Section 6—Regulatory Compliance

Stormwater Regulatory Requirements

The City's stormwater-related regulatory requirements include compliance with the following:

- NPDES Phase II Permit
- Underground Injection Control Rule
- Endangered Species Act and Water Resources Inventory Area Planning
- Puget Sound Action Agenda
- Low Impact Development and Sustainability

The following analysis compares the City's SWM Program with each of the above regulatory requirements. Actions and activities, along with schedule for compliance have been documented for implementation.

NPDES Phase II Municipal Stormwater Permit

The City of Woodinville has been identified by Ecology as a NPDES Phase II community. As such, the City needs to comply with the requirements of its Phase II Permit. See Appendix E for the Phase II Permit.

The Phase II Permit outlines stormwater program activities and implementation milestones that the City must follow beginning February 16, 2007, in order to comply with federal law. All Phase II communities are expected to develop a stormwater program that includes the required activities, implement those activities within the required timeframes over the permit term (i.e. 2007–2011), and submit annual reports to Ecology to document progress toward complete program implementation.

Permit Coverage

The Phase II Permit applies to cities with populations less than 100,000 located within, or partially within an urbanized area, and that are operating a municipal separate storm sewer system which discharges to a water of Washington State. As a Phase II community, the requirements of the Phase II Permit apply throughout the entire incorporated area of the City.

Permit Timeline

The Phase II Permit was issued by Ecology on January 17, 2007, became effective on February 16, 2007, and was modified on June 17, 2009. The permit modification included minor changes to correct inconsistencies, improve flexibility, reduce costs and advance LID techniques. The permit covers a five-year period that expires on February 15, 2012. While the actual years of the permit run from February 16 of each year to February 15 of the following year, the reporting requirements cover a calendar year from January 1 to

December 31. The City's permit will be reviewed and renewed for a second five-year period, starting in 2012. The timeline and milestone requirements for the City's 2007-2011 Phase II Permit are outlined in Figure 6-1.

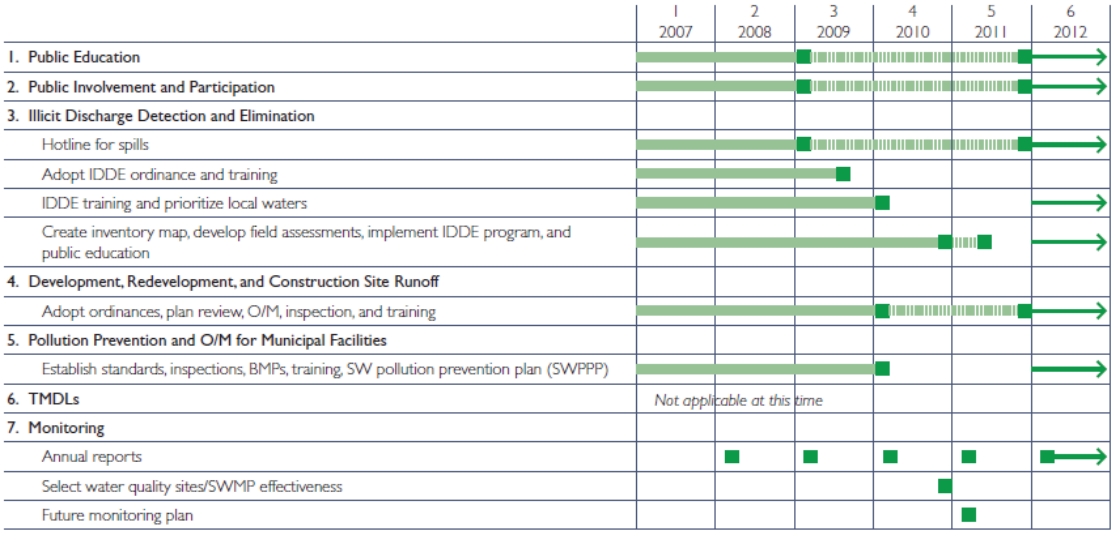

Figure 6-1 Phase II Permit Requirements and Milestones

Permit Requirements

The major program elements required by the Phase II Permit together with the associated permit conditions are listed below.

- Public Education and Outreach (Special Condition S5.C.1)
- Public Involvement and Participation (Special Condition S5.C.2)
- Illicit Discharge Detection and Elimination (Special Condition(S5.C.3)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites (Special Condition S5.C.4)
- Pollution Prevention and Operation and Maintenance for Municipal Operations (Special Condition S5.C.5)
- Total Maximum Daily Load Requirements (Special Condition S7)
- Monitoring (Special Condition S8)
- Reporting (Special Condition S9)

The requirements and due dates associated with Special Conditions S5.C.1 through S5.C.2 are covered in detail in the City's annual SWM Program document that is prepared to accompany the City's Annual Report to Ecology, which is available at City Hall and is also posted on the City's website for reference. Requirements of Special Conditions S5, and S7-S9, are summarized below, along with the results of the detailed regulatory gap analysis. A summary of outstanding NPDES compliance items through the remainder of the permit

cycle is included at the end of this Section as Table 6-6. The regulatory gap analysis is presented in a matrix format and is included at the end of this Section as Table 6-7.

Public Education and Outreach (S5.C.1)

Phase II Permit Requirement:

One of the primary requirements of the Phase II Permit is to implement an educational outreach program designed to achieve measurable improvements in the target audiences' understanding of the problem of stormwater impacts and what they can do to solve them. The goal of the program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Target audiences include residents, businesses, industries, elected officials and municipal employees. In addition, the City is required to measure the understanding and adoption of the targeted behaviors among at least one target audience in at least one subject area.

Status of City's Activities

The following activities are planned by the City to support implementation of its public education and outreach program. The City will refine stormwater education activities based on the community survey results and emphasize educational activities related to proper vehicle washing. Towards the end of the Phase II Permit cycle, the City will conduct a follow-up survey to determine the effectiveness of outreach activities relating to proper vehicle washing. The City will track and record all education and outreach activities for the purpose of annual reporting.

To comply with this Phase II Permit requirement, the City must conduct a public survey to measure the effectiveness of this public education program. Based on the results of this survey, the City may choose to pursue additional target audiences based on the results of the community survey. Some examples of topics aimed at additional target audiences include:

- Short presentations during stream planting projects (Sammamish Releaf) about the effects of stormwater on the environment.
- Presentations to neighborhood groups about local stormwater and environmental issues, proper maintenance of local drainage facilities, and proper household use and disposal of pesticides and fertilizers.
- Educate businesses to prevent discharge of pollutants from their properties through site visits, mailings, and existing documents such as the King County Stormwater Pollution Prevention Manual, as well as proper maintenance of their on-site drainage facilities.
- Hold training seminars for the development community on proper stormwater infrastructure design and the use of LID techniques and encourage local developers to attend similar trainings conducted by local agencies (i.e., King County).

Table 6-1 outlines the implementation plan needed to achieve the goals and objectives of the Public Education and Outreach Program and meet the compliance deadlines in the Phase II Permit.

Table 6-1 Public Education and Outreach		
Purpose: Develop an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts		
Applicability: Target audiences as identified. May include general public, businesses, landscapers and property managers, engineers, contractors, developers, review staff and land use planners.		
Task ID	Task Description	Schedule Notes
ED&O-1	Refine stormwater education activities based on survey results. Prioritize target audiences. Develop new brochures, adjust website content, etc.	**Target date for revised education program is mid-2010.**
ED&O -2	Conduct follow up community survey to determine effectiveness of revised education program.	**Target date for completion of survey is in 2011.**
ED&O -3	Update Stormwater Quality website.	**Update on a quarterly basis.**
ED&O -4	Continue to offer rain barrels and compost bins at Spring Garden Fair at subsidized rate.	**Annually**

ED&O = Education and Outreach

Public Involvement and Participation (S5.C.2)

Phase II Permit Requirement:

The Phase II Permit stresses the need for the City to provide on-going opportunities for citizens to review and participate in development of the SWM Program. This condition also requires the City to post the Annual Report and SWM Program document on the City's website to encourage and allow for receipt of public comment.

Status of City's Activities

The following activities are planned by the City to support development and implementation of its public involvement and participation program. The City will host annual public meetings/workshops related to its SWM Program and encourage citizen input. The City will also post the draft Stormwater Management Comprehensive Plan on the City's website and encourage public comment. And finally, the City will post the draft and final Stormwater Management Comprehensive Plan and future Annual Reports on the City's website; and track and record all public involvement and participation activities for the purpose of annual reporting.

Table 6-2 outlines the implementation plan to achieve the goals and objectives of the Public Involvement Program and meet the compliance deadlines in the Phase II Permit.

Table 6-2 Public Involvement		
Purpose: Create opportunities for the public to participate in the decision making processes involved in the development, implementation and update of the CSWM Plan.		
Applicability: Applies to general public, advisory council and watershed committees.		
Task ID	Task Description	Schedule Notes
PI-1	Conduct a public meeting to solicit input and comments on the CSWMP. Conduct SEPA process, publish notice, and present CSWMP to Council for adoption.	**Target is to conduct this activity during the summer of 2010.**
PI-2	Post CSWM Plan and Annual Report on the City's website.	**Due date of March 31, 2009.** Status: SWMP and Annual Report will be posted as completed each year.

PI = Public Involvement

Illicit Discharge Detection and Elimination (S5.C.3)

Phase II Permit Requirement:

Most cities, like Woodinville, need to develop and implement a plan to detect and eliminate illicit discharges to the storm sewer system. This includes adopting an ordinance prohibiting non-stormwater discharges to the City's stormwater system, developing a map of the stormwater infrastructure system, conducting field investigations, removing any identified sources, informing the community about hazards associated with illegal discharges and improper disposal of waste, providing opportunities for the public to report illicit discharges and spills that may pose water quality concerns, and conducting staff training.

