

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) Western Washington Phase II Municipal Stormwater Permit (Permit) Section S5.A.2. This section of the Permit requires that the SWMP Plan be organized according to the program components in S5.C and updated annually for submittal with the City's annual report due by March 31st each year. The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year, and shall include a description of:

- Planned activities for each program component included in S5.C.
- Any additional planned actions to meet the requirements of applicable TMDLs pursuant to S7 – Compliance with Total Maximum Daily Load Requirements.
- Any additional planned actions to meet the requirements of S8 – Monitoring and Assessment.

To meet these requirements, this SWMP Plan is organized 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 (S5.C.6)
- Section 7 – Stormwater Management for Existing Development (S5.C.7)
- Section 8 – Source Control Program for Existing Development (S5.C.8)
- Section 9 – Operations and Maintenance (S5.C.9)
- Section 10 – TMDL (S7)
- Section 11 – Monitoring and Assessment (S8)

Each section includes the following three subsections:

- Subsection 1 "Permit Requirements" – Describes Permit section requirements and provides dates of compliance.
- Subsection 2 "Current Activities" – Describes activities that the City completed in the reported Permit year.
- Subsection 3 "Planned Activities" – Describes possible SWMP activities for the upcoming reporting year. These activities are subject to change, as needed.

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.i	8/1/2024	YES
Respond to Annual Report questions regarding coordination with long-range plan updates	S5.C.1.b.i	3/31/2027	N/A
Continue requiring LID principles and LID BMPs when updating, revising, and developing codes, rules, standards and annually report any barriers and measures to address them	S5.C.1.c.i.a	Annually	YES
Adopt and implement tree canopy goals and policies to support stormwater management	S5.C.1.c.iii	12/31/2028	N/A
Develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area	S5.C.1.d.i	3/31/2027	N/A

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

1.2 CURRENT ACTIVITIES

Long-Range Plan Update Coordination

The inter-disciplinary team coordinated updates to the City's Surface Water and Natural Environment Elements of the Comprehensive Plan to ensure stormwater management needs and protection/improvement of receiving water health were informing the update process.

Low Impact Development (LID)

The City continues to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents. Annually, the City assesses and documents any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs and the measures to address the barriers, if applicable.

No additional barriers in the City's codes or standards relevant for LID implementation in 2024 were identified in the annual review of applicable codes, rules, standards, and other enforceable documents.

1.3 PLANNED ACTIVITIES

Long-range Planning

The inter-disciplinary team plans to coordinate updates to the City's Surface Water Master Plan to ensure stormwater management needs and protection/improvement of receiving water health are informing the update process.

Low Impact Development (LID)

The City will continue annual assessments to report newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs and the measures to address the barriers, if applicable.

SECTION 2 - PUBLIC EDUCATION AND OUTREACH

2.1 PERMIT REQUIREMENTS

The SWMP shall include an education program designed to build general awareness about methods to address and reduce impacts from stormwater runoff, effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts, and create stewardship opportunities that encourage community engagement in addressing the impacts from stormwater runoff. 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	Ongoing	YES
Develop Behavior Change Program	S5.C.2.a.ii.b	7/1/2025	N/A
Implement Behavior Change Program	S5.C.2.a.ii.c	9/1/2025	N/A
Evaluate Behavior Change Program	S5.C.2.a.ii.d	3/31/2029	N/A
Stewardships & Partnerships	S5.C.2.a.iii	Ongoing	YES

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

2.2 CURRENT ACTIVITIES

2024 Puget Sound Starts Here Outreach and STORM

The City continues to participate in regional efforts through STORM (**ST**ormwater **O**utreach for **R**egional **M**unicipalities). This year, Puget Sound Starts Here Month was a digital media campaign that focused on tire inflation and tire care. The campaign was designed to raise awareness regarding tire inflation and its link to 6PPD-q pollution in the greater Puget Sound region. Regionally the program made over 8.5 million total impressions and delivered over 66,000 clicks to the Puget Sound Starts Here website with 43,000 visits to the tire care page. The campaign was produced in English, Spanish, Vietnamese, and Korean.



