



2022 Stormwater Management Program (SWMP) Plan



**City of Des Moines
Surface Water Management
21650 11th Ave S
Des Moines, WA 9198**

March 31, 2022

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Introduction:

This document has been prepared to meet the City of Des Moines' Western Washington Phase II Municipal Stormwater Permit requirement for written documentation of the City's Stormwater Management Program (SWMP).

The City's SWMP is intended to reduce the discharge of pollutants from the City's Municipal Separate Storm Sewer System (MS4) to the maximum extent practicable (MEP), meet Washington State, All Known, Available and Reasonable methods of Treatment (AKART) requirements, and protect water quality. This goal will be accomplished by the inclusion of all permit SWMP components and implementation schedules into the City's existing SWMP.

Where the City is already implementing components called for in this permit, the City will continue those actions or activities to the existing extent required, regardless of the schedule called for in this document.

The City will implement an ongoing program for the gathering, tracking, maintaining and using information to evaluate the SWMP development, implementation and permit compliance and to set priorities. This document will be updated annually for submittal with the City's Annual Report to Ecology.

This document will reflect the City's plans for the updated compliance requirements with the 2019-2024 Permit, as issued by Ecology for the calendar year 2022.

1: SWMP MANAGEMENT AND ADMINISTRATION

The City plans to fully comply with the management and administration requirements as described in Section S5.A of the Permit. These requirements include, but are not limited to:

- Develop and implement the SWMP
- Annually update the SWMP Plan
- Track costs or estimated costs for implementing the SWMP
- Track inspection, enforcement and public education activities
- Continue to implement existing programs
- Coordination among Permittees

The City has implemented many mechanisms to increase the efficiency and the effectiveness of how to communicate the permit requirements between departments. These mechanisms range from employee designated duties, tracking software, internal meetings, and open communication lines. Below is a list and description of these specific mechanisms that will be in place for 2022:

- NPDES Coordinator Position
 - The establishment of this position creates a role in which a single person is communicating the requirements of the NPDES permit to the proper individuals and their respective duties. A single coordinator removes the possibilities of unnecessary overlap of communication and also can ensure that each department knows where to go if they have any questions regarding their compliance responsibilities and in essence creates open communication lines between all departments as it relates to the permit.
- Training Requirements
 - All individuals that are responsible for fulfilling a portion of the NPDES compliance terms are trained with the abilities to perform their responsibilities. Training ensures that individuals from any department are completing their work to the specifications of the permit.
- CityWorks
 - CityWorks is a work order and inspection program that uses GIS to help track specific assets. This program helps eliminate barriers between the Surface Water Management/Engineering Department and the Public Works Crews by providing an online platform for tracking and sharing information. CityWorks is used to track inspections for IDDE & all Surface Water Facilities.

- Frequent Internal Meetings
 - Meetings are commonly scheduled to discuss current status of the compliance programs. These meetings help keep everyone on the same page and up to date with the permit requirements.
 - Interdisciplinary Team Meetings are now included in this category as required per S.5.C.1.
- PermitTrax
 - PermitTrax is an online program used by the Planning, Building, and Public Works Departments for permit inspection tracking. In regards to the NPDES permit, the program is used to track ESC inspections & drainage inspections. This program eliminates barriers between departments as anyone from any department can log in to view inspections.

2: STORMWATER PLANNING

2.1 Permit Requirements

The 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.
- On or before August 1, 2020, the Permittee shall convene an interdisciplinary team to inform and assist in the development, progress, and influence of the program.
- On or before March 31, 2021, the Permittee shall describe how water quality and watershed protection were addressed during the 2013-2019 Permit Cycle in updates to the Comprehensive Plan and in other locally initiated or state-mandate long-range land use plans that are used to accommodate growth or transportation.
- On or before January 1, 2023, the Permittee shall submit a report that describes how water quality is being addressed, if at all, during this permit term in updates to the Comprehensive Plan and in other locally initiated or state-mandated, long-range land use plans that are used to accommodate growth or transportation.
- Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.
- Permittees shall implement a process of Stormwater Management Action Planning, which includes a Receiving Water Assessment (By March 31, 2022), a Receiving Water Prioritization (By June 30, 2022),

and a Stormwater Management Action Plan (SMAP) (By March 31, 2023) for at least one high priority area.

