



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 2025 STORMWATER MANAGEMENT PROGRAM PLAN & 2024 COMPLIANCE REPORT

March 2025



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CITY OF BELLEVUE

2025 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 7 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 –Stormwater Management for Existing Development
- S5.C.8 – Source Control Program for Existing Development
- S5.C.9 Operations and Maintenance (O&M)

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 2024 through July 2029. 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. In July of 2019, Ecology reissued an updated Stormwater Management Manual for Western Washington.

In Fall of 2023, Ecology released formal draft permits for the 2024-2029 reissuance. Ecology considered public comments between November 2023 through June 2024 and reissued the final version of the permit on July, 2024. Significant changes were made to the permit, new sections were added and comments by Ecology included the vision to work toward aligning the content and the timeframes with the other permits Including the Phase I NPDES Permit and the Construction Stormwater Discharge Permit.

The current 2024-2029 Western Washington Phase II Municipal Stormwater Permit is available at:

[WWA Phase II Permit 2024](#)

The currently used 2019 Ecology Stormwater Management Manual and the 2024 Ecology Stormwater Management Manual for Western Washington, that will be adopted by Bellevue in 2027, can be found at:

[Stormwater manuals - Washington State Department of Ecology](#)

1.3 2024-2029 Permit Implementation Timeline

The 2024-2029 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 \$95,418 fee for participating in the collectively funded regional Stormwater Action Monitoring (SAM) Collective Fund to Ecology by August 15th annually.

July 1, 2025 -Public Education and Outreach

- S5.C.2.a.ii.(b) Based on the recommendation from the 2024 evaluate and report, follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan.

September 1, 2025 -Public Education and Outreach

- S5.C.2.a.ii.(c) Begin to implement the strategy developed in C.2.a.ii.(b).

March 31, 2026 -MS4 Mapping and Documentation

- S5.C.4.b.i Submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. This reporting shall include the size and material of the outfalls.

December 31, 2026 -MS4 Mapping and Documentation

- S5.C.4.b.ii Using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.

December 31, 2026 -Public Education and Outreach

- S5.C.3.a.ii Document methods used to identify overburdened communities.

March 31, 2027 -Stormwater Planning & SMAP

- S5.C.1.d.i No later than March 31, 2027, complete a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP. The purpose of the SMAP is to support implementation in the SMED program with the identification of strategic investments through the identification of projects and actions.

June 30, 2027 -Operations and Maintenance

- S5.C.9.a Implement maintenance standards that are as protective of facility function as specified in the SWMMWW or an Ecology-approved Phase I program. Update maintenance standards as necessary.

June 30, 2027 -Minimum Technical Requirements for New Development & Redevelopment

- Appendix 10 Identifies the exemptions, definitions related to the Minimum Requirements, applicability of the Minimum Requirements that need to be included in the ECY-equivalent stormwater management manual.

July 1, 2027 -Operations and Maintenance

- S5.C.9.e.i Apply a street sweeping program to Permittee owned roads in high priority MS4 drainage areas discharging to outfalls and meet any of the following criteria (a) high traffic streets, such as arterials or collectors, (b) Streets that serve commercial or industrial land use areas.
- S5.C.9.e.ii Sweep high priority areas at least once between July and September each year and two additional times a year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required.
- S5.C.9.e.ii.a Annually sweep, and document, at least 90% of high priority areas each sweeping event.
- S5.C.9.e.iii Follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.

August 1, 2027 -Source Control Program for Existing Development

- S5.C.8.a Update and make effective the ordinances(s) or other enforceable documents, as necessary to meet S5.C.8.

December 31, 2027 -Operations and Maintenance

- S5.C.9.xv.(a) Document policies, practices, or procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee including:
 - Source control BMPs to minimize PCBs from entering the MS4. The Permittee shall not discharge washdown water to the MS4 for buildings suspected of having PCB-containing materials.
 - S5.C.9.xvi(a) Update policies, practices, or procedures to include source control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

March 31, Annually -Stormwater Management for Existing Development

- S5.C.7.b With each annual report, provide a list of planned individual projects scheduled for funding or implementation during the Permit term for the purpose of meeting the assigned equivalent acreage in Appendix 12 using the formatting specified in Appendix 12.

