

**STORMWATER MANAGEMENT
PROGRAM (SWMP) PLAN**

2021

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Acronyms and Abbreviations

AKART	All Known and Reasonable Technologies
CESCL	Certified Erosion and Sediment Control Lead
CHMP	Clyde Hill Municipal Code
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
RSMP	Regional Stormwater Monitoring Program
SIDIR	Source Identification Information Repository
SWMMWW	Stormwater Management Manual for Western Washington
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

CHAPTER 1 – BACKGROUND

1.1 THE STORMWATER MANAGEMENT PROGRAM PLAN DOCUMENT

This Stormwater Management Program (SWMP) Plan has been prepared to satisfy Special Condition S5 of the current Western Washington Phase II Municipal Stormwater Permit (Permit), of which the City of Clyde Hill is a Permittee.

Section S5.A.2 of the Permit states:

Each Permittee shall prepare written documentation of the SWMP, called the SWMP Plan. The SWMP Plan shall be organized according to the program components in S5.C or a format approved by Ecology, and shall be updated at least annually for submittal with the Permittee’s annual reports to Ecology. The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year.

The current Permit became effective on August 1, 2019 and expires on July 31, 2024.

This SWMP Plan has been organized as follows:

- **Chapter 1** introduces underlying permit requirements, required program components, City stormwater codes, stormwater utility, and a description of how the program is managed in Clyde Hill.
- **Chapters 2 - 9** address each of the SWMP Components required by the Permit, including a summary of the specific permit requirement and current City activities to comply.
- **Chapters 10** provides a summary of additional SWMP requirements that will be included in the 2019-2024 Permit, and the City’s planned initial efforts towards compliance for this year.

1.2 NPDES PHASE II MUNICIPAL STORMWATER PERMIT

1.2.1 PERMIT BACKGROUND

In 1987 the US Congress revised the Clean Water Act to include stormwater discharges in the National Pollutant Discharge Elimination System (NPDES) Permit program. The US Environmental Protection Agency (EPA) developed rules for the implementation of the new stormwater requirements and separated them into two phases. The State of Washington, through Ecology, implements these stormwater rules through the Municipal Stormwater Permit program. As an owner and operator of a small municipal separate storm sewer system (MS4), Clyde Hill is required to be covered by, and comply with, the current Western Washington Phase II Municipal Stormwater Permit (Permit). The Permit allows Clyde Hill to discharge stormwater from its MS4 into waters of the State of Washington.

1.2.2 REQUIRED SWMP COMPONENTS

The Permit requires the development and implementation of a SWMP to control discharge into and from the City's system. The SWMP includes five specific components that are designed to reduce the discharge of pollutants from the Clyde Hill's MS4 to the maximum extent practicable:

This SWMP Plan has been organized as follows:

- Develop/implement a stormwater planning program
- Develop/implement a public education and outreach program
- Create opportunities for public involvement in stormwater plans and initiatives
- Develop a program to improve mapping and documentation of MS4
- Continue implementation and tracking of illicit discharge detection and elimination (IDDE) program
- Adopt or amend ordinances for improved control of runoff from new development, redevelopment, and construction activities
- Develop/implement an operations and maintenance (O&M) program regulating impacts of City sites and activities on the MS4
- Establish a source control program for existing development

1.3 CLYDE HILL'S STORMWATER PROGRAM

1.3.1 STORMWATER CODES

Legal authority for several components of the stormwater program has been established by ordinances approved by City Council and incorporated into the City of Clyde Hill Municipal Code (CHMC).

CHMC 13.10 – Discharge of Hazardous Wastes

This chapter specifies substances that are prohibited to be discharged into the storm drainage system, allowable discharges, and conditional discharges. This chapter also prohibits illicit (non-permitted) connection to the City's storm drainage system and describes enforcement procedures.

CHMC 15.10 – Drainage

This chapter defines the required stormwater drainage requirements in the City, adjustment and variance criteria, site planning and BMP selection and design criteria, low impact development, long-term operation and maintenance of stormwater facilities. This chapter also defines the City's rights to inspect permitted stormwater facilities on private property and procedures for enforcement of maintenance standards.

1.3.2 COORDINATION AND RESPONSIBILITY

Managing the stormwater program and achieving compliance with Permit mandates in Clyde Hill is coordinated by the Public Works Department, with program administration the responsibility of the Public Works Director. This responsibility includes:

- Implementing the SWMP (Permit Section S5.A.1)

- Preparing the SWMP Plan (S5.A.2)
- Tracking SWMP costs (S5.A.3.a)
- Tracking the number of inspections, official enforcement actions and types of public education activities required by program components (S5.A.3.b)
- Continue implementation of existing stormwater management programs until they begin implementation of the updated stormwater management program (S5.A.4)
- Coordinating between other Permittees, e.g. adjacent municipalities (S5.A.5.a)
- Maintaining coordination between City departments related to the SWMP (S5.A.5.b)

The City of Clyde Hill has recently implemented Mobile 311, a GIS-based data management system, for many aspects of Public Works operations including managing work orders and documenting inspections. Mobile 311 is accessible from smartphones, allowing City field staff to readily access GIS mapping and data and document many aspects of the SWMP in a time-efficient manner.

