



WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER PERMIT

A FEDERAL CLEAN WATER ACT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) AND WASHINGTON STATE WASTE DISCHARGE GENERAL PERMIT



City of Bellevue, Washington NPDES ANNUAL REPORT 2023 STORMWATER MANAGEMENT PROGRAM PLAN / 2022 COMPLIANCE REPORT

January 2023



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CITY OF BELLEVUE

2023 STORMWATER MANAGEMENT PROGRAM PLAN

1. INTRODUCTION

1.1 Overview and Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect water quality and restore waters for “fishable, swimmable” uses. The federal Environmental Protection Agency (EPA) delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology). The NPDES permit also implements relevant provisions of Washington State’s Water Pollution Control Law.

Municipalities with a population of more than 100,000 (based on the 1990 census) were designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit as operators of large municipal separate storm sewer systems (MS4s). Municipalities with populations of less than 100,000 (based on the 1990 census) were designated as Phase II communities and must comply with Ecology’s Western Washington Phase II NPDES Municipal Stormwater Permit as operators of small and medium MS4s. More than 80 small and medium cities, including the City of Bellevue and urban portions of 5 counties in western Washington, must comply with the Phase II Permit.

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 municipalities implement 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:

- S5.C.1 - Stormwater Planning
- S5.C.2 - Public Education and Outreach (E&O)
- S5.C.3 - Public Involvement and Participation
- S5.C.4 – 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 - Operations and Maintenance (O&M)
- S5.C.8 – Source Control Program for Existing Development
- S8 - Monitoring and Assessment

As a programmatic permit, the components work together to ensure protection of water quality in our streams, lakes, wetlands, and groundwater. In addition, the Permit requires reporting and, if applicable, implementation of waterbody-specific cleanup plans developed by Ecology (aka Total Maximum Daily Loads or TMDLs). To date, Ecology has not developed such plans for Bellevue water bodies.

Permit conditions are phased in over the initial 5-year Permit term. The current permit term is from August 2019 through July 2024. The Permit requires the City to report annually (March 31 of each year) on progress in program implementation for the prior year through a compliance report. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. Ecology revises and reissues the Permit at the end of the permit term.

The SWMP Plan also documents the City's actions to protect Underground Injection Control (UIC) facilities it owns or operates in accordance with the UIC Program, authorized under the Federal Safe Drinking Water Act. UICs offer another approach to stormwater management. UIC Program requirements for City owned and regulated facilities can be met, substantially, by applying relevant SWMP actions.

Bellevue operates their Underground Injection Control (UIC) Program as part of a holistic Stormwater Management Program. The UIC Program rule, chapter 173-218 WAC, is the regulatory authority for UIC wells in Washington. The UIC program rule applies to Class V wells that receive stormwater.

1.2 Permit History

Ecology issued Washington's first Phase II Municipal Stormwater Permit to Western Washington municipalities in 2007. Ecology issued it as one general permit with the general permit conditions applicable to all Phase II municipalities in Western Washington, including Bellevue. The Phase II Permit was appealed by several parties and the permit was modified June 17, 2009, in response to the state Pollution Control Hearings Board appeal rulings.

In August 2012, Ecology extended the first Permit to July 31, 2013, issued a 5-year Permit (2013–2018) effective August 1, 2013, and also issued a new 2012 Ecology *Stormwater Management Manual for Western Washington* (2012 Ecology Manual, revised in 2014), which contained Stormwater requirements for new development, redevelopment, and construction sites. In fall of 2017, Ecology extending the existing permit from expiration in 2018 to August of 2019.

Early 2019, Ecology issued a draft permit for the 2019-2024 timeframe. Comments were solicited by Ecology and a new permit was issued July 1, 2019, with an effective permit term of August 1, 2019 - July 31, 2024. The 2019-2024 Permit retains the previous Permit's SWMP structure and phased implementation approach. It continues and builds upon prior Permit Program requirements by increasing certain Permit requirements and adding new ones.

The current 2019-2024 Western Washington Phase II Municipal Stormwater Permit and 2019 Ecology Stormwater Management Manual are available on Ecology's Web site at:

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

1.3 2019-2024 Permit Implementation Timeline

The 2019-2024 Permit requirements are phased in over the course of the Permit term. Permit requirements and key compliance dates are described here.

March 31st Annually Stormwater Management Program Administration. Submit the annual report electronically using Ecology's Water Quality Permitting Portal (WQWebPortal).

August 15th Annually Monitoring and Assessment. Pay Bellevue's \$65,805 fee for participating in the collectively funded Regional Stormwater Monitoring Program (RSMP) to Ecology by August 15th annually.

January 1, 2020 -MS4 Mapping and Documentation

- S5.C.4.b.i Begin to collect size and material for all known MS4 Outfalls during normal course of business and update records

July 1, 2020 -Public Education and Outreach

- S5.C.2.a.ii.(b) each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign. Permittee shall document lessons learned and recommendations for which option to select.

