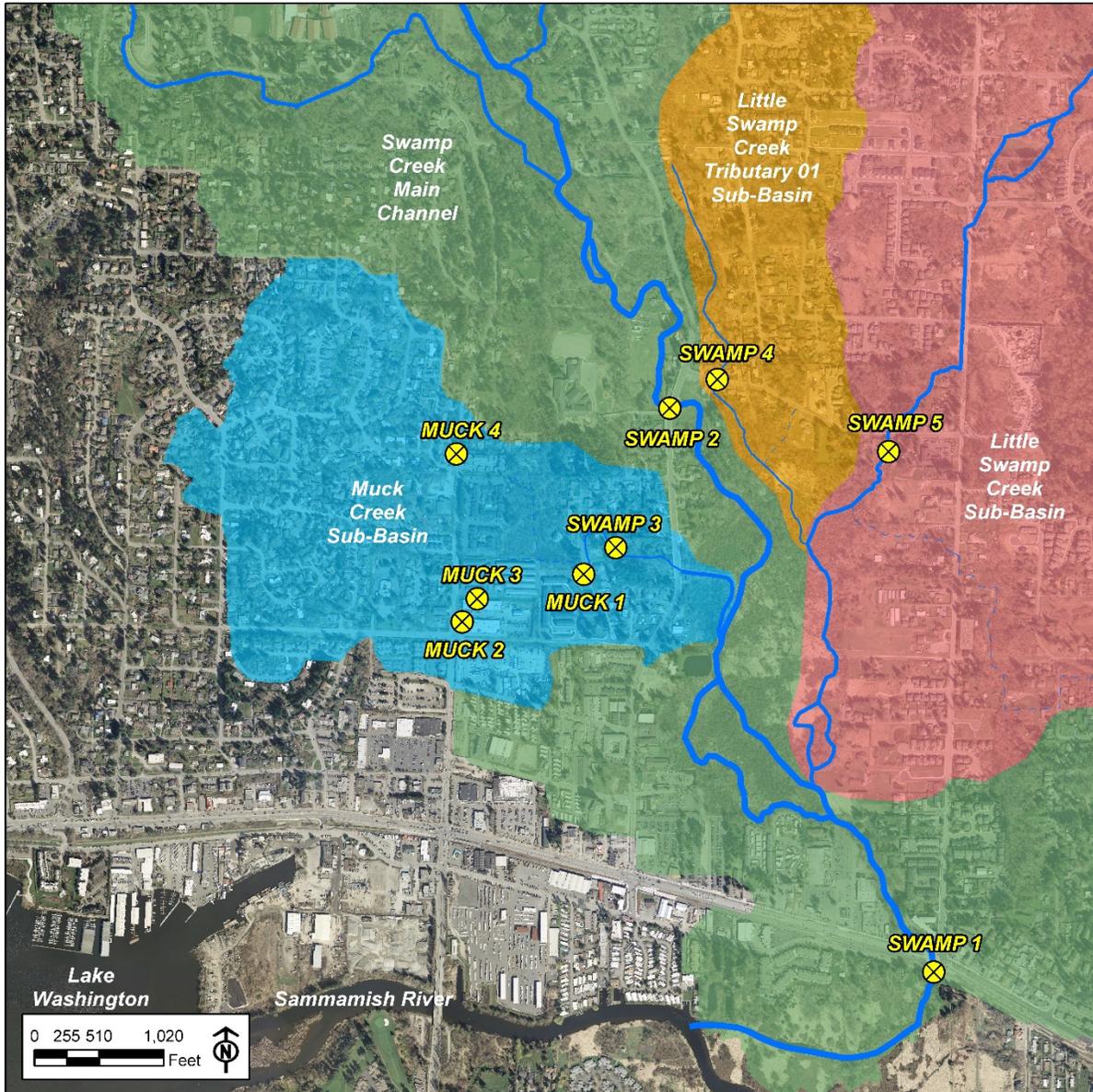
The City started collecting water samples from five locations in August 2015 per the City’s Swamp Creek Fecal Coliform Bacteria TMDL Quality Assurance Project Plan (QAPP), which was approved by Ecology on March 26, 2015. This section provides a summary of sampling data for the reporting year at those locations.