2.2 2022 Planned Activities

- Inter-disciplinary Team (S5.C.1.a)
On June 26th 2020, the City convened an inter-disciplinary team with a consultant, Parametrix. This team includes representatives from the following City of Des Moines departments: Surface Water Management, Transportation & Engineering Services, Planning, and GIS Services.
- Coordination with Long-Range Plans Update (S5.C.1.b)
In 2022 the City is contracting with a consultant, Parametrix, to provide two reports. The first describes how the City used stormwater management needs and protection/improvement of receiving water health to inform the planning update processes and influence policies and implementation strategies during the 2013-2019 permit term. This report was completed in 2021. The second describes how water quality is being addressed during this permit term (2019-2024) in updates to the Comprehensive Plan. This report will be completed by January 1, 2023.
- Low Impact Development Code-Enforcement (S5.C.1.c)
The City will continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed. In 2022 the City will assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers.
- Stormwater Management Action Planning (SMAP) (S5.C.1.d)
 - In December 2021, the City finalized a draft of the Receiving Water Assessment. This was accomplished with assistance from the SMAPr tool developed by the Our Green Duwamish regional group. The draft will be presented to the City's Inter-disciplinary Team for comment before finalizing by the due date of March 31, 2022.
 - By June 30, 2022, the City will document the prioritized and ranked list of receiving waters as well as prioritization methodology. This ranking shall include the identification of high priority catchment area(s) for focus of the Stormwater Management Action Plan.

3: PUBLIC EDUCATION AND OUTREACH

3.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to:

- Implement an education and outreach program for the City. The program shall be designed to educate a target audience about the stormwater problems and provide specific actions they can follow to minimize the problems.
- On or before July 1, 2020, the Permittee shall conduct an evaluation of the effectiveness of an ongoing behavior change campaign and document lessons learned and recommendation for a social marketing campaign.
- On or before February 1, 2021, the Permittee shall develop a campaign using social marketing practices that is tailored to the community.
- On or before April 1, 2021, the Permittee shall begin to implement the strategy developed.
- On or before March 31, 2024, the Permittee shall evaluate the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and report on any planned r recommended changes to the campaign in order to be more effective.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities that address the impacts from stormwater runoff.

3.2 2022 Planned Activities

- General Awareness (S5.C.2.a.i):

In 2022 the City plans to maintain the existing public education and outreach programs below that target the general public for general impacts of stormwater:

- Distribution of education materials through various forms of media including, but not limited to, the City's website (www.desmoineswa.gov), quarterly citywide newsletters, municipal code, televised council meetings, and handout materials. Educational materials include information on septic system maintenance, oil leak inspection, preservation of plants and trees adjacent to streams and wetlands, pet control and waste disposal, pesticide reduction, lawn fertilizer reduction, car washing tips, general stormwater education, volunteer opportunities, household BMPs, business BMPs, hazardous waste disposal, and many other topics.

