

2021 STORMWATER MANAGEMENT PROGRAM PLAN

City of Woodinville

March 2021

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INTRODUCTION

STORMWATER MANAGEMENT PROGRAM PLAN

This document represents the City of Woodinville 2021 Stormwater Management Program (SWMP) Plan. This plan has been developed as a requirement of the Western Washington Phase II Municipal Stormwater Permit (Phase II Permit) for written documentation of the City of Woodinville's SWMP. The purpose of the SWMP Plan is to inform the public of SWMP activities planned for the upcoming calendar year to maintain compliance with conditions outlined in the Phase II Permit.

The SWMP Plan shall be updated at least annually and submitted with the City's annual reports to the Department of Ecology (Ecology) by March 31. The plan is organized according to the required program components of the SWMP, and outlines planned stormwater management activities for the year 2021. The SWMP Plan is organized according to the required program components of the SWMP, and outlines planned stormwater management activities for the year 2021. The components of the SWMP are as follows:

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

The SWMP Plan includes additional actions the City will carry out to comply with applicable Phase II Permit requirements under Special Condition S7 for Compliance with Total Maximum Daily Load (TMDL) Requirements and actions to meet the requirements of Special Condition S8 for Monitoring and Assessment. The City is served by a Municipal Separate Storm Sewer System (MS4) within the TMDL coverage area for the Little Bear Creek Fecal Coliform Water Quality Improvement Project. Additional compliance requirements for the City under this TMDL are outlined in the Phase II Permit Appendix 2. A portion of the City is within the TMDL boundaries for the Bear Evans Watershed Bacteria TMDL and Bear Evans Watershed Temperature and DO TMDL as well as the multi-parameter TMDL in development for the Sammamish River and tributaries. The City does not have any additional requirements for these TMDLs at this time.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The National Pollutant Discharge Elimination System (NPDES) program was created under the Clean Water Act to regulate point sources that discharge pollutants to waters of the United States. The Environmental Protection Agency (EPA) authorizes state governments to perform many permitting, administrative, and enforcement aspects of the NPDES permit program. The Department of Ecology (Ecology) has the authority to develop and administer NPDES permits in the state of Washington. There are four types of municipal stormwater general permits in Washington to regulate discharges from municipal stormwater systems depending on different sizes of populations and different regions of the state. Phase I refers to municipalities with a population of greater than 100,000, and Phase II to those with a population of less than 100,000

according to the 1990 census. The Phase II Municipal Stormwater Permits regulate discharges from "small" MS4s in Washington. There are two Phase II Permits, the Eastern Washington Phase II Municipal Stormwater Permit and the Western Washington Phase II Municipal Stormwater Permit. The City of Woodinville is regulated under the Western Washington Phase II Municipal Stormwater Permit (Phase II Permit).

The original Phase II Permit was valid for 5 years, from February 17, 2007 to February 15, 2012, and allowed for phased implementation of stormwater management programs and actions. In 2012, Ecology reissued this Permit and extended the schedule to July 31, 2013 with no new permit conditions. The second Permit became effective on August 1, 2012 and was modified on January 16, 2015. It was originally effective until July 31, 2018 and was extended until July 31, 2019. It required continued compliance with the substantial conditions of the previous Permit. It also allowed for phased implementation of new requirements over the permit cycle. The current Permit became effective on August 1, 2019 and is set to expire July 31, 2024. As with past Permits, it requires continued compliance with the established substantial conditions and allows for phased implementation of new requirements.

The full text of the Phase II Permit is available on the Department of Ecology's website:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>

ADDITIONAL ACTIVITIES

Compliance with the Permit requires coordination and documentation of activities by several City departments. The Public Works Department coordinates regularly with the Development Services Department and will meet with staff from other departments regularly to verify that current and planned activities meet Permit requirements. Activities required for Permit compliance will be carried out by the Public Works, Development Services, Administrative Services, and Executive Departments. Ongoing support is provided by the Police Department (code enforcement), Fire Department (code enforcement and permitting review), Executive Department (volunteer coordination, City Manager), and Administrative Services (Stormwater Utility billing, records retention).

This SWMP Plan details actions and activities that fall under the requirements of the Phase II Permit. Stormwater management is one part of the City's overall surface water management (SWM) strategy as coordinated by the SWM utility services. The City undertook a SWM Utility Rate Study in 2020. Based on the recommendation of this Study, the City Council approved an increase in the City's SWM utility fee effective 2021 to cover the expenses for the operation, maintenance, and capital utility service needs. This utility supports capital projects and programs that reduce flooding, protect and improve water quality, and protect and restore aquatic habitat in the City's creeks, the Sammamish River, and Lake Leota.