1.3.3 MONITORING AND ASSESSMENT

Section S8 of the Permit requires the City to:

- Provide a description of any stormwater monitoring or stormwater-related studies conducted during the reporting period
- Pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP) that includes the following components:
 - Status and trends monitoring (small stream and marine nearshore)
 - Stormwater management program effectiveness studies
 - Source identification and diagnostic monitoring to implement the Source Identification Information Repository (SIDIR)

The City of Clyde Hill contributes to the SAM Program \$1,410 annually towards regional status and trends monitoring, effectiveness studies and source identification and the SIDIR. The City does not plan any additional stormwater monitoring or stormwater-related studies that would require reporting to Ecology.

The City of Clyde Hill is not required to conduct water quality monitoring for compliance with total maximum daily loads (TMDLs) pursuant to Section S7 and Appendix 2 of the Permit, because no TMDL implementation plans have been developed for any of the City's downstream receiving waters.

1.3.4 SWMP REPORTING

Section S9 of the Permit requires the City to submit the following on March 31 of each year:

- A copy of the current SWMP Plan
- Annual Report form (Appendix 3 of the Permit) describing the status of implementation of the requirements of the Permit during the reporting period.
- Notifications of any annexations or jurisdictional boundary changes.

The City will submit its Annual Report and SWMP Plan to Ecology by March 31 of each year.

CHAPTER 2 – STORMWATER PLANNING

Per Section S5.C.1 of the 2019-2024 Phase II Permit, the City shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. Components of this program can be summarized as follows:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program no later than August 1, 2021
- Coordination with long-range plan updates
- Low impact development (LID) code-related requirements
- Comply with Stormwater Management Action Planning (SMAP) requirements in a similar process and range of issues as outlined in the Stormwater Management Action Planning Guidance (Ecology, 2019; Publication 19-10-010). The City may rely on another jurisdiction to meet all or part of SMAP requirements at a watershed-scale, provided a SMAP is completed for at least one priority catchment located within the City's jurisdiction.

The city undertook a process to revise its codes and standards in beginning in 2013 to incorporate Low Impact Development (LID), as required by section S5.C.4.f of the 2013-2019 Permit. As part of this project, the City's subdivisions and zoning codes were reviewed, but no revisions were found to be needed. An earlier code amendment made in 2010 had adopted a Low Impact Development section in CHMC 15.10.090 that allows approval of deviations from the City's engineering and development regulations to accommodate LID

2.1 2019-2024 Phase II PERMIT REQUIREMENTS

The following is requirements for the 2019-2014 Phase II Permit:

- Coordination with long-range plan updates: The City shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies. The report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning or considering stormwater management needs or limitations.
 - On or before March 31, 2021, the City shall respond to the series of Stormwater Planning Annual Report questions to describe how anticipated stormwater impacts on water quality were addressed during the 2013-2019 permit term in updates to the Comprehensive Plan (or equivalent).
 - On or before January 1, 2023, the City shall submit a report responding to the same questions included in (a), above, to describe how water quality is being addressed during this permit term in updates to the Comprehensive Plan (or equivalent)
- Low impact development code-related requirements: the City shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes with the intent to make LID the preferred and commonly-used approach to site

development. Code revisions shall also be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

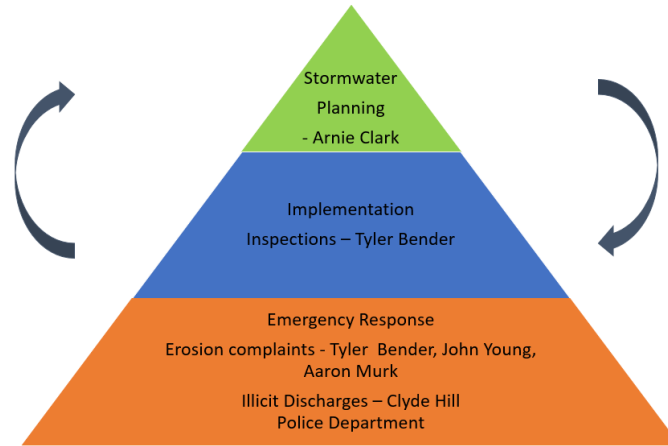
- Annually, the City shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers.
- Stormwater Management Action Planning (SMAP). The City shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2019; Publication 19-10-010). The City may rely on another jurisdiction to meet all or part of SMAP requirements at a watershed scale, provided a SMAP is completed for at least one priority catchment located within the City's jurisdiction.
 - Receiving Water Assessment. The City shall document and assess existing information related to local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management planning.
 - By March 31, 2022, the City shall submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas.
- Receiving Water Prioritization: Informed by the assessment of receiving water conditions defined above, and other local and regional information the City shall develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions.