August 1, 2020 -Stormwater Planning

- S5.C.1.a Each Permittee shall convene an inter-disciplinary team to inform and assist in the development, progress and influence of this program.

February 1, 2021 -Public Education and Outreach

- S5.C.2.a.ii.(c) Based on recommendation from S5.C.2.a.ii.(b), each Permittee shall follow social marketing practices and methods, similar to community-based social marketing and develop a campaign that is tailored to the community, including development of a program evaluation plan.

March 31, 2021 -Coordination & Stormwater Planning

- S5.A.5.b. Permittees shall include a written description of internal coordination mechanisms in the Annual Report.
- S5.C.1.b.(a) the Permittee shall respond to the series of Stormwater Planning annual Report questions to describe how anticipated stormwater impacts on water quality were addressed.

April 1, 2021 -Public Education & Outreach

- S5.C.2.a.ii.(d) begin to implement the strategy developed in S5.C.2.a.ii.(c) Social Marketing.

August 1, 2021 -MS4 Mapping and Documentation

- S5.C.4.c. the required format for mapping is electronic with fully described mapping standards.

January 1, 2022 -Controlling Runoff from New Development

- Each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(ii). Shall apply to all applications submitted Prior to the above date.

March 31, 2022 -Stormwater Planning

- S5.C.1.d.i. Permittees shall submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas.

June 30, 2022 -Receiving Water Prioritization

- S5.C.1.ii The Permittee shall document the priority ranking process used to identify high priority receiving waters.

June 30, 2022 -Controlling Runoff from New Development

- Each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(i) through (iii).

July 1, 2022 -Controlling Runoff from New Development

- Each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(i). Shall apply on or after above date.
- Each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(iii). Shall apply prior to above date, that have not started construction by July 1st, 2027.

August 1, 2022 -Source Control Program for Existing Development

- S5.C.8.b(i) Permittees shall adopt and make effective an ordinance(s), or other enforceable document(s), requiring the application of source control BMP's
- S5.C.8.b(ii) Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have potential to generate pollutants to the MS4.

December 31, 2022 -Operations and Maintenance

- S5.C.7.f I implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee
- S5.C.7.d Document practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned and maintained by the Permittee.

January 1, 2023 -Source Control Program for Existing Development

- S5.C.8.b(iii) Permittees shall implement an inspection program for sites identified pursuant to S5.C.8.b(ii).
- S5.C.8.b(iv) Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.

January 1, 2023 -Stormwater planning

- S5.C.1.b.i.(b) The Permittee shall submit a report responding to the same questions included in S5.C.1.b.i.(a) to describe how water quality is being addressed.

March 31, 2023 -Stormwater Management Action Plan (SMAP)

- S5.C.1.d.iii Permittees shall develop a SMAP for at least one high priority catchment area from S5.C.1.d.ii that identifies a description of stormwater facility retrofits, land management development strategies and targeted, enhanced or customized implementation of stormwater management actions.

August 1, 2023 -MS4 Mapping and Documentation

- S5.C.4.b.ii Complete mapping of all known connections from the MS4 to a privately owned stormwater system.

March 31, 2024 -Public Education and Outreach

- S5.C.2.a.ii.(e) Evaluate and report on the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.

1.4 NPDES Annual Report

As noted above, the Permit requires submittal to Ecology of an Annual Report by March 31 of each year of the Permit term. The NPDES Annual Report consists of the following documents:

- **Storm Water Management Program (SWMP)**, which is developed by the City and summarizes the continuing/current and planned City-wide Permit implementation activities to assure continued permit compliance for the coming year (2022).
 - Appendix A contains acronyms for City departments and Permit and SWMP acronyms and definitions.
 - Appendix B contains the 2021 Compliance Report.

- **Compliance Report**, which is a specific “fill in the blanks” spreadsheet provided by Ecology and documents the City’s Permit compliance activities for the preceding calendar year (2022). The Compliance Report is very prescriptive and is completed administratively by city-wide staff at the end of the calendar year.

1.5 Department Responsibilities

The Permit requirements affect departments across the City organization. To encourage collaboration and efficient use of resources, the City’s NPDES Coordinator works closely with member of affected Departments to ensure NPDES Permit requirements are within compliance and to obtain information necessary to submit the annual compliance report. The affected departments include Utilities, Development Services Department (DSD), Information Technology (IT), Civic Services, Fire, Planning and Community Development (PCD), City Attorney’s Office (CAO), Finance, Parks and Community Services (Parks), Transportation (Trans.), Police, City Clerk’s Office, and the City Manager’s Office (CMO).

1.6 2023 SWMP Plan Organization

This SWMP Plan describes the:

- Permit requirements;
- Continuing/current programs and activities; and,
- Planned activities to maintain compliance and implement new activities in 2023.