Status of City's Activities

The City will continue working towards developing an IDDE program by 2011. Tasks include:

- Completing the mapping of the City's stormwater system.
- Revising WMC 14.06 Water Quality Standards to update the allowable and conditional discharges for consistency with the Phase II Permit.
- Reviewing WMC 1.07.030 - Violations and updating as needed to maintain consistency with updated WMC 14.06 – Water Quality Standards.
- Prioritize receiving waters.
- Establish procedures.
- Train staff.
- Conduct field assessment activities to identify and remove illicit connections to the stormwater system.
- Train field staff to identify and report illicit discharges.
- Develop and distribute IDDE-related educational materials to businesses and the residential community.
- Track and record all IDDE activities for the purpose of annual reporting.

Table 6-3 outlines the implementation plan needed to achieve the goals and objectives of the IDDE Program and to meet the compliance deadlines in the Phase II Permit. Particular attention will be paid to those tasks that need to be accomplished in 2010.

Table 6-3 Illicit Discharge Detection and Elimination		
Purpose: Detect and remove illicit connections, illicit discharges, and improper disposals (including spills) into the MS4.		
Applicability: Applies to the City's municipal separate storm sewer system.		
Task ID	Task Description	Schedule Notes
IDDE-1	Continue updating storm system map with private systems, new developments, and corrections from field verifications.	**Due date of February 15, 2011.** Status: Under development.
IDDE-2	Update existing ordinance to modify allowable and add conditional discharges.	**Due date of August 15, 2009.** Status: Completed November 2010.
IDDE-3	Document the City's IDDE Program, including procedures for inspection, identification, and enforcement.	**Due date of August 15, 2011.** Status: Under development.
IDDE-4	Conduct training for staff responsible for responding to IDDE complaints.	**Due date of August 15, 2009.** Status: Training initiated; complete in 2010.
IDDE-6	Conduct training for all municipal field staff on identification and reporting of illicit discharges.	**Due date of February 15, 2010.** Status: Training initiated; complete in 2010.
IDDE-7	Identify and prioritize receiving waters for field assessment.	**Due date of February 16, 2010.** Status: Complete by end of 2010.
IDDE-8	Begin field inspections to locate potential illicit discharges. Document and keep records of inspections.	**Due date of February 15, 2010.** Status: Some inspections have begun. Formal program to start following IDDE-3, IDDE-4 and IDDE-5.
IDDE-9	Develop and distribute IDDE related educational materials.	**Due date of August 19, 2011.** Status: Under development.
IDDE-10	Document and keep records of all public complaint reports, field inspections, follow-up activities, and enforcement actions.	**Due with Annual Report.** Status: Under implementation.

IDDE = Illicit Discharge Detection and Elimination

The City of Woodinville is currently addressing wineries and winery waste through an information and outreach program. According to the Ecology website "Area wineries now understand that their liquid winery wastes must be disposed of via the sanitary sewer, their solid wastes must be composted, land applied, or used to feed stock, and that no wastes from any part of the winemaking process should be discharged to the City's storm drain

system.[1]" Since June 2009 at least another 10-15 businesses have determined to locate tasting facilities here.

Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.4)

Phase II Permit Requirement:

Drainage from new development and redevelopment are addressed in this requirement. To comply with this requirement, the City will need to:

- *Develop, implement, and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction sites disturbing one acre or more.*
- *Adopt an ordinance requiring the minimum technical requirements of the 2005 Ecology Manual, legal authority for inspection of private facilities, provisions to allow for LID techniques, requirements for inspection and maintenance of facilities, and enforcement procedures.*
- *Review construction documents and conduct routine inspections during construction.*
- *Inspect established stormwater BMPs on an annual basis.*
- *Establish maintenance standards consistent with the 2005 Ecology Manual.*
- *Train City staff in permit review, site inspection, and program enforcement.*

Status of City's Activities

The City needs to adopt either the 2005 Ecology Manual or the 2009 KCSWDM, both of which include maintenance standards and require follow up maintenance enforcement actions for private facilities. Staff may need follow-up training as the new manual and maintenance standards are adopted. Most of this training can be provided in-house or through programs offered by Environmental Protection Agency, King County, or other agencies. Finally, the City will need to track and record all runoff control activities for the purpose of annual reporting and permit compliance.

Table 6-4 outlines the implementation plan to achieve the goals and objectives of the program to control runoff from new development, redevelopment, and construction sites and meet the compliance deadlines in the Phase II Permit.

[1] June 2009

Table 6-4 Controlling Runoff From New Development, Redevelopment, and Construction Sites		
Purpose: Establish a program to reduce pollutants in stormwater runoff from new development projects, redevelopment projects, and construction sites. Apply the minimum technical requirements of Appendix 1 of the Phase II Permit (or equivalent).		
Applicability: All new development, redevelopment, and construction sites that disturb one acre or greater and smaller projects that are part of a larger development plan.		
Task ID	Task Description	Schedule Notes
CTRL-1	Adopt either the 2009 KCSWDM or the 2005 Ecology Manual and update City Codes as needed.	**Due date of February 16, 2010.** Status: Completed. Adopted the 2009 KCSWDM
CTRL-2	Continue to conduct plan review and site inspections for new development and redevelopment projects.	**Due date: Ongoing.** Status: Program in place.
CTRL-3	Adopt updated maintenance standards.	**Due date of February 16, 2010.** Status: Will occur concurrently with CTRL-1.
CTRL-4	Continue to implement City's existing tracking system to electronically document maintenance inspections and correlate work to NPDES requirements.	**Due date: Ongoing.** Status: Records are maintained as required by NPDES permit. Electronic tracking system is in place.
CTRL-5	Continue to provide NOI for Construction Activity to developers during pre-application meeting.	**Due date: Ongoing.** Status: Program in place.
CTRL-6	Conduct official training for staff on stormwater design requirements, erosion control, and Ecology construction permit.	**Due date of February 16, 2010.** Status: Complete by the end of 2010 following CTRL-1 and CTRL-3.

CTRL = Controlling Runoff from New Development, Redevelopment and Construction Sites

Pollution Prevention and Operation and Maintenance for Municipal Operations (S5.C.5)

Phase II Permit Requirement:

Ongoing maintenance is a key element of a successful SWM Program. To meet this requirement, the City must develop and implement a program to prevent or reduce pollutant runoff from municipal operations. The program must include annual facility inspections, spot checks of permanent treatment and flow control facilities other than catch basins, catch basin inspections, practices to reduce stormwater impacts from roadway runoff, and practices to reduce pollutant discharges from non-roadway municipal property; train municipal staff on standards, BMP selection, and how to reduce water quality impacts in daily activities; and develop and implement a SWPPP for all heavy equipment maintenance or storage yards and materials storage facilities.

Status of City's Activities

Table 6-5 outlines the implementation plan to achieve the goals and objectives of the Operations and Maintenance Program and meet the compliance deadlines in the Phase II

Permit, in accordance with G20 Letters of Notification submitted to Ecology in April 2010 and September 2010.

Table 6-5 Pollution Prevention and Operations and Maintenance		
Purpose: Develop an O&M program to prevent or reduce pollutant runoff from municipal operations.		
Applicability: All stormwater treatment and flow control facilities, catch basins, streets and roadways, and non-roadway public properties managed by the City.		
Task ID	Task Description	Schedule Notes
O&M-1	Continue to conduct annual inspections of water quality and flow control facilities.	**Due date of February 15, 2010.** Status: Program in place through contract with King County.
O&M-2	Continue to perform spot checks of water quality and flow control facilities after major storm events.	**Due date: After Major Storms.** Status: Program in place.
O&M-3	Continue to implement a schedule for rotating catch basin inspection and maintenance.	Due date of August 19, 2011. Status: Program in place.
O&M-4	Conduct roadway maintenance (street sweeping, vegetation removal, ditch cleaning, and infrastructure repair).	Due date of February 15, 2010. Status: Program in Place.
O&M-5	Develop a facilities maintenance manual that addresses stormwater issues and includes an Integrated Pest Management Plan to restrict pesticide and fertilizer use near fish habitat areas.	**Due date of February 15, 2010.** Status: Complete by the end of 2010.
O&M-6	Identify training needs, schedule and conduct ongoing training program on stormwater management.	**Due date of February 15, 2010.** Status: Complete by end of 2010 following O&M-5 and CTRL-3.
O&M-7	Evaluate facilities and develop a SWPPP as needed.	**Due date of February 15, 2010.** Status: Document Completed. Need to implement
O&M-8	Maintain records of inspections and maintenance repairs.	Due date with Annual Report Status: See CTRL-4.

O&M = Operations and Maintenance

Total Maximum Daily Loads (S7)

Phase II Permit Requirement:

Under the TMDL requirements, affected permittees must comply with specific requirements that are stipulated in Appendix 2 of the Permit. For applicable TMDLs not listed in Appendix 2, compliance with the Phase II Permit constitutes compliance with these TMDLs.

Status of City's Activities

TMDLs have been developed for Little Bear Creek (for fecal coliform) and Bear Evans Creek Watershed (for fecal coliform, temperature and dissolved oxygen); however no

additional requirements have been identified for inclusion in the City's Phase II Permit at this time.