No later than June 30, 2022, the City shall document the prioritized and ranked list of receiving waters, including the identification of high priority catchment area(s) for focus of the SMAP.

- Stormwater Management Action Plan (SMAP): no later than March 31, 2023, the City shall develop a SMAP for at least one high priority catchment area, identifying factors as described in the permit.

2.2 2021 PROGRAM ACTIVITY

Current activity for the Stormwater planning program involved maintaining the interdisciplinary team that is the foundation of the Stormwater Planning program. Primary stormwater planning is performed by Arnie Clark. Implementation of the SWMP is done by Tyler Bender. The role of Emergency response is filled by Tyler Bender, Jon Young, and Aaron Murk, and the Clyde Hill Police Department. Feedback and reporting is shared among the different groups for future Stormwater planning and implementation.



CHAPTER 3 – PUBLIC EDUCATION AND OUTREACH

3.1 PERMIT REQUIREMENTS

Section S5.C.2 of the 2019-2024 Phase II Permit requires the City to develop and implement a public education and outreach program with the goal of

- i) building general awareness about methods to address and reduce impacts from stormwater runoff,
- ii) effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts, and
- iii) create stewardship opportunities that encourage community engagement in addressing the impacts from stormwater runoff.

These three elements are further detailed below, followed by a table containing the City’s education and outreach activities planned for 2021.

The City’s education and outreach program is specifically required to:

- i. Build general awareness, selecting from the following target audiences and subject areas:
 - a. General public and businesses:
 - General impacts of stormwater on surface waters
 - Impacts from impervious surfaces
 - Impacts of illicit discharges and how to report them
 - Low impact development (LID) principles and LID BMPs
 - Opportunities to become involve in stewardship activities
 - b. Engineers, contractors, developers and land use planners:
 - Technical standards for stormwater site and erosion control plans
 - LID principals and LID BMPs
 - Stormwater treatment and flow control BMPs/facilities
- ii. Effect behavior change, selecting from the following target audiences and BMPs:

- a. General public and businesses:
 - Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials
 - Equipment maintenance
 - Prevention of illicit discharges

- b. Residents, landscapers and property managers/owners:
 - Yard care techniques protective of water quality
 - Use and storage of pesticides and fertilizers and other household chemicals
 - Carpet cleaning and auto repair and maintenance
 - Vehicle, equipment and home/building maintenance
 - Pet waste management and disposal
 - LID principles and LID BMPs
 - Stormwater facility maintenance
 - Dumpster and trash compactor maintenance

- iii. The City must also create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.

The City is required to measure the understanding and adoption of the targeted behavior for at least one target audience in at least one subject area. The resulting measurements are to be used to direct education and outreach resources most effectively, as well as to evaluate adoption of the targeted behaviors.

No later than July 1, 2021, the City shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign including documentation of lessons learned and recommendations for which option to select from permit section S5.C.2.a.ii.(c) (summarized by section C2.2.c of this plan, below). The City may forgo the above evaluation requirement if staff opt for strategy S5.C.2.a.ii.(c)3 (summarized by C2.2.c.iii of this plan, below), and it is deemed an evaluation will not add value to the overall behavior change program.

3.2 2021 PROGRAM ACTIVITY

3.2.1 Public education and outreach

Several activities planned in the Clyde Hill SWMP for 2020 were not completed and will be pursued in 2021. The following are activities the City has planned for public education and outreach:

a) Low Impact Development Education

The City has planned an educational presentation and tour on LID. The presentation will cover the impacts of stormwater on surface waters and impacts caused by impervious surfaces, and a walking tour of the Clyde Hill Elementary and Chinook Middle School campuses, which have been redeveloped recently and include Low Impact Development (LID) features (rain gardens, permeable pavement, infiltration vaults).

Target Audience: School-age children

Date: Annually

Goals:

- Increase awareness of general impacts of stormwater on surface waters
- Educated students on benefits of LID

b) Carwash Best Practices Outreach Mailer

An outreach mailer, to be sent to 200 randomly-selected households in March 2021, will include specific recommendations for residents who wash their cars at home (washing on grassy surface to promote infiltration, using only phosphate-free and pH neutral detergents, minimizing water use, and using waterless car washing soap) and will encourage use of commercial car wash facilities as an alternative.

Target Audience: General public, homeowners

Date: Annually

Goals:

- Increase awareness of impacts on stormwater on surface waters and prevention of illicit discharges.