- In 2022 the City of Des Moines is planning on continuing its partnership with the Environment Coalition of South Seattle (ECOSS) on the Puget Sound Spill Kit Program to provide selected businesses with free spill kits, training, and education on stormwater BMPs. By providing this service to the businesses the City will help build general awareness and encourage behavior change. Also, previously visited businesses will be re-visited in 2022 for post survey follow-ups. ECOSS will also be able to provide the City with measurable data for behavior change as survey questions will be asked during the initial and post visit.
- In 2022, the City is planning to continue its Car Wash Kit Program. Community car wash events are encouraged to use a “Car Wash Kit” available to check out from the City’s Public Works Department free of charge.
- In 2022, the City plans to support and continue the planning towards the second Virtual Highline Stormfest event in the Highline School District. This will be a weeklong remote-learning event for 6th graders in-lieu of the in-person Stormfest event due to the COVID-19 pandemic.
- Evaluate Effectiveness of Ongoing Behavior Change (S5.C.2.a.ii)
 - To affect positive behavior change, the City chooses to target businesses as the audience. The following BMPs will be addressed in the behavior change program:
 - Prevention of illicit discharges
 - Dumpster and trash compactor maintenance
 - Litter and debris prevention.
 - In 2022, the City plans to use the continued partnership with ECOSS to evaluate the effectiveness of ongoing behavior change on a region wide scale. Each year, ECOSS provides a detailed local and regional reports showing the results of businesses that participated through pre and post surveys. This data is centralized and presented in figures.
 - In June 2020 the City decided to select option #1 in S5.C.2.a.ii.c and will develop a strategy and schedule to more effectively implement the existing campaign. The City will meet this requirement by participating and implementing the Dumpster Lid Social Marketing Campaign. This campaign is a new regional effort between numerous jurisdictions in the greater Puget Sound area to improve water quality through improved dumpster etiquette at businesses.
 - In March 2021, the City began implementing the pilot of the regional Dumpster Outreach Group (DOG) campaign at two

businesses, and will later implement this program within our ongoing behavior change efforts with ECOSS. It is estimated that the DOG program will be implemented at full scale in January or February of 2022.

- Stewardship (S5.C.2.a.iii):
 - The volunteer storm drain marking program will continue in 2022 and act as the primary stewardship program in the City. This program is advertised intermittently as needed in the quarterly citywide newsletter, the “City Currents”.
 - The City plans to support additional stewardship events including an annual clean-up event, farmer’s market visits, and Earth Day events.

4: PUBLIC INVOLVEMENT AND PARTICIPATION

4.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to:

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, and participating in developing rate-structures or other similar activities. The Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP.
- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the City’s SWMP.
- On or before May 31st each year, the Permittee shall post on its website the updated SWMP Plan and the annual report. All other submittals shall be available to the public upon request.

4.2 2022 Planned Actions

- Opportunities for Public Participation (S5.C.3.a)

The City will continue to provide opportunities for public comment/input on the SWMP Plan. The SWMP Plan will be posted to the website for comments to be submitted.

- Availability of Documents (S5.C.3.b)

In 2022, the annual report for this permit which is due March 31st and the SWMP Plan will be posted on the City website (www.desmoineswa.gov) no later than May 31st.

5: MS4 MAPPING AND DOCUMENTATION

5.1 Permit Requirements

The Permit (Section S5.C.4) requires the City to:

- Maintain mapping data for: known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs, geographic areas served by the Permittee's MS4 that do not discharge to surface waters, tributary conveyances to all known outfalls with a 24" nominal diameter or larger, connections between the MS4 and other municipalities or public entities, and all connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- On or before January 1, 2020, the Permittee shall begin to collect the size and material for all known MS4 outfalls and update records.
- On or before August 1, 2023, the Permittee shall complete mapping of all known connections from the MS4 to a privately owned stormwater system.
- On or before August 1, 2021, the Permittee shall maintain all mapping data electronically.

5.2 2022 Planned Actions

- Ongoing Mapping (C5.4.a):
In 2022 the City will continue its ongoing GIS mapping of the MS4. The Stormwater Crews, who complete catch basin inspections will continue to highlight discrepancies between the map and the physical asset in the field.
- New Mapping (C5.4.b):
 - The City has begun collecting the size of all known outfalls meeting the January 1, 2020 deadline. The City will continue to collect size and material of these outfalls in addition to its normal routine mapping.
 - By August 1, 2023, all known connections from the MS4 to a privately owned stormwater system will be mapped.
 - The City currently maintains all MS4 mapping data electronically and is available at this web address:
<https://maps.desmoineswa.gov/swm/>
 - City staff will continue to confirm that all data is in a format that is accessible for review and use by relevant parties as requested.