The content in this SWMP Plan is based on Permit requirements and is organized similar to the Permit:

- **Section 2** addresses Permit requirements for administration of the City’s SWMP for 2023.
- **Section 3** addresses Permit requirements for Stormwater Planning for 2023.
- **Section 4** addresses Permit requirements for Public E&O for 2023.
- **Section 5** addresses Permit requirements for Public Involvement and Participation for 2023.
- **Section 6** addresses Permit requirements for MS4 Mapping for 2023.
- **Section 7** addresses Permit requirements for IDDE for 2023.
- **Section 8** addresses Permit requirements for Controlling Runoff from New Development, Redevelopment, and Construction sites for 2023.
- **Section 9** addresses Permit requirements for Municipal O&M for 2023.
- **Section 10** addresses Permit requirements for the Source Control for 2023.
- **Section 11** addresses Permit requirements for the Monitoring and Assessment for 2023.
- **Section 12** is a copy of the 2022 Annual Compliance Report submitted to Ecology.

Each section (excluding Section 12) includes a summary of the relevant Permit requirements and a description of continuing/current and planned compliance activities.

CITY OF BELLEVUE

2023 STORMWATER MANAGEMENT PROGRAM PLAN

2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

2.1 Permit Requirements

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

Develop and implement a Stormwater Management Program (SWMP). A SWMP is a set of actions and activities comprising the components list in section S5 and any additional action necessary, to meet the requirements of applicable TMDL's pursuant to *S7 – Compliance with Total Maximum Daily Load Requirements* and *S8 – Monitoring and Assessment*.

- At a minimum, the Permittee's SWMP shall be implemented throughout the geographic area subject to the Permit.
- Each Permittee shall prepare written documentation of the SWMP, called the SWMP Plan. The SWMP shall be organized according to the program components in S5.C and shall be updated at least annually for submittal with the Permittee's annual reports to Ecology. The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year, and shall include a description of:
 - Planned activities for each of the program components included in S5.C.
 - Any additional planned actions to meet the requirements of applicable TMDL's pursuant to *S7 – Compliance with Total Maximum Daily Load Requirements*
 - The City does not have any applicable TMDL's currently.
 - Any additional planned actions to meet the requirements of *S8 – Monitoring and Assessment*.
 - See section 11 – Monitoring and Assessment.
- The SWMP shall include an ongoing program for gathering, tracking, maintaining and using information to evaluate SWMP development, implementation, permit compliance and to set priorities.
 - Each Permittee shall track the cost or estimated cost of development and implementation of each component of the SWMP.
 - Costs are tracked within each program area by the program manager.
 - Each Permittee shall track the number of inspections, follow-up actions as a result of inspections, official enforcement actions and types of public education activities as required by the respective program component.
 - Inspections, follow up actions and enforcement actions are tracked within each program area by the program manager.
- Permittees shall continue implementation of existing stormwater management programs until they begin implementation of the updated program.
 - The 2022 SWMP remains in effect until the 2023 SWMP is implemented.

- Coordination among entities covered under municipal stormwater NPDES permits may be necessary to comply with certain conditions of the SWMP.
 - Clarify roles and responsibilities for the control of pollutants between physically interconnected MS4s covered by a municipal stormwater permit.
 - Staff are in regular communications with neighboring municipal staff where pollutants have or have the potential to cross jurisdictional boundaries.
 - Coordinate stormwater management activities for shared water bodies, or watersheds among Permittees.
 - As Watershed Planning efforts continue, watershed that cross jurisdictional boundaries will be discussed with neighboring Permittees as applicable.
- Include coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the terms of the Permit.
 - Permittees shall include a written description of internal coordination mechanisms in the Annual Report due no later than March 31, 2021.

| S5.A - SWMP Administration – 2019-2024 Planned Activities | | |
|---|--------------------------|---|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| SWMP preparation, updates and annual submittal with the Annual Report. | Annually - March 31st | The SWMP is prepared annually in January-February and submitted to Ecology with the annual compliance report on or before March 31st. |
| Submit the annual report electronically using Ecology's Water Quality Permitting Portal (WQWebPortal). | Annually - March 31st | The annual report is prepared in January-February annually and submitted to Ecology on or before March 31st. |
| Permittees shall include a written description of internal coordination mechanisms in the Annual Report due no later than March 31, 2021. | March 31, 2021 | Submitted in the March 2021 Compliance report - <i>To encourage collaboration and efficient use of resources, the City's NPDES Coordinator works closely with member of affected Departments to ensure NPDES Permit requirements are within compliance and to obtain information necessary to submit the annual compliance report. The affected departments include Utilities, Development Services Department (DSD), Information Technology (IT), Civic Services, Fire, Planning and Community Development (PCD), City Attorney's Office</i> |

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| | | <i>(CAO), Finance, Parks and Community Services (Parks), Transportation (Trans.), Police, City Clerk's Office, and the City Manager's Office (CMO).</i> |
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2023 STORMWATER MANAGEMENT PROGRAM PLAN

3. STORMWATER PLANNING

3.1 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.

