



# 2025 Stormwater Management Program (SWMP) Plan



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*March 12, 2025*

*Prepared by*

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# Executive Summary

The City of Snoqualmie (City) has obtained coverage under the National Pollution Discharge Elimination System (NPDES) Phase II Municipal Stormwater Permit (Phase II permit) issued by the Washington State Department of Ecology (Ecology). The Phase II permit is a federal requirement under the Clean Water Act that regulates the discharge of stormwater to surface waters and to ground waters of the State.

The permit authorizes the discharge of Stormwater runoff from municipal drainage systems into the state's surface waters (i.e., streams, rivers, lakes, wetlands, etc.) and groundwater, as long as the City implements permit-specified "best management practices" (BMPs). These BMPs are intended to protect water quality and reduce the discharge of "non-point source" pollutants to the "maximum extent practicable" (MEP). In addition, BMPs are intended to meet state AKART (all known, available, and reasonable methods of prevention, control, and treatment) waste discharge requirements.

The BMPs specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP or Program) and grouped under the following Program components:

The 2024–2029 Phase II permit, which became effective on August 1, 2024, requires all permitted municipalities to create and implement a SWMP, which address nine required program elements. These elements include:

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

This is a required plan whose purpose is to simplify and educate staff and the public about the City's Phase II permit requirement in eight required program categories for the 2024–2029 Phase II permit. In addition, this SWMP Plan also addresses requirements in S7, S8, and S9 of the Phase II permit which cover:

- Compliance with Total Maximum Daily Load (TMDL) Requirements (Section S7)
- Monitoring and Assessment (Section S8)
- Reporting and Recordkeeping Requirements (Section S9)

Permit conditions are phased in over a 5-year permit term. The current permit term is from August 2024 through July 2029. The permit requires the City to report annually (March 31 of each year) on the City of Snoqualmie's progress toward program implementation and compliance for the prior year. Ecology revises and reissues the permit at the end of the permit term.

Ultimately, this SWMP Plan outlines all the requirements of the Phase II permit and provides a summary of the City's progress towards meeting those requirements.

## The Goal

The goal of this SWMP Plan is to reduce the discharge of pollutants from the City's Municipal Separate Storm Sewer System (MS4) to the maximum extent practicable to protect water quality.

## Summary of 2024–2029 Phase II Permit Requirements

- **July 1, 2025:** Develop a social marketing campaign tailored to the community based on recommendations from the 2024 evaluation and report (S5.C.2.a.ii.(b)).
- **September 1, 2025:** Begin implementing the social marketing campaign (S5.C.2.a.ii.(c)).
- **March 31, 2026:**
  - Submit locations of all known municipal storm sewer system (MS4) outfalls (S5.C.4.b.i).
  - Develop and implement methodology to identify tree canopy to support stormwater management on City-owned or operated properties (S5.C.4.b.ii)
- **December 31, 2026:** Document specific outreach methods used to identify overburdened communities (S5.C.3.a.ii).
- **December 31, 2026:** Coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when per- and polyfluoroalkyl substances (PFAS)-containing aqueous film-forming foams (AFFFs) are used during emergency firefighting activities (S5.C.5.e.ii.(a)).
- **January 1, 2027:** Implement updated procedures for post-emergency clean up of firefighting activities when PFAS-containing AFFFs are used (S5.C.5.e.ii.(b)).
- **March 31, 2027:** Include the following with the 2027 Annual Report submittal:
  - Average annual costs (or estimates) to implement the SWMP (S5.A.3.a).
  - Description of coordination with long-range plan updates (S5.C.1.b.i).
  - SMAP for at least one new high priority high catchment area or additional actions for an existing SMAP (S5.C.1.d.i).
- **May 31, 2027:** Post SWMP Plan and the Annual Report on the City website (S5.C.3.b).



- **June 30, 2027:** Update ordinance to adopt updated stormwater design manual (S5.C.6.a and S5.C.9.a).
- **July 1, 2027:**
  - Update illicit discharge ordinance (S5.C.5.c).
  - Develop and implement a municipal street sweeping program (S5.C.9.e).
- **August 1, 2027:** Update and make effective the source control ordinance(s), or other enforceable documents (S5.C.8.a).
- **December 31, 2027:** Update standard operating procedures (SOPs) to address polychlorinated biphenyls (PCBs) in City-owned buildings (S5.C.9.d).
- **March 31, 2028:**
  - Map and access acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the City. Estimate areas managed by stormwater treatment and flow control BMPs/facilities. (S5.C.4.b.iii).
  - Fully fund, start construction, or completely implement projects that meet the assigned equivalent acreage for the Stormwater Management Program for Existing Development in Appendix 12 of the Phase II Permit (S5.C.7.c).
  - Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Phase II permit term (e.g., 2029–2032) (S5.C.7.e).
- **December 31, 2028:**
  - Adopt and implement tree canopy goals and policies to support stormwater management (S5.C.1.b.iii).
  - Map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on City-owned or operated properties (S5.4.b.iv).
- **March 31, 2029:** Submit behavior change campaign evaluation report (S5.C.2.a.ii.(d))
- **General Ongoing Requirements:**
  - Coordinate stormwater management activities for shared water bodies or watersheds to avoid conflicting plans, policies, and regulations (S5.A.5.a.ii).
  - Continue to convene an inter-disciplinary team to inform and assist in the implementation of stormwater planning policies and strategies (S5.C.1.a).
  - Continue to assess and document any newly identified administrative or regulatory barriers to implementation of LID principles and LID BMPs and the measures developed to address the barriers (S5.C.1.c.i.(a)).
  - Ongoing implementation of education and outreach program elements (S5.C.2.a.ii).

- Provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community (S5.C.2.a.iii).
- Create opportunities for the public, including overburdened communities, to participate in the SWMP Plan updates and SMAP development (S5.C.3.a).
- Post SWMP Plan and the Annual Report on the City website each year (S5.C.3.b).
- Maintain mapping data (S5.C.4.a).
- Continue an ongoing program designed to prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4 (S5.C.5.a).
- Ongoing staff training (S5.C.5, S5.C.6, S5.C.8, and S5.C.9).
- Ongoing response to spill and illicit discharge hotline calls (S5.C.5.d.ii).
- Track additional information related to illicit discharges and report this information to Ecology through the WQWebIDDE system (S5.C.5.g).
- Implement and enforce program to reduce pollutants in runoff (S5.C.6)
- Implement a program to control or reduce stormwater discharges to waters of the State from areas of existing development (S5.C.7)
- Implement a source control program to prevent and reduce pollutants in runoff from areas of existing development that discharge to the MS4. This program shall include application of source control BMPs, inspections, and enforcement (S5.C.8).
- Inspect privately owned stormwater BMPs/facilities (S5.C.9.b)
- Inspect and maintain City-owned and operated stormwater BMPs/facilities (S5.C.9.c.i)
- Inspect and, if needed, clean all catch basins and inlets owned or operated by the City at least once every 2 years (S5.C.9.c.iii).
- Implement practices, policies, and procedures to reduce stormwater impacts from City-owned properties (S5.C.9.d)
- Implement and update SWPPPs as needed (S5.C.9.f)

## 2024 Summary Highlights

### Stormwater Planning

### Public Education

- Offered 12 planting events in 2024 through the Green Snoqualmie Partnership. A total of 644 volunteer hours were recorded at these planting events.

- Participated in Snoqualmie Days (formerly known as Railroad Days) and offered a Virtual Citizens Academy to promote the spill hotline, pet waste clean up, illicit discharge prevention, and regional websites.

## Public Participation

- Posted the 2025 SWMP Plan and the 2024 Annual Report on the City's website.

## Illicit Discharge Detection and Elimination (IDDE)

- Ongoing mapping updates.
- Ongoing field screening of catch basins for illicit discharges.
- The spill reporting hotline was publicized on the City's website, City newsletter, decals on City equipment, and during the virtual Citizens Academy.

## Controlling Runoff from Development and Construction

- Ensured compliance with the 2021 King County Surface Water Design Manual and Snoqualmie Addendum.
- Conducted permitting and plan review for new development and redevelopment.

## Operations and Maintenance

- Conducted annual inspections of 40 stormwater ponds, 15 swales, 3 Stormceptors, and 4 filter cartridge vaults. Performed maintenance on 37 facilities in 2024.
- Inspected 1,522 catch basins and cleaned 406 catch basins in 2024.
- Attended Certified Stormwater Inspection Trainings provided by the NPDES National Stormwater Center

## Source Control Program for Existing Development

- Performed 27 source control inspections, including 2 follow-up inspections.
- Identified 2 enforcement actions to be performed during the source control inspections.
- Trained all new stormwater staff on source control inspection.
- Distributed relevant education and outreach materials to all businesses that were inspected.



# 1. Introduction

## Purpose

This document was prepared to meet the City of Snoqualmie's (City) requirement for development of a Stormwater Management Program (SWMP) Plan as required under condition S5 of the National Pollution Discharge Elimination System (NPDES) Phase II Municipal Stormwater Permit (Phase II permit).

This SWMP Plan outlines the requirements in the Phase II permit and summarizes the City's work program for the upcoming calendar year, January 1, 2025, through July 31, 2025.

The SWMP Plan must include a written description of department coordination mechanisms to eliminate permit barriers, and opportunities for public participation in the SWMP Plan development and decision-making process, which were required starting August 1, 2014.

The City must post the SWMP Plan to its website, and the annual report required under S9.A, no later than May 31 each year.

## The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) program was created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes and streams so that they can support "beneficial uses" such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface waters regulated by the Federal Government (Waters of the U.S.) must obtain permits and comply with certain conditions or face fines and other penalties.

In Washington State, the United States Environmental Protection Agency has delegated the authority over NPDES permits to the Washington State Department of Ecology (Ecology). Ecology has issued several general permits for stormwater system discharges that apply to municipalities with different population sizes. The Phase II permit refers to those municipalities with a population of less than 100,000 according to the 1990 census.

## Phase II Permit

The City has a current estimated population of 14,121 and must comply with the Phase II permit as issued by Ecology. The current Phase II permit is set to expire on July 31, 2029, but the permit reissuance process is underway. This permit allows cities, counties, and secondary permittees to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes, and streams, as long as they implement programs to reduce stormwater pollutants to the “maximum extent possible” by conducting activities in the following program areas:

- S5.C.1: Stormwater Planning
- S5.C.2: Public Education and Outreach
- S5.C.3: Public Involvement and Participation
- S5.C.4: Municipal Separate Storm Sewer System (MS4) Mapping and Documentation
- S5.C.5: Illicit Discharge Detection and Elimination (IDDE)
- S5.C.6: Controlling Runoff from New Development, Redevelopment, and Construction Sites
- S5.C.7: Stormwater Management for Existing Development
- S5.C.8: Source Control Program for Existing Development
- S5.C.9: Operations and Maintenance (O&M)
- S8: Monitoring and Assessment

## Phase II Permit Reporting Requirements

Specific Phase II permit requirements are summarized in the following sections along with planned activities and previously conducted activities for each specific element of the SWMP.

The Phase II permit requires the City to submit to Ecology an Annual Report by March 31 of each year of the Phase II permit term. The NPDES Annual Report consists of the following documents:

- **Stormwater Management Program (SWMP)** is developed by the City and summarizes the continuing/current and planned Citywide Permit implementation activities to ensure continued permit compliance for the coming year (2025).
- **Compliance Report** is a web-based interface on Ecology’s site with specific “fill in the blanks” data entry to document the City’s Permit compliance activities for the preceding calendar year (i.e., 2024). The Compliance Report is not flexible in that you must answer the questions in the form provided by Ecology. The information for the report is completed administratively by Citywide staff in Community Development (CD), Information Technology (IT), and Parks and Public Works (P/PW) at the end of the calendar year.

## Department Responsibilities

The Phase II permit broadly applies to many City activities, including maintenance and operations of City facilities, permitting and inspections of new development and redevelopment, and other activities conducted in different City departments and divisions, including:

- The Parks and Public Works (P/PW) Department
- The Community Development (CD) Department
- The Information Technology (IT) Department

P/PW acts as the coordinator between City departments to verify that all Phase II permit requirements are being implemented and as the permit coordinator has the authority to assign Phase II permit task components to the Departments identified above. These tasks will be further refined each year in accordance with specific Phase II permit conditions.

Table 1 summarizes the required SWMP activities that P/PW administers within the 2024–2029 Phase II permit cycle.