6: Illicit Discharge Detection and Elimination (IDDE)

6.1 Permit Requirements

The Permit (Section S5.C.5) requires the City to:

- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater illicit discharges into the MS4 to the maximum extent allowable under state and federal law.
- Implement procedures for reporting and correcting or removing illicit connections, spill and other illicit discharges when they are suspected or identified.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.
- Document IDDE Field Screening Methodology in the Annual Report.
- Train staff that are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills and connections. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Records shall be maintained that document training provided and staff trained.
- Track and maintain records of all activities conducted to meet the requirements of this section.

6.2 2022 Planned Actions

- IDDE Reporting & Correcting (S5.C.5.a):
 - The City will continue to use the procedures currently in place for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified.
- IDDE Public Awareness & Notification (S5.C.5.b):
 - The City will continue to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. This is accomplished through intermittent, typically annual, viewing of the video "IDDE- A Grate Concern". The City encourages citizens to call the Public Works Department at 206-870-6523; police department non-emergency number at 206-878-3301 to report illicit discharges and spills. These phone numbers are publicly listed on the City website and through various other means of outreach.
- IDDE Ordinance (S5.C.5.c):

- Existing Codes will be maintained with no planned changes in 2022. The City adopted an IDDE Ordinance in compliance with the permit requirement, effective September 12, 2009. This ordinance is codified as Chapter 11.20 of the Des Moines Municipal Code.
- Ongoing IDD&E Action Program (S5.C.5.d):
 - In 2022 the City plans to maintain the existing IDDE programs below:
 - IDDE Field Screening: In November 2020, the City updated their field screening methodology for illicit connections using *“The Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual”*, Herrera Environmental Consultants, May 2020. This field screening methodology will be documented in the Annual Report. The City has developed a program to meet the field screening requirements, at least 12% of the MS4 will be screened in 2022. The methodology of catch basin/manhole inspections with the routine maintenance approach will be utilized to complete this requirement.
 - In 2022, the City will maintain the ongoing IDDE Action Program. The City is currently using IDDE procedures from the *“Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments”* to characterize the nature and environmental threat posed by illicit discharges and also to trace the source of illicit discharges. Procedures for eliminating the source of discharges are currently being developed. When the City or the investigations agency determines surface water quality pollution has occurred, a notice is sent to the property owner stating the problem be remedied within a time frame listed in out code. The cleanup and enforcement depend on severity of the spill.
- Training (S5.C.5.f):
 - The City’s NPDES Coordinator is the lead for identification, investigation, termination, cleanup, and reporting illicit discharges; including spills, improper disposal and illicit connections. IDDE training is currently accomplished through the EXCAL VISUAL training video *“IDDE: a grate concern”*. The City will continue to implement IDDE training as needed in 2022. Follow-up training will be provided as needed to address changes in procedures, techniques or requirements. All training records (including course information and the staff training) will be documented and maintained in Microsoft Excel.
- Recordkeeping (S5.C.5.g):
 - The City will track and maintain records of the activities conducted to meet the requirements of this section. City staff will continue to evaluate and improve the IDDE program based on experience, lessons

learned, and feedback from public education efforts. The Cityworks asset management program is used as the primary record keeping platform for spill response. In addition, the City utilizes the Department of Ecology's Water Quality Permitting Portal (WQWebPortal) to streamline annual reporting requirements for spill response. Microsoft Excel is used as the primary record keeping platform for training records.

7: CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

7.1 Permit Requirements

The Permit (Section S5.C.6) requires the City to:

- On or before June 30, 2022, the Permittee shall implement and enforce a program to reduce pollutants in stormwater runoff to a regulated MS4 from new development, redevelopment and construction site activities. The program shall apply to both private and public development, including transportation projects.
- This program shall include a permitting process with site plan review, inspection and enforcement capable of meeting the standards listed in S5.C.6.c.(i)-(iv) For both private and public projects. At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i.
- The program shall make available, as applicable, a link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity, and a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.
- The Permittee shall ensure that all staff whose primary job duties fall within this section are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

7.2 2022 Planned Actions

- Ordinance (S5.C.6.b.iii):
The City will maintain the existing program designed to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment and construction site activities. The City adopted the 2021 King County Surface Water Design Manual (KCSWDM) as the Surface Water Design Manual for the City of Des Moines: DMMC 16.10.350.