Water quality criteria for bacteria in Washington State for waters that have “extraordinary primary contact” (including Swamp Creek) state that the geometric mean value of samples should be less than 50 colony forming units (cfu) per 100mL and the 90TH percentile value should be less than 100 cfu per 100mL.

Additionally, the City identified Muck Creek (a small tributary to Swamp Creek) as a high priority area, which requires additional analysis per the Permit. Four additional sampling sites were added to better understand bacteria concentrations in this area. The original Muck Creek site (SWAMP 3) has had high bacterial concentrations from samples collected in the past, particularly during “dry” months. Targeted area sample collection began in December 2016 and continued throughout 2019.

The map on the following page indicates sample site locations. The tables on the page following that summarize bacterial concentrations for both Swamp Creek and Muck Creek for the indicated date ranges. The full dataset can be provided upon request.

Map of TMDL sampling locations



| Table 9-2 (Swamp Creek Samples – Geomean) | | | | | |
|---|------------------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| | SWAMP 1 | SWAMP 2 | SWAMP 3 | SWAMP 4 | SWAMP 5 |
| | <i>Fecal Coliform</i> cfu/100ml |
| 2015* | 125 | 107 | 127 | 66 | 232 |
| 2016 | 134 | 143 | 136 | 155 | 210 |
| 2017 | 215 | 209 | 632 | 258 | 191 |
| 2018 | 78 | 63 | 141 | 49 | 156 |
| 2019 | 97 | 82 | 108 | 217 | 151 |
| ALL SAMPLES | 121 | 110 | 173 | 142 | 181 |

* Partial Year

| Table 9-3 (Swamp Creek Samples – 90 th Percentile) | | | | | |
|---|------------------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| | SWAMP 1 | SWAMP 2 | SWAMP 3 | SWAMP 4 | SWAMP 5 |
| | <i>Fecal Coliform</i> cfu/100ml |
| 2015* | 345 | 205 | 775 | 90 | 790 |
| 2016 | 483 | 712 | 487 | 1048 | 905 |
| 2017 | 380 | 290 | 8200 | 896 | 820 |
| 2018 | 218 | 168 | 610 | 89 | 569 |
| 2019 | 498 | 414 | 1490 | 2220 | 725 |
| ALL SAMPLES | 488 | 358 | 1570 | 1328 | 876 |

* Partial Year

| Table 9-4 (Muck Creek Samples – Geomean) | | | | |
|--|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| | MUCK 1 | MUCK 2 | MUCK 3 | MUCK 4 |
| | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml |
| 2017 | 503 | 33 | 60 | 111 |
| 2018 | 109 | 12 | 31 | 31 |
| 2019 | 364 | 22 | 29 | 24 |
| ALL SAMPLES | 244 | 19 | 32 | 37 |

| Table 9-5 (Muck Creek Samples – 90 th Percentile) | | | | |
|--|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| | MUCK 1 | MUCK 2 | MUCK 3 | MUCK 4 |
| | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml | <i>Fecal Coliform</i> cfu/100ml |
| 2017 | 2000 | 329 | 320 | 393 |
| 2018 | 770 | 534 | 480 | 160 |
| 2019 | 3000 | 248 | 490 | 442 |
| ALL SAMPLES | 1970 | 316 | 480 | 335 |

All five Swamp Creek sites exceeded water quality standards during this reporting period, as shown in the table above. Geometric mean values and 90th percentile values increased at most sites from 2018 to 2019.

In Muck Creek, the geometric mean values exceeded water quality standards at one site and 90th percentile values were exceeded at all four sites. Muck Creek is very slow moving during the dry season and often has high animal activity. These factors may be contributing to the high summer-time peaks and low winter-time values. This also explains the compliance discrepancy between the geomean report and the 90th percentile values.

Continued monitoring at the Muck Creek sites may help focus source tracing and identification of bacterial pollution sources. Preliminary results indicate that bacteria levels increase somewhere east of 68th Ave NE before reaching 71st Ave NE. However, this area is dominated by natural wetlands and will require additional investigation. Additionally, identifying a new high-priority area by 2021 will help to focus bacterial pollution reduction efforts in additional Swamp Creek tributaries.