Table 1. SWMP Administration Permit-Required Activities.		
Activity	Due Date	Status
SWMP preparation, updates, and annual submittal with the Annual Report.	Annually–March 31	Ongoing
Submit the annual report electronically using Ecology’s Water Quality Permitting Portal (WQWebPortal).	Annually–March 31	Ongoing
Develop a written description of internal coordination mechanisms in the Annual Report.	March 31, 2026	Completed

## Public Comments

The City appreciates public input in the ongoing development and implementation of this document. Comments or concerns regarding this SWMP Plan may be sent to the following address:

City of Snoqualmie  
Parks and Public Works Department  
Attention: Patrick Fry, P.E., Project Engineer  
P.O. Box 987  
Snoqualmie, WA 98065

The Phase II permit (Section S5.C.3) requires the City to:

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities.

- Permittees shall create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the City's SMAP and SWMP. This condition of the Phase II permit will be met by asking City Council to approve the SWMP annually by resolution at a public hearing.

The City shall post on their website their SWMP Plan and the annual report no later than May 31 each year.



# 2. Stormwater Planning

## Overview

The 2024–2029 Phase II permit (Section S5.C.1) requires the City to implement a stormwater planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

## Required Activities

Section S5.C.1 in the 2024–2029 Phase II permit describes requirements for stormwater planning:

- **Convene an interdisciplinary team:** Inform and assist in the development, progress, and influence of the stormwater program.
- **Coordination with long-range plan updates:** Report how water quality and watershed protection will be addressed during the 2024–2029 Phase II permit cycle.
- **Low impact development (LID) code-related updates:** Continue the code and enforceable document review process to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible. In addition to integrating LID principles into new enforceable documents and code, existing enforceable documents and code shall be reviewed on an annual basis for barriers to LID.
- **Tree canopy goals and policies:** Adopt and implement tree canopy goals and policies to support stormwater management (new requirement in the 2024–2029 Phase II permit).
- **Stormwater Management Action Planning:** Develop a Stormwater Management Action Plan (SMAP) for at least one new high priority catchment area, or additional actions for an existing SMAP.

Table 2 summarizes the required stormwater planning activities, due dates, and status for the 2024–2029 Phase II permit cycle.

**Table 2. Stormwater Planning Permit-Required Activities.**

Activity	Due Date	Status
Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of this program.	Ongoing	Ongoing
Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report due in March 2027.	March 31, 2027	Not Completed
Assess and document any newly identified administrative or regulatory barriers to implementation of LID principles or BMPs.	Ongoing—Annually	Ongoing
Adopt and implement tree canopy goals and policies to support stormwater management.	December 31, 2028	Not Completed
Develop and submit a Stormwater Management Action Plan (SMAP) for at least one new high priority catchment area or additional actions for an existing SMAP.	March 31, 2027	Not Completed

## Planned Activities

Table 3 summarizes the stormwater planning activities planned for the 2025 calendar year.

**Table 3. Stormwater Planning Activities for 2025.**

Activity	Department(s)	Timeline Notes
<b>Annual LID code review:</b> Assess previously identified barriers and report newly identified administrative or regulatory barriers to implementation of LID principles or LID BMPs.	P/PW and CD	Ongoing—Annually

# 3. Public Education and Outreach

## Overview

The 2024–2029 Phase II permit (Section S5.C.2) requires the City to provide a stormwater education and outreach program that will:

- Build general awareness about methods to address and reduce impacts from stormwater runoff.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

## Required Activities

According to S5.C.2 in the 2024–2029 Phase II permit, the City is required to design its public education and outreach program based on the local and regional water quality information and priority audience characteristics. The Phase II permit lists target audiences and subject areas for education, and target audiences and Best Management Practices (BMPs) with a goal of behavior change.

Table 4 summarizes the required stormwater planning activities, due dates, and status for the 2024–2029 Phase II permit cycle.

Table 4. Public Education and Outreach Permit-Required Activities.		
Activity	Due Date	Status
To build general awareness, annually select at a minimum one priority audience and one subject area as defined in the Phase II permit, to provide subject area information to the priority audience on an ongoing or strategic schedule.	Ongoing—Annually	In Progress
To affect behavior change, select at a minimum one priority audience and one BMP defined in the permit. Conduct a new evaluation of the effectiveness of an ongoing behavior change campaign and document lessons learned.	Ongoing	In Progress
Based on the recommendation from the 2024 evaluation and report, follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan.	July 1, 2025	Not Completed
Begin to implement the behavior change strategy developed.	September 1, 2025	Not Completed
Evaluate and report on changes in understanding and adoption of behaviors resulting from the implementation of the strategy and any planned or recommended changes to the campaign to be more effective.	March 31, 2029	Not Completed
Provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement.	Ongoing	In Progress

## Planned Activities

The City currently implements and participates in stormwater outreach and environmental education programs. The education program to date has consisted of activities such as providing online and print material, classroom education, direct target audience outreach, and coordination with regional agencies. Past stormwater education activities are summarized in the following section. The Phase II permit public education program is developed jointly between the Parks and Public Works and Community Development. Outreach activities, funding sources, and implementation schedule are planned annually for future years. Highlights of the planned activities for 2025 include:

- Continued publication and promotion of spill reporting hotline. Offer “don’t pollute” puck labels on nearby catch basins to interested residents.
- Continued coordination with Ecology staff and other NPDES jurisdictions.
- Continued stewardship activities through partnerships with Green Snoqualmie, Mountains to Sound Greenway, and King County.
- Implement natural lawn care behavior change campaign.

Table 5 summarizes the public education and outreach activities planned for the 2025 calendar year.