- Convene an inter-disciplinary team to inform and assist in the development, progress and influence of this program.
 - The interdisciplinary team was established August of 2020 and consists of representatives from Utilities, Parks and Community Development with other Department representatives attending as needed. This team was originally established to create and implement the Watershed Management Plan and will serve as the planning team for stormwater planning requirements within the permit.
- Coordinate long-range plan updates. Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in Bellevue.
 - On or before March 31, 2021, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the 2013-2019 permit term.
 - See the 2020 Annual Compliance Report in Section 12 of the 2021 SWMP: questions 6-13.
 - On or before January 1, 2023, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality are currently being addressed.
 - Submitted December of 2022. Available via WQWebPortal or by request.
- Continue Low Impact Development code-related requirements to make LID the preferred and commonly used approach to site development.
 - The City has made LID the preferred and commonly used approach to site development per the SWMMWW standards. Local development-related codes, rules, standards or other enforceable documents are designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.
- Stormwater Management Action Planning.
 - Receiving Water Assessment - Permittees shall document and assess existing information related to their local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management.
 - By March 31, 2022, submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas.
 - The City established an inventory of 26 defined drainage basins. A Watershed Scale Planning Effort is currently underway to further evaluate the benefits of a Watershed Based management approach with the City.

- Receiving Water Prioritization – Develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions and other land/development management actions.
 - No later than June 30, 2022, document the prioritized and ranked list of receiving waters.
 - The City has prioritized watersheds and sub-basins within the Watershed Management Plan. Basins and sub-basins are categorized by ‘Protect’, ‘Improve’, or ‘Sustain’. Documentation available upon request.
- Stormwater Management Action Plan (SMAP) - No later than March 31, 2023, Permittees shall develop a SMAP for at least one high priority catchment area that identifies:
 - The SMAP is nearing completion and will be submitted by the March 31, 2023 deadline. Components of the SMAP are listed under each requirement below.
 - A description of the stormwater facility retrofits needed for the area, including BMP types and preferred locations.
 - Bellevue’s SMAP has identified several potential retrofits ranging in complexity and cost from low level efforts to high level efforts. A future feasibility analysis for each site is necessary to determine constructability efforts needed.
 - Land management/development strategies and/or actions identified for water quality management.
 - Bellevue operates two regional in-stream stormwater facilities within the SMAP catchment area. These facilities may have the potential for increased water quality enhancements.
 - Targeted, enhanced, or customized implementation of stormwater management actions.
 - The SMAP contains targeted efforts within the Crossroads area for Source Control and Behavior Change efforts. Enhanced maintenance on several of the surrounding arterial streets is also being considered.

| S5.C.1 – Stormwater Planning – 2019-2024 Planned Activities | | |
|--|-----------------|---|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| Convene an interdisciplinary team to inform and assist in the development, progress and influence of this program. | August 1, 2020 | The City has a Watershed Management Team that serves to meet this requirement. A portion of the team’s work is to respond to Stormwater Planning questions and prepare necessary documentation. |

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| On or before March 31, 2021, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the 2013-2019 permit term. | March 31, 2021 | See the 2020 Annual Compliance Report in Section 12 of the 2021 SWMP; questions 6-13. |
| On or before January 1, 2023, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality are currently being addressed. | January 1, 2023 | Submitted December of 2022. Available via WQWebPortal or by request. |
| By March 31, 2022, submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas. | March 31, 2022 | The City has an existing watershed inventory of 26 drainage basins/sub-basins. |
| No later than June 30, 2022, document the prioritized and ranked list of receiving waters. | June 30, 2022 | The City has prioritized watersheds and sub-basins within the Watershed Management Plan. Basins and sub-basins are categorized by 'Protect', 'Improve', or 'Sustain'. Documentation available upon request. |
| Stormwater Management Action Plan (SMAP) - No later than March 31, 2023, Permittees shall develop a SMAP for at least one high priority catchment area. | March 31, 2023 | Under development. On track to be completed by March 31, 2023. |

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4. PUBLIC EDUCATION AND OUTREACH

4.1 Permit Requirements

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

Continued implementation of an education and outreach program designed to 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 and create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

- Each Permittee shall implement an education and outreach program for the area served by the MS4.
 - General Awareness - Permittees shall annually select at a minimum one target audience and one subject area as defined in the permit, to provide subject area information to the target audience on an ongoing or strategic schedule.
 - The target audience for 2023 continues to be the General Public including overburdened communities, schools and businesses in the subject area of general impacts of stormwater on surface waters, including impacts from impervious surfaces.
 - Behavior Change – Permittees shall select, at a minimum, one target audience and one BMP from a defined list within the Permit.
 - No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign and document lessons learned.
 - Ecology provides and option to forgo this requirement if the City opts to develop a strategy and schedule for a new target audience and BMP behavior change campaign.
 - Bellevue is participating in a regional effort to effect behavior change around the maintenance and operation of dumpsters and their contribution to leaching pollutants into stormwater systems.
 - By February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community based social marketing and develop a campaign tailored to the community.
 - A campaign has been developed around the maintenance and operation of dumpsters as a contribution to pollutants entering stormwater systems.
 - No later than April 1, 2021, begin to implement the strategy developed.
 - The dumpster outreach campaign begin in 2021 and continues through 2023 and into 2024. Additional information can be found at the Washington Stormwater website for the [Dumpster Outreach Group](#).
 - No later than March 31, 2024, evaluate and report on changes in understanding and adoption of targeted behaviors and any planned or recommended changes to the campaign in order to be more effective.