The City is a member of the WRIA 8 Salmon Recovery Council and has projects planned to improve fish passage within City waterways.

The City anticipates updating the Comprehensive Stormwater Management Plan (CSWMP) in 2021. The current CSWMP was prepared in 2010. CSWMP sets priorities and recommends project programs and rates to support the utility over the next 5-10 years. The update is anticipated to include public involvement in the form of virtual open houses and web information. In addition to CSWMP, the City will also be preparing the Stormwater Management Action Plan (SMAP) in 2021 as required by the Permit.

PROGRAM CONSIDERATIONS DURING COVID-19

The City has been following the public health guidance provided by King County Public Health, Washington State Public Health, and the Governor's orders for phased re-opening. Services offered at City Hall are limited and the facility is closed to the general public. The functioning of the stormwater system has been deemed essential and compliance with the permit is expected to remain on track. Most office-based staff have been working remotely and additional safety measures have been put in place to protect field staff.

The City expects to continue to conduct program meetings and training virtually. This will likely include the opportunities for public involvement in the development of the CSWMP and SMAP. The City hopes this increases the opportunity for more people to engage in the decision-making process by eliminating the barrier of travel. Most City staff, including the City's Surface Water Program Coordinator, remain reachable for program input by direct line or email.

The City anticipates the ability to provide stewardship opportunities for limited in-person volunteers in Fall 2021.

STORMWATER MANAGEMENT PROGRAM

STORMWATER PLANNING

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of the program.**

The City organized an inter-disciplinary team to inform and assist in the development, progress, and influence of the Stormwater Planning program. The team includes members from the Public Works Engineering and Development Services Departments. Additional members may be included as necessary depending on the scope of tasks for program development.

- **Coordination with long-range plan updates.**

The City's inter-disciplinary team will describe how stormwater management needs and protection or improvement of receiving water health are informing the planning update processes and influencing policies and implementation strategies through responses to a series of Stormwater Planning Annual Report questions. These responses are due on March 31, 2021 to Ecology and would describe how stormwater impacts on water quality were addressed during the 2013-2019 permit term. A similar report is due on January 1, 2023 responding to the same questions to describe how water quality is being addressed during this permit term.

- **Low impact development (LID) code-related requirements.**

The City continues to make effective local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID Best Management Practices (BMPs). City staff will annually assess administrative or regulatory barriers to implement LID Principles or LID BMPs and document any newly identified barriers.

- **Stormwater Management Action Planning (SMAP).**

- Document and assess existing information related to local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management planning. Prepare a watershed inventory and brief description of relative conditions.
- Develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of tailored stormwater management planning actions. Document the ranking process and receiving water prioritization.
- Develop SMAP for at least one high priority catchment area.

The City will begin Stormwater Management Action Planning and SMAP development in early 2021 as part of the update to the CSWMP. The City has selected a qualified consulting firm to achieve Stormwater Management Action Planning and develop the SMAP. The City will provide opportunities for public involvement and stakeholder engagement throughout the SMAP development process and host virtual open houses where applicable.

PUBLIC EDUCATION AND OUTREACH

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

The City participates in the regional groups Stormwater Outreach for Regional Municipalities (STORM), Stormwater Outreach Group (SOGgies), and the Dumpster Outreach Group (DOG) and implements adopted elements of regional programs locally where applicable. The City participates in Puget Sound Starts Here and builds awareness with target audiences on how storm drains in the City impact the Sammamish River, Lake Washington, and Puget Sound.

- **Build general awareness about methods to address and reduce impacts from stormwater runoff. Select, at a minimum, one target audience and one subject area to build general awareness from.**

The City will continue to build general awareness about methods to address and reduce impacts from stormwater runoff through education and outreach programs. The City has selected the general public (including overburdened communities, or school age children) and businesses as a target audience and the general impacts of stormwater on surface waters, including impacts from impervious surfaces. The City will build general awareness through these programs and methods:

- Articles for a variety of stormwater topics in the City's monthly newsletter, the Woodinville Wire.
 - A standalone Stormwater Management page on the City's website and social app, Engage Woodinville with information about pollution prevention ideas and activities, and other general awareness topics.
 - Promote webinars hosted by the King Conservation District to encourage residents to participate in stewardship activities (stream property stewardship, natural yard care, native planting).
 - Stocking and maintaining pet waste stations with educational signage at City Hall and City parks.
 - Build general awareness with businesses as a target audience and the general impacts of stormwater on surface waters, including impacts from impervious surfaces through mailers and technical assistance.
 - Distribute information about pollution prevention to wineries prior to crush and bottling times. Information is distributed through Woodinville Wine Country.
 - The City is partnering with the Snohomish Conservation District to install a rain garden at the Public Works Maintenance Facility and build general awareness with the public on LID Principles and BMPs.
- **Affect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Select, at a minimum, one target audience and one BMP.**
 - Conduct a new evaluation of the effectiveness of an ongoing behavior change campaign. Document lessons learned and recommendations to either more effectively implement the existing campaign, expand the existing campaign to a new target audience, or develop a strategy and schedule for a new target audience and BMP behavior change campaign.
 - Based on the recommendation, follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan.

- Begin implementing the strategy developed no later than April 1, 2021.
- No later than March 31, 2024, evaluate and report on the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.

The City evaluated the effectiveness of an ongoing behavior change campaign in 2020. Based on this evaluation, the City will be following social marketing practices to develop and implement a new target audience and BMP behavior change campaign. The City has been an active partner jurisdiction in the planning effort for a regional dumpster management behavior change campaign. City staff participated in the Dumpster Summit, which was four half-day workshops. The City completed intercept surveys to identify audience barriers, benefits, motivators, and influential others between the first and second halves of the Dumpster Summit. The City also provided additional follow-up information on audience profile once closing lids at commercial properties was selected as the focus of the Dumpster Outreach Group. The City participated in the Toolkit Survey to help the planning team develop communications elements. The strategy and schedule for the dumpster management behavior change campaign was developed by February 1, 2021 and the City will select two businesses to participate in the pilot phase to begin implementing the campaign by April 1, 2021.

- **Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.**

The City will continue to provide and advertise stewardship opportunities and partner with existing organizations to encourage residents to participate in activities or events planned and organized within the community.

- The City promotes storm drain marking. The City provides materials to mark private storm drains and helps community members and businesses mark storm drains with “Puget Sound Starts Here” markers.
- Provides and advertises an annual Arbor Day tree planting event.
- The City applied for a WaterWorks grant to develop educational materials and provide stewardship opportunities to reduce impacts from stormwater runoff in Lake Leota.

PUBLIC INVOLVEMENT AND PARTICIPATION

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the SMAP and SWMP.**

The City will solicit SWMP feedback through the City newsletter and Engage Woodinville. The City will encourage public comments and engagement in City Council meetings during the CSWMP and SMAP development processes. The City will host virtual open houses during the SMAP process for stakeholder engagement.

- **Post the SWMP Plan and the annual report to City website no later than May 31 of each year.**

The City will post the SWMP Plan and annual report to the City website and Engage Woodinville with feedback survey by May 31, 2021.

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) MAPPING AND DOCUMENTATION

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Maintain ongoing mapping for the following features:**

The City maintains mapping of the municipal stormwater system electronically through Geographic Information System (GIS) data. Mapped features include but are not limited to known outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned or operated by the City, geographic areas served by the MS4 that do not discharge stormwater to surface waters, tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, connections between the MS4 owned or operated by the City and other municipalities or public entities, all connections to the MS4 authorized or allowed by the City after February 16, 2007. Maps are updated to reflect records drawings from new and redevelopment and verifications in the field from inspections.

- **New mapping.**

The City has continued to collect and verify size and material for all known MS4 outfalls and update records accordingly.

- **No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards.**

The City uses GIS-based electronic mapping which includes attributes of the municipal stormwater system.

- **To the extent consistent with national security laws and directives, make available to Ecology, upon request, available maps depicting the information required above.**

The City will make maps available to Ecology, upon request, depicting the information required above.

- **Upon request, and to the extent appropriate, provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees.**

The City has created an interactive GIS map which is available to Ecology and federally recognized Indian Tribes, municipalities, and other Permittees. The City anticipates maintaining a publicly accessible interactive GIS map as part of the City website update occurring in 2021.

ILLCIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

The City implements an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. The program includes:

- **Procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.**

The City will continue the ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. The City responds to and investigates calls and reports of spills, illicit discharges, illicit connections, dumping, and other environmental concerns. The City responds immediately to all illicit discharges which constitute a threat to human health, welfare, or the environment and typically investigates reports or calls of illicit discharges the day of reporting.