Business Inspections

Within Kenmore’s portion of Swamp Creek, there are no businesses that require source control inspections for bacterial pollution. There is one horse owning residential property located in the Lower Swamp Creek subbasin, but it does not meet the criteria to be considered a “commercial animal handling area” as defined by SIC 075. There is also a hobby farm with llamas and alpacas located in the Swamp Creek basin, but this site does not meet the requirements for source control inspections.

Public Education and Outreach

The parks maintenance program promotes pet waste removal. Visible signs and pet waste bags are provided in City parks.

The City provides stormwater education materials on City Social Media, City Newsletter, and City events regarding proper domestic pet waste management. The City’s mobile watershed model (used at public events) is also used to demonstrate how pet waste is introduced into the watershed and to educate citizens on pet waste BMPs. Staff provide a “poop toss” game to educate children and parents on proper pet waste management. The following photo shows children and parents enjoying the game at a public event.



Operations and Maintenance

Municipal parks and other City owned and operated lands that are reasonably expected to have substantial domestic animal (dog and horse) waste collection stations. Waste collection stations provide plastic bags to the public for collecting the pet waste.

6.3 PREVIOUS ACTIVITIES

The City identified the Muck Creek sub-basin as the high priority area that will be the focus of source identification and elimination efforts starting in 2016. This sub-basin had some of the highest concentrations of bacterial pollution measured during the previous monitoring project.

Ordinance 16-0428, amending KMC Chapter 13.45 "*Water Quality*", continues prohibiting non-stormwater, illegal discharges from commercial animal handling areas and commercial composting facilities. The ordinance also updated the 2009 Stormwater Pollution Prevention Manual by adopting the 2016 version which contains BMPs addressing commercial composting and animal handling areas.

The City conducted monitoring for bacterial pollution in Swamp Creek during previous Permit cycles. This information was used to update the City's QAPP in 2015, which is effective through the remainder of this Permit.

In 2010, Ordinance 09-0299 amended KMC Chapter 13.45 "*Water Quality*" to prohibit non-stormwater, illegal discharges from commercial animal handling areas and commercial composting facilities. The ordinance also adopted the 2009 Kenmore Stormwater Pollution Prevention Manual which contained BMPs addressing commercial composting and animal handling areas.

9.4 PLANNED ACTIVITIES

The City will continue monitoring Swamp Creek bacterial concentrations, including additional sites in Muck Creek. Muck Creek was identified as a high priority area to identify and eliminate bacterial pollution sources. In 2020, Muck Creek data will be used to focus tracing and identification of bacterial sources in this high priority area.

The City will continue with education and outreach efforts in regards to bacterial pollution, particularly regarding proper pet waste management and illicit sewer discharge/connection prevention.

SECTION 10 – MONITORING AND ASSESSMENT (S8)

10.1 PERMIT REQUIREMENTS

Permittees are required to either 1) annually pay into a collective fund or 2) conduct in-house monitoring and assessment for the following:

- Regional status and trends monitoring
- Effectiveness studies and source control identification studies
- Stormwater discharge monitoring (if in-house option selected)

The City has opted to pay into a collective fund.

| Minimum Performance Measure | Permit Section | Compliance Date | Compliance |
|--|----------------|---------------------------------------|------------|
| Pay into collective fund for Regional Status and Trends Monitoring | S8.A.1 | 12/1/2019 <i>Continue Annually</i> | YES |
| Notify Ecology in writing of City's option to pay into collective fund through 2024 | S8.A.2 | 12/1/2019 | YES |
| Pay into collective fund for SWMP Effectiveness and Source Identification Studies | S8.B.1 | 12/1/2019 <i>Continue Annually</i> | YES |
| Notify Ecology in writing of City's option to pay into collective fund through 2024 | S8.B.2 | 12/1/2019 | YES |
| Provide information for effectiveness and source identification studies, as requested by Ecology | S8.B.3 | Annually | YES |

10.2 CURRENT ACTIVITIES

The City provided payment for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies to Ecology.

10.3 PREVIOUS ACTIVITIES

The City provided payment for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies to Ecology.

10.4 PLANNED ACTIVITIES

The City will continue providing payment for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies to Ecology.