- Stewardship – Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.
 - Then City of Bellevue has an active Stream Team that participate in salmon and peamouth observation and general stream health. An active Storm Drain Marking Program funded through Utilities. Riparian planting efforts utilizing volunteers and City staff throughout the year through our Parks Department and various education opportunities focused on stormwater and stream health that target our schools and community events.

| S5.C.2 – Education and Outreach – 2019-2024 Planned Activities | | |
|--|--------------------|--|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| Permittees shall annually select at a minimum one target audience and one subject area as defined in the permit, to provide subject area information to the target audience on an ongoing or strategic schedule. | Ongoing - Annually | Outreach will continue in the form of school programs, outreach/tabling at community events, and information in the city’s newsletter and utilities bill inserts. |
| No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign and document lessons learned. | July 1, 2020 | <p>Because the city discontinued the previous behavior change campaign after evaluation, we shared lessons learned from our 2019 Stormwater Runoff Awareness, Attitudes, and Behavior Survey of Residents.</p> <p>Bellevue conducted a strategy and schedule for a new target audience under option 3 in S5.C.2.a.ii.(c)</p> <p>Bellevue has joined with regional partners to support outreach for management of solid waste dumpsters at commercial dumpster areas.</p> |
| By February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community based social marketing and develop a campaign tailored to the community. | February 1, 2021 | Bellevue is participating in a regional effort to prevent pollution around commercial dumpster areas. |
| No later than April 1, 2021, begin to implement the strategy developed. | April 1, 2021 | The dumpster outreach campaign begin in 2021 and |

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| | | continues through 2023 and into 2024. |
| No later than March 31, 2024, evaluate and report on changes in understanding and adoption of targeted behaviors and any planned or recommended changes to the campaign in order to be more effective. | March 31, 2024 | To be developed following implementation of the dumpster outreach strategy. |

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5. PUBLIC INVOLVEMENT AND PARTICIPATION

5.1 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, 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 Permittee’s SMAP and SWMP.
 - The City posts the draft SWMP on the City website, typically by mid-January of each year, inviting the public to submit comments to the NPDES Coordinator.
 - The City holds a Public Meeting at the Environmental Services Commission (ESC) meeting, typically on the first Thursday of February, inviting comments from the public and the ESC. The Public meeting is posted in local newspapers and on the City Website ahead of the ESC scheduled meeting.
- Each Permittee shall post on their website their SWMP Plan and the annual report no later than May 31st each year.

| S5.C.3 – Public Involvement & Participation – 2019-2024 Planned Activities | | |
|---|----------------------|---|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| <ul style="list-style-type: none"> • Each Permittee shall post on their website their SWMP Plan and the annual report no later than May 31st each year. | Annually – May 31 | The draft SWMP is posted for comment in mid to late January annually. A Public Hearing is held annually at the City’s Environmental Services Commission meeting in February. The final SWMP is included in the submittal to Ecology and is posted to the City website along with the annual report on or before May 31 st annually. Typically, this occurs in late March-early April. |

Comments on the draft 2023 SWMP and minutes from the February 2, 2023 Environmental Services Commission meeting and Public Hearing will be included within this section of the final draft of the SWMP before submittal to Ecology.

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6. MS4 MAPPING AND DOCUMENTATION

6.1 Permit Requirements

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

Implement an ongoing program for mapping and documenting the MS4.

- Ongoing Mapping – Each Permittee shall maintain mapping data for the features listed below:
 - Known MS4 outfalls and discharge points.
 - Receiving waters.
 - Stormwater treatment and flow control BMP's/facilities owned or operated by the Permittee.
 - Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.
 - Tributary conveyance to all known outfalls and discharge points with a 24-inch diameter or equivalent.
 - Connections between MS4 owned or operated by the Permittee and other municipalities or public entities.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
 - The City maintains mapping data that meet the requirements of the Permit. Mapping data is available to the public through the City's online GIS portal.
- New mapping requirements for the 2019-2024 permit:
 - No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business.
 - The City has been collecting size and material for all known MS4 features including outfalls.
 - No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system.
- No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards.
 - The City maintains GIS based electronic mapping data for the MS4 and will continue to update the data as new information comes available. GIS data is available online through the City's GIS portal.
 - The City has fully described GIS mapping rules and standards.