Monitoring (S8)

Phase II Permit Requirement:

Under the monitoring requirements, the City will need to prepare for implementation of a comprehensive long-term monitoring program that includes stormwater outfall and SWM Program effectiveness monitoring. For the stormwater monitoring preparations, the City will need to select two outfalls and document the reasons for site selection, possible constraints, a description of the drainage basin and any water quality concerns in the receiving waters. For the program effectiveness monitoring, the City will need to design an approach to assess the effectiveness of a targeted action or focused suite of actions and whether the SWM Program is achieving a targeted environmental outcome. The City must identify the actions and outcomes to be evaluated, select sites and develop monitoring plans no later than December 31, 2010.

Status of City's Activities

Under the existing Phase II Permit, the City is required to prepare for future stormwater outfall and program effectiveness monitoring.

Annual Reporting & Reporting on LID Barriers (S9)

Phase II Permit Requirement:

Under the Reporting requirements, annual reports must be submitted by March 31st each year for compliance activities occurring in the previous calendar year. Annual reporting submittals must include a copy of the City's current Stormwater Management Program document and the Annual Report Form for Cities, Towns and Counties, as provided by Ecology.

Pursuant to the Phase II Permit modification issued June 17, 2009, no later than March 31, 2011, the City will also need to submit a summary of identified barriers to the use of LID and measures to address barriers together with a report that describes currently available LID practices that can be reasonably implemented within the Permit term, potential or planned non-structural actions and LID techniques to prevent stormwater impacts with schedules to require broader scale implementation in the future, and goals and metrics to identify, promote, and measure LID use.

Wilmot Park - City of Woodinville

Additional permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G20, apply to the City of Woodinville, though they do not result in specific program activities. These additional conditions cover topics such as who is covered by the Phase II Permit, what discharges are authorized under the permit, and describes the legal guidelines for transferring, revoking, and appealing the permit.

Status of City's Activities

Annual reports must be submitted by March 31st for compliance activities occurring in the previous calendar year.

Underground Injection Control Rule

UIC Control Rule:

With the passage of the Safe Drinking Water Act by Congress in 1974, the EPA created the Underground Injection Control Program as one of the key programs for protecting drinking water sources. In 1984, Ecology received the authority from EPA to regulate UIC wells and adopted the UIC rule, Chapter 173-218 WAC. UIC wells do not include wells that draw water from underground aquifers such as potable water wells. In contrast, a UIC well is a human-made hole that is used to put water or other fluids into the ground. In Washington, most of these wells are used to dispose of septic wastes and stormwater runoff. In January 2006, Ecology adopted revisions to the UIC program rule which went into effect on February 3, 2006. The rule applies to both new and existing UIC wells. Even though UIC wells are used for stormwater management, there is no overlap between the UIC rule and Phase II Permit requirements. Under Special Condition S2.A.1, the Phase II Permit clearly states that, "Discharges to ground waters of the state through facilities regulated under the UIC program, Chapter 173-218 WAC, are not covered under this permit."

As it relates to stormwater management, the rule regulates Class V UIC wells which must be registered and rule authorized (meet the nonendangerment standard) or receive a State Waste Discharge Permit issued by Ecology to operate. The rule also requires annual updates to Ecology on well status changes and sets specific criteria for well decommissioning and associated notifications.

Status of City's Activities

The activities required for compliance with the UIC Rule depend on the number and type of underground injection control facilities (such as dry wells or underground infiltration galleries) that the City uses for stormwater management. With less than 10 city-operated infiltration facilities, the City's UIC requirements are fairly minor.

The City will determine which infiltration facilities are categorized as UICs, requiring registration with the State. Long term activities may include retrofitting existing injection control facilities to provide additional water quality treatment.

Endangered Species Act and Water Resources Inventory Area Planning

ESA Requirements:

In 1999, the federal government listed the Puget Sound Chinook salmon and bull trout as threatened in the Puget Sound Region. Local governments have responded to these listings by putting in place policies and practices to protect and restore these fish populations and their habitat. In the Puget Sound region, a coalition

of local governments has created a Regional Forum system for coordinating these protection and restoration efforts on a watershed basis. The Regional Forum is organized by watershed (WRIA), consistent with the watershed identification system used by Ecology and other state resource agencies. In addition to these current listings, steelhead trout were listed as threatened in May 2007 and as of October 2008 are now protected under the same regulations as threatened Pacific salmonids.

The Watershed Planning Act (RCW 90.82) provides local governments a framework and resources for developing local solutions to watershed issues on a watershed basis. These WRIA or watershed plans are required to address water quantity with optional elements of water quality and habitat.

In order to integrate salmon recovery planning into watershed planning, twelve State agencies signed a Memorandum of Understanding for the coordinated implementation of the Watershed Planning Act and the Salmon Recovery Planning Act. The Memorandum clarifies over a 10-year planning horizon roles and responsibilities, annual reporting requirements, fosters cooperative working relationships between state agencies, local governments and tribal governments, and, where possible, simplifies implementation procedures. The Regional Forum uses WRIA watershed planning as a tool to integrate water resource planning issues, including salmon protection and recovery.

Status of City's Activities

The City of Woodinville is included in WRIA 8, the Cedar, Lake Washington, Sammamish watershed. The July 2005 WRIA 8 Chinook Salmon Conservation Plan was approved in May 2008 and ratified by the 27 participating jurisdictions by September 2005, including the City of Woodinville. Actions within the Plan have been developed in three broad categories: land use, planning, and infrastructure; site-specific habitat protection and restoration projects; and public outreach and education. The Plan is currently under implementation in accordance with a three-year work plan that covers 2008-2010.

The City of Woodinville ratified the Plan in Resolution No. 307 adopted July 11, 2005. In the Resolution, the City gave its approval and support to plan goals to:

- Continue work on a collaborative basis to further plan implementation.
- Use the plan as a guide and source for local action and site specific projects.
- Use an adaptive management approach.
- Use the start list to guide priorities.
- Work together to seek funding opportunities.

In addition to the Resolution ratifying the July 2005 WRIA 8 Chinook Salmon Conservation Plan, the City has solidified its commitment to preserving, enhancing and protecting fish and wildlife habitat through its 2009 Comprehensive Plan land use goals and policies and plans to continue its support of ongoing activities, as outlined in Section 3. As part of the City's 2002 ESA Habitat Assessment, several other activities were identified for future implementation, as described below.

The Regional Road Maintenance ESA Program Guidelines are based on the King County 4(d) program template. To fully comply with the Section 4(d) ESA limits and receive protections under this clause, the City must complete the Part 3 application and receive approval for the associated road maintenance package from WSDOT and the Federal Services. Since Woodinville's maintenance program is based directly on the Services-Approved King County program, it is assumed that the City would also qualify for coverage.

In addition, the City needs to maintain a high level of water quality and habitat protection during construction activities. Many of the City's capital projects focus on habitat restoration, and as such, take place in areas that ESA-listed species extensively utilize. Projects such as fish passage culvert replacements and channel modifications have the potential to create temporary impacts that may harm aquatic life. The City needs to outline policies, monitoring protocols, and construction inspection guidelines to ensure appropriate erosion control, water quality BMPs, and mitigation requirements are implemented during construction, and also identify personnel to oversee proper implementation of habitat protection measures on active construction sites.

The City recognizes the potential for water quality impacts associated with chemical plant and insect controls. Although the Parks, Recreation, and Open Space goals and policies contained within the City's Comprehensive Plan address ESA compliance, they do not address chemical use for noxious and invasive weed control or mosquito control. The issue of herbicides and pesticides has been identified as a potential liability for ESA compliance and the City must adopt an Integrated Pest Management Plan (consistent with Phase II Permit requirements) that provides direction on how, when and which chemicals may be used during facility and parks maintenance operations.

Puget Sound Action Agenda

Puget Sound Action Agenda Requirements:

In April, 2007, the Washington State Legislature passed legislation abolishing the Puget Sound Action Team and creating a new Puget Sound Partnership (Partnership) to coordinate and lead the effort to restore and protect Puget Sound. The Partnership consists of a Leadership Council, Executive Director, Ecosystem Coordination Board, and a Puget Sound Science Panel. The Partnership's charge is to define a strategic action agenda that prioritizes necessary actions based on science and includes clear, measurable goals for the recovery of Puget Sound by 2020. Adopted December 1, 2008, the Puget Sound Action Agenda replaces the prior Puget Sound Water Quality Management Plan. The Action Agenda sets state policy, is a strategy for cleaning up, restoring and protecting Puget Sound, and includes five strategic priorities and associated long-term and short-term actions to achieve progress. The five strategic priorities include:

A. *Protect intact ecosystem processes, structures, and functions*
B. *Restore ecosystem processes, structures, and functions*
C. *Reduce the sources of water pollution*
D. *Work effectively and efficiently together on a priority basis*
E. *Build an implementation, monitoring, and accountability management system*

Although the Partnership has no regulatory authority to enforce implementation of the Action Agenda, it is authorized to develop funding criteria that prohibits funding projects and activities that are in conflict with it. However, to encourage accountability, the Partnership is authorized to designate entities which consistently achieve outstanding progress in implementing the Action Agenda as "Puget Sound Partners". Further, the Partnership is also authorized to create funding preference for these "Puget Sound Partners" for funds allocated to the Puget Sound basin. While the Partnership is accountable for achieving the Action Agenda, the legislature intended that all governmental entities within Puget Sound exercise their existing legal authorities to implement applicable provisions. Should the Partnership determine that an entity is substantially out of compliance with the Action Agenda, it may recommend to the governor that the entity be ineligible for state financial assistance until the substantial noncompliance is remedied.