2024 Social and Print Media Outreach

The City continues to output information to Kenmore residents via social media and the city's printed and electronic newsletters. The social media posts included information and messaging on general awareness topics such as pet waste, reporting spills, vehicle maintenance, water quality, BMP's, clearing drains, and more. Articles printed in the City's E-newsletter and quarterly print newsletter typically feature seasonal topical information such as natural lawn care, car washing, updates on stormwater facility maintenance, drain clearing, or preparing for effects from storms.

2024 Summer Events

For 2024, the City hosted a booth at six City sponsored events including summer concerts, Earth Day, farmers markets, and Streamfest. The booth has educational games and materials to encourage the public to engage with important stormwater and water pollution related topics. The "poop toss" and watershed model are geared toward school-age children, but there were also informational posters for parents and older children that highlighted how to reduce their water pollution and impacts on local waterbodies.



2024 TESC and Construction Outreach

The City continued to distribute outreach materials targeted towards developers, contractors, and homeowners to inform them on how to reduce their environmental impacts during construction. The Development Services Department distributes the materials to permit applicants based on the level of complexity of their project. There are materials for large sites and small site projects that include technical standards, inspection and maintenance triggers for BMP's, and common issues found on sites.

2024 Stewardship

In 2024 the city continued implementing the Adopt-a-Drain program in Kenmore, joining 24 other cities in the Puget Sound region. The program allows residents, businesses, or organizations to “adopt a drain”, keeping it clear of leaves or debris and reporting through the online portal on the frequency and cleaning of their general maintenance. In addition to helping keep storm drains free and clear of debris throughout the year, the program also helps increase general awareness of stormwater systems and pollution prevention for individuals that participate. In 2024 the city saw 27 new drain adoptions and 475.7 pounds of debris collected and reported by participants.

The city continues to partner with organizations to offer stewardship opportunities to Kenmore residents. People for Environmentally Responsible Kenmore (PERK) is a resident group active in storm drain marking and public outreach activities. The Sno-King Watershed is a resident organization the city collaborates with on efforts including the Swamp Creek Restoration Project and Streamfest 2024. The organization is active in Kenmore performing activities such as water quality testing, riparian noxious weed removal and native plantings, trash pickups, and educational events.



Photo: Swamp Creek Restoration Project

2.3 PLANNED ACTIVITIES

The City will develop a social marketing campaign by July 1, 2025 and begin implementation by September 1, 2025. The City will determine whether to continue implementing the existing campaign more effectively, expand the existing campaign to a new audience or BMP, or develop a new campaign.

The City plans to continue implementing, and may expand, many of the activities described above. This may include renewed outreach materials and engagement opportunities with the community, more robust social media and print campaigns, and an expanded presence at community events like Streamfest. The City plans to continue to have a booth with activities, games and outreach materials at City events such as Earth Day, farmers markets, summer concerts, and more. General awareness campaigns will continue on a variety of stormwater topics.

The City plans to continue participating regionally with the multi-jurisdictional outreach group “STORM” and the local Stormwater Outreach Group, “SOG”. SOG will be coordinating throughout the year to produce a cost-sharing regional awareness campaign and/or generate new materials/media.

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
Overburdened Communities Documentation	S5.C.3.a.ii	12/31/2026	N/A
SWMP Availability	S5.C.3.b	Annually	YES

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

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. Language translation is provided to encourage participation of overburdened communities.

3.3 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.

The City plans to update the Surface Water Master Plan, which will include opportunities for public involvement and participation throughout the process.

The City plans to develop outreach measures for overburdened communities and will document these methods no later than December 31, 2026. These methods may include strategies such as more robust translation of written materials and on-site language services at public meetings and outreach events, implementing actions identified in City's DEIA Strategic Plan and coordinating with the DEIA Advisory Committee, which is comprised of community members that focus on these types of issues.