March 31, 2028 - Stormwater Management for Existing Development

- S5.C.7.e Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the 2029-2034 Permit term.
- S5.C.7.c Fully fund, start construction, or completely implement projects(s) that meet the Permittee's equivalent acreage and submit documentation with the Annual Report.

March 31, 2028 -Operations and Maintenance

- S5.C.9.e.v Document and report: (a) mapped priority areas swept, (b) sweeping dates, (c) sweeping frequency, (d) type of sweeper, (e) total curb miles of priority areas and curb miles swept, and (f) approximation of street waste removed for each sweeping event.

December 31, 2028 -Stormwater Planning

- S5.C.1.c.iii Adopt and implement tree canopy goals and policies to support stormwater management.

December 31, 2028 -MS4 Mapping and Documentation

- S5.C.4.b.iii Implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow controls BMPs/facilities owned or operated by

the Permittee. Submit with the Annual Report a map and breakdown of acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities.

- S5.C.4.b.iv Using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

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 (2025).
 - Appendix A contains acronyms for City departments and Permit and SWMP acronyms and definitions.
 - Appendix B contains the 2024 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 (2024). 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), Finance and Asset Management (FAM), 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 2025 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 2025.

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 2025.
- **Section 3** addresses Permit requirements for Stormwater Planning for 2025.
- **Section 4** addresses Permit requirements for Public E&O for 2025.
- **Section 5** addresses Permit requirements for Public Involvement and Participation for 2025.
- **Section 6** addresses Permit requirements for MS4 Mapping for 2025.
- **Section 7** addresses Permit requirements for IDDE for 2025.
- **Section 8** addresses Permit requirements for Controlling Runoff from New Development, Redevelopment, and Construction sites for 2025.

- **Section 9** addresses Permit requirements for Stormwater Management for Existing Development 2025
- **Section 10** addresses Permit requirements Source Control for 2025
- **Section 11** addresses Permit requirements for the O&M Requirements for 2025.
- **Section 12** addresses Permit requirements for the Monitoring and Assessment for 2025.
- **Section 13** addresses Permit requirements for the Reporting and Record Keeping for 2025.
- **Section 14** is a copy of the 2024 Annual Compliance Report submitted to Ecology.

Each section (excluding Section 13) includes a summary of the relevant Permit requirements and a description of continuing/current and planned compliance activities.

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2025 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 and sources of funding. Permittees shall provide annual average costs to implement the SWMP and TMDL requirements.
 - Costs are tracked within each program area by the program manager.
 - Each Permittee shall track the number of inspections, follow-up actions because of inspections, official enforcement actions and types of public education activities as required by the respective program component. This information shall be included in the annual
 - 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 2024 SWMP remains in effect until the 2025 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 communication with neighboring municipal staff where pollutants have or may have the potential to cross jurisdictional boundaries.
 - Coordinate stormwater management activities for shared water bodies, or watersheds among Permittees.
 - As Watershed Planning efforts continue, watersheds 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, 2026.
 - 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), Finance and Asset Management (FAM), Fire, Community Development (CD), City Attorney’s Office (CAO).

S5.A - SWMP Administration – 2024-2029 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 31 st .
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 31 st .
Permittees shall include a written description of internal coordination mechanisms in the Annual Report due no later than March 31, 2026.	March 31, 2026	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

		<p>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), Facilities and Asset Management (FAM), Fire, Community Development (CD), 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).</p>
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2025 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, 2027, the Permittee shall describe how stormwater management needs and protections/improvement of receiving water health are (or are not) informing the long range planning process and influencing policy.
- 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.
 - Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated.
- No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management. Establish a long-term goal of canopy.
 - Maintaining or increasing canopy in overburdened communities.
 - Maintaining existing mature canopy.
- Stormwater Management Action Planning.
 - Stormwater Management Action Planning (SMAP). Permittees shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication no. 24-10-027) for one new priority catchment or additional actions for an existing SMAP.
 - By March 31, 2027, Permittees shall complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP.