Under Priority C of the Action Agenda, Reduce the sources of water pollution, subpriority C.2.2 focuses on managing stormwater runoff in urban and urbanizing areas to reduce stormwater-related impacts, and calls for implementing NPDES municipal stormwater permits, incorporating LID requirements for development and redevelopment into all stormwater codes, and retrofitting existing stormwater facilities for compliance with current standards. However, detailed implementation planning has not yet been completed and due dates for these objectives have not yet been established.

Implementing Phase II Permit covers many of the Action Agenda stormwater objectives. The City has been implementing its Phase II Permit for close to three years with an additional two years of implementation remaining under the current permit cycle. In addition, the Phase II Permit Modification issued in June 2009 advances LID as earlier described.

In January 2010, the Partnership published its first biennial "State of the Sound Report" that documents the current status of the ecosystem, as well as status of implementation and funding. The Partnership's major focus since publishing the Action Agenda in December 2008 has been to evaluate ecosystem status and develop a performance management system to manage recovery efforts. Implementation of the Action Agenda is just getting underway. The Partnership's near term work is to align the state's 2011-1012 biennium budget to the Action Agenda.

In 2010, the Partnership plans to work aggressively toward:

- *Finalizing ecosystem indicators*
- *Prioritize threats to the ecosystem*
- *Establish outcome measures with implementing agencies*
- *Set quantitative targets and benchmarks for the reduction of priority threats and identify potential revisions to the 2008 Action Agenda*
- *Establish criteria to determine consistency of action with the Action Agenda*

Status of City's Activities

Until this work is complete, there is no new direction regarding stormwater management priorities. Currently, the City is addressing the Action Agenda priority for managing stormwater runoff in urban areas to reduce stormwater impacts by implementing its NPDES

Phase II Permit requirements and encouraging LID for new development and redevelopment.

Low Impact Development and Sustainability

LID Requirements:

Using LID techniques for surface water management on new developments and capital improvement projects is a way to improve water quality in a manner that more closely emulates flow characteristics from natural forested conditions. Recreating these natural functions in LID designed projects does a better job of protecting the environment when compared with traditional engineering drainage designs. LID has been emerging over the past several years as a new way of managing stormwater runoff. The goal of LID is twofold: a) capture pollutants in stormwater prior to discharging to a lake or stream (usually through settling and filtration); and b) reduce peak flows that are caused by converting land from forest to buildings, streets and parking lots (via detention/storage and or infiltration in an LID facility). An increase in peak flows cause erosion of stream channels and destruction of aquatic habitat.

There is a high degree of interest on the subject, particularly in the Puget Sound. Ecology has devoted a section to the subject in the 2005 Ecology Manual, and the Puget Sound Action Team published the "Low Impact Development Technical Guidance Manual for the Puget Sound" in 2005, which is frequently used as a technical resource by engineers and planners.

Status of City's Activities

The issue of stormwater management and protecting the environment is of particular interest to the City of Woodinville because it is located in two salmon bearing watersheds, Little Bear Creek and Bear Creek/Cottage Lake Creek. The City of Woodinville published a draft sustainable development study in February 2007, with emphasis on the R-1 zone that covers approximately 1,100 acres at the northeasterly end of the City. The study is entitled "Draft R-1 Sustainable Development Review." The study was issued after a moratorium was established to limit development in the R-1 zone, to be enforced until the results of the study were made complete and a decision could be made. The study examined several key factors, environmental, neighborhood character, transportation, and capital facilities and services. Under environmental, sustainability was a key component, with the use of LID. The study presented the benefits, options, and land-use requirements of LID, and recommended implementing LID in the zoning codes and drainage design standards.

In July 2007, the City was actively working on updating their sustainability study with involvement from the Citizen Advisory Panel. The City gathered information on implementing LID standards, looking at examples of what other municipalities have done to implement LID based facility designs.

The City is strongly interested in, and actively pursuing, the creation of sustainable land-use standards and LID drainage design standards. These are likely to be implemented in the near future by updating the zoning codes and design standards.

Potential Future NPDES Phase II Permit Requirements

The Department of Ecology has not published the next Phase II Permit scheduled to begin in 2012. However, there are three areas that there are anticipated additional activities that may be required for the City of Woodinville: monitoring, TMDLs and LID.

Monitoring

It is likely that in the next permit term (beginning in 2012), the City will be required to implement monitoring programs. These monitoring requirements are similar to those already in place for NPDES Phase I permittees with the exception of BMP effectiveness monitoring. It is anticipated that the monitoring programs will involve additional investment by the City in staff time and resources for equipment purchase, and installation, sample collection, lab analysis, data analysis, recordkeeping, and annual reporting.

Total Maximum Daily Loads

TMDLs have been developed for Little Bear Creek (for fecal coliform) and Bear Evans Creek (fecal coliform, temperature and dissolved oxygen); however they are not current requirements under the Phase II Permit. Should a TMDL be approved by EPA or a Detailed Implementation Plan be approved by Ecology during the Phase II Permit cycle that applies to the City, additional requirements may be established by Ecology through future Phase II Permit modifications. This may require such activities are monthly water quality monitoring on both creeks along with annual reporting of the monitoring results.

Low Impact Development

In February 2009, the Pollution Control Hearing Board ruled that Ecology begin to prepare all Phase II permittees, including the City of Woodinville, for future implementation of LID. Ecology has been convening a stakeholder advisory process to provide input on those requirements. No specific requirements on LID for the next permit cycle have been identified at this time.

Summary of NPDES Compliance Items

A summary of outstanding NPDES compliance items through the remainder of the permit cycle is presented in Table 6-6. The regulatory gap analysis is presented in a matrix format as Table 6-7.

Table 6-6 Outstanding NPDES Compliance Items for the Remainder of the Permit Cycle As of September 2010	
Item	Due
Public Education and Outreach	
Develop system to document education and outreach activities	2/15/09
Conduct follow up survey to measure effectiveness of education efforts related to proper vehicle washing	12/31/11
Public Involvement and Participation	
Host annual public meetings or workshops related to the City's Stormwater Program	Annually
Post 2010 Annual Report and SWMP on website	3/31/11
Post 2011 Annual Report and SWMP on website	3/31/12
Illicit Discharge Detection and Elimination	
Update ordinance	8/15/09
Prioritize receiving waters for field assessments	2/15/10
Develop procedures for field assessments, and characterizing, tracing and removing sources	Prior to field assessments
Train staff to conduct field assessments and follow up activities and develop system to track trainings	Summer 2010
Conduct dry weather field assessments of 3 high priority receiving waters	Summer 2010
Characterize, trace and remove sources as needed	Summer 2010
Develop system to document number and types of spills identified, inspections made and outcome of enforcement actions (Does the City's CRS system satisfy this requirement?)	Prior to field assessments
Complete mapping of structural stormwater BMPs	2/15/11
Conduct dry weather field assessment of at least one high priority receiving water	Summer 2011
Develop and distribute IDDE related education materials and track feedback	8/19/11
Runoff Control for New Development, Redevelopment and Construction Sites	
Adopt ordinance that includes minimum technical requirements equivalent to the 2005 Ecology Manual and provisions to allow LID techniques	2/16/10
Adopt maintenance standards for facilities consistent with the 2005 Ecology Manual	2/16/10
Develop permit tracking system capable of documenting all inspections, enforcement activities, maintenance activities, and construction sites	2/16/10
Train staff in new ordinance requirements and develop system to track trainings	2/16/10
Non-Roadway Property Maintenance	
Develop Nutrient Management and Integrated Pest Management Plan	2/15/10
Train Staff on Nutrient Management and Integrated Pest Management Plan	After Plan is developed
Implement Nutrient Management and Integrated Pest Management Plan	After Staff Training
Develop Facilities Maintenance Plan	2/15/10

Table 6-6 Outstanding NPDES Compliance Items for the Remainder of the Permit Cycle As of September 2010	
Item	**Due**
Train Staff on Facilities Maintenance Plan	After Plan is developed
Implement Facilities Maintenance Plan	After Staff Training
Develop and implement a SWPPP for City equipment maintenance and storage facilities	2/15/10
Conduct quarterly SWPPP inspections and repairs as necessary for heavy equipment maintenance or storage yards and materials storage facilities	Quarterly after SWPPP is developed
TMDLs	
Coordinate with Ecology on the development/implementation of the Little Bear Creek Fecal Coliform TMDL and the Bear-Evans Watershed Fecal Coliform/Temperature/Dissolved Oxygen TMDL detailed implementation plans	TBD – As determined by Ecology
Monitoring	
Prepare for future stormwater outfall monitoring; select two outfalls and document site selection	12/31/10
Prepare for future program effectiveness monitoring; identify 1 questions to be studied, select monitoring sites and develop monitoring plans	12/31/10
Describe status of preparation for future monitoring and include in annual report	3/31/11
Describe status of preparation for future monitoring and include in annual report	3/31/12
Reporting	
Develop 2010 Annual Report and SWMP and submit to Ecology	3/31/11
Develop 2011 Annual Report and SWMP and submit to Ecology	3/31/12