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 • Outfall size and material • 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 • Known connections from MS4 to privately owned systems 	S5.C.4.a	8/1/2024	YES
Submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.	S5.C.4.b.i	3/31/2026	N/A
Map tree canopy to support stormwater management on Permittee-owned or operated properties.	S5.C.4.b.ii	12/31/2026	N/A
Implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.	S5.C.4.b.iii	3/31/2028	N/A
Map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.	S5.C.4.b.iv	12/31/2028	N/A
The required format for mapping is electronic (GIS).	S5.C.4.c	8/1/2024	Yes

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

4.2 CURRENT ACTIVITIES

The City maintains an inventory of the municipal separate storm sewer system (MS4) in an ESRI ArcGIS database (see screenshot below), which is available to the public on 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. In 2022, the City's MS4 GIS database was updated to include stormwater infrastructure and Low Impact Development Best Management Practices included in Ecology's and King County's design manuals.

Mapping of size and material for all known MS4 outfalls (required starting 2020) has been implemented by the City since 2010. This data has been collected through extensive mapping efforts as well as through normal course of business. There are currently 320 known MS4 and private outfalls mapped in the ArcGIS database.

The Permit requires mapping of all known connections from the MS4 to privately owned stormwater systems, beginning 2023. This data is routinely collected and updated through extensive mapping efforts and normal course of business.

An example of the City's MS4 GIS map:



4.3 PLANNED ACTIVITIES

The City plans to evaluate existing tree canopy data and update, as needed, to incorporate into stormwater management strategies on City owned or operated properties. The City plans to map trees in the right-of-way to supplement tree canopy data and better inform stormwater management strategies.

The City plans to begin developing a methodology to map and assess MS4 basins. The City will initially focus on basins with outfalls 24-inch or larger and have stormwater treatment facilities.

The City plans to begin developing a methodology to map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on City owned or operated properties.

The City will continue updating the MS4 GIS database, as needed, to 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 prohibit, 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	Ongoing	YES
Inform public employees, businesses and the general public of hazards associated with IDDE	S5.C.5.b	Ongoing	YES
Implement an ordinance effectively prohibiting non-stormwater discharges into the MS4	S5.C.5.c	Ongoing	YES
Update ordinance, if necessary, to meet requirements	S5.C.5.c	7/1/2027	N/A
Implement field screening program	S5.C.5.d.i	Ongoing	YES
Field screening – 12% each year	S5.C.3.d.i.a	Annually	YES
Publicly listed IDDE hotline	S5.C.5.d.ii	Ongoing	YES
Field staff training	S5.C.5.d.iii	Ongoing	YES
IDDE response program	S5.C.5.e	Ongoing	YES
Fire Response Notification for PFAS	S5.C.5.e.ii.a	12/31/2026	N/A
Update and implement procedures for fire response post response clean-up	S5.C.5.e.ii.b	1/1/2027	N/A
IDDE staff training	S5.C.5.f	Ongoing	YES
Recordkeeping	S5.C.5.g	Ongoing	YES

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

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. 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, the Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, and the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual.

Illicit Discharge and Spill 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. There is also an option to report spills online via the City's website.

Training

Environmental Services staff are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges and are trained to conduct these activities. All city field staff are CESCL trained and most maintain current certifications, as construction sites are one of the most common sources of IDDE reports in Kenmore. Public Works Operations field staff are also trained in initial cleanup response and surface-level source tracing needed for adequate response procedures. All Environmental Services permanent and seasonal staff are trained to conduct source tracing, source identifying, field indicator identification, field screening, proper BMP's, and identifying general water quality concerns.

Tracking and Recordkeeping

The City maintains records of illicit discharges and connections, response actions taken and enforcement actions. All reports are tracked as a Service Request via Cityworks and coded as a *Surface Water - Water Quality* concern. All reports are investigated as soon as possible, and any cleanup effort is initiated as an emergency priority. Once the illicit discharge report is considered resolved, the Service Request is closed, and the applicable information is entered into the WQWebIDDE website.

Spills and Response Summary

In 2024, there were 43 suspected illicit discharges, spills or illicit connections reported to the City.