S5.C.4 – MS4 Mapping & Documentation – 2019-2024 Planned Activities

| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
|--|-----------------|--|
| No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business. | January 1, 2020 | Ongoing |
| No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system. | August 1, 2023 | Mapping of private connections is underway. |
| No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards. | August 1, 2021 | The City has fully described mapping standards. Stormwater system information is available to download via GIS Shapefiles on the City website. |

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7. ILLICIT DISCHARGE DETECTION AND ELIMINATION

7.1 Permit Requirements

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

Continued implementation of an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

- Include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.
 - The City utilizes the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual* (Herrera Environmental Consultants, Inc. and Aspect Consulting, LLC, May 2020 Revision) as the basis of the Illicit Discharge Detection and Elimination Program.
- Inform public employees, businesses and the general public of hazards associated with illicit discharges and improper disposal of waste.
 - The City has an ongoing Education and Outreach/Training Program and dedicated staff to inform public employees, businesses and the general public of the hazards of illicit discharges and improper disposal of waste.
- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
 - Section 24.06.125 of the Bellevue Utilities Storm and Surface Water Code defines *Prohibited, Permissible, and Conditional Discharges* to the MS4. Enforcement of the provisions of the code are set forth in Bellevue City Code 1.18.075, *Enforcement Procedures for Violations of Chapters 24.02, 24.04, 24.06 and 23.76 BCC*.
- Implement an ongoing program design to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.
 - Implement procedures for conducting investigations of the Permittee's MS4, including field screening and methods for identifying potential sources.
 - All Permittee's shall complete field screening for an average of 12% of the MS4 each year. Permittee's shall annually track total percentage of the MS4 screened beginning August 1, 2019.
 - The City has an ongoing program to track annual and total percentage of the MS4 screened. The primary source is through the City's Municipal and Operations inspections. Other sources include pipe inspections, hotline reports and staff observations.
 - A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
 - The City has a 24/7 hotline for reporting of all Utilities related matters (425.452.7840). The City also has a mobile application (My Bellevue) where reports can be filed and receives notifications from Ecology through the ERTS notification.
 - Implement an ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe and illicit discharge and/or illicit connection to the MS4.

- City staff are trained at two levels within the organization, awareness and response. Awareness training is designed for field staff that may observe an illicit discharge; response level training is designed to contain the discharge until Water Quality/IDDE staff can respond.
- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.
 - Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee.
 - The City has dedicated and trained IDDE staff that respond to all reported illicit discharges and/or illicit connections.
 - Procedures for tracing the source of an illicit discharge, including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or detailed inspection procedures.
 - All reported illicit discharges or illicit connections are traced to their source as information is available. Staff have resources available to them that allow for opening manholes, utilizing mobile cameras and other equipment that can aid in this activity.
 - Procedures for eliminating the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance; follow-up inspections; and use of developed compliance strategies including escalating enforcement and legal actions.
 - Staff follow up on each reported illicit discharge to notify property owners, business managers and appropriate authorities to initiate a mitigation plan that is designed to eliminate any illicit discharges and/or illicit connections. The City's preferred approach is through voluntary compliance first. The City has an escalating enforcement mechanism in place should voluntary compliance not be successful.
- Train staff who are responsible for identification, investigation, termination, cleanup and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities.
 - City staff are trained at two levels within the organization, awareness and response. Awareness training is designed for field staff that may observe an illicit discharge; response level training is designed to contain the discharge until Water Quality/IDDE staff can respond.
- Track and maintain records of the activities conducted to meet the requirements of this section.
 - All illicit discharges and/or illicit connection investigations are tracked and recorded through the City's Maintenance Management Information System (MMIS) using the characteristics set by Ecology in Appendix 12 of the Permit. Duplicate information is also entered into the Department of Ecology WebIDDE reporting system.

S5.C.5 – Illicit Discharge Detection & Elimination – 2019-2024 Planned Activities

| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
|--|-----------------|--|
| All Permittee's shall complete field screening for an average of 12% of the MS4 each year. Permittee's shall annually track total percentage of the MS4 screened beginning August 1, 2019. | August 1, 2019 | Ongoing. The City tracks MS4 screening through the Operations and Maintenance inspection program. Approximately 50% of the system is inspected annually. |

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8. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

8.1 Permit Requirements

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

Implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects.

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.
 - Each Permittee shall adopt and make effective a local program, no later than June 30, 2022 that meets the requirements set forth in the Permit.
 - The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the Permit conditions.
 - The City implemented an ordinance in 2016 that meets the current Permit requirements. (Ord 6321) (See BCC 24.06 & 24.06.065)
- The program shall include a permitting process with site plan review, inspection and enforcement capability to meet permit standards.
 - Review of all stormwater site plans for proposed development activities.
 - Inspections, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review.
 - Inspection of all permitted development sites during construction to verify proper installation and maintenance of erosion and sediment controls.
 - Inspection of all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential development every six months, until 90% of them lots are constructed or when construction has stopped and the site is fully stabilized, to identify maintenance needs and enforcement as needed.
 - Inspection of all permitted development sites upon completion and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.
 - Compliance with inspection requirements shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during the permit term shall be determined by achieving 80% of required inspections.
 - Procedures for keeping records of inspections and enforcement actions by staff.
 - An enforcement strategy to respond to issues of non-compliance.
 - The City passed several ordinances in 2016 to meet the requirements of the current permit. (see BCC 24.06.060 – Permitting review and inspection, 23.76 – Clear and Grade/Erosion Control, 24.06.105 & 24.06.125 – Routine Inspections).
- The program shall make available, as applicable, the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity and, as applicable, a link to the

electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.