Table 6-7
CITY OF WOODINVILLE
Surface Water Management Program Analysis

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
SWMP Element #1 - Public Education and Outreach								
S5.C.1.a	**1.1 Outreach to Two Target Audiences**	Begin implementing or participating in an education and outreach program. Prioritize target audiences and subject areas: -General Public about stormwater basics; -Businesses about chemical use/storage and illicit discharges; -Homeowners/Landscapers/Property Managers about yard care, fertilizers, carpet cleaning, auto maintenance, LID and pond maintenance; -Development Community about flow control, stormwater treatment, LID, and erosion control.	Begin By Year 2 (2/15/2009)	Car wash kits are available to fund raising groups.	Car wash kits are available to fund raising groups.	In Place	Ongoing	
				Brochure addressing stormwater basics is available at the City information counter.	Brochure addressing stormwater basics is available at the City information counter.	In Place	Ongoing	
				Articles in City newsletter and on website.	Articles in City newsletter and on website.	In Place	Quarterly	
				Conduct volunteer planting as part of the Sammamish Releaf project.	Conduct volunteer planting as part of the Sammamish Releaf project.	In Place	Annually	
				Host a booth and distribute information at annual Earth Day events.	Host a booth and distribute information at annual Earth Day events.	In Place	Annually	
				Offer rain barrels and compost bins at Spring Garden Fair at subsidized rates.	Offer rain barrels and compost bins at Spring Garden Fair at subsidized rates.	In Place	Annually	
				Stormwater website	Stormwater website	In Place	Update Quarterly	Recommended Activity.
					Based on the survey results (Element 1.2) emphasize education related to proper vehicle washing.	In Place	Ongoing	The City is already providing some education focused on proper vehicle washing and may want to increase its emphasis with additional educational tools. Refer to Ecology Stormwater Education and Outreach resources for additional guidance.
S5.C.1.b	**1.2 Measure Results of the Educational Activities**	Begin participating in an effort to measure understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area.	Begin By Year 2 (2/15/2009)	Completed community survey in 2009 to determine current stormwater understanding in the community.		Complete	Once	Community survey in 2009 provides a baseline from which the City can measure understanding and behavior changes through follow up surveys.
					Conduct follow up survey to determine effectiveness of education related to proper vehicle washing.	12/31/2011	Once	
S5.C.1.c	**1.3 Maintain Records**	Track and maintain records of public education and outreach activities.	Required to Begin By Year 2 (2/15/2009)		Develop spreadsheet or database system to document all education and outreach activities (numbers of brochures distributed, car wash kits handed out, website visits, etc.)	ASAP (2010)	Ongoing	Demonstrates extent of program and facilitates annual reporting to Ecology. Need to start as soon as possible as due date for beginning this activity has passed.
SWMP Element #2 - Public Involvement and Participation								
S5.C.2.a	**2.1 Input to SWMP**	Create on-going opportunities for public to participate in decision-making processes involving the development, implementation and update of the SWMP.	Year 1 (2/15/2008)	Conducted a citywide survey in 2009 to identify stormwater problems.				The City can get credit for public involvement through watershed committees, stewardship programs, environmental activities or other similar activities (i.e. Sammamish Re-leaf in Element 1.1).
				Planning a public meeting in 2010 and SEPA review as part of this comprehensive stormwater management plan update.	Host annual public meetings or workshops related to stormwater program.	Summer 2010	Annually	
S5.C.2.b	**2.2 Availability of Stormwater Program Documents**	Make the SWMP and the Annual Report available to the public by posting on the City Website.	March 31 Each Year	Posted the 2007 and 2008 Annual Reports and SWMPs on City's website.				
					Post 2009 Annual Report and SWMP on City's website.	3/31/2010	Annually	
					Post 2010 Annual Report and SWMP on City's website.	3/31/2011	Annually	
					Post 2011 Annual Report and SWMP on City's website.	3/31/2012	Annually	
SWMP Element #3 - Illicit Discharge Detection and Elimination								
S5.C.3.a	**3.1 Storm Sewer System Map**	Develop a municipal storm sewer system map of: -All storm sewer outfalls (including tributary areas and land use); -Receiving waters; -Structural stormwater facilities; -Connection points authorized during permit term; -Areas not draining to surface water.	Year 4 (2/15/2011)	Mapping is being reviewed and updated as part of the comprehensive stormwater management plan update.	Finish mapping update.	2/15/2011	Once	
					Update maps with as-built information from new developments and capital projects.	After initial map is complete	Annually	

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
S5.C.3.b	**3.2 Illicit Discharge Ordinance**	Develop and implement an ordinance prohibiting non-stormwater discharge to the MS4. The ordinance should cover: -Potable water flushing; -Lawn and landscape irrigation runoff; -Swimming pool discharges; -Street and sidewalk wash water; -Other non-stormwater discharge. Include enforcement procedures in the ordinance and develop an enforcement strategy.	Year 2.5 (8/15/2009)	Current WMC 14.06 - Water Quality has been in place since 1993 when the City adopted King County Code 8.12 through Ordinance No. 24. In 2003, the City reinforced its commitment to protecting water quality by adopting City Ordinance No. 350, codified in WMC Chapter 1.07, by establishing discharge of contaminants into surface water, stormwater or ground water as a civil violation.	Revise WMC 14.06 to update allowable discharges and conditional discharges. Review WMC 1.07.030 and update as needed to maintain consistency with updated WMC 14.06.	ASAP (2010)	Once	City has missed the due date for this requirement and has submitted a G20 notification to Ecology.
S5.C.3 & S5.C.3.c	**3.3 Detection and Elimination Program**	Develop and implement program to detect and address non-stormwater discharges, including spills and illicit connections.	Permit End (8/19/2011)	Respond to complaints and observed problems and assist the Fire Department with spill clean-up.	Respond to complaints and observed problems and assist the Fire Department with spill clean-up.	In Place	Ongoing	
		Develop procedures for: -Locating priority areas based on land use, previous complaints, and storage practices; -Field assessment during dry weather of outfalls in 3 priority receiving waters; Once a problem is reported or identified: -Characterizing nature and potential threat of illicit discharges; -Tracing the source of illicit discharge; -Notifying property owners; -Removing the source and conducting follow-up inspections.	Variable In time to meet milestone dates for each activity		Identify and prioritize receiving waters for field assessment.	5/1/2010	Once	Procedures need to be developed prior to the first round of field assessments during Summer 2010. Center for Watershed Protection (CWP) has a guidance manual for developing a successful IDDE program. Screening for illicit connections shall be conducted using *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*, Center for Watershed Protection, October 2004 or another methodology of comparable effectiveness.
					Develop procedures for field assessment activities.	5/1/2010	Once	
					Develop procedures for characterizing, tracing and removing sources.	5/1/2010	Once	
		Field Assessments of 3 high priority receiving waters	Year 4 (2/15/2011)		Follow established procedure and conduct field assessments of 3 high priority receiving waters during dry weather.	Summer 2010	Once	Assessments must occur in dry weather prior to 2/15/2011 permit deadline.
		Field Assessments of at least one high priority receiving water	Annually After Year 5 (2/15/2012)		Follow established procedure and conduct field assessment of 1 high priority receiving water during dry weather.	Summer 2011	Once	Assessments must occur in dry weather prior to 2/15/2012 permit deadline.
		Characterization, source tracing and removal	As needed		Characterize, trace, and remove sources of illicit discharges following established procedures.	As needed	As needed	
S5.C.3.d	**3.4 Public Education and Spill Reporting**	Inform public employees, businesses, and general public of hazards associated with illegal discharges.	Permit End (8/19/2011)		Develop and distribute IDDE related educational materials.	Permit End (8/19/2011)	Once	Can be incorporated into overall education program (Element 1.1)
		Publicize a hotline for public reporting of spills and illicit discharges.	Year 2 (2/15/2009)	Spill reporting hotline has been established. City documents and routes complaint calls as received.	Document and route complaint calls as received.	In Place	Ongoing	
		Keep records of calls and follow-up actions taken.	Year 2 (2/15/2009)	City's CSR software tracks customer complaints and City follow-up activity.	City's CSR software tracks customer complaints and City follow-up activity.	In Place	Ongoing	
S5.C.3.e	**3.5 Program Evaluation and Tracking**	Track number and type of illicit discharges, including spills, identified and inspections made.	Permit End (8/19/2011)		Set-up system to track numbers and types of spills identified, inspections made, and outcome of enforcement actions.	5/1/2010	Ongoing	Recommended due date to have program in place prior to Summer 2010 inspections.
		Track feedback from public education efforts.	Permit End (8/19/2011)		Track feedback on IDDE related educational activities.	Permit End (8/19/2011)	Ongoing	Likely to be minimal.
S5.C.3.f	**3.6 Staff Training**	Train responsible staff on illicit discharge identification, investigation, clean-up, and reporting.	Year 2.5 (8/15/2009)		Conduct training for engineering staff responding to IDDE complaints.	Training inititated; complete in 2010	Once with follow-up as needed	City has missed the due date for this requirement and has submitted a G20 notification to Ecology.
		Ongoing training for all municipal field staff on identification and reporting.	Year 3 (2/15/2010)		Conduct training for all maintenance staff on identifying illicit discharges and proper reporting procedures.	Training inititated; complete in 2010	Once with follow-up as needed	
		Document and maintain records of training.	Year 2.5 (8/15/2009)		Develop and implement a tracking system to document staff training.	ASAP (2010)	Ongoing	City has missed the due date for this requirement and has submitted a G20 notification to Ecology.