- No illicit discharge found/identified: 11
- Cleaned up before reaching MS4: 4
- Illicit discharge reached MS4: 28
 - Illicit discharge was removed from MS4 before reaching receiving waterbody: 26
 - Illicit discharge reached receiving waterbody: 2

5.3 PLANNED ACTIVITIES

The City plans to evaluate existing codes and other regulatory mechanisms to identify changes needed to comply with section S5.C.5 of the Permit, including a focus on firefighting activity discharges and external building washdown discharges.

The City plans to continue conducting field screening of the MS4, which is typically done in conjunction with annual catch basin inspections, and will complete at least 12% of the City's MS4, annually.

The City will continue to implement all required IDDE conditions specified in section S5.C.5 of the Permit.

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 a regulated small 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
Update Ordinance	S5.C.6.a	6/30/2027	N/A
Ordinance shall include equivalent language to Appendix 1 of the Permit	S5.C.6.b.i	6/30/2027	N/A
Ordinance shall include a site planning process and BMP selection/design criteria	S5.C.6.b.ii	6/30/2027	N/A
Ordinance shall provide legal authority to inspect	S5.C.6.b.iii	6/30/2027	N/A
Review all applicable site plans	S5.C.6.c.i	Ongoing	YES
Pre-inspect high sediment transport sites	S5.C.6.c.ii	Ongoing	YES
Inspect and enforce ESC	S5.C.6.c.iii	Ongoing	YES
Inspect stormwater facilities and catch basins in new residential developments twice per year until 90% of lots are completed	S5.C.6.c.iv	Ongoing	YES
Inspect permanent stormwater facilities upon completion of construction and verify maintenance responsibility	S5.C.6.c.v	Ongoing	YES
Achieve at least 80% inspections	S5.C.4.b.vi	Ongoing	YES
Maintain records of inspections and enforcement actions	S5.C.6.c.vii	Ongoing	YES
Implement enforcement strategy to respond to issues of non-compliance	S5.C.6.c.viii	Ongoing	YES
NOIs for construction and industrial activity, and UIC registration are available	S5.C.6.d	Ongoing	YES
Applicable staff are trained	S5.C.6.e	Ongoing	YES

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

6.2 CURRENT ACTIVITIES

The City implements the King County program approved by Ecology under the 2024 Phase I Permit, which was adopted, via ordinance, and codified in Chapter 13.35 Kenmore Municipal Code (Surface Water Runoff Policy), and establishes enforceable mechanisms addressing runoff from new development, redevelopment, and construction projects, including transportation projects.

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 under either the City's private facility maintenance program or the City's public facility maintenance program.

Table 6-2 summarizes all reportable projects active in 2024. 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 2021 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 (date permit applied for) 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 (date permit applied for) 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.

Table 6-2		
Project Type	Active Projects	2024 Status (Jan 1 – Dec 31)
Residential	57	32 Construction Started 25 Under Review
Townhomes	6	4 Construction Started 2 Under Review
Apartments	3	0 Construction Started 3 Under Review
Commercial	5	3 Construction Started 2 Under Review
Land Division	28	21 Construction Started 7 Under Review
Park Project	3	2 Construction Started 1 Under Review
Road Project	5	3 Construction Started 2 Under Review
Drainage Project	5	2 Construction Started 3 Under Review
Total	112	67 Under Construction 45 Under Review

6.3 PLANNED ACTIVITIES

The City will continue implementing the 2021 King County Surface Water Design Manual and all other relevant standards required by the 2024 Western Washington Phase II Municipal Stormwater Permit.

The City will evaluate and adopt either Ecology's program or King County's program, if deemed equivalent, by June 30, 2027.

SECTION 7 – STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT

7.1 PERMIT REQUIREMENTS

The City shall implement a program to control or reduce stormwater discharges to water of the State from existing development. The program shall aim to focus on strategic stormwater investments over longer planning timeframes.