3.2.2 EFFECTING BEHAVIOR CHANGE

a) Proper pet waste management behavior

The City has installed pet waste stations at parks for the general public to use. The City monitors participation and performs regular maintenance and cleaning of the stations.

Target Audience: General public

Date: Ongoing

Goals:

- Increase awareness of impacts on stormwater on surface waters and prevention of illicit discharges.
- Pet waste management

3.2.3 CREATING STEWARDSHIP OPPORTUNITIES

Within Clyde Hill, local Scout groups will continue to be invited to participate in marking catch basins with Lake Washington Starts Here – Don't Pollute emblems until all catch basins include the labels. Materials and training will be provided by the City.

Other stewardship opportunities that exist in close proximity to Clyde Hill include:

City of Bellevue Environmental Stewardship Volunteer Opportunities:

<https://parks.bellevuewa.gov/nature-and-environment/visitor-centers-environmental-programs/environmental-stewardship-volunteer-opportunities>

(Provides information on volunteer stewardship opportunities in City of Bellevue parks)

Earthcorps:

<https://www.earthcorps.org/volunteer/>

(Provides information on volunteer stewardship opportunities in other Eastside parks)

3.2.4 MEASURING UNDERSTANDING AND ADOPTION OF TARGETED BEHAVIORS

The City has developed a strategy and schedule for a new target audience and BMP behavior change campaign annually. Monitoring effective behavior change is optional for programs that select a new target audience and BMP behavior change.

CHAPTER 4 – PUBLIC INVOLVEMENT AND PARTICIPATION

4.1 PERMIT REQUIREMENTS

Section S5.C.3 of the Permit requires the City to provide ongoing opportunities for public involvement participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. The City must comply with applicable state and local public notice requirements when developing elements of the SWMP.

Minimum performance measures are:

- a. Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the City’s SWMP.
- b. Post on City website the SWMP Plan and the annual report required under S9.A of the Permit no later than May 31st each year.

4.2 2021 PROGRAM ACTIVITY

4.2.1 Decision-Making Process Opportunities

The SWMP Plan will be presented to the City Council at a general city meeting on April 13, 2021. During the meeting, any member of the public who wishes to comment on the SWMP will be given the opportunity to provide comments. The City will notify the public of stormwater related discussions outside of the annual SWMP via the City website with digital posts and videos.

4.2.2 SWMP and Annual Report Posting

This SWMP Plan document and Permit annual report is posted in Kiosk in front of City Hall and on the City’s website in the current year prior to May 31.

CHAPTER 5 – MS4 MAPPING AND DOCUMENTATION

5.1 PERMIT REQUIREMENTS

The City shall implement a program for maintaining mapping and documentation of the MS4. Minimum performance measures are:

- Ongoing Mapping: The City shall maintain mapping data for the features listed:
 - Known MS4 outfalls and known MS4 discharge points.
 - Receiving waters, other than groundwater
 - Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
 - Geographic areas served by the City's MS4 that do not discharge stormwater to surface waters.
 - Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:
 - Tributary conveyance type, material, and size where known.
 - Associated drainage areas.
 - Land use.
 - Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007. 9,10 b.

- New Mapping: The City shall:
 - No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business (e.g. during field screening, inspection, or maintenance) and update records.
 - No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system.
 - No later than August 1, 2021, the required format for mapping is electronic (e.g. Geographic Information System, CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes), with fully described mapping standards.
 - To the extent consistent with national security laws and directives, the City shall make available to Ecology, upon request, available maps depicting the information required in S5.C.4.a through c, above.
 - Upon request, and to the extent appropriate, the City shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. This Permit does not preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

5.2 2021 PROGRAM ACTIVITY

The City of Clyde Hill's MS4 has been previously mapped and includes the elements required by the current Permit. Updates to the map are made quarterly by the City's GIS consultant. Privately-owned detention tank systems that are part of planned development will be added to the MS4 mapping from record drawings when construction is completed. Ongoing mapping efforts as it pertains to stormwater activities assists the identified workgroup (interdepartmental & consultant) to identify drainage issues within the City.

Each year, the City continues to edit/improve existing CB map data while performing annual inspections; new CB; unknown private connections to the MS4 may also be discovered/updated while conducting CB inspections. The City hired a separate entity to inspect all private detention structures within the City. The City has also located all outfalls to receiving waters.

CHAPTER 6 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

6.1 PERMIT REQUIREMENTS

Section S5.C.5 of the Permit requires the SWMP to include an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4. The required program has minimum performance measures as summarized below (see Permit for complete text):

- The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4

Illicit connections and illicit discharges must be identified through, but not limited to: field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.