- Notice of Intent is issued by the Clear and Grade permit process and completion of the Storm Water Pollution Prevention Plan (SWPPP).
- Ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities.
 - The City has ongoing training for inspectors and plan reviewers related to their field of interest as well as an overall IDDE awareness training.

| S5.C.6 – Controlling Runoff from New Development, Redevelopment & Construction Sites - 2019-2024 Planned Activities | | |
|---|-----------------|--|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| Each Permittee shall adopt and make effective a local program, no later than June 30, 2022 that meets the requirements set forth in the Permit. | June 30, 2022 | The City implemented an ordinance in 2016 that satisfies the Permit requirements. (Ord 6321) (See BCC 24.06 & 24.06.065) |

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9. OPERATIONS AND MAINTENANCE

9.1 Permit Requirements

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

Implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts.

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* or a Phase I program, approved by Ecology.
 - No later than June 30, 2022, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit.
 - The City has administratively adopted the *2019 Stormwater Management Manual for Western Washington* as our maintenance standards.
- Maintenance of stormwater facilities regulated by the Permittee - Verify adequate long-term O&M of stormwater treatment and flow control BMP's/facilities that are permitted and constructed pursuant to section 6 and shall be maintained in accordance with defined maintenance timelines defined in section 7.
 - Implementation of an enforceable ordinance or other enforceable mechanism.
 - Section 24.06.045 of the Bellevue Utilities Storm and Surface Water Code defines the *Authority of the Utility* including the Private Drainage Inspection Program. Enforcement of the provisions of the code are set forth in Bellevue City Code 1.18.075, *Enforcement Procedures for Violations of Chapters 24.02, 24.04, 24.06 and 23.76 BCC*.
 - Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted according to Permit standards.
 - The City has an ongoing Private Drainage Inspection Program that includes inspections of facilities and a record tracking system for inspection results, notifications, and maintenance requested/performed.
- Maintenance of stormwater facilities owned or operated by the permittee.
 - Implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMP's/facilities and taking appropriate maintenance actions in accordance with the adopted maintenance standards.
 - The City has an ongoing inspection program that annually inspects all treatment and flow control BMPs/facilities, taking appropriate maintenance activities as determined by inspection results.
 - Spot check potential damaged stormwater treatment and flow control BMPs/facilities after major storm events.
 - The City maintains a routine surveillance list of known problem locations that are inspected before, during and following major storm events. Known problem

locations consist of treatment and flow control BMPs/facilities, pipe ends, culverts and specific stream locations.

- Inspect all catch basins and inlets owned and operated by the Permittee every two years.
 - The City has an ongoing inspection program that bi-annually inspects all catch basins, inlets and manholes, taking appropriate maintenance activities as determined by inspection results.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.
 - The City maintains practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.
 - No later than December 31, 2022, document the practices, policies and procedures.
 - Documentation consists of Standard Operating Procedures, Best Management Practices and/or information found on the City website across several Departments (Utilities, Transportation, Parks).
- Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.
 - Staff are annually trained on IDDE awareness and/or response dependent on their role in the organization.
 - Stormwater staff are trained on maintenance standards periodically as needed or as conditions change. Several Stormwater Staff are trained as Municipal Stormwater Inspectors.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee.
 - The City maintains several SWPPP's originally drafted in 2010 and updated as needed since.
 - Currently the City has Bellevue has 5 SWPPP sites managed by the Utilities, Facilities/Asset Management and Parks Departments. SWPPPs are available upon request.

| S5.C.7 – Operations & Maintenance - 2019-2024 Planned Activities | | |
|--|-------------------|--|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| No later than June 30, 2022, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit. | June 30, 2022 | The City will administratively adopt the 2019 <i>Stormwater Management Manual for Western Washington</i> as our maintenance standards. |
| No later than December 31, 2022, document the practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee. | December 31, 2022 | Documentation consists of Standard Operating Procedures, Best Management Practices and/or information found on the City website across several Departments |

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|--|-------------------|---|
| | | (Utilities, Transportation, Parks). |
| As necessary, update SWPPPs no later than December 21, 2022 per Permit requirements. | December 21, 2022 | Bellevue has 5 SWPPP sites managed by the Utilities, Facilities/Asset Management and Parks Departments. All 5 of the SWPPPs have been updated as needed. SWPPPs are available upon request. |

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10. SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

10.1 Permit Requirements

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

Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include application of operational source control BMPs and, if necessary, structural BMPs. Inspection of potential pollutant generating sources at publicly and privately owned institutional and commercial sites. Application and enforcement of local ordinances at identified sites. And practices to reduce polluted runoff for the application of pesticides, herbicides and fertilizers from identified sites.