- A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations.
- Land management/development strategies and/or actions identified for water quality management.
- Focused, enhanced, or customized implementation of stormwater management actions related to the Permit sections within S5.
- Identify changes needed for local long-range plans to address SMAP priorities.
- A proposed implementation schedule and budget sources for short and long-term actions.
- Actions in the SMAP that may benefit overburdened communities.
- A process and schedule to provide future assessment and feedback to improve the planning process.

S5.C.1 – Stormwater Planning – 2024-2029 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.	Ongoing	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.
On or before March 31, 2027, the Permittee shall describe how stormwater management needs and protections/improvement of receiving water health are (or are not) informing the long range planning process and influencing policy.	March 31, 2027	Under review.
As an ongoing effort, continue to require LID Principals and BMPs when updating, revising and developing new local development codes. Make LID the preferred and commonly used approach to site development.	Ongoing	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.

<p>By December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management.</p>	<p>December 31, 2028</p>	<p>The City has existing tree canopy goals. Alignment with stormwater management is under development.</p>
<p>By March 31, 2027 complete a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP.</p>	<p>March 31, 2027</p>	<p>The City has developed a SMAP. Options for a new SMAP or additional actions on the existing SMAP are under review</p>

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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 priority audience and one subject area as defined in the permit.
 - 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, 2025, each Permittee shall follow recommendations from the 2024 evaluate and report and follow social marketing practices and methods to develop an outreach campaign.
 - By September 1, 2025, each Permittee shall begin to implement the strategy developed.
 - No later than March 31, 2029, evaluate and submit a report on the changes in understanding and adoption of behaviors from implementation along with planned or recommended changes.
 - Stewardship – Each Permittee shall provide, partner with or promote stewardship opportunities to encourage residents or businesses to participate in activities.
 - The City of Bellevue has an active Stream Team that participates 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 – 2024-2029 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, 2025, based on the recommendation from the 2024 evaluation and report, develop a campaign tailored to the community.	July 1, 2025	The City plans to design a new behavior change campaign for the current permit cycle. Previous behavior change efforts were completed in 2024.
No later than September 1, 2025, implement the strategy.	September 1, 2025	Under development
No later than March 31, 2029, evaluate and submit a report on the changes in understanding and adoption of behaviors from implementation along with planned or recommended changes.	March 31, 2029	To begin in 2028.

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2023 STORMWATER MANAGEMENT PROGRAM PLAN

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-February of each year, inviting the public to submit comments to the NPDES Coordinator.
 - The City will hold a Public Meeting at the Environmental Services Commission (ESC) meeting, scheduled February 6, 2025 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 – 2024-2029 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Each Permittee shall post on their website their SWMP Plan and the annual report no later than May 31 st each year.	Annually – May 31	<p>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.</p> <p>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 31st annually. Typically, this occurs in late March-early April.</p>

CITY OF BELLEVUE

2024 STORMWATER MANAGEMENT PROGRAM PLAN

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.
 - Size and material of outfalls.
 - 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.
 - Ongoing mapping of all known connections from the MS4 to a privately-owned stormwater system.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
 - 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 and public facing [MapViewer](#).
 - The City has fully described GIS mapping rules and standards.
- New mapping requirements for the 2024-2029 permit:
 - No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report.
 - No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop a methodology to identify canopy for stormwater management purposes, which may be updated annually.
 - No later than December 31, 2028, implement a methodology to map acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater and flow control BMPs/facilities, owned or operated by the Permittee. Submit with the Annual Report a map and breakdown of acreage managed or unmanaged by stormwater treatment and flow control/BMPs/facilities.
 - No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