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
SWMP Element #4 - Controlling Runoff from New Development, Redevelopment, and Construction Sites								
S5.C.4.a	**4.1 Stormwater Runoff Control Ordinance**	Adopt an ordinance to address runoff from new development, redevelopment, and construction site projects disturbing 1 or more acre. The ordinance should include: -Minimum technical requirements equivalent to the 2005 Ecology Manual; -Legal authority for inspection of private facilities; -Provisions to allow LID techniques.	Year 3 (2/16/2010)	WMC 14.09 establishes the surface water runoff policy, adopts the KCSWDM, requires inspection and maintenance of stormwater facilities and includes enforcement authority. WMC 1.03, 1.06 and 1.07 set forth penalties and enforcement procedures. On 2/11/08, The City adopted by rule the 2005 KCSWDM.	Adopt an ordinance to update WMC 14.09 and adopt the 2009 KCSWDM.	ASAP (2010)	Once	City has missed the due date for this requirement and has submitted a G20 notification to Ecology. The 2009 KCSWDM has been deemed equivalent to the 2005 Ecology Manual through permit modification issued 6/17/2009. Note: 2009 KCSWDM requires LID type flow control BMPs to attenuate stormwater runoff volumes on site.
S5.C.4.b	**4.2 Site Plan Review and Inspection**	Develop a permitting process with plan review, inspection, and enforcement for public and private projects that disturb 1 acre of land or greater. -Review all stormwater site plans; -Inspect high risk sites prior to clearing and construction; -Inspect all sites during and after construction; Verify all sites have a maintenance plan in place and maintenance responsibility has been assigned; -Implement an enforcement strategy. Compliance = 80% of scheduled inspections.	Year 3 (2/16/2010)	Community Development receives all applications and forwards plans to appropriate department for review.	Community Development receives all applications and forwards plans to appropriate department for review.	In Place	For each proposed project	
				Civil plans examiner reviews all site plans for both temporary and permanent stormwater control.	Civil plans examiner reviews all site plans for both temporary and permanent stormwater control, verifies maintenance plan is in place and maintenance responsibility has been assigned.	In Place	For each proposed project	
				Civil site inspector performs construction inspections approximately two times per week on active sites.	Civil site inspector performs construction inspections approximately two times per week on active sites.	In Place	2 X/week	Listed frequency based on current City practice. Permit requires one inspection during and one inspection following construction.
S5.C.4.c	**4.3 Long Term Operation and Maintenance**	Adopt an ordinance requiring inspection and maintenance of stormwater facilities and establishing enforcement procedures.	Year 3 (2/16/2010)	WMC 14.09 requires inspection and maintenance of private stormwater facilities and includes enforcement authority. WMC 1.03, 1.06 and 1.07 set forth penalties and enforcement procedures. Inspection and maintenance of public facilities is included in Element 5.	Complete.	In Place	N/A	
		Adopt maintenance standards for facilities consistent with the 2005 Ecology Manual.	Year 3 (2/16/2010)	WMC 14.09 adopts the KCSWDM, which includes maintenance standards.	Update maintenance standards with the City's upcoming adoption of the 2009 KCSWDM.	ASAP (2010)	Once	City has missed the due date for this requirement and has submitted a G20 notification to Ecology.
		Inspect treatment and flow control facilities annually.	Year 3 (2/16/2010)	Contract with King County to annually inspect private stormwater facilities, identify needed repairs and send maintenance requests to facility owners.	Contract with King County to annually inspect private stormwater facilities, identify needed repairs and send maintenance requests to facility owners.	In Place	Annually	
				Begin follow up maintenance enforcement actions with property owners starting in 2009.	Continue follow up maintenance enforcement actions with property owners.	In Place	As needed	
		For new residential developments that are part of a larger common plan of development, inspect new water quality and flow control facilities every 6 months during building construction.	Year 3 (2/16/2010)		Inspect new water quality and flow control facilities every 6 months during building construction.	In Place	Ongoing	
S5.C.4.d	**4.4. Permit Tracking and Inspection Records**	Keep records of all inspections, enforcement actions, maintenance activities, and construction sites.	Year 3 (2/16/2010)	Maintain records of work performed and inspection records from King County.	Develop a permit tracking system to electronically document all inspections, enforcement activities, maintenance activities and construction sites and correlate work to NPDES requirements.	ASAP (2010)	Ongoing	This tracking system relates to development projects; separate from the O&M tracking system described in Element 5.9.
S5.C.4.e	**4.5 NOI for Construction Activity**	Make copies of the "Notice of Intent for Construction Activity" and/or "Notice of Intent for Industrial Activity" available to developers.	Immediately (2/16/2007)	The NOI is discussed in pre-application meetings and Ecology contact information is given to applicants. The NOI is also available at the Development Services counter.	The NOI is discussed in pre-application meetings and Ecology contact information is given to applicants. The NOI is also available at the Development Services counter.	In Place	For each proposed project	

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
S5.C.4.f	**4.6 Staff Training**	Conduct training for staff in permitting, plan review, construction site inspection, and enforcement concerning the Stormwater Runoff Control program (Element 4.1); Maintain records of training.	Year 3 (2/16/2010)	Staff attend training as available.	Identify and attend specific training related to stormwater design and erosion control in the 2009 KCSWDM and the Ecology construction permit.	Following adoption of new manual (2010)	Once	Most training can be conducted in-house or through seminars offered by EPA, King County, and other agencies.
				Two staff will attend CESCL training in 2009.	CESCL training for staff involved in construction site inspections.	As needed	Once for all inspection staff	
					Conduct follow up staff training as needed to address changes in procedures, techniques or staffing.	After initial training	As needed	
					Maintain records of training.	ASAP (2010)	Ongoing	Use tracking system developed in Element 3.6.
SWMP Element #5 - Pollution Prevention and Operation and Maintenance for Municipal Operations								
S5.C.5.a	**5.1 Adopt Maintenance Standards**	Adopt maintenance standards consistent with the 2005 Ecology Manual;	Year 3 (2/16/2010)	Covered under Element 4.3.	Covered under Element 4.3.			
S5.C.5.b	**5.2 Annual Inspections of Water Quality and Flow Control Facilities**	Conduct annual inspections of stormwater treatment and flow control facilities; Perform necessary maintenance actions. Compliance = 95% of scheduled inspections.	Annually Starting in Year 3 (2/15/2010)	Contract with King County to perform annual inspections of public facilities. The County sends the City work orders for maintenance.	Perform annual inspections of public facilities and identify maintenance needs.	In Place	Annually	
				Maintenance crews perform maintenance as needed.	Perform maintenance as identified through inspections: Mowing	In accordance with maintenance standard	3 x /year	Likely frequency. Actual maintenance dependent on condition at inspection.
					Perform maintenance as identified through inspections: Sediment Removal	In accordance with maintenance standard	Once every 5 years	Likely frequency. Actual maintenance dependent on condition at inspection.
					Perform maintenance as identified through inspections: Miscellaneous repairs (flow control structures, fences, etc)	In accordance with maintenance standard	Once every 3 years	Likely frequency. Actual maintenance dependent on condition at inspection.
S5.C.5.c	**5.3 Spot Checks after Storm Events**	Spot check stormwater treatment and flow control facilities after major storm events (>10-year recurrence interval); Conduct repairs as necessary.	After major storm events Starting in Year 3 (2/15/2010)	City conducts spot checks before and after storm events of known problem areas and looks for new problem areas.	Continue inspections of problem areas before and after storm events; maintain or repair as necessary.	In Place	2 x/year	Likely frequency. Actual maintenance dependent on condition at inspection.
S5.C.5.d	**5.4 Catch Basin Inspection**	Inspect all catch basins and inlets at least once during the permit term; Clean catch basins as necessary; Dispose of decant water appropriately.	Permit End (8/19/2011)	City has created a rotating schedule for catch basin inspection and cleaning, starting in 2009.	Continue rotating catch basin inspection and cleaning so that all catch basins are inspected at least once every five years and cleaned in accordance with the City's maintenance standards.	In Place	Update as needed	
				Use a private contractor for catch basin inspection and cleaning on a budgetary basis.	Inspect and clean catch basins in accordance with the City's maintenance standard by the end of the Permit term.	Permit End (8/19/2011)	In accordance with schedule	Actual maintenance dependent on condition at inspection.
					Annual catch basin inspection and cleaning following initial activities.	Future	In accordance with schedule	Actual maintenance dependent on condition at inspection.
				Private contractor disposes of decant water at appropriate decant facility.	Dispose of decant water at appropriate decant facility.	In Place	Ongoing	
S5.C.5.f	**5.5 Road Maintenance**	Implement practices to reduce stormwater impacts from street, parking lot, and highway runoff. Address the following activities: -Pipe and culvert cleaning; -Ditch and roadside vegetation management; -Street cleaning; -Street repair, resurfacing, and striping; -Snow and ice control; -Utility installation; -Dust control.	Year 3 (2/15/2010)	Adopted the ESA Regional Road Maintenance Guidelines in April 2002.	See 10.3.c for additional implementation activities.	See 10.3.c	See 10.3.c	
				Operate street sweeper daily October - January up to 800 hours; increased sweeping for fall leaf pickup and following snow/ice events.	Operate street sweeper daily October - January up to 800 hours; increased sweeping for fall leaf pickup and following snow/ice events.	In Place	800 hours/year	
				Continue use of private contractor for vactor services to clean pipes/culverts.	Clean pipes/culverts in accordance with City's adopted maintenance standard.	In Place	Once every 5 years	Likely frequency. Actual maintenance dependent on condition at inspection.
				Mow roadside ditches as needed for vegetation management.	Mow roadside ditches.	In Place	3 x / year	Likely frequency. Actual maintenance dependent on condition at inspection.
					Minor ditch repair as part of ongoing road maintenance (may include hand ditching, blading, and reseeding).		Once every 3 years	Likely frequency. Actual maintenance dependent on condition at inspection.

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
S5.C.5.g	**5.6 Non-Roadway Property Maintenance**	Implement practices to reduce stormwater impacts from city-owned non-roadway property runoff (parks, open space, right-of-way, and maintenance yards). Address the following: -Application of fertilizer, pesticides, and herbicides; -Sediment and Erosion control; -Landscape maintenance and vegetation disposal; -Trash management; -Building exterior cleaning and maintenance.	Year 3 (2/15/2010)	Working to develop and implement an Integrated Pest Management Plan (See Element 10.3.a).	See 10.3.a for additional implementation activities.	ASAP (2010)	See 10.3.a	City has missed the due date for this requirement and has submitted a G20 notification to Ecology. The Parks Department is responsible for parks maintenance.
					Develop a facilities maintenance manual that includes practices to reduce impacts to stormwater.	ASAP (2010)	Once	City has missed the due date for this requirement and has submitted a G20 notification to Ecology. Facilities Department is responsible for building maintenance and landscaping.
					Implement facilities maintenance practices.	After manual is developed	Ongoing	Facilities Department is responsible for building maintenance and landscaping.
S5.C.5.h	**5.7 Staff Training**	Implement ongoing training activities for construction, maintenance, and operations personnel. Include training on: -O&M standards; -inspection procedures; -selecting appropriate BMPs; -Reducing water quality impact in daily activities; -Reporting of water quality concerns and illicit discharges. Maintain records of training.	Year 3 (2/15/2010)	City staff have attended training on ESA Regional Road Maintenance Guidelines.	Send two staff per year to stormwater related O&M training (i.e. ESA Road Maintenance training or similar).	In place	2 people/year	Recommended training schedule.
					Conduct ongoing training for O&M staff during staff meetings or other regularly scheduled department gatherings.	ASAP (2010)	Bi-monthly	Refresher sessions in staff meetings.
					Maintain records of training.	ASAP (2010)	Ongoing	Use tracking system developed in Element 3.6
S5.C.5.i	**5.8 SWPPP for Maintenance Yards**	Develop and implement Stormwater Pollution Prevention Plans for all equipment maintenance and storage yards not covered under the Industrial Stormwater General Permit. Include an implementation schedule for structural BMPs and conduct occasional visual inspection of discharge from the site.	Year 3 (2/15/2010)		Evaluate City maintenance storage facilities.	Complete	Once	SWPPP is required.
					Develop SWPPP for heavy equipment maintenance or storage yards and material storage facilities.	ASAP (2010)	Once	City has missed the due date for this requirement and has submitted a G20 notification to Ecology.
					Quarterly inspections and repairs as necessary to implement SWPPPs for heavy equipment maintenance or storage yards and material storage facilities.	ASAP (2010)	Quarterly	
S5.C.5.j	**5.9 Record Keeping**	Maintain records of inspection and/or repair activities.	Ongoing	Starting in 2009, began tracking and recording stormwater maintenance activities with an application called Task Tracker.	Continue tracking and recording maintenance activities with the Task Tracker application.	In Place	Ongoing	
SWMP Element #6 - Program Implementation								
S5.A.1	**6.1 SWMP Implementation**	Develop and implement a SWMP that covers the geographic area subject to the permit. Included with Elements 1 through 5.	Permit End (8/19/2011)	Developing SWMP that complies with Permit requirements as part of this comprehensive stormwater management plan update.	Implement, manage and coordinate SWMP activities as described in this comprehensive stormwater management plan update.	See Elements #1-5	See Elements #1-5	Conducting activities in Elements #1-5 meets this requirement.
S5.A.2	**6.2 SWMP Documentation**	Prepare written documentation of the SWMP and issue annual updates with the Annual Report to Ecology.	March 31 Each Year	City has developed and submitted its 2007 and 2008 SWMPs to Ecology.	Complete.	Complete	N/A	
					Develop and submit 2009 SWMP to Ecology	ASAP (2010)	Once	
					Develop and submit 2010 SWMP to Ecology	3/31/2011	Once	
					Develop and submit 2011 SWMP to Ecology	3/31/2012	Once	
S5.A.3	**6.3 Program Tracking**	Track the cost or estimated cost of development and implementation of the SWMP; provide this information to Ecology upon request.	Annually starting in 2009	Use SWM Fund budget to estimate development and implementation costs of the SWMP if information is requested by Ecology.	Use SWM Fund budget to estimate development and implementation costs of the SWMP if information is requested by Ecology.	In Place	As requested by Ecology	
		Track the number of inspections, enforcement actions, and public education activities. Include this information in the Annual Report.	As stipulated by Permit	Tracking of inspections, enforcement actions and public education activities are covered in Elements #1-5.	Tracking of inspections, enforcement actions and public education activities are covered in Elements #1-5.	See Elements #1-5	See Elements #1-5	
S5.B	**6.4 MEP and AKART**	Design the SWMP to reduce discharge of pollutants to the Maximum Extent Practicable (MEP), meet State AKART requirements, and protect water quality.	N/A	WMC focuses on MEP and AKART standards for reducing pollutants.	No specific activities.	Complete	N/A	Conducting activities in Elements #1-5 meets this requirement.

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
SWMP Element #7 - Total Maximum Daily Load Allocations								
S7.A	**7.1 Permit Recognized TMDLs**	Applicable TMDLs are listed in Appendix 2 of the NPDES Permit. None apply to the City of Woodinville at this time.	N/A	No TMDLs apply in this category.	No TMDLs apply in this category.	N/A	N/A	
S7.B	**7.2 TMDLs not Listed in Permit**	Compliance with TMDLs not listed in Appendix 2 of the Permit is achieved by meeting the requirements of the Permit; Keep records and report activities relevant to applicable TMDLs.	N/A	Participate in monitoring efforts for the Little Bear Creek Fecal Coliform TMDL.	Participate in monitoring efforts for the Little Bear Creek Fecal Coliform TMDL.	In Place	See 8.1	The TMDL was approved by EPA on 7/1/05.
				Coordinate with Ecology on the development of the Detailed Implementation Plan for the Little Bear Creek Fecal Coliform TMDL.	Coordinate with Ecology on the development of the Detailed Implementation Plan for the Little Bear Creek Fecal Coliform/Temperature/Dissolved Oxygen TMDL.	TBD	As determined by Ecology	The Detailed Implementation Plan for Little Bear Creek Fecal Coliform TMDL is on hold indefinitely.
S7.C	**7.3 TMDLs Approved during the Permit Cycle**	Comply with future TMDL requirements issued through permit modifications.	N/A	Coordinate with Ecology on the development of the Detailed Implementation Plan for the Bear-Evans Watershed Fecal Coliform/Temperature/Dissolved Oxygen TMDL.	Coordinate with Ecology on the development of the Detailed Implementation Plan for the Bear-Evans Watershed Fecal Coliform/Temperature/Dissolved Oxygen TMDL.	TBD	As determined by Ecology	The Detailed Implementation Plan for the Bear-Evans Watershed Fecal Coliform/Temperature/ Dissolved Oxygen TMDL is expected to be completed by June 2010. City has no formal obligation to comply with TMDL requirements until they are included in the NPDES permit.
SWMP Element #8 - Monitoring								
S8.B	**8.1 Existing Monitoring**	Describe any stormwater monitoring or studies and type of information gathered in annual report; Assess the appropriateness of the BMPs in the SWMP and note any proposed changes.	March 31 Each Year	Collect and report water quality data to Snohomish County for Little Bear Creek, Woodin Creek, and Derby Creek. City contributes funding for King County to monitor Lake Leota.	Collect and report water quality data to Snohomish County for Little Bear Creek, Woodin Creek, and Derby Creek. City contributes funding for King County to monitor Lake Leota.	In place	Monthly	
S8.C.1.a	**8.2 Stormwater Monitoring**	Prepare for future monitoring by selecting 2 outfalls for flow-weighted composite sampling (must meet Ecology requirements). Document site selection, possible constraints, basin description, and water quality concerns in receiving waters.	12/31/2010		Identify two sites for future monitoring. Conduct site visits to verify suitability for permanent installation of sampling equipment. Verify sites are appropriately mapped in outfall database (Element 3.1)	12/31/2010	Once	
S8.C.1.b	**8.3 SWMP Effectiveness Monitoring**	Prepare for future monitoring by identifying 2 questions be studied and selecting monitoring sites. Develop a monitoring plan based on Ecology requirements.	12/31/2010		Identify two questions to be studied and suitable sites for collecting relevant data.	12/31/2010	Once	Consider partnering with other WRIA 8 communities to develop a collaborative monitoring study.
					Develop a monitoring plan for each site.	12/31/2010	Once	
S8.C.2	**8.4 Annual Reporting**	Describe the status of identifying monitoring sites, questions, and developing monitoring plan.	Starting with 2010 Annual Report (3/31/2011)		Include status report on steps taken to prepare for future monitoring with the 2010 Annual Report.	3/31/2011	Once	
					Include status report on steps taken to prepare for future monitoring with the 2011 Annual Report.	3/31/2012	Once	
SWMP Element #9 - Reporting								
S9.A&B	**9.1 Annual Reports**	Submit annual reports each year on the previous year's NPDES Phase II activities. Report includes current SWMP, Annual Report Form (Appendix 3 of Phase II Permit), and applicable supporting documentation.	March 31 Each Year	Developed and submitted the 2007 and 2008 Annual Reports to Ecology.				Complete the annual permit reporting forms supplied by DOE and assemble supporting documentation (use information tracked under Element 9.2).
					Develop and submit 2009 Annual Report to Ecology.	ASAP (2010)	Once	
					Develop and submit 2010 Annual Report to Ecology.	3/31/2011	Once	
					Develop and submit 2011 Annual Report to Ecology.	3/31/2012	Once	
S9.C.2	**9.2 Ongoing Tracking**	To support annual report submittal, maintain records of activities completed and implementation status of each element in Elements 1 through 5. Track progress toward meeting minimum performance measures and plans for meeting future permit deadlines	Ongoing	Tracking some compliance activities as documented in Elements 1-5.	-Track SWM related activities completed by all City departments and correlate activities to NPDES permit requirements. -Document staff hours and expenses to complete activities. -Track progress toward meeting milestones outlined in the permit. -Identify activities that are behind schedule and revise implementation schedule as needed to maintain realistic goals.	March 31 Each Year	Quarterly	
S9.C	**9.3 Maintaining Records**	Maintain records of SWMP and permit activities for five years.	Ongoing	Maintain records of SWMP activities.	Maintain records of annual SWMP activities and archive the records as submitted to Ecology.	In Place	Ongoing	Maintain records in City files for at least five years.
S9.D	**9.4 Public Access**	Make all records of SWMP and permit activities available to the public at reasonable times during business hours.	Ongoing	Make records of SWMP activities available to the public.	Make records of SWMP activities available to the public.	In Place	Ongoing	

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
SWMP Element #10 - Additional Regulations								
	10.1 Underground Injection Control Rule	Comply with Washington State's UIC Rule, as outlined in WAC 173-218. The updated rule went into effect February 3, 2006, and incorporates federal UIC guidelines. Compliance includes registration and assessment of City owned and operated wells, with retrofitting or abandonment as needed, constructed prior to the effective date. Wells constructed after the effective date require registration prior to use and must comply with the nonendangerment standard.	Registration by 2/02/2009 Assessment by 2/02/2011		Complete and submit Ecology registration forms for existing wells constructed prior to 2/02/2006.	ASAP (2010)	Once	The City has missed the deadline for this requirement. Deadline of 2/2/2009 is for 50 wells or less. The City currently owns and operates less than 10 infiltration facilities.
					Assess existing wells constructed prior to 2/02/2006 to evaluate threats to groundwater.	2/2/2011	Once	
					Develop schedule and retrofit existing wells constructed prior to 2/02/2006 identified as a high threat to ground water. Take immediate action to correct the use of wells determined to be an imminent public health hazard.	Immediate if health hazard	Once per well	
					Comply with the non-endangerment standard and register wells constructed after 2/02/2006.	Prior to Use	Once per well	
					Provide updates on changes in status of registered wells.	After 2/2/2009	Annually	
					Notify Ecology of well decommissions.	Within 1 year	Once per well	
					Notify Ecology of well decommissions when the well poses an imminent public health hazard.	Immediately	As needed	
	10.2 Puget Sound Action Agenda	The Puget Sound Partnership's December 2008 Action Agenda identified 5 strategic priorities for restoring and protecting Puget Sound. Priority C.2.2 calls for implementing NPDES municipal stormwater permits, incorporating LID requirements for development and redevelopment into all stormwater codes, and retrofitting existing stormwater facilities for compliance with current standards.	Not Yet Specified	Implementing NPDES municipal stormwater permit (See Elements 1-9) covers many of the Puget Sound Action Agenda objectives.	Implementing NPDES municipal stormwater permit (See Elements 1-9) covers many of the Puget Sound Action Agenda objectives.	Not Yet Specified	Ongoing	Implementation planning is currently underway.
					Incorporate LID requirements for development and redevelopment into City stormwater code.		Once	
					Retrofit existing stormwater facilities for compliance with current standards.		As specified in future guidance document	
	10.3 Endangered Species Act General	Continue compliance with ESA guidelines through individual project review and/or implementation of basin plan activities.	N/A	Comply with ESA guidelines through Individual project reviews.	Comply with ESA guidelines through Individual project reviews.	In Place	Ongoing	
				Annual Sammamish Re-leaf volunteer project.	Continue Sammamish Re-leaf projects and pursue habitat and restoration activities.	N/A	Annually	
					Pursue CIP projects focused on habitat protection and fish passage improvements (see Element 13).	Per approved 6-Yr SWM CIP	Annually	
					Monitor changes and new developments in ESA regulations.	N/A	Ongoing	
	10.3.a Endangered Species Act IPM Plan	Adopt an Integrated Pest Management (IPM) Plan to guide maintenance activities in parks and open space areas. The plan should outline appropriate use of chemicals (fertilizers, pesticides, etc) to reduce impacts to fish habitat.	N/A		Develop IPM Plan.	ASAP (2010)	Once	Recommended due date.
					Implement IPM Plan during landscape and vegetation management activities.	Starting in 2010	Ongoing	Recommended due date; consistent with required due date for Element 5.6 for IPM Plan.
	10.3.b Endangered Species Act Construction Methods	Review existing construction methods for public projects and outline sequencing guidelines to protect fish habitat, consistent with the erosion and sediment control guidelines of the KCSWDM. Train staff on appropriate methods.	N/A		Outline sequencing guidelines for public projects.	2010	Once	Recommended due date.
					Require ESC Plans for both public and private projects that include a sequencing schedule.	Starting in 2010	Ongoing	New activity identified as part of the ESA program analysis.
					Conduct short training with City maintenance staff to ensure understanding of how erosion control and sequencing affect fish habitat.	2010	Annually	Recommended due date.
	10.3.c Endangered Species Act 4(d) Coverage	Apply for 4(d) coverage through WSDOT and the services as part of full adoption of the ESA Road Maintenance Manual.	N/A	City has adopted 4(d) rule ESA Road Maintenance Manual to guide maintenance activities.	Complete and submit application to appropriate agencies.	6/30/2010	Once	Application is the last step in full adoption of the manual and 4(d) rule protection for maintenance activities. Recommended due date.
					Track responses and approval.	9/30/2010	Once	Recommended due date.
	10.4 WRIA 8	Continue involvement with WRIA 8 activities.	N/A	Participates in WRIA 8 activities.	Continue involvement with WRIA activities.	In Place	Ongoing	
			N/A		Look for opportunities to partner with other WRIA agencies to meet program goals (i.e. monitoring program, ESA, etc).	N/A	As available	

Requirements				Existing SWM Program	Future SWM Program			
Permit Ref	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance	Permit Milestone Date	Current Activities	Required Activities, Due Dates and Frequencies	Due Date	Frequency	Comments
SWMP Element #11 - Local Stormwater Activities								
	11.1 Professional Consulting Services	Implement miscellaneous contracts as determined by City Staff to support the SWM Program (includes professional services for SWM program planning, private vactoring, TVing of storm drain lines, etc).	N/A	Identify and administer consulting contracts to support the surface water program.	Identify and administer consulting contracts to support the surface water program.	In Place	Annually	
	11.2 Redmond/ Bear Creek Groundwater Program	Participate in groundwater evaluation program to maintain adequate drinking water source to local communities.	N/A	Participate in groundwater evaluation program.	Participate in groundwater evaluation program.	In Place	Ongoing	
SWMP Element #12 - Program Overhead								
	12.1 Vehicle Use	SWM Fund pays the City's Equipment Rental Fund for annual vehicle use. Equipment Rental Fund then purchases and maintained vehicles.	N/A	Ongoing program cost.	Continue to allocate budget for vehicle use.	Annually	As part of annual budget process	
	12.2 General Fund Payment	Payment to General Fund for overhead services	N/A	Ongoing program cost.	Continue to allocate budget for General Fund Payment.	Annually	As part of annual budget process	
	12.3 General SWM Program Overhead	Includes budgets for Communication, Travel, Advertising, Rentals & Leases, Repairs & Maintenance, and Miscellaneous	N/A	Ongoing program cost.	Continue to allocate budget for SWM Program Overhead.	Annually	As part of annual budget process	
	12.4 Supplies	Includes office supplies as well as safety gear, software, signage, small tools, and miscellaneous maintenance and planting supplies.	N/A	Ongoing program cost.	Continue to allocate budget for Supplies.	Annually	As part of annual budget process	
SWMP Element #13 - Capital Projects								
	13.1 Surface Water Reserve Projects	City's SWM budget pays into the surface Water Capital Projects Budget to fund CIP projects. The fund pays for both construction and engineering costs.	Ongoing	Approved expenditures in the 2009 Budget include: - Sammamish River Outfall - Comprehensive SWM Plan Update	Transfer funds from Surface Water Management fund to the Surface Water Reserve fund to support implementation of the 6-Yr SWM CIP being developed as part of this comprehensive stormwater plan update.	Annually	As part of annual budget process	
SWMP Element #14 - Maintenance Yard and Equipment								
	14.1 Capital Outlay (Equipment)	Budget for SWM contribution to equipment purchases.	N/A	The 2009/2010 Budget includes purchase of a video camera in 2009 for pipe inspections.	Allocate budget for needed equipment purchases.	Annually	As part of annual budget process	
	14.2 Maintenance Yard Construction	Construct a new maintenance yard for storing equipment and resources needed for operations of city-owned infrastructure.	N/A	The 2009/2010 Budget allocates resources in 2009 and 2010 towards the Public Works Maintenance Yard.	Transfer funds from the Surface Water Management Fund to the Surface Water Reserve Fund to support construction of the Public Works Maintenance Yard.	As Needed	As part of annual budget process	

Notes:
- Activities are based on the *Western Washington Phase II Municipal Stormwater Permit* , issued January 17, 2007 and modified June 17, 2009.
- The permit effective dates are February 16, 2007 through February 15, 2012 and permit years run from February to February.
- "Permit End" means 180 days prior to the expiration date of the permit (8/19/2011)
- "2005 Ecology Manual" refers to the Washington State Department of Ecology's 2005 *Stormwater Management Manual for Western Washington*.
- Monitoring requirements vary based on City or County population. Guidelines listed here are for small cities (population between 10,000 and 25,000).
- Activities in Program Elements 11-14 are not required by the NPDES Phase II permit, but are the management, planning, administrative and capital project activities needed to run a successful program.

Due in 2010
Due in 2011
Due in 2012