Ongoing public education activities include:

- Publication and promotion of spill reporting hotline
- Volunteer stewardship projects
- Participation in regional stormwater

**Table 5. Planned Education and Outreach Programs and Activities for 2025.**

<b>Item</b>	<b>Target Audience</b>	<b>Goal/Behavior/Activity</b>
City Website	General Public	The City's website has been used to promote community activities and educational opportunities.
Spill Response	General Public	Continue to monitor water quality complaints, spill reporting and illicit discharge reporting hotline, and publicize it via news releases and the City website. Businesses and citizens who are found to be causing illicit discharges receive education, and potentially enforcement actions, if they refuse to voluntarily correct the problem.
Newsletter E-Notices	General Public	The City will continue to e-notice in the City Newsletter to promote classes, stewardship opportunities, and water-related best management practices.
Volunteer Stewardship Projects	General Public	The City will partner with the Green Snoqualmie Partnership, Mountains to Sound Greenway, and King County on several planting events in 2025.
Hazardous Waste Collection	General Public and Homeowners	The City collects fluorescent light bulbs, batteries, and prescription medications at various City buildings. The annual hazardous waste collection and recycling event sponsored by King County.
Behavior Change Campaign: Natural Lawn Care	General Public, Homeowners, Landscapers (lawn care), Property Managers/ Owners	The City shares outreach materials related to natural lawn care through their website.
Pet Waste Stations	General Public	The City plans on continuing to provide pet waste disposal bags at the pet waste stations that have been installed in local parks.
Household Hazardous Waste Education	General Public and Homeowners	The City will continue the partnership with Waste Management to provide education on hazardous waste via bill insert notices.
Stormwater Outreach for Regional Municipalities (STORM)	General Public	The City is a member of Stormwater Outreach for Regional Municipalities (STORM), an organization of jurisdictions that have joined to address non-point pollution in the Puget Sound. The City will continue to promote approved regional stormwater awareness campaign activities.

# 4. Public Involvement and Participation

## Overview

The 2024–2029 Phase II permit (Section S5.C.3) requires the City to:

- Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the SMAP and SWMP Plan.
- Make the available SWMP Plan and Annual Report available to the public, including posting on the City’s website.
- Document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities.

Ongoing public involvement activities include:

- Posting the SWMP Plan and Annual Report on the City’s website

## Required Activities

Table 6 summarizes the public involvement and participation activities for the 2024–2029 permit cycle.

Table 6. Public Involvement and Participation Permit-Required Activities.		
Activity	Due Date	Status
Post on the SWMP Plan and the annual report on the City website.	Annually–May 31	Ongoing
Document methods used to identify overburdened communities.	December 31, 2026	Not Completed

## Planned Activities

Table 7 summarizes the public involvement and participation activities planned for the 2025 calendar year.

Table 7. Planned Public Involvement Activities for 2025.		
Activity	Department(s)	Timeline Notes
The City maintains a web page for the Stormwater Division located under the Public Works and Utilities Division home pages. The web page is updated with the latest Annual Report and SWMP Plan each year.	P/PW	Ongoing

# 5. MS4 Mapping and Documentation

## Overview

Mapping is a required element of the stormwater permit because it is not possible to perform proper long-term maintenance or inspection requirements of the permit without having adequate maps. Additionally, to respond to illicit discharge detection and elimination (IDDE) or other water quality requirements of the permit, maps provide critical information to emergency response personnel allowing staff to be able to assess, classify, contain, repair, stop, report, and take appropriate and efficient steps to protect the waters of the state from pollutant discharges under the City of Snoqualmie’s jurisdictional authority.

## Required Activities

The 2024–2029 Phase II permit requires an ongoing program for mapping and documenting the MS4 (Section S5.C.4). At a minimum, maps are required to include or depict:

- Known MS4 outfalls and MS4 discharge points, receiving waters, and stormwater treatment and flow control BMPs/facilities owned, operated, or maintained by the City.
- Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger (or equivalent cross-sectional area for non-pipe systems), showing all tributary conveyance types, materials and size where known; associated drainage areas; and land uses.
- All authorized or allowed MS4 connections since August 1, 2013 (date of the City’s first coverage under the Phase II permit).
- Connections between the City’s MS4 and MS4s of other municipalities or public entities.
- Geographic areas served by the MS4 that do not discharge stormwater to surface waters.
- Connections to privately owned stormwater systems.

Ongoing GIS activities include:

- Municipal stormwater system map updates

Table 8 summarizes the MS4 mapping and documentation activities, due dates, and status for the 2024–2029 permit cycle.

**Table 8. MS4 Mapping and Documentation Permit-Required Activities.**

Activity	Due Date	Status
Maintain mapping data for MS4 features listed in the Phase II permit. The required format for mapping is electronic (e.g., GIS, CAD, etc.) with fully described mapping standards.	Ongoing	Ongoing
Submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.	March 31, 2026	Not Completed
Map tree canopy to support stormwater management on City-owned or operated properties and develop and follow a methodology to intentionally identify canopy for stormwater management purposes.	December 31, 2026 (update annually or as needed)	In Progress
Implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Include a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the City in the Annual Report.	March 31, 2028	In Progress
Map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on City-owned or operated properties.	December 31, 2028	Not Completed

## Planned Activities

Table 9 summarizes the MS4 mapping and documentation activities planned for the 2025 calendar year.

**Table 9. Planned MS4 Mapping and Documentation Activities for 2025.**

Activity	Department(s)	Timeline Notes
Map known MS4 outfalls, known MS4 discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned or operated by the City, tributary conveyances for 24-inch nominal diameter or larger outfalls and discharges points, connections between the MS4 and other municipalities or public entities, geographic areas that do not discharge stormwater to surface waters, connections between the City MS4 and other municipalities or public entities, and known connections to a privately owned stormwater system. Continue to track and map all new MS4 connections.	P/PW, CD, GIS	Ongoing



## 6. Illicit Discharge Detection and Elimination (IDDE)

### Overview

The Illicit Discharge Detection and Elimination (IDDE) program refers to the process of detecting and removing illicit connections and discharges—including spills not under the purview of another responding authority—into the MS4.

### Required Activities

Permit-required components of an IDDE program include:

- Illicit discharge ordinance
- Field screening and discharge elimination
- Public information and hotline
- Training
- Public education and outreach
- Recordkeeping

Ongoing IDDE program activities include:

- Illicit discharge ordinance implementation
- Annual field screening of 12 percent of the MS4

### Illicit Discharge Ordinance

The 2024–2029 Phase II permit requires the City to implement an ordinance or other regulatory action necessary to effectively prohibit non-stormwater, illicit discharges into the stormwater system. Ordinance requirements are outlined in Section S5.C.5.c in the 2024–2029 Phase II permit.

### Field Screening and Discharge Elimination

This section addresses MS4 field screening investigation procedures for illicit connections (S5.C5.d.i), and developing procedures to characterize, trace and eliminate illicit discharges, including spills and illicit connections, to the MS4.