- **Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.**

The City informs public employees of hazards associated with illicit discharges and improper disposal of waste through internal/in-house illicit discharge training. The City informs businesses and the general public about these hazards through mailers, the Engage Woodinville website, and the City's newsletter.

- **Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.**

The City will implement and enforce Woodinville Municipal Code (WMC) Chapter 13.04.030 titled Prohibited discharges to effectively prohibit non-stormwater, illicit discharges into the MS4 and update when needed. Code enforcement is carried out in accordance with WMC Chapter 1.06.

- **Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. The program shall include the following components:**
 - Procedures for conducting investigations of the Permittee's MS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections. The Permittee shall implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Screening for illicit connections may be conducted using Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2013), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report.

The City will update IDDE Program documents and Standard Operating Procedures for IDDE: Field Screening and Conducting Investigations, as necessary. The City uses outfall inspections as the primary field screening methodology.

- Complete field screening for an average of 12% of the MS4 each year.

The City will implement a field screening methodology and screen an average of at least 12% of the MS4 annually. The City has been screening approximately 80% of the MS4 annually through outfall inspections.

- A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.

The City publicly lists and publicize hotline at 425-489-2700 for public reporting of spills and other illicit discharges. The City also implements “Woodinville Works”, the City’s version of the citizen request and work management software SeeClickFix, for the public to report environmental pollution.



- An ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.

The City has an annual training program for all Public Works field staff that might come into contact with or observe an illicit discharge or illicit connection to the MS4, on identifying, reporting, and responding to an illicit discharge and/or connection.

- **Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the MS4.**

The City has an IDDE Program document and Standard Operating Procedure for IDDE Field Screening and Conducting Investigations. These documents have procedures for characterizing illicit discharges, tracing illicit discharges and connections, and eliminating discharges. The City’s goal is to eliminate illicit discharges and improve source control through technical assistance and education but has methods for code enforcement to escalate elimination compliance when necessary. The City will meet the following timelines:

- Respond immediately to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment.
- Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports, or monitoring information that indicates a potential illicit discharge.
- Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.
- Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

- **Train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities.**

In addition to annual training, staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections receive additional training to conduct these activities. The City participates in IDDE-related training provided by the Regional Operations and Maintenance Program (ROADMAP) and Herrera on the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual when available.

- **Recordkeeping: Track and maintain records of the activities conducted to meet the requirements of this section. In the Annual Report, submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the City during the previous calendar year. The data shall include the information specified in Appendix 12 and WQWebIDDE.**

The City uses WQWebIDDE and the information specified in the Phase II Permit Appendix 12 to track and maintain records of IDDE activities conducted to meet the requirements of this section.

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.**

The City maintains Woodinville Municipal Code (WMC) Chapter 15.05 titled Site Development Regulations and Chapter 13.05 titled Stormwater Runoff and Surface Water and Erosion Control that addresses runoff from new development, redevelopment, and construction site projects. WMC Chapter 1.06 titled Code Enforcement has been updated to include enforcement mechanisms to address violations of these requirements.

The City has adopted the 2016 King County Surface Water Design Manual and plans to adopt King County's revised manual once complete.

- **The program shall include a permitting process with site plan review, inspection and enforcement capability. Records of maintenance inspections and maintenance activities shall be maintained.**

The City will maintain the ongoing permitting program with site plan reviews, inspections, and enforcement actions when necessary. The City maintains records of maintenance inspections and maintenance activities in the permit planning software Accela.

- **The program shall make available, as applicable, the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment. Continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.**

The City will continue to provide the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.

- **Ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities.**

Staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites complete Certified Erosion and Sediment Control Lead (CESCL) training and maintain certification. The City plans to enroll a new engineering staff member in CESCL certification in 2021.

Staff attend site plan review training led by Ecology and attend other training opportunities where necessary and applicable.

OPERATIONS AND MAINTENANCE (O&M)

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology. For facilities which do not have maintenance standards, the City shall develop a maintenance standard.**

The City has adopted and continues to implement maintenance standards outlined in the 2016 King County Surface Water Design Manual, which is a Phase I program approved by Ecology. The City implements the maintenance standards and schedule provided by Contech for Filterra facilities and StormFilters.

- **Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, the City shall perform maintenance:**
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000.

Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, the City will perform maintenance within the timelines outlined above.