- Local Program for New Development (S5.C.6.c):
 - The City will maintain the existing permitting process with plan review, inspection and enforcement capability to meet the standards listed in (i) through (viii), in the permit under section S5.C.6.c, for both private and public projects, using qualified personnel.
 - The City’s Surface Water Management Department will continue to conduct all construction related inspections that deal with drainage improvements and erosion control within the City.

- Long-term Operation and Maintenance (S5.C.6.c.iv):
The City will maintain the existing program to ensure inspection and maintenance of private facilities in new residential developments are being performed.

- Availability of NOIs (S5.C.6.d):
The City’s Community Development Department will continue to make available copies of the “Notice of Intent for Construction Activity” and copies of the “Notice of Intent for Industrial Activity” to representatives of proposed new development and redevelopment. The City enforces local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology. The City will continue to provide copies of the NOI upon request. The electronic forms for both the Construction Stormwater General Permit NOI & the Industrial Stormwater General Permit are available on the City website at the following link:
https://desmoineswa.gov/departments/public_works/surface_water_management/water_quality_npdes

- Training (S5.C.6.e):
The existing training program per S5.C.6.e will be maintained. Trainings will be conducted in house and by other agencies, such as the Department of Ecology and the Washington Stormwater Center.

8: MUNICIPAL OPERATIONS AND MAINTENANCE

8.1 Permit Requirements

The Permit (Section S5.C.7) requires the City to:

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in Chapter 4 of Volume V of the SWMMWW.

- Perform annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, and take appropriate maintenance actions in accordance with the adopted maintenance standards.
- Conduct spot checks of potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events (greater than 10-year, 24-hour recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards.
- Inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the SWMMWW. Decant water shall be disposed of in accordance with Appendix 6 – Street Waste Disposal.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all land owned or maintained by the City, and road maintenance activities under the functional control of the City.
- Implement an ongoing training program for employees of the City whose construction, operations or maintenance job functions may impact stormwater quality. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. The Permittee shall document and maintain records of training provided and staff trained.
- Develop and 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 in areas subject to this Permit that are not required to have coverage under an Industrial Stormwater General Permit.
- Maintain records of inspections and maintenance or repair activities conducted by the City.

8.2 2022 Planned Actions

- Maintenance Standards (S5.C.7.a):
Existing maintenance standards will remain established in 2022. The City has adopted the 2021 King County Surface Water Design Manual (KCSWDM) for maintenance standards for all publicly owned facilities: DMMC 16.10.350.
- Maintenance of Stormwater Facilities regulated by the Permittee (S5.C.7.b):

The City will continue to inspect and require timely maintenance of stormwater treatment and flow control BMPs/facilities that fall under this permit section.

- Maintenance of Stormwater Facilities owned by the Permittee (S5.C.7.c):
The City plans to maintain its ongoing program for annual inspection and maintenance of municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. No changes or additions will be made to the post-storm inspection program in 2022. The City plans to inspect half of all known catch basins and inlets owned by the City in 2022. City crews are inspecting with I-Pads in the field and scheduling required maintenance as needed. They will also be checking for evidence of illicit discharges or illicit connections during regular inspections. The City will continue to use its asset management program, Cityworks, to track inspections associated with this section of the permit.
- Reducing Stormwater Impacts (S5.C.7.d):
The City will continue to use the adopted King County Site Management Plan as the City's practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City.
- Training (S5.C.7.e):
Training under this section will continue on an as needed basis.
- Stormwater Pollution Prevention Plan (SWPPP) (S5.C.7.f):
The City's Planning, Building and Public Works Department developed and implemented a Stormwater Pollution Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City. The SWPPP includes periodic visual observation of discharges from the facility to evaluate effectiveness of BMPs. The City will continue to implement this plan during 2022.
- Recordkeeping (S5.C.7.g):
No changes to the existing record keeping program will be made in 2022.