S5.C.4 – MS4 Mapping & Documentation – 2024-2029 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Implement an ongoing program for mapping and documenting the MS4	Ongoing	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 and public facing MapViewer .
No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report.	March 31, 2026	All known outfalls are currently within existing map data.
No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop a methodology to identify canopy for stormwater management purposes, which may be updated annually.	December 31, 2026	Under review
No later than December 31, 2028, implement a methodology to map acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater and flow control BMPs/facilities, owned or operated by the Permittee. Submit with the Annual Report a map and breakdown of acreage managed or unmanaged by stormwater treatment and flow control/BMPs/facilities.	December 31, 2028	Under review
No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.	December 31, 2028	Under review

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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.
- No later than July 1, 2027, implement and update an ordinance if necessary, 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.
- No later than December 31, 2026, the Permittee must coordinate with fire fighting agencies/departments that serve the area that discharge to the MS4 to be notified when PFA-containing AFFFs are used during emergency firefighting activities.
 - City staff have coordinated with surrounding agencies and fire departments and have documented the discontinuation of PFAS-containing AFFFs. Jurisdictions include Bellevue, Eastside Fire, Kirkland, Mercer Island, Redmond and King County.
- No later than January 1, 2027, Permitted shall update and implement procedures to minimize discharges to the MS4 during post emergency clean-up and disposal activities including, but not

limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4.

- o Bellevue Fire along with Eastside Fire and surrounding agencies no longer use PFAS-containing AFFFs.

S5.C.5 – Illicit Discharge Detection & Elimination – 2024-2029 Planned Activities		
Activity	Due Date	Status/Notes
No later than July 1, 2027, update and implement an ordinance to effectively prohibit non-stormwater, illicit discharges into the Permittee’s MS4.	July 1, 2027.	Section 24.06.125 of the Bellevue Utilities Storm and Surface Water Code defines <i>Prohibited, Permissible, and Conditional Discharges</i> to the MS4. 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> Existing code language is under evaluation for potential changes.
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.	Ongoing	Ongoing. The City tracks MS4 screening through the Operations and Maintenance inspection program. Approximately 50% of the system is inspected annually.
No later than December 31, 2026, the Permittee must coordinate with fire fighting agencies/departments that serve the area that discharge to the MS4 to be notified when PFA-containing AFFFs are used during emergency firefighting activities.	December 31, 2026	City staff have coordinated with surrounding agencies and fire departments and have documented the discontinuation of PFA-containing AFFFs. Jurisdictions include Bellevue, Eastside Fire, Kirkland, Mercer Island, Redmond and King County.
No later than January 1, 2027, Permitted shall update and implement procedures to minimize discharges to the MS4 during post emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-	January 1, 2027	Bellevue Fire along with Eastside Fire and surrounding agencies no longer use PFAS-containing AFFFs.

containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4.		Additional measures to minimize discharges during emergencies are under review.
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CITY OF BELLEVUE

2025 STORMWATER MANAGEMENT PROGRAM PLAN

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 or revise and make effective a local program, no later than June 30, 2027, 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*)
 - Existing code is under review.
- 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.
 - Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review per Appendix 7.
 - 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 at least twice per 12-month period with no less than 4 months between inspections, until 90% of the 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 annually.
 - 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*).
 - Existing code is under review.
- 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 – 2024-2029 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, 2027 that meets the requirements set forth in the Permit.	June 30, 2027	The City implemented an ordinance in 2016 that satisfies the Permit requirements. (<i>Ord 6321</i>) (<i>See BCC 24.06 & 24.06.065</i>) Existing code is under review.
Each Permittee shall inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential development at least twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed.	Ongoing, beginning August 1, 2024	Active residential developments are inspected at least twice within a 12-month period as required.

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2025 STORMWATER MANAGEMENT PROGRAM PLAN

9. STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT

9.1 Permit Requirements

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

Implement and document a Program to control or reduce stormwater discharges to waters of the State from areas of existing development.