- No later than August 1, 2022, Permittees shall adopt and make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
 - Section 24.06.045 of the Bellevue Utilities Storm and Surface Water Code defines the *Authority of the Utility* for developing and implementing programs and right of entry for inspections. Enforcement of the provisions of the code are set forth in Bellevue City Code 1.18.075, *Enforcement Procedures for Violations of Chapters 24.02, 24.04, 24.06 and 23.76 BCC*.
- No later than August 1, 2022, Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4.
 - An initial inventory of businesses was established back in August and has been refined since. As of January 2023, Bellevue has 1938 sites that will be included within the Source Control Program.
- No later than January 1, 2023, Permittees shall implement an inspection program for identified sites.
 - The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements.
 - Information/Inspection notifications for the Source Control program are being sent to identified businesses starting in January with site inspections to begin shortly after.
 - Additional information on Bellevue’s Source Control program can be found on the [Business Pollution Prevention](#) page of the City’s website.
- No later than January 1, 2023, Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.
 - Bellevue Utilities Regulatory Compliance section has recommended timelines for escalating enforcement based on each program need and associated requirements. Escalating enforcement procedures emphasize voluntary compliance first and foremost. Corrective actions and civil violations are only pursued when voluntary compliance efforts break down.

- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities.
 - The Source Control program is housed within Bellevue Utilities and managed by a full time Senior Engineering Technician. The program manager has completed the recent ‘Source Control Inspection’ training offer via the Washington Stormwater Center and is/has been involved in ongoing regional discussions focused on Source Control and Business Inspections for pollution prevention.

| S5.C.8 – Source Control Program for Existing Development - 2019-2024 Planned Activities | | |
|--|-----------------|---|
| <u>Activity</u> | <u>Due Date</u> | <u>Status/Notes</u> |
| No later than August 1, 2022, Permittees shall adopt and make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. | August 1, 2022 | Section 24.06.045 of the Bellevue Utilities Storm and Surface Water Code defines the <i>Authority of the Utility</i> for developing and implementing programs and right of entry for inspections. Enforcement of the provisions of the code are set forth in Bellevue City Code 1.18.075, <i>Enforcement Procedures for Violations of Chapters 24.02, 24.04, 24.06 and 23.76 BCC.</i> |
| No later than August 1, 2022, Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4. | August 1, 2022 | An initial inventory of businesses was established back in August and has been refined since. As of January 2023, Bellevue has 1938 sites that will be included within the Source Control Program. |
| No later than January 1, 2023, Permittees shall implement an inspection program for identified sites. | January 1, 2023 | Bellevue’s Source Control Program being implementation of Business Pollution Prevention inspections January 1, 2023. |

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|--|------------------------|--|
| <p>No later than January 1, 2023, Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.</p> | <p>January 1, 2023</p> | <p>Bellevue Utilities Regulatory Compliance section has recommended timelines for escalating enforcement based on each program need and associated requirements. Escalating enforcement procedures emphasize voluntary compliance first and foremost. Corrective actions and civil violations are only pursued when voluntary compliance efforts break down.</p> |
|--|------------------------|--|

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11. MONITORING AND ASSESSMENT

11.1 Permit Requirements

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

The NPDES Monitoring and Assessment program provides two options for Permittees. Permittees can either choose to perform the requirements of this permit section on their own or they can opt in to a payment option and allow Ecology to utilize the funds for region wide studies and assessments.

Bellevue elected to opt in to the regional approach and allow Ecology to manage the funding. Initial cost comparisons of the two options showed a significant increase in costs should Bellevue choose to try and meet the permit requirements on their own.

The program itself is separated into two areas, *Regional Status and Trends* and *Effectiveness and Source Identification Studies*.

Regional Status and Trends

- All Phase II Western Washington Municipal Permittees shall notify Ecology in writing which of the following two options for regional status and trends monitoring by December 1, 2019.
 - Option a – Make annual payment into a collective fund to implement a regional receiving water status and trends monitoring of small stream and marine nearshore areas. The annual payments into the collective fund are due on or before August 15 each year.
 - Option b – Conduct stormwater discharge monitoring per the Permit requirements.
 - The City has elected to participate in option a.

SWMP Effectiveness and Source Identification Studies

- All Phase II Western Washington Municipal Permittees shall notify Ecology in writing which of the following two options for effectiveness and source identification studies by December 1, 2019.
 - Option a – Make annual payment into a collective fund to implement effectiveness and source identification studies. The annual payments into the collective fund are due on or before August 15 each year.
 - Option b – Conduct stormwater discharge monitoring per the Permit requirements.
 - The City has elected to participate in option a.

The cost to Bellevue to meet the permit requirements of Section 8 – Monitoring and Assessment for the 2019-2024 permit term is:

- Regional Status and Trends - \$23,273 annually
- Effectiveness and Source ID Studies - \$42,532 annually

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12. 2022 ANNUAL COMPLIANCE REPORT

Section reserved for the 2022 Annual Compliance Report. The 2022 Annual Compliance Report is under development with the final report to be submitted to Ecology no later than March 31, 2023. Additionally, the Annual Compliance Report will be attached to this document and posted on the City website no later than May 31, 2023.