The City's IDDE program must:

- Adhere to the guidelines and procedures set forth in the “Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual” created by Herrera Environmental Consultants, Inc and Aspect Consulting, LLC.
- Field screen at least 12 percent of the City's MS4, annually.
- Characterize the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the City.
- Implement procedures for the post-emergency clean up of firefighting activities using aqueous film-forming foams (AFFFs).
- Trace the source of an illicit discharge.
- Eliminate the discharge and its source, including notifying appropriate authorities and property owners, technical assistance to eliminate the discharge, follow-up inspections, and escalating enforcement, if needed.
- Meet the timelines listed in the **IDDE Timelines** callout box.

#### IDDE Timelines

**Immediately** respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.

**Within 7 days** on average, investigate or refer to an agency with appropriate authority any complaints, reports, or monitoring data indicating a potential illicit discharge.

**Within 21 days** of a report or discovery of a suspected illicit connection, initiate an investigation to determine a connection's source, nature and discharge volume, and the party responsible for the connection.

**Within 6 months**, use the compliance strategy in a documented effort to eliminate the illicit connection upon an illicit connection confirmation. All known illicit connections to the MS4 shall be eliminated.

## Public Information and Hotline

Publicize a hotline or other telephone number for public reporting of spills and other illicit discharges per S5.C.5.d.ii in the 2024–2029 Phase II permit. **24-hour IDDE Hotline number: 425-888-8011.**

Ongoing IDDE activities include:

- Responding to calls to the illicit discharge hotline

## Training

This SWMP Plan section addresses two Phase II permit sections on staff training:

- **All Field Staff:** Implement an ongoing training program for all municipal field staff on identifying illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/connection (S5.C.5.d.iii in the 2024–2029 Phase II permit).
- **Designated Field Staff:** Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections are required to be trained to conduct these activities (S5.C.5.f in the 2024–2029 Phase II permit).
- **Both Training Programs:** Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Document the trainings provided, including the staff trained, the number of trainings, names of staff trained and training topics.

## Public Education and Outreach

Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper waste disposal per S5.C.5.b in the 2024–2029 Phase II permit.

Ongoing IDDE activities include:

- Training
- Public education and outreach

## Recordkeeping

Per Sections S5.C.5.d–f of the 2024–2029 Phase II permit, the City tracks and retains records of the following:

- Number of inspections made for illicit connections, including field screenings.
- Number of illicit discharges, including spills, identified and/or eliminated.
- Number of trainings provided, training subjects, and the staff trained.

Section S5.C.5.g of the 2024–2029 Phase II permit also requires the City to track specific information to submit to Ecology through the WQWebIDDE system.

## Summary

Table 10 summarizes the required IDDE program activities, due dates, and status for the 2024–2029 permit cycle.

Table 10. IDDE Program Permit-Required Activities.		
Activity	Due Date	Status
Implement procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified.	Ongoing	Ongoing
Inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.	Ongoing	Ongoing
Update the City’s ordinance to effectively prohibit non-stormwater, illicit discharges into the City’s MS4.	July 1, 2027	Ongoing
Complete field screening for an average of 12 percent of the MS4 each year. Annually track total percentage of the MS4 screened.	Ongoing	Ongoing—Annually
Adhere to the “Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual” for detecting and removing illicit discharges.	Ongoing	Ongoing
Immediately respond to illicit discharges, including spills, which are determined to constitute a threat to human health or the environment; investigate within 7 days of an identified potential illicit discharges, initiate an investigation within 21 days of discovery of suspected illicit connections to determine the connection source, discharge, and party responsible.	Ongoing	Ongoing
Train staff responsible for IDDE. Document and maintain records of the training provided and the staff trained.	Ongoing	Ongoing
Track and maintain records of the activities conducted to meet the requirements of this section for inclusion in annual report.	Ongoing	Ongoing
Coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.	December 31, 2026	Not Completed
Update and implement procedures to minimize discharges to the MS4 during post-emergency cleanup and disposal activities including, but not limited to, the immediate clean up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4.	January 1, 2027	Not Completed

## Planned Activities

Table 11 summarizes the IDDE program activities planned for the 2025 calendar year.

Table 11. Planned IDDE Program Activities for 2025.		
Activity	Department(s)	Timeline Notes
<b>Ordinances.</b> Continued enforcement of SMC 15.18.150 (Illicit Discharges to storm water system or water prohibited).	P/PW and CD	Ongoing
<b>Field Screening.</b> Conduct field screening of at least 12 percent of the City's MS4 for illicit discharges/connections.	P/PW	Ongoing—Annually
<b>Hotline.</b> Maintain and continue to publicize 24-hour spill reporting hotline (425-888-8011).	P/PW	Ongoing
<b>City Staff Trainings.</b> Provide IDDE training to appropriate City staff.	City Staff	Ongoing
<b>IDDE Procedures.</b> Continue to implement procedures to comply with IDDE characterization, tracing, and elimination requirements.	P/PW	Ongoing
<b>Spills.</b> Implement spill reporting forms. Investigate spill sources and follow up, including code enforcement as necessary.	P/PW	Ongoing
<b>Recordkeeping.</b> Continue to track and maintain records of IDDE activities.	P/PW	Ongoing

# 7. Controlling Runoff from New Development, Redevelopment, and Construction Sites

## Overview

The City is required to develop, implement, and enforce a program to reduce pollutants in stormwater runoff to its MS4 from new development, redevelopment, and construction site activities.

## Required Activities

This program applies to private and public development, including roads; it must include the following:

- Runoff ordinance
- Stormwater site plan review
- Construction site inspections and enforcement
- Notice of Intent (NOI)
- Training

Ongoing activities related to new development, redevelopment, and construction sites include:

- Runoff ordinance implementation
- Stormwater site plan review
- Construction inspections and enforcement

## Runoff Ordinance

The City must implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction sites. The City has done this in Ordinance 1198 and codified in Chapter 15 of the Snoqualmie Municipal Code.

## Stormwater Site Plan Review

The City must implement a permitting process to review all stormwater site plans for proposed development activity per S5.C.6.c.i in the 2024–2029 Phase II permit.

## Construction Site Inspections and Enforcement

Table 12 summarizes the annual reporting requirements of Community Development (CD) to Parks/Public Works (P/PW) for construction site inspections and enforcement.