- Implement stormwater facility retrofits, or tailored SWMP actions that meet criteria described in the permit.
- Annually, ever year by March 31, Permittee shall provide a list of planned, individual projects scheduled for funding during this Permit term that will go toward the equivalent acreage found in Appendix 12.
- No later than March 31, 2028, then annually thereafter, Permittees shall fully fund, start construction or completely implement project(s) that meet the criteria in Appendix 12 and submit documentation with the Annual Report, due on March 31, 2028.
 - Projects that started construction after January 1, 2023, may be included.
 - Credit will be given for exceedance of the requirement as described in Appendix 12 and may be applied in the 2029-2034 Permit term up to 50% of the next Permit term’s requirement.
 - Permittees shall report which projects may provide Tribal and overburdened community benefits.
- Permittees may collaborate to meet a regional goal under conditions set forth in Appendix 12.
- No later than March 31, 2028, Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (2029-2032).

S5.C.7 – Stormwater Management for Existing Development – 2024-2029 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Permittees shall implement stormwater facility retrofits, or tailored SWMP actions that meet criteria described in Appendix 12.	Ongoing	The City has formed a team of internal and external subject matter experts to begin implementation of the SMED program.
No later than March 31 annually, permittees shall provide a list of individual projects scheduled for funding or implementation for the Permit term per requirements in Appendix 12.	March 31 Annually	Under development

<p>No later than March 31, 2028, and annually thereafter, Permittee shall fully fund, start construction, or completely implement project(s) that meet the criteria defined in Appendix 12.</p>	<p>March 31, 2028, then Annually thereafter.</p>	<p>Under review</p>
<p>No later than March 31, 2028, the Permittee shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the 2029-2034 Permit term.</p>	<p>March 31, 2028</p>	<p>This will be revisited annually as the project list is revised.</p>

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10. SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

10.1 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. 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, 2027, Permittees shall adopt and update to 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*.
- 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. The inventory shall be updated every 5 years.
 - An initial inventory of businesses was established back in August of 2022 and has been refined since. As of April 2024, Bellevue has 1752 sites that will be included within the Source Control Program.
- Permittees shall continue 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.
 - Additional information on Bellevue’s Source Control program can be found on the [Business Pollution Prevention](#) page of the City’s website.
- Permittees shall continue to inspect 100% of the sites identified through credible complaints.
- 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. Currently this role is vacant; training for the successful applicant will be determined as necessary based on experience.

S5.C.8 – Source Control Program for Existing Development – 2024-2029 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
No later than August 1, 2027, Permittees shall adopt and update 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, 2027	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>
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. The inventory shall be updated at least once every 5 years.	Ongoing	An initial inventory of businesses was established back in August and has been refined since. As of April 2024, Bellevue has 1752 sites that will be included within the Source Control Program.
Permittees shall continue to implement an inspection program for identified sites.	Ongoing	Bellevue’s has an ongoing Source Control Program that meets or exceeds minimum requirements et for the in the permit.

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11. OPERATIONS AND MAINTENANCE

11.1 Permit Requirements

The Permit (Section S5.C.9) 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, 2027, 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. This will remain the standard until the 2024 Manual has been adopted.
- 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 S5.C.6 and shall be maintained in accordance with defined maintenance timelines defined in section S5.C.9.
 - 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 as defined in S5.C.9.b.(b).
 - 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.
- No later than December 31, 2025, the Permittee must continue to 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, 2027, 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).
 - Documentation of practices, policies and procedures is currently under review.
 - Development of PCB BMP's are underway for Permittee owned building cleaning, maintenance, renovation and demolition.
 - No later than July 1, 2027, and ongoing thereafter, the Permittee shall develop and implement a street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.
 - The City has developed a street sweeping program that can be found at [Street Sweeping | City of Bellevue \(bellevuewa.gov\)](http://www.bellevuewa.gov). The City is evaluating the existing program to ensure consistency with NPDE permit requirements/objectives.
 - No later than March 31, 2028, Permittee shall document, and report mapped priority areas swept, sweeping frequency, type of sweeper curb miles swept and approximate amount of waste removed.
 - Documentation methods are currently under development.
 - 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 in 2022. Staff are trained annually on the SWPPPs and illicit discharge response and reporting.
 - 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.
 - Many staff, such as inspectors and Senior Engineering Technicians are CESCL certified.

S5.C.9 – Operations & Maintenance – 2024-2029 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>

<p>No later than June 30, 2027, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit.</p>	<p>June 30, 2027</p>	<p>By June 30, 2027, the City will administratively adopt the 2024 <i>Stormwater Management Manual for Western Washington</i> as our maintenance standards.</p>
<p>No later than December 31, 2025, the Permittee must continue to inspect all catch basins and inlets owned and operated by the Permittee every two years.</p>	<p>December 31, 2025</p>	<p>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.</p>
<p>No later than December 31, 2027, document 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.</p>	<p>December 31, 2027</p>	<p>Documentation of practices, policies and procedures is currently under review.</p> <p>Development of PCB BMP's are underway for Permittee owned building cleaning, maintenance, renovation and demolition.</p>
<p>No later than July 1, 2027, and ongoing thereafter, the Permittee shall develop and implement a street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.</p>	<p>July 1, 2027</p>	<p>The City has developed a street sweeping program that can be found at Street Sweeping City of Bellevue (bellevuewa.gov). The City will ensure the Street Sweeping Program aligns with the requirements set forth in the Permit.</p>
<p>No later than March 31, 2028, Permittee shall document, and report mapped priority areas swept, sweeping frequency, type of sweeper curb miles swept and approximate amount of waste removed.</p>	<p>March 31, 2028</p>	<p>Documentation methods are currently under development.</p>

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12. MONITORING AND ASSESSMENT

12.1 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 into a payment option and allow Ecology to utilize the funds for region wide studies and assessments.

Bellevue elected to opt into 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 its 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, 2024.
 - 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. Payment is due no later than December 1, 2024, for Permittees that chose this option during the 2019-2024 Permit term.
 - 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, 2024.
 - 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. Payment is due no later than December 1, 2024, for Permittees that chose this option during the 2019-2024 Permit term.
 - 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 2024-2029 perm it term is:

- Regional Status and Trends - \$38,475 annually
- Effectiveness and Source ID Studies - \$56,943 annually

S5.C.8 – Monitoring and Assessment – 2024-2029 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
No later than December 1, 2024, Permittees must notify in writing to Ecology, which of the two options (outlined in S.8.A.) for status and trends monitoring the Permittee chooses to carry out during the permit cycle.	December 1, 2024	The City has elected to participate in option a.
No later than December 1, 2024, Permittees must notify Ecology in writing, which of the two options (outlined in S.8.B.) for effectiveness studies the Permittee chooses to carry out during the permit cycle.	December 1, 2024	The City has elected to participate in option a.

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13. REPORTING REQUIREMENTS

13.1 Permit Requirements

The Permit (Section S5.9) requires the City to:

The NPDES Reporting and Record Keeping requires the City to keep records and submit reports annually as detailed in the Permit.

Annual Report Submittal

- No later than March 31 of each year, beginning in 2025, the Permittee shall submit an Annual Report. The reporting period for the first Annual Report will be from January 1, 2024 through December 31, 2024. The reporting period for all subsequent Annual Reports will be the previous calendar year unless otherwise specified.
 - Permittees shall submit Annual Reports electronically using the Ecology's Water Quality Permitting Portal.

Records Retention

- The Permittee is required to keep all records related to this Permit and the SWMP for at least five years after the expiration date of this Permit.

Records Available to the Public

- Permittees shall make all records related to this Permit and Permittee's SWMP available to the public at reasonable times during business hours.
- Permittees shall make all records related to this Permit and Permittee's SWMP available to the public at reasonable times during business hours.

Annual Report for Cities, Towns, and Counties

- Permittees shall submit the current Stormwater Management Plan.
- Permittee shall describe the status of implementation of the requirements of this Permit during the reporting period.
- Permittee shall include the report and requirements as delineated in Appendix 3.

CITY OF BELLEVUE
2025 STORMWATER MANAGEMENT PROGRAM PLAN

14. 2024 ANNUAL COMPLIANCE REPORT

Number	Permit Section	Question
1	S9.D.6	<p>Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee’s geographic area of permit coverage during the reporting period per S9.D.6.</p> <p style="text-align: center;">Not Applicable</p>
2	S5.A.2; S9.D.1	<p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)</p> <p style="text-align: center;">Final 2025 SWMP_2_03132025132503</p>
3	S5.A	<p>Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.</p> <p style="text-align: center;">Yes</p>
4	S5.A.5.b	<p>Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)</p> <p style="text-align: center;">Yes</p>
5	S9.D.4	<p>If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)</p> <p style="text-align: center;">Not Applicable</p>
6	S5.C.1.a	<p>Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)</p> <p style="text-align: center;">Yes</p>
12	S5.C.1.c.i	<p>Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces,</p>

Number	Permit Section	Question
		<p>native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)</p> <p>Yes</p>
13	S5.C.1.c.i(a)	<p>From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)</p> <p>No</p>
19	S5.C.2	<p>Did you choose to adopt one or more elements of a regional program? (S5.C.2)</p> <p>No</p>
20	S5.C.2	<p>Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.</p> <p>Q21 S5.C.2.a.iGeneralAwareness_20_03052025132029</p>
24	S5.C.2.a.iii	<p>Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.</p> <p>Yes</p>
24a	S5.C.2.a.iii	<p>Attach a list of stewardship opportunities provided.</p> <p>Q26a S5.C.2.a.iiiStewardship20_24a_03052025132029</p>
25	S5.C.3.a	<p>Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee’s SWMP and the SMAP.</p> <p>Posted the SWMP on the website, public hearing after presentation to Environmental Service Council, solicited comments from public.</p>
25a	S5.C.3.a.i	<p>Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)</p> <p>Information disseminated at public events such as community fairs and markets.</p>
26	S5.C.3.	<p>Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)</p>

Number	Permit Section	Question
		Yes
26a	S5.C.3.	<p>List the website address in Comments field.</p> <p>https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/utilities-plans-and-reports/stormwater-management</p>
27	S5.C.4.	<p>Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?</p> <p>Yes</p>
32	S5.C.5.b	<p>Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)</p> <p>Yes</p>
32a	S5.C.5.b	<p>Describe actions in Comments field. (S5.C.5.b)</p> <p>Internal training program for employees, educate homeowners and businesses during private detention system inspections, source control inspections, community events such as farmers markets and fairs, and by publicizing the spill hotline.</p>
33	S5.C.5.c	<p>Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.</p> <p>Yes</p>
35	S5.C.5.d.i	<p>Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.</p> <p>Yes</p>
35a	S5.C.5.d.i	<p>Cite field screening methodology in Comments field.</p> <p>Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, May 2020 Revision, Herrera Environmental Consultants, Inc. and Aspect Consulting, LLC.</p>
36	S5.C.5.d.i(a)	<p>Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)</p> <p>43</p>

Number	Permit Section	Question
36a	S5.C.5.d.i(a)	<p>Cite field screening techniques used to determine percent of MS4 screened.</p> <p>Inspections completed by surface water staff via annual Catch Basin and WQ/FC inspections.</p>
37	S5.C.5.d.ii	<p>Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)</p> <p>Cards to staff and Bellevue customers with hotline number, posted on City website.</p>
38	S5.C.5.d.iii	<p>Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.</p> <p>Yes</p>
39	S5.C.5.e	<p>Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.</p> <p>Yes</p>
40	S5.C.5.f	<p>Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.</p> <p>Yes</p>
41	S5.C.5.g	<p>Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13.</p> <p>Imported from WQWebIDDE</p>
42	S5.C.6.b.i-iii	<p>Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.</p> <p>Yes</p>
44		<p>Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?</p> <p>No</p>

Number	Permit Section	Question
45	S5.C.6.b.i. and Section 5 of Appendix 1	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) 0
46	S5.C.6.b.i., and Section 6 of Appendix 1	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) 0
47	S5.C.6.c.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) Yes
47a	S5.C.6.c.i	Number of site plans reviewed during the reporting period. 711
48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii? No
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. Yes
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii. 722
49b	S5.C.6.c.iv	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv? Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) Yes

Number	Permit Section	Question
51	S5.C.6.	<p>Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)</p> <p>Yes</p>
52	S5.C.6.c.viii	<p>Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)</p> <p>67</p>
53	S5.C.6.c.vi	<p>Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)</p> <p>Yes</p>
54	S5.C.6.d	<p>Made online links to Ecology’s Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d)</p> <p>Yes</p>
55	S5.C.6.e	<p>All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e)</p> <p>Yes</p>
56	S5.C.7.b	<p>Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b)</p> <p>SMED Worksheet_56_03122025113519</p>
57	S5.C.8.b	<p>Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee’s MS4 per S5.C.8.b? (Required at least once every five years)</p> <p>Yes</p>
57a	S5.C.8.b	<p>Number of total sites identified for the inventory.</p>

Number	Permit Section	Question
		1733
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d. 2024 Source Control Actions_58_03132025133214
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d. Q59 S5.C.8.d SourceControlProg_59_03052025132439
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e? Yes
61	S5.C.9.a	Implemented 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 per S5.C.9.a? Yes
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a) Yes
63a	S5.C.9.a.ii	If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.9.a) Filtera vaults, Vortex vaults, Modular wetlands, Storm filter vaults. Maintenance follows manufacturers recommendations.
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard. Yes
64a	S5.C.9.a.ii	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control. Not Applicable

Number	Permit Section	Question
65	S.5.C.9.b.i(a)	<p>Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)?</p> <p>Yes</p>
66	S5.C.9.b.i(b)	<p>Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)</p> <p>Yes</p>
66a	S5.C.9.b.i(b)	<p>Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?</p> <p>No</p>
66b	S5.C.9.b.i(b)	<p>If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).</p> <p>Not Applicable</p>
67	S5.C.9.b.ii	<p>Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)</p> <p>Yes</p>
68	S5.C.9.c.i	<p>Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)</p> <p>Yes</p>
68a	S5.C.9.c.i	<p>Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)</p> <p>1503</p>
68b	S5.C.9.c.i	<p>Number of facilities inspected during the reporting period.</p> <p>1503</p>
68c	S5.C.9.c.i	<p>Number of facilities for which maintenance was performed during the reporting period.</p> <p>174</p>

Number	Permit Section	Question
69	S5.C.9.c.i	<p>If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.</p> <p>Not Applicable</p>
70	S5.C.9.c.ii	<p>Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.</p> <p>Yes</p>
71	S5.C.9.c.iii	<p>Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.9.c.iii)</p> <p>Yes</p>
71a	S5.C.9.c.iii	<p>Number of known catch basins and inlets?</p> <p>22931</p>
71b	S5.C.9.c.iii	<p>Number of catch basins and inlets inspected during the reporting period?</p> <p>9792</p>
71c	S5.C.9.c.iii	<p>Number of catch basins and inlets cleaned during the reporting period?</p> <p>1867</p>
72	S5.C.9.c.iii	<p>Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.</p> <p>Not Applicable</p>
73	S5.C.9.d	<p>Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.9.d)</p> <p>Yes</p>
79	S5.C.9.f	<p>Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f)</p>

Number	Permit Section	Question
		Yes
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)
		Yes
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)
		Not Applicable
82	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)
		Not Applicable
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a)
		Yes
84	S8.A.2.a, S8.A.2.b	Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b.
		Yes
85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?
		Yes
86	S8.B.2.a, or S8.B.2.b.	Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b.
		Yes
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)
		Not Applicable

Number	Permit Section	Question
89	G3	<p>Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)</p> <p>Yes</p>
90	G3	<p>Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.</p> <p>Yes</p>
91	Compliance with standards	<p>Notified Ecology within 30 days of becoming aware that a discharge from the Permittee’s MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)</p> <p>Yes</p>
92	Compliance with standards	<p>If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.</p> <p>Not Applicable</p>
93	Compliance with standards	<p>Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)</p> <p>Not Applicable</p>
94	G20	<p>Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)</p> <p>Yes</p>
95	G20	<p>Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.</p> <p>1</p> <p>Comment: Late ERTS reported November 11, 2024.</p>

Attachments are available via Ecology’s Water Quality Permitting and Reporting Information System (PARIS) at [Paris - Permit Lookup](#)