- Permittees shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the City's MS4, including the following components:
 - Procedures for conducting investigations of the City's MS4, including field screening and methods for identifying potential sources, implementation of a field screening methodology, and completing field screening for at least 12% of the MS4 each year. Permittees shall annually track total percentage of the MS4 beginning August 1, 2019.
 - A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
 - An ongoing training program for a municipal field staff.
- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the City's MS4, including:
 - Procedures for characterizing the nature and potential public environmental threat of an illicit discharge
 - Procedures for tracing the source of an illicit discharge
 - Procedures for eliminating the illicit discharge
 - Meet the following timelines in addressing illicit discharges:
 - Immediate response to illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment

- Investigate within 7 days, on average, any complaint, report or monitoring information that indicates a potential illicit discharge
 - Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection
 - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months
- Train staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Provide follow-up training as needed. Document and maintain records of training.
 - Recordkeeping: Track and maintain records of the activities conducted to meet the requirements for illicit discharge detection and elimination (IDDE).

6.2 2021 PROGRAM ACTIVITY

6.2.1 Program to Detect and Identify Illicit Discharge

The City of Clyde Hill will continue its existing Illicit Discharge Detection and Elimination (IDDE) program, which is documented in the Clyde Hill Illicit Discharge Detection and Elimination Plan, dated September 2008.

Field Screening Methodology

Clyde Hill's IDDE program utilizes the Outfall Reconnaissance Inventory field screening methodology, as described in Chapter 11 of the Center for Urban Watershed Protection's *Illicit Discharge Detection and Elimination* guidance manual (IDDE Manual) dated October 2004. Outfall reconnaissance was performed (dry weather and wet weather) for at least 40% of the City's MS4 in 2017 and 2018. Outfall reconnaissance in 2019 screened runoff for at least 12% of other areas of the City. In 2020, outfall inspections were recorded utilizing the City's Mobile 311 GIS-based data management system.

IDDE Training Program

Clyde Hill staff involved in IDDE have previously undergone training. Additional training will be provided in 2021 if needed due to staff changes.

Hotline for Public Reporting of Spills and other Illicit Discharges

The City Hall telephone number is listed on the City's website for reporting be identified on the City's website specifically for reporting spills and other illicit discharges.

Illicit Discharge Public Education

Illicit discharge public education to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper storage of waste have been integrated into the public education efforts described in Chapter 3 of the SWMP Plan.

6.2.2 Program to Address Illicit Discharges

Procedures for characterizing the nature and potential threat posed by detected or reported illicit discharges are documented in Chapter 6 of the City of Clyde Hill's IDDE Plan.

Procedures for tracing the source of an illicit discharge are described in Chapter 5 of the City's IDDE Plan, with references to Chapter 13 of the Center for Urban Watershed Protection's IDDE Manual for detailed procedures for tracing the source of identified illicit discharges.

Procedures for eliminating the illicit discharge, including spill response, are contained in Chapter 6 of the City's IDDE Plan. CHMC 13.10 contains notification and enforcement procedures for addressing illicit discharges.

6.2.3 Illicit Discharge Training

Clyde Hill staff responsible for the IDDE program attended a training seminar in 2017. Additional training will be provided in 2021 if needed due to staff changes.

6.2.4 Illicit Discharge Recordkeeping

All recordkeeping associated with the City's IDDE program is maintained by the Public Works Director. Records include the following:

- Field Screening Data Sheets
- Records of all detected illicit discharges and actions taken
- Reports of all reported spills and illicit discharges and actions taken
- Records of illicit connections and actions taken
- Records of IDDE training provided and staff trained

In 2021, continued field screening and inspections will be performed using the City's "Mobile 311" GIS-based data management system. All IDDE incidences are reported to the WQ WebIDDE app for reporting to Ecology.

CHAPTER 7 – CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

7.1 PERMIT REQUIREMENTS

Section S5.C.6 of the Permit requires that the City implement and enforce a program to reduce pollutants in stormwater runoff to its MS4 from new development, redevelopment and construction site activities. The program must apply to both private and public development, including roads. The program is required to have several components as summarized below (see Permit for complete text):

- a. Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects, no later than 06/30/22. The

ordinance shall apply to all new applications on or after 07/01/22 or previous applications prior to 01/01/2017 that have not started construction by 01/01/22 or all applications between 01/02/17 to 07/01/22 that have not started construction by 07/01/2027.

- b. The ordinance or other enforceable mechanism shall include, at a minimum:
- i. The Minimum Requirements, thresholds, and definitions in Appendix 1 or a program approved by Ecology under the 2013 NPDES Phase I Municipal Stormwater Permit amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and variance criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.
 - ii. The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the 2019 Phase I Permit), will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under chapter 90.48 RCW to apply AKART prior to discharge:
 - Site planning requirements
 - BMP selection criteria
 - BMP design criteria
 - BMP infeasibility criteria
 - LID competing needs criteria
 - BMP limitations
 - iii. Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

Permittees who choose to use the requirements, limitations, and criteria above in the *Stormwater Management Manual for Western Washington*, or a Phase I program approved by Ecology, may cite this choice as their sole documentation to meet this requirement.
- c. The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the following standards:
- i. Review of all stormwater site plans for proposed development activities
 - ii. Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review based on

definitions and requirements in Appendix 7 of the Permit, or all construction sites that meet the minimum thresholds in Appendix 1 of the Permit.

