



**CITY OF PACIFIC
2013
STORMWATER
MANAGEMENT
PROGRAM
(SWMP) PLAN**

September 31, 2013

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(SWMP)
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2013 Stormwater Management Program (SWMP) Plan

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Introduction and Background

In 1987, Congress amended the federal Clean Water Act to address municipal stormwater discharges through the National Pollution Discharge Elimination System (NPDES) permits. These are federally mandated permits developed by the Environmental Protection Agency (EPA). In Washington State, EPA delegated the power and duty to write, issue, and enforce NPDES permits to the Washington State Department of Ecology (Ecology). In 2007, NPDES Municipal Stormwater permits were issued in two phases, and were subsequently updated in 2009. Phase I permits were issued to large municipalities and county governments with populations over 100,000 (as of the 1990 census). Phase II Permits were issued to smaller governmental entities with populations under 100,000. The City of Pacific (City) is covered under Western Washington's Phase II Municipal Separate Stormwater Sewer System (MS4) NPDES permit (Phase II Permit).

The Phase II Permit allows for stormwater system discharges into the White River, as long as the City implements permit-required programs to protect the river's water quality. These programs are intended to reduce the discharge of pollutants to the maximum extent practicable. The Phase II Permit requires the City to develop a Stormwater Management Program (SWMP). The SWMP must include the following components:

- ◆ A public education and outreach program.
- ◆ A process for involving the public in the development of a stormwater management program.
- ◆ An illicit discharge detection and elimination (IDDE) program to identify and remove discharges into the MS4 system.
- ◆ Adoption of ordinances to control runoff from new development, redevelopment, and construction activities.
- ◆ An operation and maintenance program to reduce pollutants from municipal operations.

In addition, the Phase II Permit requires that the City prepare written documentation of the SWMP and update that documentation annually. This SWMP plan satisfies this requirement; it is the fifth update to the SWMP plan that was originally prepared in March 2008. In addition to the five components listed above, this SWMP plan also includes a discussion of the monitoring and reporting requirements of the Phase II Permit.

The Phase II Permit that became effective on February 16, 2007 expired on February 15, 2012 (2007-2012 Phase II Permit), but was reissued unmodified and remained effective through July 31, 2013. A 1-year permit was issued to cover the period from August 1, 2012, through July 31, 2013 (2012-2013 Phase II Permit). This 1-year permit was essentially unchanged from the 2007-2012 Phase II Permit, except for the requirement to inspect 20 % of all catch basins owned by the permittee. A new 5-year Phase II Permit became effective beginning August 1, 2013, and extending through July 31, 2018. The new 5-year Phase II Permit is referred to in this document as the 2013-2018 Phase II Permit.

Component 1: Public Education and Outreach

While there are many actions the City can take to protect water quality, the day-to-day behaviors of residents can have the greatest impact on water quality. This section describes the Phase II Permit requirements related to Public Education and Outreach, including the City's current and planned compliance activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S5.C.1 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to develop and implement a public education and outreach program by February 16, 2009, specifically targeted to City residents, the general public, businesses, elected officials, policy makers, planning staff, and other City employees. Education and outreach efforts shall be prioritized in the following areas:

- ◆ Impacts of stormwater on surface waters and the impacts from impervious surfaces
- ◆ Source control best management practices (BMPs) related to pet wastes, vehicle maintenance, landscaping, and sensitive area buffers
- ◆ BMPs for use and storage of automotive and household chemicals, handling and disposal of hazardous wastes, and for car washing
- ◆ The impacts of illicit discharges and how to report them
- ◆ Yard care techniques to protect water quality and proper storage of pesticides and fertilizers
- ◆ BMPs and good housekeeping measures for carpet cleaning, auto repairs, and other maintenance activities
- ◆ Low impact development (LID) techniques including site design, pervious paving, and retention of trees
- ◆ Stormwater treatment and flow control facility maintenance

Current Activities

The City's Community Development / Public Works Department (CDPWD) provides information on the City's website regarding IDDE Hotline as well as links to "Puget Sound Starts Here", the Department of Ecology website, and the US Environmental Protection Agency. "Puget Sound Starts Here" posters have been placed throughout City hall to provide the stakeholders with additional info.

The City's cable channel PTV Channel 21 is also used to inform City residents of upcoming educational events as well as to present short informational slideshows on stormwater, aquatic habitat, and water quality. In 2011, storm drain markers were installed in throughout the City by the public works crew.

City staff continue to seek and participate in mentoring opportunities with neighboring jurisdictions.

Planned Activities

Table 1 summarizes the City's planned activities associated with Public Education and Outreach.

Table 1: Pacific Planned Activities

Activity	Tasks	Lead	Schedule or Frequency
Website Updates	The City's website will be updated with additional public outreach material related to stormwater education on an ongoing basis	Stormwater Manager	Ongoing
City Hall Informational Guides	Provide stormwater information brochures: Car Washing; Cleaning up After Pets; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	Ongoing
City Park Kiosks	Rotate a series of stormwater educational posters at kiosks in City parks	Stormwater Manager / City Engineer	Ongoing
Stewardship / Outreach	Mail information to local NGO's about the City Carwash Kit	Stormwater Manager	Ongoing
Citizens Advisory Committee	Reestablish a citizen advisory panel to develop opportunities to educate the public and businesses on stormwater issues	Stormwater Manager / City Engineer	Ongoing
Earth Day	Provide stormwater information brochures: LID; IDDE; Construction; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	2 nd or 3 rd Saturday in April
Spring Hazardous Waste Clean-Up	Provide stormwater information brochures: LID; IDDE; Construction; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	1 st weekend in May
Pacific Days	Provide stormwater information brochures: LID; IDDE; Construction; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	2 nd full weekend in July
Fall Hazardous Waste Clean-Up	Provide stormwater information brochures: LID; IDDE; Construction; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	2 nd Saturday in September
Police Open House	Provide stormwater information brochures: LID; IDDE; Construction; Fertilizer & Pesticides; etc.	Stormwater Manager / City Engineer	3 rd Friday in September

Component 2: Public Involvement and Participation

Public input is important to the development and implementation of the SWMP. The City actively solicits public participation by making stormwater information available for review and providing opportunities for comment.

This section describes the Phase II Permit requirements related to public involvement, including current and planned compliance activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S5.C.2 of the 2007-2012 and 2012-2013 Phase II Permit requires that by February 16, 2008, the City shall develop a plan for public involvement and participation that creates opportunities for the public to participate in developing the SWMP, and comply with applicable state and local public notice requirements. The two main components of this plan include:

- ◆ Developing and implementing a process for consideration of public comments on the City's SWMP.
- ◆ Posting the Annual Report, SWMP Plan, IDDE Program Plan, and Stormwater Pollution Prevention Plans (SWPPPs) on the City's website.

Current Activities

The City will continue to encourage comments on the SWMP through a variety of communication methods, including the City website and PTV 21. The Annual Report, SWMP plan, IDDE Program Plan, and SWPPPs will continue to be posted on the website. The public will be able to provide feedback via email, telephone, and letters.

City staff have ongoing discussions with the City Council Public Works Committee regarding stormwater and the Phase II Permit.

Planned Activities

Table 2 summarizes the City's planned activities associated with public involvement and participation.

Table 2: Planned public involvement and participation opportunities.

Activity	Tasks	Lead	Schedule or Frequency
Public Involvement in the SWMP	Solicit feedback on website	Stormwater Manager / City Engineer	Ongoing
Revise SWMP Plan	Update SWMP Plan with planned activities for 2014	Stormwater Manager / City Engineer	Update SWMP Plan in spring 2014; post on City's website by May 31, 2014
Prepare and Submit Annual Report	Prepare and submit Annual Report; submittal should include SWMP Plan and other supplemental documentation (if applicable)	Stormwater Manager / City Engineer	No Annual Report submittal required in 2014; the next Annual Report submittal to Ecology is required by March 31, 2015

Component 3: Illicit Discharge Detection and Elimination

An illicit discharge is defined as any discharge into the stormwater system that is not composed entirely of stormwater. Discharges may be from a variety of sources and activities including:

- ◆ Illegal discharges, dumping, and improper disposal of discharges from:
 - Potable water sources
 - Lawn watering and other irrigation
 - Swimming pools or other highly chlorinated water
- ◆ Any incidental spills that have the potential to affect water quality such as oil, gas, diesel fuel, paints, or solvents
- ◆ Dumping of material into a storm system.

This section describes the Illicit Discharge Detection and Elimination (IDDE) Phase II Permit requirements, as well as the City's current and planned compliance activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S5.C.3 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to develop and fully implement an ongoing IDDE Program to detect and address non- stormwater discharges, spills, illicit connections, and illegal dumping into the stormwater system by August 16, 2011. The specific Phase II Permit requirements are as follows:

- ◆ By February 16, 2007, initiate a program to develop and maintain a map of all connections to the stormwater system
- ◆ By February 16, 2011, develop a stormwater system map that shows all known separate storm sewer outfalls, receiving waters, BMPs maintained by the City, tributary conveyances, associated drainage areas, and land use
- ◆ By February 16, 2009, publicize a public hotline number for reporting of spills and other illicit discharges; and track all calls and follow-up actions taken
- ◆ By August 16, 2009, implement an ordinance that effectively prohibits non- stormwater, illegal discharges, or dumping into the City's stormwater system to the maximum extent allowable by state and federal law
- ◆ By August 16, 2009, ensure that all staff responsible for identification, investigation, termination, cleanup, and reporting illicit discharges are trained to conduct these activities
- ◆ By August 16, 2010, develop and implement an ongoing training program for all municipal staff involved with IDDE
- ◆ By August 16, 2011, distribute information to public employees, business, and the general public of the hazards associated with illegal discharges and improper disposal of wastes.

Current Activities

The City has completed the required stormwater system map and will continue making updates on an ongoing basis. The following public illicit discharge and spill hotline numbers are listed on the City's website (<http://www.cityofpacific.com/stormwater.html>) and in the IDDE Program Plan:

- ◆ (253) 929-1118 (regular business hours, 8am – 5pm)
- ◆ 911 (after hours)

The City's IDDE Program Plan was finalized in June 2009; implementation of the IDDE Program began in late 2009 and continued through 2012. Modifications to the Pacific Municipal Code related

to the IDDE ordinance became effective on March 9, 2009 (24.08.120 - Illicit discharges).

Dry weather outfall inspections for Basins F, I, K and L were performed in August, 2012. No indicators of illicit discharges were observed based on visual observations in any of the basins inspected.

Planned Activities

Table 3 summarizes the planned activities associated with the City’s IDDE program.

Table 3: Planned illicit discharge detection and elimination activities.

Activity	Tasks	Lead	Schedule or Frequency
IDDE Program Plan Implementation	Implement IDDE Program plan requirements	Stormwater Manager / City Engineer	Ongoing
Update Standard Operating Procedures (SOPs)	Update SOP for spill response and documentation	Stormwater Manager / City Engineer	Before June 30, 2013
Complete Mapping Requirements	Work with stormwater manager and stormwater field technician to ensure maps are updated regularly	City Engineer	Ongoing
Publicize Phone Number for Reporting Spills and Illicit Discharges	Publicize phone number on website and in print material	Stormwater Manager / City Engineer	Ongoing
Tracking System for Complaints, Investigations, and Spill Response	Use hard copy binder and electronic (PDF files) systems to track IDDE-related work	Stormwater Manager / City Engineer	Ongoing
Illicit Discharge Field Screening	Select and implement an illicit discharge field screening methodology	Stormwater Manager / City Engineer	Perform field screening on 40% of the MS4 by December 31, 2017
IDDE Ordinance	Minor edits to IDDE ordinance	Stormwater Manager / City Engineer	Before February 2, 2018
Staff Training	Refresher training on IDDE general awareness and IDDE response	Stormwater Manager / City Engineer	Ongoing

Component 4: Controlling Runoff from New Development, Redevelopment, and Construction Sites

The Community Development / Public Works Department (CDPWD) is responsible for permitting, inspection, and code enforcement actions for construction-related activities in the City.

This section describes the Phase II Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including current and planned activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S5.C.4 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to develop and implement a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction activities. The program is to be applied to all sites that disturb a land area 1 acre or greater, including projects less than 1 acre that are part of a larger common plan of development or sale. The specific Phase II Permit requirements are as follows:

- ◆ Adopt an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction sites by February 16, 2010.
- ◆ Develop and implement a site planning process and BMP selection and design criteria that meet the - Technical Thresholds in Appendix 1 of the Phase II Permit and will protect water quality, reduce the discharge of pollutants to the maximum extent practicable, and satisfy State requirements to apply all known, available, and reasonable methods of prevention, control, and treatment (AKART) prior to discharge by February 16, 2010.
- ◆ Develop and adopt a permitting process with plan review, with the legal authority to inspect private stormwater facilities that discharge into the City stormwater system, using qualified personnel. Develop and implement a training program for planning and review staff. These provisions shall be in place no later than February 16, 2010.
- ◆ Develop a process for provisions to allow non-structural preventative actions and source reduction approaches such as LID techniques.

No later than February 16, 2010, verify that all staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites are trained to conduct these activities. Develop and implement a plan review and inspection training program for staff.

Current Activities

The City has a permitting process implemented through its CDPWD that includes plan review, inspection, and enforcement. All sites that include clearing, grading, other land-disturbing activities, or development must go through the permitting process. This process includes final inspections prior to approval of project construction to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs.

Pacific Municipal Code (PMC) 24.08.100 - Stormwater management manuals adopted, adopts the latest version of the King County Surface Water Design Manual. These standards are further amended by PMC 24.08 to be equivalent to Ecology's Stormwater Management Manual for Western Washington (2005) for projects disturbing more than 1 acre. The City currently issues stormwater permits and performs inspections for construction projects both greater than and less than Ecology's 1-acre threshold. The City's previous standards still apply for sites disturbing less than 1 acre.

The City's updated stormwater regulations clearly identify responsibilities for maintenance, repair, operation, and inspection of private stormwater systems. These responsibilities lie with the property owner.

The City encourages developers to schedule a pre-development conference prior to beginning a project. Staff inform developers and designers of the preference for implementation of LID measures.

Training opportunities for City staff are pursued on an ongoing basis. Internal staff training is conducted on an ongoing basis to leverage knowledge from City staff who have attended pertinent training courses.

Planned Activities

Table 4 summarizes the City’s planned activities associated with controlling runoff from new development, redevelopment, and construction sites.

Table 4: Planned activities to control runoff from new development, redevelopment, and construction sites.

Activity	Tasks	Lead	Schedule or Frequency
Develop/update documents and forms to improve the permitting process	Ongoing process	City Engineer	Ongoing
Update City’s website to improve stormwater management and regulatory information	Ongoing process	Stormwater Manager / City Engineer	Ongoing
Staff Training	Pursue training opportunities for development review and inspection staff Conduct internal staff training by leveraging knowledge from City staff who have attended pertinent training courses	Stormwater Manager / City Engineer	Ongoing
Review All Stormwater Site Plans	Continue current practices	City Engineer / Consultant	Continue current practices and update as needed
Construction Site Inspections	Review and refine the inspection procedures used during construction to inspect/enforce TESC measures on projects exceeding the 1-acre land disturbance threshold	Stormwater Manager / City Engineer	Continue current practices and modify as needed
Inspections of Subdivision Stormwater Controls During Construction Period	Review and refine the inspection program for residential subdivisions while individual lots are in construction	Stormwater Manager / City Engineer	Continue current practices and modify as needed
Record Keeping	develop permit tracking system to track the status of plan reviews, inspections, correction notices, and final project approvals	Stormwater Manager / City Engineer	Ongoing
Notice of Intent Availability	Continue to support Ecology by distributing copies of the “Notice of Intent for Construction Activity” at the City permit counter	City Engineer	Ongoing

Table 4: Planned activities to control runoff from new development, redevelopment, and construction sites.

Activity	Tasks	Lead	Schedule or Frequency
Revise Stormwater Ordinances	Revise ordinances to reflect the elimination of the 1-acre threshold and incorporate new LID language	City Engineer	Before December 31, 2016
Review and Adopt New Stormwater Manual	Review the 2012 Stormwater Management Manual for Western Washington to determine what code amendments may be required by the City	City Engineer	Before December 31, 2016
Expand Construction Site Inspection Program to Incorporate Sites < 1-acre	Review and refine the inspection program for residential subdivisions	City Engineer	Before December 31, 2016
Review and Revise Local Development-related Codes, Rules, Standards, and Other Enforceable Documents	Review and revise codes, rules, standards, and other enforceable documents to incorporate and require LID principles and LID BMPs	City Engineer	Before December 31, 2016
Summarize the Results of the Code Review and Revision Process	This summary shall include a list of participants, documents reviewed, and revisions made	City Engineer	Include as an attachment to the March 31, 2017, Annual Report

Component 5: Pollution Prevention and Operation and Maintenance for Municipal Operations

In December 1995, the City of Pacific Municipal Code 15.09.02 established the City's Storm and Surface Water Utility. The code set forth the primary authority and responsibility for carrying out the Puget Sound Water Quality Management Plan including responsibilities for maintenance, operation, and improvement of the City's storm and surface water drainage system. The primary utility activities are specified in the Pacific Municipal Code and include: basin planning, capital improvements, and facility maintenance.

This section describes the Phase II Permit requirements related to pollution prevention and operation and maintenance for municipal operations, including current and planned activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S5.C.5 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to develop and implement an operation and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from the municipal separate stormwater system and municipal O&M activities by February 16, 2010. The specific Phase II Permit requirements are as follows:

- ◆ Establish maintenance standards that are at least as protective as those specified in Chapter 4 of Volume V of Ecology's Stormwater Management Manual for Western Washington (2005).
- ◆ Perform inspection of all municipally owned stormwater treatment and flow control and treatment facilities, other than catch basins, and take appropriate maintenance actions.
- ◆ Spot check potentially damaged permanent treatment and flow control facilities (other than catch basins) after major (greater than 24-hour, 10-year recurrence interval rainfall) storm events; and conduct maintenance and repairs as needed.
- ◆ Inspect all catch basins and inlets at least once by February 15, 2012 and clean as according to established maintenance standards.
- ◆ Establish an inspection program to determine inspection requirements.
- ◆ Have practices in place to reduce stormwater impacts associated with runoff from municipal O&M activities, including but not limited to streets, parking lots, roads, and highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- ◆ Establish and implement policies and procedures to reduce pollutants in discharges from all publicly owned lands, including parks, open spaces, road right-of-ways, and maintenance yards.
- ◆ Develop and implement an ongoing training program for City staff that addresses the importance of protecting water quality, the requirements of the Phase II.
- ◆ Permit, O&M standards, inspection procedures, selecting appropriate BMPs, ways to perform job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns.
- ◆ Prepare SWPPPs for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.
- ◆ Maintain inspection and maintenance repair records and summarize annual activities for the - Pollution Prevention and Operations and Maintenance for Municipal Operations component of the Annual Compliance Report; including any updates to the SWMP Plan.

Current Activities

The City currently has stormwater field maintenance policies and procedures (consistent with Ecology's 2005 manual) in place that address the following activities:

- ◆ Storm event preparation
- ◆ Stormwater system patrol and inspection
- ◆ Inspecting and cleaning detention basins/ponds
- ◆ Inspecting and cleaning catch basins
- ◆ Cleaning stormwater lines
- ◆ Cleaning and flushing culverts
- ◆ Cleaning and reshaping ditches
- ◆ Street sweeping
- ◆ Erosion control in water courses
- ◆ Stormwater line repair and replacement
- ◆ Shoulder pulling

Storm event preparation, system patrol, and inspection of storm drainage - Hot Spot areas are performed by maintenance department crews within 24 hours of notification of a major weather event.

City-maintained treatment and flow control facilities are inspected by stormwater technician. City-owned detention ponds are inspected bi-annually and cleaned as necessary. Work orders are automatically generated as the preventative maintenance is due.

Catch basin inspection and cleaning, culvert flushing, and line cleaning is performed annually by City staff and contractors. There are approximately 1,300 catch basins in the Pacific stormwater system. The City is responsible for maintaining over 800 basins and 500 catch basins are privately owned and maintained. Future maintenance and inspections will continue with annual inspections of the east and west discharge areas (White River / Government Canal and Milwaukee Ditch / Soatin Creek). Additional areas will be cycled in as the budget allows. The City budgets \$30,000 annually to accomplish this component of the O&M program. The public works department is developing a database for these activities.

Street sweeping is performed by City maintenance staff and is an ongoing activity to reduce stormwater impacts. All street sweepings are separated from green debris and disposed of properly. All excavated spoils from utility operations and street waste are decanted under contract at the City of Auburn facility.

The City began a new policy for snow control and removal in 2010 that was continued in 2011 and 2012. Liquid anti-/deicers are now applied before a predicted snowstorm which results in application of less treated sand during the snowstorm.

Three Stormwater Pollution Prevention Plans (SWPPPs) were developed for the all City facilities. Implementation of the SWPPPs began in late 2009 and continued through 2012.

Periodic wet weather SWPPP inspections were conducted throughout 2009-2012.

In terms of ongoing record keeping, the City documents SWPPP information (i.e., significant spills and leaks, dry and wet weather inspections, site modifications), tracks O&M costs, keeps inspection and maintenance repair records, and updates this SWMP plan annually.

Planned Activities

Table 5 summarizes the City’s planned activities associated with pollution prevention and O&M for municipal operations.

Table 5: Planned pollution prevention and operation and maintenance activities.

Activity	Tasks	Lead	Schedule or Frequency
Implement maintenance procedures and standards	Ongoing process	Stormwater Manager / Stormwater Technician / City Engineer	Ongoing
Implement Stormwater Pollution Prevention Plans (SWPPPs)	Ongoing process	Stormwater Manager / Stormwater Technician / City Engineer	Ongoing; dry and wet weather SWPPP inspections to be conducted in 2013
Treatment and flow control facility inspections	Ongoing inspection program for detention basins/ponds and other stormwater facilities	Stormwater Manager / Stormwater Technician	Ongoing
Catch Basin Inspection Program	Ongoing inspection program for catch basins, and spot checking of “hot spots”	Stormwater Manager / Stormwater Technician	Ongoing
Street Sweeping	Ongoing program	Stormwater Manager / Stormwater Technician	Ongoing
Record Keeping	Continue record updates Document activities associated with SWPPP Continue tracking costs	Stormwater Manager / Stormwater Technician / City Engineer	Ongoing
Communication and Coordination	Monthly meetings with PWD staff regarding measures to protect water quality Meetings with PW crew to review findings of SWPPPs and discuss practices to reduce stormwater impacts	Stormwater Manager / Stormwater Technician / City Engineer	Monthly/Ongoing
Stormwater BMP Manuals for Maintenance Activities	Develop Stormwater BMP Manuals for PW crew that address typical maintenance activities	Stormwater Manager / Stormwater Technician / City Engineer	Before June 30, 2013
Evaluate Catch Basin Inspection Options	Three options for catch basin and inlet inspections: Option 1: Inspect at least once by August 1, 2017, and every 2 years thereafter Option 2: Inspect and clean catch basins on a “circuit basis” with inspections of 25% of catch basins and inlets within each circuit to	Stormwater Manager / Stormwater Technician / City Engineer	Either August 1, 2017, or July 31, 2018 (depends on option selected)

Table 5: Planned pollution prevention and operation and maintenance activities.

Activity	Tasks	Lead	Schedule or Frequency
	identify maintenance needs Option 3: Clean all pipes, ditches, catch basins, and inlets within a circuit once during the permit term		
Review and Adopt New Stormwater Manual	Review the 2012 Stormwater Management Manual for Western Washington to determine if blanket adoption will work for the City	City Engineer	Before December 31, 2016
Update SWPPPs	Update City SWPPP	Stormwater Manager / City Engineer	Before June 30, 2013
Staff Training	Refresher training on SWPPP and source control BMPs	Stormwater Manager / Stormwater Technician / City Engineer	Ongoing

Monitoring and Reporting

Monitoring

This section provides a brief discussion of the Phase II Permit monitoring requirements, including current and planned activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S8 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to do the following:

- ◆ Conduct sampling or testing required for characterizing illicit discharges pursuant to Section S5.C.3 or S6.D.3 of the Phase II Permit
- ◆ Provide a description of any stormwater monitoring or studies conducted during the reporting period
- ◆ Provide an assessment of the appropriateness of the BMPs identified for each component of the SWMP; and any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why.
- ◆ Develop a monitoring plan in preparation for future, long-term monitoring due with the fourth Annual Report (March 31, 2011) that includes two components:
 - Stormwater monitoring – the City shall identify two outfalls or conveyances (one representing commercial land use and one representing high-density residential land use) where stormwater sampling could be conducted by December 31, 2010.
 - Targeted SWMP effectiveness monitoring – the City shall identify at least two suitable questions and select sites where stormwater, sediment or receiving water monitoring of physical, chemical, and/or biological characteristics monitoring will be conducted by December 31, 2010.

The City 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 Phase II Permit, since no TMDL implementation plans have been developed for the White River.

Current Activities

City staff conducted dry weather outfall inspections in August 2012 (as described in the Component 3: Illicit Discharge Detection and Elimination section). No water quality testing was performed.

The City provides a qualitative assessment of the appropriateness of the BMPs identified for each component of the SWMP in the Annual Report that is submitted to Ecology. The City also met the deadline for developing and submitting a monitoring plan in preparation for future, long-term monitoring with the fourth Annual Report (March 31, 2011).

Planned Activities

The City is currently evaluating the proposed monitoring requirements in the 2013-2018 Phase II Permit to determine if they will be opting in to the Regional Stormwater Monitoring Program (RSMP) or opting out and conducting their own monitoring. The RSMP includes three main components: status and trends monitoring, effectiveness studies, and source identification and diagnostic monitoring information repository. The City must notify Ecology by December 1, 2013, regarding which monitoring option they have selected for each component and start contributing to the RSMP fund beginning in August 2014 if they decide to participate in the RSMP.

Reporting

This section provides a brief discussion of Phase II Permit reporting requirements, including current and planned activities.

2007-2012 and 2012-2013 Phase II Permit Requirements

Section S9 of the 2007-2012 and 2012-2013 Phase II Permit requires the City to submit the following on March 31 of each year of the Phase II Permit term:

- ◆ A copy of the current SWMP plan
- ◆ Appendix 3 – Annual Report Form for Cities, Towns, and Counties.
- ◆ Notification of any annexations, incorporations, or jurisdictional boundary changes resulting in an increase or decrease in the geographic area of Phase II Permit coverage during the reporting period, and implications for the SWMP.

Additional requirements for the fourth Annual Report (due on March 31, 2011) include:

- ◆ Monitoring Plan (discussed in the Monitoring section)
- ◆ A summary of identified barriers to the use of LID within the area covered by the Phase II Permit and measures to address the barriers
- ◆ A report describing, at a minimum:
 - LID practices that are currently available and that can reasonably be implemented within the Phase II Permit term
 - Potential or planned non-structural actions and LID techniques to prevent stormwater impacts
 - Goals and metrics to identify, promote, and measure LID use
 - Potential or planned schedules to require and implement the non-structural and LID techniques on a broader scale in the future.

Current Activities

Since March 2008, the City has submitted an Annual Report to document the SWMP work completed in the prior year. The form of the report is developed by Ecology. The Annual Report is required to be updated each year in March through the Phase II Permit cycle. The Annual Report is accompanied by the City's current SWMP plan, which reflects the status of the implementation of each component of the SWMP. The 2013 SWMP Plan (this document) satisfies this requirement and is the City's fifth annual update to its SWMP. The City also developed a monitoring plan in preparation for future long-term monitoring and LID report that was included with the fourth Annual Report submitted to Ecology on March 31, 2011.

Planned Activities

The City submitted an Annual Report Ecology on March 31, 2013. The City will be submitting the SWMP Plan to Ecology by October 31, 2013. The next Annual Report is not due to Ecology until March 31, 2015; however, the City will be updating their SWMP Plan and posting it on their website by May 31, 2014.

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