- **Maintenance of stormwater facilities regulated by the City.**

The City adds provisions to plats to allow for access and permission to inspect stormwater facilities to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed.

The City annually inspects stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the City since 2010. The City will continue to achieve a minimum of 80% of required inspections.

- **Maintenance of stormwater facilities owned or operated by the City.**

The City annually inspects all municipally owned or operated stormwater treatment and flow control BMPs/facilities and takes appropriate maintenance actions in accordance with the adopted maintenance standards. The City will continue to achieve a minimum of 95% of required inspections.

The City spot checks potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events and inspects all potentially damaged facilities if widespread damage is present. The City takes appropriate maintenance action based on the results of the inspections.

The City inspects all catch basins and inlets owned or operated by the City every two years and cleans catch basins if the inspection indicates cleaning is needed to comply with maintenance standards.

- **Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee.**

The City implements practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities.

Woodinville will document these practices, policies, and procedures no later than December 31, 2022. The City follows procedures and best management practices outlined in the 2016 King County Surface Water Design Manual, King County Stormwater Pollution Prevention Manual, and Woodinville specific plans such as the Transportation Infrastructure Standards and Specifications.

- **Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.**

The City's Public Works engineering and maintenance staff whose primary construction, operations, or maintenance job functions may impact stormwater quality receive training to minimize impacts to stormwater quality. Staff complete CESCL training and Integrated Pest Management and Public Operator License recertification classes.

- **Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City.**

The City implements a SWPPP for the City's Public Works Maintenance Facility. The SWPPP includes detailed descriptions of the operational and structural BMPs in use, inspection schedule and results, an inventory of materials and equipment stored on-site, a list of activities conducted that may be exposed to rain, a map of the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure, and a plan for responding to spills. The City will update this SWPPP no later than December 31, 2022 to correspond with the planned facility expansion.

- **Maintain records of the activities conducted to meet the requirements of this section.**

The City will continue to track and maintain records of O&M activities and summarize these activities in the Annual Report.

SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include:**

- Adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities by August 1, 2022.

The City will begin the process to adopt an ordinance or other enforceable documents requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities in 2021 for it to be effective by August 1, 2022.

- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4 by August 1, 2022.

The City has developed a draft inventory of sites that have the potential to generate pollutants through the Department of Revenue business licensing data, internal business licensing data, King County parcel data, Google Maps, City GIS data, NAICS codes, and locations identified through complaints, spills, or illicit discharges.

- Implement an inspection program for sites identified by January 1, 2023.

The City will continue developing the Source Control Program in preparation for implementing the program by January 1, 2023.

- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified by January 1, 2023.

The City will begin developing informational materials about activities that may generate pollutants and the source control requirements applicable to those activities.

- Train staff who are responsible for implementing the source control program to conduct these activities by January 1, 2023.

The City will train all staff responsible for implementing the program. Training topics will include the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures.

COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

WRIA 8 - LITTLE BEAR CREEK FECAL COLIFORM WATER QUALITY IMPROVEMENT PROJECT

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- **The City shall screen for bacteria sources when conducting IDDE related field screening under S5.C.5 of the Permit, in any MS4 sub-basins which discharge to surface waters in the TMDL area. Implement associated schedules and activities in S5.C.5 in response to any illicit discharges found.**

The City will continue to screen for bacteria sources when conducting IDDE-related field screening in any sub-basins which discharge to surface waters in the TMDL area. The City follows field screening methodologies outlined in the Herrera Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual and field staff are trained to identify bacterial sources of illicit discharges and what the bacteria threshold levels are during annual IDDE training.

The City will continue to conduct regular water quality monitoring and fecal coliform bacteria level testing at two locations in Little Bear Creek.

- **Confirm that pet waste collection stations are installed and maintained in all public lands/parks adjacent to Little Bear Creek.**

Pet waste collection stations are installed at the public Rotary Park adjacent to Little Bear Creek. City staff will continue to check the stations daily or weekly, depending on park usage, and maintain stations as necessary.

MONITORING AND ASSESSMENT

PLANNED ACTIVITIES FOR PERMIT REQUIREMENTS

- Regional Status and Trends Monitoring
- Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies

The City submitted a written notification to Ecology of the selection to pay into the collective funds for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies. The City will pay \$1,929 into the collective fund for Regional Status and Trends Monitoring and \$3,525 into the collective fund for SWMP Effectiveness and Source Identification Studies in 2021.