- iii. Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls.
 - iv. Each Permittee shall manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed to identify maintenance needs and enforce compliance with maintenance standards as needed.
 - v. Inspect all permitted developments upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.
 - vi. Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term shall be determined by achieving at least 80% of required inspections. The inspections may be combined with other inspections provided they are performed using qualified personnel.
 - vii. The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
 - viii. An enforcement strategy shall be implemented to respond to issues of noncompliance.
- d. The program shall make available, as applicable, the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic *Industrial Stormwater General Permit* NOI form for industrial activity to representatives of proposed new development and redevelopment. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- e. Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

7.2 2021 PROGRAM ACTIVITY

The City of Clyde Hill has an established program for controlling runoff from new development, redevelopment and construction sites that will continue in 2021. The following sections describe existing program elements to comply with Permit requirements, as well as specific program enhancements planned for 2021.

7.2.1 Stormwater Ordinance

Clyde Hill Municipal Code (CHMC) 15.10 adopts minimum stormwater requirements found in Appendix 1 of the Permit, and the 2012 *Stormwater Management Manual for Western Washington (SWMMWW)*, as amended in December 2014. CHMC 15.10 also adopts the *Clyde Hill Storm Water Drainage Guidelines*,

which provides additional requirements, particularly for small residential projects common in Clyde Hill that fall below the flow control thresholds of the SWMMWW.

The legal authority to inspect and enforce maintenance standards for private stormwater facilities through the approval process for new development and redevelopment is currently established by CHMC 15.10.100, CHMC 15.10.110 and 15.10.120.

7.2.2 Stormwater Permitting Process

The City will continue its current stormwater permitting process with plan review, inspection and enforcement capability to ensure compliance with code requirements for both private and public projects, using qualified personnel. This includes:

- Review of all stormwater site plans
- Inspection of all submitted development sites that have a high potential for sediment transport prior to clearing and construction
- Inspection of all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls with enforcement as necessary, based on the inspections
- Inspection of all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls, such as stormwater facilities and structural BMPs
- Verification that a maintenance plan has been completed and responsibility for maintenance has been assigned with enforcement as necessary, based on the inspections
- Ensuring compliance with inspection requirements by the presence and records of an established inspection program that is designed to inspect all sites and achieve at least 80% of scheduled inspections

Beginning in 2019, the City has utilized its Mobile 311 GIS-based data management system to document all site inspections performed as part of the permitting process.

7.2.3 Enforcement of Stormwater Ordinance for Sites with Ecology Permits

The City will enforce local ordinances controlling runoff from sites that are also covered by stormwater permits by Ecology.

7.2.4 Training

City staff currently responsible for stormwater site review and inspection are familiar with the requirements of the SWMMWW and Clyde Hill Stormwater Drainage Guidelines to development sites and have undergone Certified Erosion and Sediment Control Lead (CESCL) training. If needed due to staff change or to enhance knowledge, additional training will be provided.

Records of training provided as well as records of staff that received training are maintained by the Public Works Director.

7.2.5 Low Impact Development

The City will continue to require LID Principles and LID BMPS when updating, revising, and developing new local development-related codes, rules, standard, or other enforceable documents, as needed.

CHAPTER 8 – MUNICIPAL OPERATIONS AND MAINTENANCE

8.1 PERMIT REQUIREMENTS

Section S5.C.7 of the Permit requires that the City document and implement a program to regulate maintenance activities and training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program is required to have several components as summarized below (see Permit for complete text):

- a. Implement maintenance standards that are as protective, or more protective, of facility function than those specified in *Stormwater Management Manual for Western Washington* or Phase I program approved by Ecology. For facilities which do not have maintenance standards, the City is required to develop a maintenance standard. Maintenance standards were required to be implemented no later than June 30, 2022.
 - i. The purpose of the maintenance standard is to determine if maintenance is required.
 - ii. When an inspection identifies an exceedance of the maintenance standard, maintenance is required to be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins
 - Within 6 months for catch basins
 - Within 2 years for maintenance that requires capital construction of less than \$25,000

Circumstances beyond the Permittee’s control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.

- b. Maintenance of stormwater facilities regulated by the Permittee
 - i. The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.7.a.

The provisions shall include:

- (a) Implementation of an ordinance or other enforceable mechanism that:
 - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.7.a.
 - Requires inspection of facilities in accordance with the requirements in (b), below.
 - Establishes enforcement procedures.
- (b) Perform annual inspection of all City-owned or operated permanent stormwater and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6c, including those permitted in accordance with

requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

- ii. Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections.
- iii. The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

c. Maintenance of stormwater facilities owned or operated by the Permittee.

- i. Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities, and taking appropriate maintenance actions in accordance with the adopted maintenance standards.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

- ii. Perform spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events (24 hour storm event with a 10 year or greater recurrence interval).
- iii. Each Permittee shall inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *Stormwater Management Manual for Western Washington*.

The following alternatives to the standard approach of inspecting all catch basins every two years may be applied to all or portions of the system:

- (a) The catch basin inspection schedule of every two years may be changed as appropriate to meet the maintenance standards based on maintenance

records of double the length of time of the proposed inspection frequency.

- (b) Inspections every two years may be conducted on a “circuit basis” whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include an inspection of the catch basin immediately upstream of any MS4 outfall, discharge point, or connections to public or private storm systems, if applicable.
- (c) The Permittee may clean all pipes, ditches, and catch basins and inlets within a circuit once during the permit term. Circuits selected for this alternative must drain to a single point.

iv. Compliance with inspection requirements in S5.C.7.c i-iii, above, is determined by the presence of an established inspection program designed to inspect all sites and achieving at least 95% of inspections.

d. 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. No later than December 31, 2022, document the practices, policies, and procedures. Lands owned or maintained by the Permittee include, but are not limited to streets, parking lots, roads, highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. The following activities shall be addressed:

- Pipe cleaning
- Cleaning of culverts
- Ditch maintenance
- Street cleaning
- Road repair and resurfacing, including pavement grinding
- Snow and ice control
- Utility installation
- Pavement striping maintenance
- Maintaining roadside areas, including vegetation management
- Dust control
- Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts
- Sediment and erosion control
- Landscape maintenance and vegetation disposal
- Trash and pet waste management
- Building exterior cleaning and maintenance

e. Implement an ongoing training program for City employees whose primary construction, operations or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures,

techniques, requirements, or staffing. Permittees shall document and maintain records of training provided and the staff trained.

- f. Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes stormwater discharges associated with the activity. As necessary, update SWPPPs no later than December 31, 2022, to include the following information. At a minimum, the SWPPP shall include:
 - i. A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed. BMPs selected must be consistent with the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology. The SWPPP must be updated as needed to maintain relevancy with the facility.
 - ii. At minimum, annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections must be documented in an inspection report or check list.
 - iii. An inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to precipitation or runoff and could result in stormwater pollution.
 - iv. A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.
 - v. A plan for preventing and responding to spills at the facility which could result in an illicit discharge.
- g. Maintain records of inspections and maintenance or repair activities conducted by the City.

8.1.1 Operations and Maintenance of Permitted Stormwater Facilities Program

In 2019 the City implemented a program to inspect all permitted, privately-maintained stormwater facilities within Clyde Hill. The steps to implement this program will be as follows:

- The City's GIS consultant will add private detention systems to the GIS-mapping based on record drawings (approximately 110 detention tanks).
- City field staff will field check facility locations and update GIS records using Mobile 311.
- City field staff will perform inspections in accordance with CHMC 15.10.100 and CHMC 15.10.110, utilizing maintenance standards from Chapter 4 of Volume V of the 2014 SWMMWW. Inspections will be documented using Mobile 311.
- Notifications will be delivered to property owners when an inspection identifies an exceedance of maintenance standards, requiring maintenance be performed within 1 year for typical facility maintenance, or within 6 months for catch basins. Maintenance requiring capital construction will be required to be performed within 2 years.
- Follow-up inspections will be performed after maintenance has been performed.
- Enforcement of maintenance requirements, if required, will be performed in accordance with CHMC 15.10.120.

After four years of annual facility inspections, the City will review maintenance records and evaluate if a reduced inspection frequency is appropriate.

8.2 2021 PROGRAM ACTIVITY

The City of Clyde Hill has an established program for municipal operation and maintenance, which will continue in 2021. The following sections describe current program elements to comply with Permit requirements.

8.2.1 Maintenance Standards

The City utilizes the maintenance standards specified in Section 4.6 of Volume V of the *Stormwater Management Manual for Western Washington* for operation and maintenance of the City's stormwater systems.

8.2.2 Inspection of Municipal Stormwater Facilities

Annual Inspections: There are currently two publicly-maintained stormwater treatment and flow control facilities in the City of Clyde Hill that require annual inspection: a detention tank serving City Hall and a sediment trap with pump at the City's maintenance facility.

Catch Basin Inspections and Cleaning: City staff will continue to inspect and clean all catch basins at least once every two years, with half of the City completed in each year of the two-year cycle. Decant water from the catch basin cleaning effort will be disposed of in accordance with the requirements set forth in Permit Appendix 6, Street Waste Disposal.