Table 7-1			
Minimum Performance Measure	Permit Section	Compliance Date	Compliance
Implement stormwater facility retrofits, or tailored SWMP actions	S5.C.7.a	Ongoing	Yes
Provide a list of planned, individual projects scheduled for funding or implementation	S5.C.7.b	Ongoing	Yes
Fully fund, start construction, or completely implement project(s) equivalent to 3.9-acres	S5.C.7.c	3/31/2028	N/A
May collaborate to meet a regional goal	S5.C.7.d	Ongoing	Yes
Report estimated amount of equivalent acres managed by stormwater facility retrofits for next Permit term	S5.C.7.e	3/31/2028	N/A

6.3 CURRENT ACTIVITIES

The City developed a stormwater facility retrofit program and conducted a surface water management rate study to establish rates to fund the program through 2029. New rates were adopted and implemented in 2024. These funds are anticipated to support at least two stormwater facility retrofit projects in this permit cycle.

6.3 PLANNED ACTIVITIES

The City is designing a stormwater facility retrofit project to construct a flow control and runoff treatment facility that provides flow control and runoff treatment for existing development. The existing facilities were constructed in 1976 and do not meet current design standards. The project area is comprised of approximately 40 residential homes on 11-acres. Construction is anticipated in 2026.

The City plans to develop street sweeping and stormdrain line cleaning programs as described in Appendix 12.

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 control for pollution generating sources associated with identified land uses.	S5.C.8.a	8/1/2027	N/A
Establish an inventory of institutional, commercial, and industrial sites.	S5.C.8.b.i	Ongoing	YES
Establish an inventory of other pollutant generating sources, based on complaint response.	S5.C.8.b.ii	Ongoing	YES
Implement an inspection program.	S5.C.8.c	Ongoing	YES
Provide program information to identified sites.	S5.C.8.c.i	Ongoing	YES
Annually complete a number of inspections equal to 20% of the number of sites listed in the inventory.	S5.C.8.c.ii	Ongoing	YES
Inspect 100% of sites identified through credible complaints.	S5.C.8.c.iii	Ongoing	YES
Annually report inspections.	S5.C.8.c.v	Ongoing	YES
Implement a progressive enforcement policy	S5.C.8.d	Ongoing	YES
Train staff responsible for implementing the source control program	S5.C.8.e	Ongoing	YES

8.2 CURRENT ACTIVITIES

The City established an inventory of publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory was created based on a couple factors, including:

- Sites identified based on their Standard Industrial Code (SIC), SIC Industry Group Number, and/or North American Industrial Classification System (NAICS) code. Activity

codes determined by Ecology to have potential for pollutant generating sources were provided in Appendix 8 of the Permit.

- Sites with known pollution generating sources, such as existing private stormwater facilities or sites with historical complaints.

The inventory, as of December 31, 2024, includes 280 sites. It should be noted that the inventory includes sites that do not discharge to the MS4, which exceeds the minimum requirements set forth in the Permit. The City determined that applying source control measures to all applicable sites in the City, whether they discharge to the MS4 or directly to receiving waters, was critical to protect and enhance the quality and health of the City's natural resources and was more fair to the business community as a whole.

Prior to site inspections in 2024, all businesses in the City's inventory who had not previously received information about the source control inspection program were mailed an introduction letter which included information about activities that may generate pollutants and applicable BMPs which may be required.

The City continued conducting source control inspections at Kenmore business in 2024. When site inspections identified the need for source control BMPs, attempts were typically made to discuss on-site with the property manager to provide education and technical assistance. The property owner/manager was subsequently mailed and/or emailed a correction letter identifying the required source control BMPs to bring the property into compliance with city code.

A total of 39 businesses were inspected in 2024 with some sites receiving follow-up inspections to ensure that required source control BMPs were correctly implemented. The City received two credible complaints related to pollution generating activities at Kenmore businesses and followed up with source control inspections as required by the permit.

Applicable City staff have received training for source control inspections and ongoing training is expected.

8.3 PLANNED ACTIVITIES

The City will continue to conduct source control inspections at Kenmore business and work with property/owners and managers. To continue to implement the City's progressive enforcement policy, reinspection of sites with unresolved source control issues will be prioritized in 2025 and applicable enforcement strategies will be utilized to gain compliance.