9: SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

9.1 Permit Requirements

The Permit (Section S5.C.8) requires the City to:

- Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4 which include: application of operation

source control BMPs, structural source control BMPs or treatment BMPs/facilities, inspections of pollutant generating sources at publicly or privately owned institutional, commercial and industrial sites, application and enforcement of local ordinances, and practices that reduce polluted runoff from the application of pesticides, herbicides and fertilizers.

- On or before August 1, 2022, adopt ordinances or other enforceable items requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
- On or before August 1, 2022, establish an inventory that identifies publicly and privately owned commercial and industrial properties which have the potential to generate pollutants to the City's MS4.
- On or before January 1, 2023, implement an inspection program for the sites identified above that inspects 20% of listed sites annually and 100% of sites identified through legitimate complaints.
- On or before January 1, 2023, implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- Train staff who are responsible for implementing the source control program to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff.
- Maintain records of training provided and the staff trained.

9.2 2022 Planned Actions

- Implement a Program to Prevent & Reduce Pollutants (S5.C.8.a)
 - The City will continue to use ECOSS for business outreach, education, and preparedness for the upcoming business inspection requirement in 2022.
- Ordinance (S5.C.8.b.i)
 - The City has authority to establish a Source Control Program under DMMC 11.20.070 – Requirements to prevent, control, and reduce storm water contamination by use of BMPs. City staff will evaluate the City Code in order to determine if changes are necessary and will complete said changes before the August 1st, 2022 deadline.
- Site Inventory (S5.C.8.b.ii)
 - City staff will compile an inventory of all potential pollution generating sites within the City based off of business activities listed in Appendix 8 and based off of complaints for home-based businesses and multi-family sites in order to meet the August 1, 2022 deadline.
- Source Control Inspection Program (S5.C.8.b.iii)

- City staff will research options for a source control inspection program to meet the January 1, 2023 deadline. Current alternatives available include performing inspections in-house, contracting out to a private firm that offers source control inspections, or participating in a regional inspection program. At this time no such regional inspection program is available for jurisdictions.
- Progressive Enforcement Policy (S5.C.8.b.iv)
 - An existing ordinance with the City, codified as DMMC 11.20.090 – Violations and enforcement, satisfies the requirement for a progressive enforcement policy.
- Training (S5.C.8.b.v)
 - City staff will research opportunities for source control program training during 2022. Specifically, trainings that focus on conducting business inspections and enforcement will be targeted.

10: MONITORING AND ASSESSMENT (Section S8)

- Reporting:
The City will provide any monitoring or stormwater-related studies conducted by the City during the reporting period in the annual report.
- Regional Status and Trends Monitoring:
The City will continue to support RSMP small streams and marine nearshore status and trends monitoring in Puget Sound through the annual contribution to the collective fund with Ecology.
- SWMP Effectiveness and Source Identification Studies:
The City will continue to support RSMP effectiveness studies through the annual contribution to the collective fund with Ecology.

11: REPORTING REQUIREMENTS

- No later than March 31st of 2022, the City will submit an annual report. The reporting period for the annual report will be from January 1, 2021 through December 31, 2021. The City will submit annual reports electronically using Ecology's WQWebDMR.
- The City will continue to keep all records related to the Permit and the SWMP for at least five years.
- The City will continue to make all records related to the Permit and the City's SWMP available to the public at reasonable times during business

hours. The City will provide a copy of the most recent annual report to any individual or entity, upon request.

- The 2021 annual report for the City will include the following.
 1. A copy of the City's current SWMP Plan as required by S5A.2.
 2. Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of the permit during the reporting period.
 3. Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of this permit during the reporting period. Refer to appendix 3 for annual report questions.
 4. If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under this permit.
 5. Certification and signature pursuant to G19D, and notification of any changes to authorization pursuant to G19.C.
 6. A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the City's geographical area of permit coverage during the reporting period.