8.2.3 Stormwater Impact Reduction Procedures

The City has implemented the following practices, policies, and procedures to reduce stormwater impacts:

City Parks: The City of Clyde Hill operates two small parks: Clyde Hill City Park (0.8 acre) which contains two tennis court located at the south end of 95th Avenue NE, west of Clyde Hill Elementary, and Clyde Hill View Park, a short segment of public right-of-way (approx. 0.1 acre) along NE 26th Street immediately east of 92nd Avenue NE that contains a landscaped stairway and small lawn area with park bench. The City uses native and adapted vegetation to reduce water, fertilizer and pesticide needs, and uses integrated pest management to minimize the use of pesticides.

Road and Street Maintenance: The City of Clyde Hill performs street sweeping of major streets on a monthly basis, weather permitting. Roadside area and vegetation are maintained without use of herbicides or pesticides. Road repair and resurfacing is performed by contractors in accordance with requirements for construction stormwater pollution prevention as documented in the 2014 SWMMWW. Clyde Hill coordinates with WSDOT on snow and ice events. Crews will apply deicer sparingly to dry surfaces in anticipation of a forthcoming event. During snow and ice events, sand or sand/salt mixes is applied to areas determined to be hazardous by the attendant crewmember. Following an event, sand and grit is swept to reduce material ending up in catch basins.

8.2.4 Training

Field staff have received Certified Stormwater Inspector – MS4 training, provided by the National Stormwater Center. Pollution prevention training will be continued by sending appropriate staff to training courses when needed due to staff change or to increase knowledge.

8.2.5 Stormwater Pollution Prevention Plan (SWPPP)

A SWPPP has been prepared for the City’s main maintenance/storage facility located at 2119 96th Avenue NE.

8.2.6 Municipal O&M Recordkeeping

The Public Works Director or designee will maintain records of all inspections and maintenance activities.

CHAPTER 9 – SOURCE CONTROL PROGRAMS FOR EXISTING DEVELOPMENT

9.1 PERMIT REQUIREMENTS

The City shall maintain a program dedicated to the prevention and reduction of pollutant runoff from areas which discharge to the MS4. The success of this program relies on a comprehensive and up-to-date catalog of all publicly and privately owned institutional, commercial, and industrial sites with the potential to generate pollutants within discharge range of the MS4.

Development, application, and enforcement of a source control program will require the implementation of several key components over the next three years.

- Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
- Inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
- Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by a separate NPDES permit. Permittees that are in compliance with the terms of this Permit will not be held liable by Ecology for water quality standard violations or receiving water impacts caused by industries and other Permittees covered, or which should be covered under an NPDES permit issued by Ecology.

- Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.

9.2 2019-2024 PERMIT REQUIREMENTS

- No later than August 1, 2022, Permittees shall adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities (see Appendix 8 to identify pollutant generating sources).
- No later than August 1, 2022, the Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.
 - Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8).
 - Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.
- No later than January 1, 2023, Permittees shall implement an inspection program for sites identified pursuant to S5.C.8.b.ii, above.
 - All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the permit term to allow for tailoring and distribution of the information during site inspections.
 - The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.
 - Each Permittee shall inspect 100% of sites identified through credible complaints.
 - Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.
- No later than January 1, 2023, each Permittee shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:

- If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.
 - When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s), the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.
 - Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.
 - A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.
- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

9.3 2021 PROGRAM ACTIVITY

The City is reviewing current Municipal Code pertaining with the goal to identify any revisions or additions to ordinances that will be required to meet the August 1, 2022 for the enforcement of source control BMPs to existing, developed sites. The City will also identify the level of effort to identify and inventory potential sources of pollutants.

CHAPTER 10 – 2019-2024 PERMIT REQUIREMENTS

10.1 SUMMARY OF ADDITIONAL PERMIT REQUIREMENTS

The 2019-2024 Permit expands the program components from five to eight:

- Permit Section S5.C.1 – Comprehensive Stormwater Planning
- Permit Section S5.C.2 – Public Education and Outreach
- Permit Section S5.C.3 – Public Involvement and Participation
- Permit Section S5.C.4 – MS4 Mapping and Documentation
- Permit Section S5.C.5 – Illicit Discharge Detection and Elimination
- Permit Section S5.C.6 – Controlling Runoff from New Development, Redevelopment and Construction Sites
- Permit Section S5.C.7 – Operations and Maintenance
- Permit Section S5.C.8 – Source Control Programs for Existing Development

10.2 2021 PROGRAM ACTIVITIES

The following list of items were adopted in the 2019 SWMP Plan and Annual Report and were continued into 2021:

- Plan the behavior change assessment for the revised Public Education and Outreach program component.
- Review the new Source Control Program for Existing Development component and look for ways for early integration into the City’s existing program, particularly in areas of overlap between the Public Education and Outreach and Illicit Discharge and Detection program elements.