SECTION 9 - OPERATIONS AND MAINTENANCE

9.1 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 9-1			
Minimum Performance Measure	Permit Section	Compliance Date	Compliance
Implement maintenance standards that are as protective of SMMWW	S5.C.9.a	8/1/2024	YES
Update maintenance standards to meet requirements of S5.C.9	S5.C.9.a	6/30/2027	N/A
Annual inspection of facilities regulated by the city	S5.C.9.b	Ongoing	YES
Annual inspection of facilities owned and operated by the city	S5.C.9.c.i	Ongoing	YES
Spot check facilities after major storms	S5.C.9.c.ii	Ongoing	YES
Inspect and clean all applicable catch basins	S5.C.9.c.iii	Ongoing	YES
Achieve 95% inspection rate	S5.C.9.c.iv	Ongoing	YES
Implement practices and policies to reduce stormwater impacts	S5.C.9.d	12/31/2027	N/A
Develop and implement a municipal street sweeping program	S5.C.9.e	7/1/2027	N/A
Implement a SWPPP for applicable sites	S5.C.9.f	Ongoing	YES
Implement an ongoing training program	S5.C.9.g	Ongoing	YES
Maintain records of inspections and maintenance	S5.C.9.h	Ongoing	YES

9.2 CURRENT ACTIVITIES

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

- Annually inspect all private stormwater facilities. Private facilities include all treatment and flow control BMPs/facilities operated and maintained by the private property owner but are inspected by the City to enforce maintenance. In the current reporting period, this included 159 facilities.

Table 9-2	
Facilities Regulated by the City	
Private Facilities Total	159
Private Facilities Inspected	159
Private Facilities Passed Inspection	80
Private Facilities Requiring Maintenance	79
Maintenance Completed 2024	42*

**Maintenance schedules continue into 2025*

- Annually inspect and maintain all public stormwater facilities. Public facilities include all treatment and flow control BMPs/facilities owned or operated by the City. Acceptance of public facilities constructed by private developers typically includes acceptance of substantial completion and/or final construction and then at least a two-year maintenance/defect period, in which the developer is responsible for maintaining the new facility. The list below includes all public facilities that have passed the acceptance of substantial completion and/or final construction but may still be in maintenance/defect (city staff begin annual inspections during this period). In the current reporting period, this included 250 active facilities. The table below shows the breakdown of public facility inspections and maintenance. Due to inspections being performed throughout the calendar year, some maintenance from 2023 inspections was performed in 2024.

Table 9-3	
Facilities Owned/Operated by the City	
Public Facilities Owned and/or Operated by the City	250
Public Facilities Inspected	250
Public Facilities Requiring Maintenance	122
Maintenance Completed 2024	120*

**Maintenance schedules continue into 2025*

- Spot check facilities and other critical drainage areas before and after significant storm events.
- Annually inspect all catch basins owned and operated by the City and clean them, if needed. The current reporting year was the City's fifteenth consecutive year of annual catch basin inspections.

Table 9-4	
Catch Basins Owned/Operated by the City	
MS4 Catch Basins Total	4703
MS4 Catch Basins Inspected in 2024	4563
MS4 Catch Basins Cleaning Needed	352
MS4 Catch Basins Cleaned in 2024	390

- 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.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for the City's storage yards, which currently includes two sites.
- City staff responsible for operations, maintenance or construction activities are trained on applicable procedures and standards, which include erosion sediment control and IDDE.
- Maintain records of operations and maintenance activities, which is primarily accomplished through the City's asset/inspection/work order management system (Cityworks).

9.3 PLANNED ACTIVITIES

The City will continue implementing applicable operations and maintenance policies and procedures from the Operations & Maintenance Practices and Policies Manual and will continue to comply with the requirements set forth in the Permit and plans to update accordingly, as needed. An update to the OMPPM will be completed by 12/31/2027 to reflect any applicable changes since the last update, particularly any changes resulting from the adoption of the new surface water design manual in June 2027.

SECTION 10 – SWAMP CREEK TMDL

10.1 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 10-1			
Minimum Performance Measure	Permit Section	Compliance Date	Compliance
Business Inspections	Appendix 2	Ongoing	YES
Public Education and Outreach	Appendix 2	Ongoing	YES
Operations and Maintenance	Appendix 2	Ongoing	YES
Targeted Illicit Connection and Illicit Discharge Detection and Elimination	Appendix 2	12/31/2025	NA

10.2 CURRENT ACTIVITIES

2024 Business Inspections

There are no facilities with SIC Industry Group number 074 or 075, including NAICS Major Group 1152xx and NAICS 325315 (composting facilities) to inspect in the City's area of Swamp Creek.