**Table 12. Annual Reporting from Community Development to Parks/Public Works.**

Activity	Assigned To	Due Date
Confirm annually that they inspect, prior to clearing and construction, all permitted sites that have a high potential for sediment transport. As an alternative to evaluating each site, the City may choose to inspect all construction sites that meet the minimum thresholds specified in the Phase II permit.	CD	Annually in February
Confirm annually that all permitted development sites have been inspected during construction to verify proper installation and maintenance of required erosion and sediment controls.	CD	Annually in February
Report the number of constructions sites inspected to P/PW from above.	CD	Annually in February
Confirm inspection of all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.	CD	Annually in February
Confirm by providing a copy of the maintenance plan to P/PW that CD has verified a maintenance plan is completed and that responsibility for maintenance is assigned to the property owner prior to final approval and occupancy being granted and attach a list of the stormwater treatment and flow control BMPs/facilities that fall into this category.	CD	Annually in February
Confirm that inspections of all permanent stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments have been completed every 6 months until 90 percent of the lots are constructed (or when construction is stopped, and the site is fully stabilized) to identify maintenance needs and enforce compliance with maintenance standards as needed.	CD	Annually in February
Annually report the number of inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv	CD	Annually in February
Report the number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects per S5.C.6.c.ii–iv S5.C7.c.Viii) to P/PW.	CD	Annually in February
Confirm that all maintenance plans have been verified and are complete and that responsibility for maintenance is assigned for projects to property owner prior to final approval and occupancy being granted and attach a list of the stormwater treatment and flow control BMPs/facilities that fall into this category.	CD	Annually in February
CD must confirm to P/PW that they achieved at least 80 percent of scheduled construction-related inspections relating to runoff control.	CD	Annually in February

## Notice of Intent

The program shall make both Construction and Industrial Activities Notices of Intent (NOI) copies available for re/development representatives, beginning no later than August 1, 2019 (S5.C.6.d in the 2024–2029 Phase II permit). The City shall continue to enforce local runoff ordinances for sites also covered by Ecology stormwater permits.

## Training

Community Development (CD) must report and confirm annually 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 (S5.C.6.e in the 2024–2029 Phase II permit).

## Summary

Table 13 summarizes the required activities, due dates, and status for controlling runoff from new development, redevelopment, and construction sites during the 2024–2029 Phase II permit cycle.

Table 13. Controlling Runoff from New Development, Redevelopment, and Construction Site Permit-Required Activities.		
Activity	Due Date	Status
Update City's ordinance that addresses runoff from new development, redevelopment, and construction site projects. Needs to meet the minimum requirements in Appendix 1 of the Phase II permit.	June 30, 2027	Not Completed
Continue implementing permitting process with site plan review, inspection, and enforcement capability meeting the standards listed in the Phase II permit for both public and private projects.	Ongoing	Ongoing
Make available electronic copies of the Notice of Intent forms for construction and industrial activities.	Ongoing	Ongoing
Provide training to appropriate staff. Document and maintain records of the training provided and staff trained.	Ongoing	Ongoing

## Planned Activities

Table 14 summarizes the planned activities related to controlling runoff from new development, redevelopment, and construction sites for the 2025 calendar year.

Table 14. Planned Controlling Runoff from New Development, Redevelopment, and Construction Site Activities for 2025.		
Activity	Department(s)	Timeline Notes
<b>Notices of Intent.</b> Update NOI link on City website to: <a href="https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance">https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance</a> .	CD	Ongoing
<b>Recordkeeping.</b> Records on plan review and inspection reports are, to date, maintained in individual project files by CD. Annual reporting of data related to the control of runoff from these sites will be reported on a single report to Parks and Public Works by February 1 of each year.	CD	Ongoing
<b>Stormwater Site Plan Review.</b> The City currently conducts development review, permitting, and inspections during the construction process. Drainage and Temporary Erosion and Sediment Control (TESC) plans are reviewed by a consultant and approved by CD.	CD	Ongoing
<b>Construction Site Inspections.</b> The City contracts with consultants to conduct inspections of facilities during construction and at completion of construction.	CD	Ongoing



## 8. Stormwater Management for Existing Development

### Overview

Section S5.C.7 details implementing a program to control or reduce stormwater discharges to waters of the State from areas of existing development. This is a new program in the 2024–2029 Phase II permit.

### Required Activities

The 2024–2029 Phase II permit (S5.C.7) requires the City’s Stormwater Management for Existing Development program to include:

- **Stormwater Facility Retrofits:** The City shall implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12, using Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d.), or similar stormwater planning process; and/or opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure (S5.C.7.a in the 2024–2029 Phase II permit).
- **Annual Report:** Provide a list of planned individual projects scheduled for funding or implementation during the 2024–2029 Phase II permit term. The City shall fully fund, start construction, or completely implement these projects and submit documentation yearly with the Annual Report as specified in S5.C.7.b–c. Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required.
- **Collaborate to Meet Regional Goals:** The City is required to manage at least 0.5 equivalent acres within their own jurisdiction but may receive acreage credit for contributing to meeting an overall regional goal outside their defined Phase II permit coverage area.
- **Acreage Report:** The City shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Phase II permit term (2029–2032). This report shall be submitted to Ecology no later than March 31, 2028, as is required by S5.C.7.e.

Table 15 summarizes the permit-required Stormwater Management for Existing Development activities, due dates, and status for the 2024–2029 permit cycle.

**Table 15. SMED Permit-Required Activities.**

<b>Activity</b>	<b>Due Date</b>	<b>Status</b>
Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (2029–2032).	March 31, 2028	Not Completed
Fully fund, start construction, or completely implemented projects that meet the City's assigned equivalent average (2.3 acres).	March 31, 2028	Not Completed
Provide a list of planned, individual projects scheduled for funding or implementation during this Permit term (2025–2029).	March 31, annually	In Progress
Implement stormwater facility retrofits using strategic stormwater investments identified in SMAP(s) or opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.	Ongoing	Ongoing

## Planned Activities

Table 16 summarizes the Stormwater Management for Existing Development activities planned for the 2025 calendar year.

**Table 16. Planned SMED Activities for 2025.**

<b>Activity</b>	<b>Department(s)</b>	<b>Timeline Notes</b>
Provide a list of planned, individual projects scheduled for funding or implementation annually during the 2025–2029 Phase II permit term.	P/PW	Ongoing

## 9. Source Control Program for Existing Development

### Overview

Section S5.C.8 in the 2024–2029 Phase II permit describes requirements for establishing a source control program to prevent and reduce pollutants in runoff from existing development.

### Required Activities

The source control program will include the following activities:

- **Source Control Ordinance:** The City will develop and adopt an ordinance requiring the application of source control BMPs for pollutant generating sources (no later than August 1, 2027) (Section S5.C.8.a in the 2024–2029 Phase II permit).
- **Source Control Inventory:** The City will develop an inventory of all publicly and privately owned commercial and industrial properties with the potential to generate pollutants (no later than August 1, 2027) (Section S5.C.8.a in the 2024–2029 Phase II permit).
- **Source Control Inspection Program:** In addition to providing education materials related to pollution generating activities to businesses, the City will inspect 20 percent of all businesses on an annual basis to ensure compliance with source control requirements (no later than January 1, 2028) (Section S5.C.8.c.ii in the 2024–2029 Phase II permit).
- **Source Control Enforcement:** The City will develop an enforcement policy that requires businesses to comply with stormwater requirements (no later than January 1, 2028) (Section S5.C.8.d in the 2024–2029 Phase II permit).
- **Source Control Training:** The City will provide training for staff responsible for implementing the source control program (Section S5.C.8.e in the 2024–2029 Phase II permit).

Table 17 summarizes the permit-required source control program activities, due dates, and status for the 2024–2029 permit cycle.

**Table 17. Source Control Program Permit-Required Activities.**

Activity	Due Date	Status
Update and make effective the ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.	August 1, 2027	Not Completed
Update inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4 at least once every 5 years.	July 31, 2029	Not Completed
Implement an inspection program for identified sites. <ul style="list-style-type: none"> <li>Annually inspect 20 percent of the businesses/sites listed in the source control inventory.</li> <li>Inspect 100 percent of sites identified through credible complaints.</li> </ul>	Ongoing	Ongoing
Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.	Ongoing	Ongoing
Provide training to appropriate staff. Document and maintain records of the training provided and staff trained.	Ongoing	Ongoing

## Planned Activities

Table 18 summarizes the source control program activities planned for the 2025 calendar year.

**Table 18. Planned Source Control Program Activities for 2025.**

Activity	Department(s)	Timeline Notes
Implement inspection program for the identified sites.	P/PW	Ongoing
Provide training to appropriate staff. Document and maintain records of the training provided and staff trained.	P/PW	Ongoing

# 10. Operations and Maintenance

## Overview

The City must develop and implement an operations and maintenance (O&M) program for public facilities that includes a training component, with the goal of preventing or reducing pollutant runoff from municipal operations. This section primarily affects the P/PW Department.

## Required Activities

The 2024–2029 Phase II permit (S5.C.9) requires the City’s O&M program to include:

- **Maintenance Standards:** Implement maintenance standards as protective as those in the Stormwater Management Manual for Western Washington, Chapter 4, Volume V; standards should meet the O&M timelines summarized on the following page and be updated or created as necessary (S5.C.9.a in the 2024–2029 in the Phase II permit).
- **Annual Inspections:** Annually inspect all City–owned or operated treatment and flow control BMPs/facilities and take appropriate maintenance actions per adopted maintenance standards (previous bullet and O&M timelines summarized on the following page) per S5.C.9.b.i.(b) in the 2024–2029 Phase II permit.
- **Private Facility Inspections:** Annually inspect all treatment and flow control BMPs/facilities that discharge to the MS4 and are owned or operated by the City per S5.C.9.b.i.(b) in the 2024–2029 Phase II permit. The private facility inspection program should include a procedure to retain inspection and enforcement action records, including reports, maintenance activities, warnings, violation notices, and other records.
- **Spot Checks:** Spot check potentially damaged stormwater treatment and flow control facilities after a major storm event (24-hour storm event within a 10-year-plus interval). If spot checks indicate widespread damage/maintenance needs, inspect all such facilities and conduct repairs per the O&M timelines summarized on the following page and per S5.C.9.c.ii in the 2024–2029 Phase II permit.
- **Catch Basins:** Annually inspect and, if needed clean, all catch basins and inlets owned and operated by the City once every 2 years per S5.C.9.c.iii(a) in the 2024–2029 Phase II permit.

Ongoing O&M activities include:

- Annual inspections of stormwater treatment and flow control facilities
- Spot checks
- Catch basin inspections and cleaning

*Note:* Required inspection compliance for S5.C.9.c.i–iii in the 2024–2029 Phase II permit is determined by the presence of an inspection program designed to inspect all sites, achieving 95 percent+ of inspections per S5.C.7.c.iv in the 2024–2029 Phase II permit.

- **Practices, Policies, and Procedures:** Implement practices, policies, and procedures to reduce runoff pollutants from all lands owned or maintained by the City, including streets, parking lots, roads or highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. For the full list of activities that must be addressed, see S5.C.9.d in the 2024–2029 Phase II permit.
- **Street Sweeping:** Develop and implement a municipal street sweeping program to focus on priority areas. For the necessary elements to include, see S5.C.9.e in the 2024–2029 Phase II permit.
- **Staff Training:** Hold an ongoing staff training program addressing water quality, O&M standards, inspection procedures, selecting appropriate BMPs, job performance to minimize water quality impacts, and procedures to report water quality concerns. Document and maintain records of training provided and the staff trained per S5.C.9.g in the 2024–2029 Phase II permit.
- **Stormwater Pollution Prevention Plan (SWPPP):** Implement a SWPPP for all heavy equipment maintenance/storage, and material storage, yards, and facilities, owned or operated by the City, including structural BMPs per S5.C.9.f in the 2024–2029 Phase II permit. The 2024–2029 Phase II permit requires annual inspections of the facility.

### O&M Timelines

*See S5.C.9.a.ii in the 2024–2029 Phase II permit*

When an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed within:

- 6 months for catch basins.
- 1 year for typical maintenance of facilities (except catch basins).
- 2 years for maintenance that requires capital construction of less than \$25,000.

These timelines apply except for circumstances beyond City control such as property

Table 19 summarizes the permit-required O&M activities, due dates, and status for the 2024–2029 permit cycle.

<b>Table 19. Operations and Maintenance Permit-Required Activities.</b>		
<b>Activity</b>	<b>Due Date</b>	<b>Status</b>
Update maintenance standards as necessary to meet the requirements of the Permit.	June 30, 2027	Completed
Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the City.	Ongoing	Ongoing—Annually
Annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities.	Ongoing	Ongoing—Annually
Spot check potentially damaged stormwater BMPs after major storm events (24-hour storm with a 10-year or greater recurrence interval)	Ongoing	Ongoing—Annually
Inspect all catch basins and inlets owned or operated by the City every 2 years.	Ongoing	Ongoing—Annually
Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the City, and road maintenance activities under the functional control of the City.	Ongoing	Ongoing
Update practices, policies, and procedures to address PCBs by December 31, 2027.	December 31, 2027	Not Completed
Provide training to appropriate staff. Document and maintain records of the training provided and staff trained.	Ongoing	Ongoing
Implement SWPPPs for facilities owned or operated by the City.	Ongoing	Completed
Develop and implement a municipal street sweeping program.	July 1, 2027	Not Completed
Submit sweeping priority area map, sweeping dates, sweeping frequency, type of sweeper, total curb miles, and approximation of street waste solids removed with the Annual Report.	March 31, 2028	Not Completed

## Planned Activities

Table 20 summarizes the O&M activities planned for the 2025 calendar year.

Table 20. Planned Municipal Operations and Maintenance Activities for 2025.		
Activity	Department(s)	Timeline Notes
<b>O&amp;M.</b> The City has had a longstanding program to maintain public stormwater facilities. The City updated its Stormwater System Operations and Maintenance Manual in 2019.	P/PW	Ongoing
<b>Inspections of City-owned or City-Maintained Treatment and Flow Control BMPs/Facilities.</b> Facility inspection records are currently retained, though the City will assess whether it is feasible to reduce required annual inspection frequency where possible.	P/PW	Ongoing
<b>Inspections of Privately owned Treatment and Flow Control BMPs/Facilities.</b> <u>Note:</u> The City has one privately owned pervious pavement facility, which is inspected annually.	P/PW	Ongoing
<b>Spot Checks.</b> Spot checks of potentially damaged permanent treatment and flow control BMPs/facilities are conducted after major storms. Staff to check all the City's stormwater ponds and structures annually.	P/PW	Ongoing
<b>Catch Basins.</b> The City stormwater maintenance program includes catch basin inspections and maintenance with documentation in written reports.	P/PW	Ongoing
<b>Staff Training.</b> Stormwater staff are required to stay up to date on Certified Stormwater Inspector Trainings. Internal trainings occur during onboarding of new hires/transfers.	P/PW	Ongoing



# 11. Compliance with Total Maximum Daily Load (TMDL) Requirements

## Overview

Additional requirements apply if there is an applicable, approved Total Maximum Daily Load (TMDL) for stormwater discharges from MS4s owned or operated by the City listed in Phase II Permit Appendix 2; see Section S7 2024–2029 Phase II permit.

- The City is not listed for TMDLs listed in Appendix 2 under the 2013–2018 Phase II permit, the 2019–2024 Phase II permit, or the 2024–2029 Phase II permit.
- If the City has actions associated with TMDLs under future Phase II permit terms, it should incorporate requirements as pertinent at that time.

## Planned Activities

No activities to report.

# 12. Monitoring And Assessment

## Overview

A Regional Stormwater Monitoring Program (RSMP) has been developed that includes monitoring for regional status and trends and stormwater management program effectiveness and source identification studies. The City paid into the collective fund to implement the Regional Stormwater Action Monitoring (SAM) program in lieu of conducting their own stormwater monitoring for the 2019–2024 Phase II permit. The SAM program includes the following areas:

- Regional Status and Trends Monitoring (S8.A)
- Stormwater Management Program Effectiveness and Source Identification Studies (S8.B)

Permittees with TMDLs have other monitoring requirements; these do not apply to the City.

## Required Activities

Table 21 summarizes the permit-required monitoring and assessment activities, due dates, and status for the 2024–2029 permit cycle.

Table 21. Monitoring and Assessment Permit-Required Activities.		
Activity	Due Date	Status
Submit annual payments to Ecology collective funds for Regional Status and Trends Monitoring and SWMP Effectiveness and Source Identification Studies.	Starting December 1, 2024	In Progress

## Planned Activities

Table 22 summarizes monitoring and assessment activities planned for the 2025 calendar year.

Table 22. Planned Monitoring and Assessment Activities for 2025.		
Activity	Department(s)	Timeline Notes
Submit annual payments to Ecology collective funds for Regional Status and Trends Monitoring (\$3,623/year) and SWMP Effectiveness and Source Identification Studies (\$5,361/year).	P/PW	Annual payments into collective funds due by August 15 each year beginning in 2025.

# 13.Reporting Requirements

## Overview

Section 9 of the 2024–2029 Phase II permit describes reporting and recordkeeping requirements. The Annual Report and SWMP Plan are prepared and submitted each year to Ecology.

## Required Activities

As part of the implementation of the SWMP, the City gathers, tracks, maintains, and uses information on an ongoing basis to evaluate the SWMP development and implementation. The City strives to submit an annual report on the Phase II permit no later than March 31 each year for activities the previous year.

Ongoing Reporting activities include:

- Submitting Annual Report and SWMP Plan to Ecology

Records related to the Phase II permit and SWMP shall be retained for at least 5 years and be reasonably available to the public. Administration items, such as annexations, must be included in the Annual Report.

Table 23 summarizes the permit-required reporting activities, due dates, and status for the 2024–2029 permit cycle.

Table 23. Reporting Permit-Required Activities.		
Activity	Due Date	Status
Prepare Annual Report (including updated SWMP Plan and Compliance Report) and submit electronically through Ecology’s WQWeb Portal.	Due March 31 of each year	In Progress

## Planned Activities

Table 24 summarizes planned reporting activities for the 2025 calendar year.

Table 24. Planned Reporting Activities for 2025.		
Activity	Department(s)	Timeline Notes
Submit 2025 Annual Report (2025 SWMP Plan and 2024 Annual Compliance Report) electronically through Ecology’s WQWebPortal.	P/PW, CD, IT/GIS	Completed
Prepare 2026 Annual Report (2026 SWMP Plan and 2025 Annual Compliance Report).	P/PW, CD, IT/GIS	Not Completed
Retain all records related to the Phase II permit and the SWMP for at least 5 years after the expiration date of the permit.	P/PW	Ongoing