2024 Public Education and Outreach

The City provides stormwater and bacterial pollution education and outreach materials on City social media, online and printed newsletter articles, and city sponsored events. In 2024, the Environmental Services Division had a booth at a total of six City sponsored events. These booths contained educational materials, games, and interactive models targeted towards pet waste management and bacterial pollution. The city's mobile watershed model has been used to demonstrate how pet waste is introduced into the watershed and to educate citizens on pet waste BMPs while staff provided 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 2019 public event.



2024 Operations and Maintenance

The City of Kenmore currently has multiple animal waste collection stations at all eight municipal parks. In addition, certain other city owned or maintained property and facilities that are reasonably expected to have substantial domestic animal (dog and horse) use have waste collection stations or pet waste signage. The stations/signage are posted as needed, based on facility specific considerations and factors such as requests from the public or observations by city staff. Waste collection stations are maintained regularly by city public works staff.

2024 TMDL Sampling Summary

Table 10-2: 2024 Swamp Creek TMDL Results					
	Swamp 1	Swamp 2	Swamp 3	Swamp 4	Swamp 5
	Main channel at NE 175 th St. bridge	Main channel at 73 rd Ave NE bridge	Swamp Creek at 18810 71 st Ave NE	Little Swamp Creek Trib. 01 at NE 192 nd St.	Little Swamp Creek at NE 192 nd St.
Sample Date	CFU/100mL	CFU/100mL	CFU/100mL	CFU/100mL	CFU/100mL
1/22/2024	160	300	460	44	220
2/22/2024	44	64	29	140	110
3/21/2024	50	41	13	21	15
4/22/2024	39	24	64	90	20
5/23/2024	120	200	110	130	220
6/25/2024	164	238	39	NF	57
7/25/2024	240	147	640	NF	270
8/21/2024	98	50	740	NF	105
9/24/2024	62	135	780	NF	32
10/25/2024	66	50	32	NF	39
11/26/2024	39	365	302	64	122
12/23/2024	10	30	80	580	500
2024 Geometric Mean	68.2	94.2	124.3	92.1	87.3
2024 90 th Percentile	179.2	263.4	748	445	316

10.3 PLANNED ACTIVITIES

The City of Kenmore will continue with education and outreach efforts regarding bacterial pollution, particularly regarding proper pet waste management and illicit sewer discharge/connection prevention. The City will also continue to assess the need for additional animal waste collection stations or signage on City owned or maintained properties in addition to maintaining those currently in place.

The City plans to develop a written plan by December 31, 2025 that identifies a high priority area as the focus of a targeted illicit connection or illicit discharge detection and elimination effort. This plan will be submitted along with the 2025 NPDES Annual Report due March 31, 2026. The targeted IC/IDDE plan shall be implemented by January 1, 2026.

SECTION 11 – MONITORING AND ASSESSMENT (S8)

11.1 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.

Table 11-1			
Minimum Performance Measure	Permit Section	Compliance Date	Compliance
Pay into collective fund for Regional Status and Trends Monitoring	S8.A.1	Ongoing	YES
Notify Ecology in writing of City's option to pay into collective fund	S8.A.2	12/31/2024	YES
Pay into collective fund for SWMP Effectiveness and Source Identification Studies	S8.B.1	Ongoing	YES
Notify Ecology in writing of City's option to pay into collective fund	S8.B.2	12/31/2024	YES
Provide information for effectiveness and source identification studies, as requested by Ecology	S8.B.3	Ongoing	YES

11.2 CURRENT ACTIVITIES

The City provided payment for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies to Ecology. The City provided notification to Ecology to continue making annual payments into a SAM collective fund to implement both Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies.

11.3 PLANNED ACTIVITIES

The City will continue providing annual payments into a SAM collective fund to implement Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies.