

*This 2007 SWMP is an attachment to the City's 2007 Annual Report to
the Department of Ecology for its Phase II NPDES Permit*

City of Asotin

2007 Stormwater Management Program and Implementation Checklist



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Section I—Background

Introduction

The recently issued *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Eastern Washington*, hereafter referred to as the Phase II Permit, outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act. All Phase II communities are expected to develop a Stormwater Management Program (SWMP) that includes the required activities, implement those activities within the required timeframes of the permit term (i.e., 2007–2011), and submit annual reports to Ecology by March 31st each year to document progress toward complete program implementation.

The Phase II permit was issued by Washington State Department of Ecology (Ecology) on January 17, 2007, and became effective on February 16, 2007. The permit covers a five-year period that expires on February 15, 2012. While the actual years of the permit run from February 16 to February 15 of the next year, the reporting requirements cover a calendar year from January 1 to December 31. The permit will be reviewed and renewed for a second five-year period starting in 2012.

The Phase II Permit automatically applies to cities and counties with populations less than 100,000 located within or partially within a federally designated urbanized area and that operate a municipal separate storm sewer system (MS4) which discharges to a “water” of Washington State (i.e., a river, stream, wetland, etc.). Urbanized areas are defined as population centers with greater than 50,000 people and densities of at least 1,000 people per square mile, and are based on the 2000 census. For future permits, the urbanized area will be based on the most recent federal census.

Ecology also can designate cities with a population of 10,000 or more that are located outside of urbanized areas as additional permittees. Designation criteria can include considerations such as discharge to sensitive waters, high population density, high growth or growth potential, contiguity to an urbanized area, significant contribution of pollutants to waters of the US, or ineffective protection of water quality by other programs. The City of Asotin (City) has been designated by Ecology as a Phase II permittee based on the current population of 1,130 and location within the Clarkston urbanized area.

The City is the county seat for Asotin County, and was incorporated in the late 1880’s. The City of Asotin is located at the confluence of the Snake River and Asotin Creek, seven miles south of the City of Clarkston. The region is very fertile in agriculture, with the major crops being wheat, barley, plums, peaches and apples.

Section I—Background

Continued

Regarding stormwater planning, Asotin County and the cities of Asotin and Clarkston entered into an interlocal cooperation agreement in March 2007 for the purpose of providing intergovernmental cooperation, coordination, and administration for grant funding received through Ecology's Phase II Municipal Stormwater Grants Program (Fiscal Year 2006). The Stormwater Grants Program funds are currently being used for the following: (1) inventory and mapping of public stormwater sources and facilities; (2) development of stormwater-related ordinances; (3) development of stormwater management plans to meet Phase II Permit requirements; (4) development of a public education and outreach program; and (5) development of financial plans for each jurisdiction. In addition, the cities and County were recently awarded additional grant funds through the Stormwater Grants Program. These funds will be used to: (1) conduct municipal facility assessments; (2) identify preferred BMPs; (3) develop stormwater pollution prevention plans (SWPPPs) for select municipal facilities; and (4) train staff. Finally, the cities and County were awarded funding for a competitive grant application submitted through the Stormwater Management Implementation Grants Program (Fiscal Year 2008). The grant funds will be used for the development and formation of defensible stormwater utilities to ensure that a stable, dedicated, adequate, and equitable funding mechanism is available for the cities and County to finance and successfully implement the stormwater management programs that are currently being developed for each jurisdiction.

Stormwater Management Program Components

The Phase II Permit is broken down into six components, and the implementation and enforcement of the six components is collectively referred to as a municipality's SWMP. The six components are:

1. Public Education and Outreach;
2. Public Participation and Involvement;
3. Illicit Discharge Detection and Elimination;
4. Construction Site Stormwater Runoff Control;
5. Post-Construction Stormwater Management for New Development and Redevelopment;
6. Pollution Prevention and Good Housekeeping for Municipal Operations.

In addition to these six minimum elements, the NPDES II Permit also requires the following:

1. Compliance with stormwater provisions of approved Total Maximum Daily Loads (TMDLs);
2. Monitoring and program evaluation; and
3. Record keeping and annual reporting.

Section I—Background

Continued

The SWMP is designed to reduce the discharge of pollutants from municipalities to the maximum extent practicable, to satisfy the state requirement to apply “All Known, Available, and Reasonable methods of prevention, control and Treatment” (AKART) prior to discharge, and to protect water quality. The Phase II Permit requires that specified activities from each category above be completed each year in order to achieve full compliance by the end of the first permit term.

Stormwater Program Planning

As the City addresses the requirements and deadlines of the NPDES Phase II Permit, it is important that tools be available to help the City know what elements of the permit are due each year and to track the status of what is being successfully implemented. A detailed breakdown (matrices) of required annual NPDES activities is currently being prepared for the City. The detailed annual listing of required activities, combined with estimates of needed equipment, staffing, and funding, will represent an “Implementation Plan” that the City can use to track permit elements that are due in any given year and make judgments about the resources needed to meet the requirements. The Implementation Plan matrices will also aid in: (1) tracking program implementation, (2) preparing and updating the City’s required NPDES Phase II Stormwater Management Program, and (3) preparing and submitting required annual NPDES Phase II reports to Ecology.

The Implementation Plan to be developed for the City will represent the culmination of various work and related analyses, and is anticipated to be completed by early 2008. The work conducted as part of this process will include: (1) documentation of the City’s existing stormwater program activities, services, and levels of funding; (2) a review of current stormwater requirements through a regulatory assessment; and (3) performing a regulatory “gap analysis” to identify enhanced or new activities required for compliance. The process is described further in the following sections.

Section 2—Summary of Stormwater Program Definition Process

The City's existing stormwater program has been documented based on various sources of data and information provided by the City. Information provided by the City included stormwater related ordinances, drainage design standards, maps, inventories of existing storm system facilities and infrastructure, operation and maintenance activities, and other related information. A "stormwater program self-assessment questionnaire form" was also developed and used to establish a baseline understanding of the City's existing stormwater management activities and priorities. The questionnaire sought information about existing City activities related to the regulatory requirements, as well as existing equipment, capital project needs, and estimates of current expenditures. The questionnaire also asked whether or not the City believes that a new funding source is needed to pay for existing and new stormwater activities. City staff completed and returned the questionnaire form on March 18, 2008.

Local receiving water issues [303(d) listings, TMDLs, etc.] and other issues that may affect stormwater management requirements were downloaded from various agency sources and reviewed. Additional City stormwater program components will be recommended to help comply with any applicable local TMDLs. TMDL related recommendations include activities such as participating in local water quality monitoring activities, providing educational information to the public, and other related activities.

Section 3—Stormwater Management Program

A stormwater regulatory assessment was conducted based on review of the Phase II Permit, along with guidance provided in the Model Municipal Program for Eastern Washington. Information about the City's existing stormwater program activities were compared to the regulatory requirements of the permit to identify the "gap" between what is currently being done and what will need to be done each year to ensure compliance with the permit. The results of this analysis served as the basis for the development of written documentation of the City's SWMP which is to be submitted with the annual report to Ecology. The following sections describe the actions that the City has taken, or will take to comply with the requirements of the Phase II Permit.

To aid in tracking permit requirements, this section has been organized into the six components that correspond with the Special Conditions as outlined in the Phase II Permit. Further, each section describes the permit requirements, current City activities, and planned actions to be implemented. The City's expected activities over the 5-year permit term are included in the attached detailed annual stormwater program implementation matrices (Appendix A).

It should be noted that Special Conditions S7 (Compliance with TMDLs), S8 (Monitoring and Program Evaluation), and S9 (Reporting and Record Keeping) also apply to permit holders. However, while compliance activities are not required to be included in the SWMP, compliance with S7 and S8 are to be addressed in the annual report to Ecology. The permit and annual reporting requirements for these conditions are described as they relate to the implementation of the City's overall stormwater program.

In addition, permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G21, apply to permit holders, though they do not result in specific program activities, nor is the SWMP required to document compliance with these activities. These additional conditions cover topics such as who is covered by the Phase II Permit; what discharges are authorized under the permit; legal guidelines for transferring, revoking, and appealing the permit; and penalties for non-compliance.

Public Education and Outreach—Special Condition S5.B.1

Regulatory Requirements

The City must develop and implement a formal Public Education and Outreach (PE&O) Program aimed at distributing educational material to the community about the impacts of stormwater discharges to water bodies and the steps that can be taken to reduce pollutants in stormwater. The City's outreach and educational efforts must be targeted and presented to specific audiences within the community, including the general public, businesses, design professionals, contractors, developers, and City staff.

Section 3—Stormwater Management Program

Continued

Status of Existing Activities

The City currently does not distribute stormwater educational materials to the community as part of a formal PE&O Program.

Year 2 Activities

A regional effort will be conducted by Asotin County, the City of Clarkston and the City of Asotin to create a PE&O Program. This effort will be directed by a consultant, who will help staff to identify key groups, industries, and businesses within their jurisdictions (target audiences) that would most benefit from educational information about how to reduce and prevent stormwater pollution. A regional PE&O plan will be created (single plan that addresses the needs of the cities and County) that describes the target audiences and lists the types of education and outreach efforts each will receive. Stormwater brochures and fact sheets will be created and handed out to provide information on topics such as improper disposal of waste, stormwater pollution that occurs from everyday activities of residents and businesses, and steps that can be taken to reduce stormwater pollution and prevent illicit discharges. A regional stormwater website is currently being created to provide information to the residents of Asotin County on the progress of the SWMP, as well as general information about stormwater, urban and rural pollution, and what they can do to help prevent pollution. This website will be hosted on the Asotin County website under their Public Works Department webpage.

The early efforts to educate the public on the requirements of the NPDES Phase II Permit, the negative effects of stormwater pollution, and other related issues will aid in the passing of stormwater-related ordinances and a future stormwater utility and rate ordinance that will need public support and approval over the next few years.

Public Involvement and Participation—Special Condition S5.B.2

Regulatory Requirements

The City must adopt a program or policy directive to create opportunities for the public to participate in the decision making process involving the development, implementation, and update of the City's SWMP and associated ordinances. The Public Involvement and Participation (PI&P) Program implemented by the City must comply with applicable state and local public notice requirements, and must also include provisions for consideration of public comments.

Status of Existing Activities

The City has adopted a public participation policy for the development and implementation of an enhance City stormwater management program (Resolution No. 2008-405).

Section 3—Stormwater Management Program

Continued

Year 2 Activities

The City will implement the adopted public involvement policy by creating opportunities for public and stakeholder participation in the development and implementation of the SWMP. This may include invitations to the public to attend public hearings, participate in the development and adoption of regulatory ordinances and other required program elements, participate in volunteer opportunities, or other similar activities. Additional information and involvement efforts to be developed by the City include distributing news releases to local newspapers and posting an updated version of the SWMP on the Asotin County stormwater webpage. The City will also respond to any calls that may be received as a result of the public involvement and educational outreach activities.

Illicit Discharge Detection and Elimination—Special Condition S5.B.3

Regulatory Requirements

The City must develop, implement, and enforce a program to detect and eliminate illicit discharges into its MS4. This element of the SWMP requires that the City: (1) develop and adopt an ordinance that prohibits non-stormwater (illicit) discharges and authorizes enforcement actions; (2) develop a map of the MS4, showing the location of all known connections to the MS4 and outfalls to receiving waters; (3) prioritize receiving waters and conduct field assessments; (4) develop procedures for characterizing illicit discharges, spills, or illegal dumping, and procedures for tracing and removing sources of illicit discharges; (5) establish a hotline for public reporting of spills and other illicit discharges and maintain records of calls and follow-up actions taken; (6) provide adequate training to municipal staff; and (7) implement procedures for program evaluation and assessment.

Status of Existing Activities

A consultant is currently in the process of creating a digital stormwater map for the City. Multiple data sources are being combined into a single digital map. The City responds to phone calls concerning illicit spills and discharges, and they try to address the problems adequately. However, they have no response plan or code enforcement. The only phone number that is published in the phone book is the City of Asotin Public Works Department (509-243-1223).

Year 2 Activities

A consultant will work with the City to develop an ordinance that specifically prohibit non-stormwater (illicit) discharges to its MS4 for adoption and enforcement in Year 3 (required by July 2009). The City will take public comments into consideration when finalizing the ordinance, consistent with the public involvement policy adopted as part of the PI&P Program. The City will also begin developing a written Illicit Discharge Detection and Elimination (IDDE) Program plan to address the inspection of outfalls, tracing sources of

Section 3—Stormwater Management Program

Continued

illicit discharges, staff training needs, field assessments, spill response and containment, tracing methods, sampling/analyzing techniques, removal methods, interface with other agencies, and program evaluation methods. The City will also begin developing a method for documenting all phone call complaints and the follow-up activities that occurred to remediate the situation. The City will finish creating a digital map of their MS4 and update it as needed.

Construction Site Stormwater Runoff Control—Special Condition S5.B.4

Regulatory Requirements

The City must develop, implement, and enforce a program to reduce pollutants in stormwater runoff to its MS4 from construction activities, including private and public projects. This element of the SWMP requires that the City: (1) develop and adopt an ordinance that requires erosion and sediment controls during construction-phase work, including sanctions to ensure compliance; (2) implement procedures for site plan review, including review of SWPPPs prior to construction; (3) implement procedures for site inspection and enforcement of construction stormwater pollution control measures; (4) provide adequate training for all permitting, planning, review, inspection, and enforcement staff; and (5) maintain records of activities related to site plan review, inspection, and enforcement.

Status of Existing Activities

The Asotin County Building and Planning Department reviews and approves all building permits for the City of Asotin. All other construction reviews are performed by Keltic Engineering, which is the City Engineer on a consultant basis. Erosion control notes are placed on all reviewed construction plans.

Year 2 Activities

A consultant will work with the City to develop an ordinance to reduce pollutants in stormwater runoff to the MS4 from new development and redevelopment projects by requiring erosion and sediment controls and other construction-phase pollution controls. The ordinance will apply to both private and public projects that disturb one acre or more, and from construction projects of less than one acre that are part of a common plan of development or sale. The City will take public comments into consideration when finalizing the ordinance for adoption in Year 3 (required by December 2009). The City will also provide information to contractors and developers about training available on erosion and sediment control BMPs and development of SWPPPs for construction sites through handouts and/or fliers placed on the front desk of the Public Works Department and

Section 3—Stormwater Management Program

Continued

attached to reviewed plans. The City will begin developing a method for documenting all phone call complaints and the follow-up activities that occur to remediate the situation.

Post-Construction Stormwater Management for New Development and Redevelopment—Special Condition S5.B.5

Regulatory Requirements

The City must develop, implement, and enforce a program to address post-construction stormwater runoff to its MS4 from both private and public new development and redevelopment projects. This element of the SWMP requires that the City: (1) develop and adopt an ordinance that requires post-construction stormwater controls, including requirements for runoff treatment, flow control, source control, and on-going long-term operation and maintenance of approved BMPs; (2) implement procedures for site plan review, including review of stormwater site plans prior to construction to ensure that plans include stormwater pollution prevention measures; (3) implement procedures for site inspection and enforcement of post-construction stormwater control measures; (4) provide adequate training for staff; and (5) maintain records.

Status of Existing Activities

All construction reviews are performed by Keltic Engineering, which is the City Engineer on a consultant basis.

Year 2 Activities

A consultant will work with the City to develop an ordinance to address post-construction stormwater runoff to its MS4 from both private and public new development and redevelopment projects, including enforcement mechanisms. The City will take public comments into consideration when finalizing the ordinance for adoption in Year 3 (required by December 2009). Inspections will occur for both public and private projects, including inspection of stormwater controls both during and after construction. Required new and on-going staff training will be needed but is assumed to be integrated with the enhanced construction stormwater management training. The City will provide information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with the NPDES permit using the same handout/flier as mentioned above for construction site operators.

Section 3—Stormwater Management Program

Continued

Pollution Prevention and Good Housekeeping for Municipal Operations— Special Condition S5.B.6

Regulatory Requirements

The City must develop and implement an Operation and Maintenance Program (O&M Plan) aimed at preventing or reducing pollutant runoff from municipal facilities and/or activities. The O&M Plan shall include appropriate pollution prevention/good housekeeping (PP&GH) practices for various municipal operations (e.g., storm system maintenance, municipal building maintenance, parks and open space maintenance, etc.), and shall include a schedule of inspections and record keeping requirements. In addition, the City must develop and implement a formal training program for all staff whose job functions may impact stormwater quality.

Status of Existing Activities

The City has reviewed existing and near-term municipal construction projects and sought coverage under the statewide NPDES Construction Stormwater General Permit for all projects that meet the criteria for coverage. The City has also reviewed all municipal “industrial” facilities/sites and sought coverage under the statewide NPDES Industrial Stormwater General Permit for municipal sites meeting the criteria for coverage. Maintenance of the storm sewer system is currently performed on an as-needed basis and consists primarily of catch basin and system line cleaning. The City has a street maintenance program, but no pollution prevention practices are employed. No formal documentation or record keeping is maintained. The City also incorporates water quality and/or site hydrology considerations in the review and evaluation of new flood management projects by consulting with the Army Corps of Engineers and the City Engineer on projects.

Year 2 Activities

The City will continue to perform storm system maintenance and inspection; however, the inspection and O&M activities will need to be enhanced to meet the regulatory requirements and will need to be documented. The City will continue to seek coverage under the statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. The City will also begin developing a good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities aimed at preventing and reducing water quality impacts. A consultant will conduct facility assessments and create SWPPPs for three municipal facilities in the County, one per each regional jurisdiction, and provide training to all pertinent staff on how to implement the SWPPP.

Section 3—Stormwater Management Program

Continued

Compliance with Total Maximum Daily Load Allocations

Regulatory Requirements

Ecology conducted a review of all TMDLs approved by EPA at the time of the final permit issuance (January 17, 2007) to determine whether stormwater, including municipal stormwater sources, were identified in any of the TMDLs. Ecology did not identify any TMDLs with established load or waste load allocations for municipal stormwater discharges covered under the permit. Since Ecology has not identified any TMDLs with more specific requirements than those found in the NPDES Phase II Permit, compliance with the permit constitutes compliance with applicable TMDLs. However, the City is encouraged to participate in the development of local TMDLs to ensure that stormwater impacts are responsibly addressed and help control potential future costs.

Monitoring and Program Evaluation Requirements

Regulatory Requirements

Although water sampling or other testing is not specifically required during the first permit term, the City must annually report any stormwater monitoring or studies and investigations conducted by, on behalf of, or reported to the City. The City must also perform an annual assessment of the appropriateness of the BMPs identified for each SWMP component. Further, the City must prepare and plan to implement a future comprehensive long-term monitoring program beginning in Year 4. Cities with populations exceeding permit-specified thresholds must create a program consisting of up to the following three components: (1) stormwater outfall monitoring (greater than 10,000); (2) targeted SWMP effectiveness monitoring (all cities regardless of population); and (3) runoff treatment BMP effectiveness monitoring (greater than 25,000). Since the City's population is currently less than 10,000, they will only be required to create a program for targeted SWMP effectiveness monitoring. This monitoring will be designed to determine the effectiveness of the City's SWMP at controlling stormwater related problems directly addressable by targeted actions in the SWMP.

Status of Existing Activities and Needs

These requirements will be fulfilled as the SWM Program is further developed and implemented. The City is encouraged to sponsor or participate with local agencies conducting routine or special water-quality studies. The City will need to develop, implement, and document a stormwater program monitoring and evaluation system.

Section 3—Stormwater Management Program

Continued

Reporting and Record Keeping Requirements

Regulatory Requirements

The City is required to prepare and submit annual reports to Ecology. The reports must include the most current version of the City's SWMP and status of compliance with the various conditions outlined in the permit. The annual reports must include: (1) the status of implementation of each SWMP component; (2) an assessment of the City's progress in meeting the minimum performance standards; (3) a description of activities implemented, including the number and type of inspections, enforcement actions, PE&O activities, and illicit discharges detected and eliminated; and (4) other reporting requirements.

Status of Existing Activities and Needs

The City will need to develop and implement a formal on-going process for gathering, recording, maintaining, and using information to track the development and implementation of their SWMP. Designated staff will need to itemize the types of record keeping needed for the various program components, meet with various departments/divisions to assess needs for new or enhanced processes, create record keeping forms and protocols, and work with staff at various levels to implement the process.

Section 4—Detailed Annual Stormwater Program Implementation Matrices

A detailed matrix of required annual stormwater activities have been developed for the City as part of the formal gap analysis process described earlier. For convenience, a summary table has been provided for each of the Phase II Permit requirements and the City's expected activities over the 5-year permit term (Appendix A). Appendix A is in a check list format to assist the City in determining what needs to be done for a particular activity in a given year and to track the status of program implementation over time. The check list is meant to be used by City staff to help develop the program and track what needs to be done by when on an annual basis.

As discussed earlier, the annual matrices are based primarily upon the final NPDES Phase II General Permit for Eastern Washington. However, professional judgment and experience with similar projects has been used to “fill in the blanks” when necessary, such as describing the intermediate steps necessary to develop a potentially controversial stormwater ordinance in time to meet regulatory deadlines. The activities in the matrices reflect what NPDES Phase II requires and when, not what the City may already be doing. In some cases, the City has already at least partially met NPDES requirements. It should also be pointed out that the schedule developed for the required activities generally reflects the minimum required timeframes (deadlines) for implementation over the 5-year term of the permit. However, some activities, such as ordinance development and adoption, will be started in earlier years based on anticipated level-of-effort, expected timeframes, and local preferences.

Appendix A—Annual Stormwater Program
Implementation Checklist

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
A. General NPDES Requirements			
YEAR 1			
A1. Prepare Notice of Intent (NOI).	Assume that City has prepared and submitted NOI.	NOI prepared and submitted.	√
A2. Pay Annual Permit Fee.	City of Asotin - \$250	Pay fee.	√
YEAR 2			
A2. Pay Annual Permit Fee.	City of Asotin - \$300	Pay fee.	
YEAR 3			
A2. Pay Annual Permit Fee.	City of Asotin - \$400	Pay fee.	
YEAR 4			
A2. Pay Annual Permit Fee.	City of Asotin - \$500	Pay fee.	
YEAR 5			
A2. Pay Annual Permit Fee.	City of Asotin - \$600	Pay fee.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
B. Public Education and Outreach: General public, builders, businesses, engineers, developers, plan reviewers, etc.			
YEAR 1			
	Note that minimum requirements do not begin until Yr 3, which may not satisfy desired local approach, particularly when things like ordinances are being developed. Even then, the focus is on water quality protection, not how and why programs are being developed and how the public may be affected.		
YEAR 2			
B1. Begin development and documentation of public education and outreach strategy. Includes conducting analysis to identify and characterize target audiences within jurisdiction.	Target audiences may include types of commercial businesses, owners of multi-family units, residential home owners, organizations that hold charity car washes, educational institutions, etc.	Conduct analysis and develop a document that identifies and characterizes target audiences and defines a strategy and process for reaching them.	
YEAR 3			
B1. Continue development and documentation of public education and outreach strategy. Includes conducting analysis to identify and characterize target audiences within jurisdiction.	Target audiences may include types of commercial businesses, owners of multi-family units, residential home owners, organizations that hold charity car washes, educational institutions, etc.	Hand out fliers to target audiences and answer any questions that may arise from the handouts.	
YEAR 4			
B2. Develop a formal written public education and outreach strategy designed to reach the target audiences identified in B1.	This document was created by consultant in Year 2 and presented to joint meeting with City of Clarkston and Asotin County and elected leaders.	Update strategy created in Year 2 as needed to identify new target audiences.	
B3. Implement the public education and outreach strategy developed in B2.	Assume this includes: stormwater brochures (general), work anticipated from public responses to brochure mailing (inspection, rectifying problems reported, equipment costs), storm drain stenciling with volunteers, minor classroom education coordinated with schools, and development of stormwater website.	Begin public education and outreach activities.	
YEAR 5			
B2. Continue to develop/refine the formal written public education and outreach strategy designed to reach the target audiences identified in B1.	Assume some time necessary to review and update the public education and outreach strategy.	Update public education and outreach strategy as needed. Continue public education and outreach activities.	
B3. Continue to implement the public education and outreach strategy developed in B2.	Assume this includes: stormwater brochures (targeted), work anticipated from public response to brochure mailing (inspection, rectifying problems reported, equipment costs), continued storm drain stenciling with volunteers, and minor classroom education coordinated with schools. Cost also includes semi-annual update of stormwater website.	Continue public education and outreach activities.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
C. Public Involvement: Allow public and stakeholder involvement in program development and funding via committees, hearings, advisory panels, etc.			
YEAR 1			
C1. Adopt a program or policy directive to allow the public to participate in the process of developing and implementing the Stormwater Management Program (SWMP), including all ordinances. Must include consideration of public comments.	Note that it may be desirable for actual public/stakeholder involvement to begin in year 1 depending on preferences of local leaders. A formal policy must be developed and adopted by elected leaders by end of permit year 1	Develop and adopt official public involvement policy for stormwater. Assume involves staff time, discussions with leaders, approval at formal agenda.	√
YEAR 2			
C2. Continue to implement the program or policy directive adopted in Year 1 allowing the public to participate in the process of developing and implementing the Program, including all ordinances. Assume this involves an advisory body, open houses, and news releases.	Funding will be shown here to account for broader information and involvement efforts including: open house meetings, work anticipated from public response to open house (inspection, rectifying problems reported, equipment costs), news releases, and other needed activities. Assume that the cost of some involvement work is included in the cost of a particular activity (e.g., developing ordinances).	News release (one), open house (one), advisory body meetings (three).	
C3. Respond to public calls.	Identified as an additional activity that will reasonably be expected by the City. Public calls assumed to be generated from information posted in news releases, website, and other sources. Does not include costs associated with response to public calls generated by other permit elements (e.g., illicit discharge hot line; complaints about utility fees, standards, and other requirements; etc.).	Respond to public calls received.	
C4. Post updated written SWMP on local agency website and/or deliver to Ecology for posting on their website.	Assume costs for coordination and posting of updated SWMP on website. Costs associated with annual updates to SWMP covered elsewhere.	Post updated SWMP on website.	
YEAR 3			
C2. Continue to implement the program or policy directive adopted in Year 1 allowing the public to participate in the process of developing and implementing the Program, including all ordinances. Assume this involves an advisory body, open houses, and news releases.	Funding will be shown here to account for broader information and involvement efforts including: open house meetings, work anticipated from public response to open house (inspection, rectifying problems reported, equipment costs), news releases, and other needed activities. Assume that the cost of some involvement work is included in the cost of a particular activity (e.g., developing ordinances).	News release (one), open house (one), advisory body meetings (three).	
C3. Respond to public calls.	Identified as an additional activity that will reasonably be expected by the City. Public calls assumed to be generated from information posted in news releases, website, and other sources. Does not include costs associated with response to public calls generated by other permit elements (e.g., illicit discharge hot line; complaints about utility fees, standards, and other requirements; etc.).	Respond to public calls received.	
C4. Post updated written SWMP on local agency website and/or deliver to Ecology for posting on their website.	Assume costs for coordination and posting of updated SWMP on website. Costs associated with annual updates to SWMP covered elsewhere.	Post updated SWMP on website.	
YEAR 4			
C2. Continue to implement the program or policy directive adopted in Year 1 allowing the public to participate in the process of developing and implementing the Program, including all ordinances. Assume this involves an advisory body, open houses, and news releases.	Funding will be shown here to account for broader information and involvement efforts including: open house meetings, work anticipated from public response to open house (inspection, rectifying problems reported, equipment costs), news releases, and other needed activities. Assume that the cost of some involvement work is included in the cost of a particular activity (e.g., developing ordinances).	News release (one), open house (one), advisory body meetings (three).	
C3. Respond to public calls.	Identified as an additional activity that will reasonably be expected by the City. Public calls assumed to be generated from information posted in news releases, website, and other sources. Does not include costs associated with response to public calls generated by other permit elements (e.g., illicit discharge hot line; complaints about utility fees, standards, and other requirements; etc.).	Respond to public calls received.	
C4. Post updated written SWMP on local agency website and/or deliver to Ecology for posting on their website.	Assume costs for coordination and posting of updated SWMP on website. Costs associated with annual updates to SWMP covered elsewhere.	Post updated SWMP on website.	
YEAR 5			
C2. Continue to implement the program or policy directive adopted in Year 1 allowing the public to participate in the process of developing and implementing the Program, including all ordinances. Assume this involves an advisory body, open houses, and news releases.	Funding will be shown here to account for broader information and involvement efforts including: open house meetings, work anticipated from public response to open house (inspection, rectifying problems reported, equipment costs), news releases, and other needed activities. Assume that the cost of some involvement work is included in the cost of a particular activity (e.g., developing ordinances).	News release (one), open house (one), advisory body meetings (three).	
C3. Respond to public calls.	Identified as an additional activity that will reasonably be expected by the City. Public calls assumed to be generated from information posted in news releases, website, and other sources. Does not include costs associated with response to public calls generated by other permit elements (e.g., illicit discharge hot line; complaints about utility fees, standards, and other requirements; etc.).	Respond to public calls received.	
C4. Post updated written SWMP on local agency website and/or deliver to Ecology for posting on their website.	Assume costs for coordination and posting of updated SWMP on website. Costs associated with annual updates to SWMP covered elsewhere.	Post updated SWMP on website.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
D. Illicit Discharge Detection and Elimination: Develop, implement, and enforce program to detect and eliminate polluted non-stormwater discharges into the MS4.			
YEAR 1			
D1. City to begin mapping MS4, showing connections to MS4, known outfalls, and receiving waters. Include field surveys to verify locations of outfalls and identify previously unknown outfalls on priority water bodies.	Note that minimum requirements do not begin until Yr 3 and will require that City map 1/3 of system per year through Yr 5. Costs for continued mapping activities will be covered by existing funding in Yr 1. Costs to complete mapping activities and additional field-related activities will be carried out under direction of permit compliance staff using program funding in Yr 2.	Costs for existing activities rolled-in during Yr 2 and assumed by SW Utility.	
D2. Begin developing an ordinance that prohibits illicit discharges and authorizes enforcement actions (involve the public as required). Ordinance must be completed and adopted by permit year 2.5.	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt ordinance, and place in local code. Assume staff time, possible consultant assistance, legal consultant review.	Begin IDDE Ordinance involving public and stakeholders, legal support.	
YEAR 2			
D1. City to continue mapping MS4, showing connections to MS4, known outfalls, and receiving waters. Include field surveys to verify locations of outfalls and identify previously unknown outfalls on priority water bodies.	Note that minimum requirements do not begin until Yr 3 and will require that City map 1/3 of system per year through Yr 5. Costs for continued mapping activities will be covered by existing funding in Yr 1. Costs to complete mapping activities and additional field-related activities will be carried out under direction of permit compliance staff using program funding in Yr 2.	Finish mapping effort of system. Includes needed system surveying and inspection.	In progress
D2. Complete and adopt an ordinance that prohibits illicit discharges and authorizes enforcement actions (involve the public as required). Ordinance must be completed and adopted by permit year 2.5.	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt ordinance, and place in local code. Assume staff time, possible consultant assistance, legal consultant review.	Complete IDDE Ordinance involving public and stakeholders, legal review, hearing comments and responses, revisions, formal adoption, placement in code.	In progress
D3. Begin developing written IDDE Program Plan that addresses ordinance enforcement, staff training needs, priority areas & businesses, field assessments, complaint handling, discharge characterization methods, hazard assessment, spill response and containment, tracing methods, sampling/analyzing techniques, removal methods, interface with other agencies, program evaluation methods.	Assume that once ordinance is on the books, enforcement activities are phased-in starting in Yr 3. Assume that written guidance is needed for orderly implementation. Assume preparation involves multiple divisions and takes a significant amount of staff time for most of a year. Funding estimate is only for lead compliance staff.	Develop IDDE Plan using guidance documents from Center for Watershed Protection, Ecology, and other jurisdictions as an aid. Ordinance Enforcement and Spill Response plans included with IDDE Plan. Involve multiple staff as needed.	
D4. Publicize a hotline or other local phone number for public reporting of spills and illicit discharges.	Assume that hotline or other local phone number is publicly listed and publicized by end of year. Assume calls are received from public in the following year and require follow-up activities (inspection; source tracing, identification, removal; enforcement activities; and response to public). Assume costs for follow-up activities covered in D7. Records of all calls and follow-up activities must be maintained.	Publish hotline for pollution reporting in subsequent years.	
YEAR 3			
D1. Continue updating map of the City MS4, including new and removed connections, updates to system characteristic data and information, location of previously unknown outfalls and connections, etc.	Assume that City has completed MS4 mapping and field survey work by end of Year 2. Assume minimal work needed for annual updates to map by permit compliance staff.	Annually update MS4 mapping.	
D3. Complete written IDDE Program Plan started in Year 2.	Assume that once ordinance is on the books, enforcement activities are phased-in starting in Yr 3. Assume that written guidance is needed for orderly implementation.	Complete IDDE Plan using guidance documents from Center for Watershed Protection, Ecology, and other jurisdictions as an aid.	
D4. Respond to spills and illicit discharge hotline phone calls; address reported problems; keep records.	Assume that some calls require significant staff time to address, possibly also involving enforcement procedures, interface with other agencies, and legal support. Assume some overlap with D4. Costs for existing activities assumed by SW Utility.	Respond to pollution reporting hotline, address reported problems, trace and resolve problems, and conduct enforcement as needed to eliminate any illicit discharges.	
D5. Begin implementation of the IDDE Program and regulatory ordinance.	Assume some IDDE work begins this year. Based on areas likely to have illicit discharges, staff will prioritize receiving waters and outfalls for visual inspection during field assessments in subsequent years.	Develop a list of prioritized receiving waters within City for visual inspection of outfalls.	
D6. Implement procedures, records, and tracking needed to evaluate program effectiveness versus criteria established in the IDDE Program Plan.	Assume IDDE records and monitoring activities begin following implementation plan this year under guidance of staff involved in the IDDE Program.	Develop criteria and procedures to evaluate the effectiveness of the IDDE Program, implement the process and evaluate the program at the end of the year .	
D7. Begin training staff that will come into contact with illicit discharge issues as part of their normal job responsibilities.	Initial training course is needed for staff involved in the IDDE Program. Staff training shall be for those responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, improper disposal, and illicit connections. Training is also needed for all City field staff to educate them on recognizing illicit discharges and illicit connections. Office personnel training for receiving initial reports of illicit discharges, how to identify a spill, an improper disposal, or an illicit connections to the MS4 and proper procedures for reporting the illicit discharge.	Provide training to staff involved in IDDE program and related activities.	
YEAR 4			
D1. Update completed map of City MS4, including new and removed connections, updates to system characteristic data and information, location of previously unknown outfalls and connections, etc.	Assume that City has completed MS4 mapping and field survey work by end of Year 2. Assume minimal work needed for annual updates to map by permit compliance staff.	Annually update MS4 mapping.	
D4. Respond to spills and illicit discharge hotline phone calls, address reported problems, keep records.	Assume that some calls require significant staff time to address, possibly also involving enforcement procedures, interface with other agencies, and legal support. Assume some overlap with D4. Costs for existing activities assumed by SW Utility.	Respond to pollution reporting hotline, address reported problems, trace and resolve problems, and conduct enforcement as needed to eliminate any illicit discharges.	
D5. Continue to fully implement the IDDE Program and regulatory ordinance.	IDDE work begins in earnest this year with a fully implemented IDDE Program by mid-year. Staff will conduct field assessments on three high-priority water bodies within the City. Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions.	Conduct field assessments on three high-priority water bodies within the City and conduct necessary follow-up activities to ensure termination of illicit discharges identified.	
D6. Continue implementing procedures, records, and tracking as needed to evaluate program effectiveness versus criteria established in the IDDE Program Plan.	Assume IDDE records and monitoring activities continue following implementation plan this year under guidance of staff involved in the IDDE Program.	Review, update, and use criteria and procedures to evaluate the effectiveness of the IDDE Program, implement the process and evaluate the program at the end of the year .	
D7. Repeat or update IDDE staff training as needed.	Assume that IDDE training is repeated or updated annually as needed based on staffing changes and updated methods.	Evaluate need for training update. Update and repeat training as needed.	
D8. Inform public employees, businesses, and general public about hazards posed by illicit discharges and improper waste disposal. Develop and distribute information to target audiences identified in B1 and B2.	Some overlap with B3 - implementation of public education and outreach strategy. Likely need to begin this activity in earlier years. Cost reflects overlap with B3.	Inform public employees, businesses, and general public about hazards posed by illicit discharges and improper waste disposal. Provide information on proper disposal, etc.	In Progress

YEAR 5			
D1. Update completed map of City MS4, including new and removed connections, updates to system characteristic data and information, location of previously unknown outfalls and connections, etc.	Assume that City has completed MS4 mapping and field survey work by end of Year 2. Assume minimal work needed for annual updates to map by permit compliance staff.	Annually update MS4 mapping.	
D4. Respond to spills and illicit discharge hotline phone calls, address reported problems, keep records.	Assume that some calls require significant staff time to address, possibly also involving enforcement procedures, interface with other agencies, and legal support. Assume some overlap with D4. Costs for existing activities assumed by SW Utility.	Respond to pollution reporting hotline, address reported problems, trace and resolve problems, and conduct enforcement as needed to eliminate any illicit discharges.	
D5. Continue implementation of the IDDE Program and regulatory ordinance.	Staff will conduct field assessments on one additional high-priority water body within the City. Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions.	Conduct field assessment on one additional high-priority water body within the City and conduct necessary follow-up activities to ensure termination of illicit discharges identified.	
D6. Continue implementing procedures, records, and tracking as needed to evaluate program effectiveness versus criteria established in the IDDE Program Plan.	Assume IDDE records and monitoring activities continue following implementation plan this year under guidance of staff involved in the IDDE program.	Review, update, and use criteria and procedures to evaluate the effectiveness of the IDDE Program, implement the process and evaluate the program at the end of the year.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
E. Construction Site Stormwater Runoff: Develop, implement, and enforce program to reduce pollutants in runoff to the MS4 from construction sites one or more acres in size.			
YEAR 1			
E1. Begin developing an ordinance for Construction Stormwater Management that requires erosion and sediment controls and regulates sites at least 1+ acre in size (involve the public as required). Ordinance must be completed and adopted by permit year 3. Must include construction stormwater pollution prevention activities that are equivalent to the minimum technical requirements contained in E. WA Stormwater Manual and consistent with the statewide NPDES Construction Stormwater General Permit, including use of approved BMPs, chemical monitoring, certified professionals, etc. Must include language to allow access by City staff to inspect site for compliance. May allow Erosivity Waiver to be used, at the discretion of the local agency.	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, develop an ordinance enforcement strategy, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt the ordinance, and place in local code. Assume staff time, possible consultant assistance, legal consultant review. Assume that ordinance will require a local construction stormwater permit or approval to be obtained.	Begin developing/updating Construction Stormwater Management ordinance involving the public, stakeholders, and legal support. Includes development of an ordinance enforcement strategy.	In progress
E2. Provide information to construction operators about training available on stormwater pollution prevention for construction sites consistent with NPDES permit or E. WA Stormwater Manual.	Assume that operators are informed of available training opportunities as a normal part of the agencies construction permitting or approval process. Provide flyers on state or trade group training opportunities for example.	Inform construction operators about available training on stormwater pollution prevention for construction sites.	In progress
YEAR 2			
E1. Complete and adopt an ordinance for Construction Stormwater Management (involve the public as required). Ordinance must be completed and adopted by permit year 3	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, develop an ordinance enforcement strategy, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt the ordinance, and place in local code. Assume staff time, possible consultant assistance, legal consultant review. Assume that ordinance will require a local construction stormwater permit or approval to be obtained.	Complete Construction Stormwater Management ordinance involving the public, stakeholders, legal review, hearing comments and responses, revisions, formal adoption, and placement in code.	In progress
E2. Continue providing information to construction operators about training available on stormwater pollution prevention for construction sites consistent with NPDES permit or E. WA Stormwater Manual.	Assume that operators are informed of available training opportunities as a normal part of the agencies construction permitting or approval process. Provide flyers on state or trade group training opportunities for example.	Inform construction operators about available training on stormwater pollution prevention for construction sites.	In progress
E3. Adopt procedures for receipt and consideration of construction site problems reported by the public, including publicizing a hot line phone number.	Assume hot line is the same one as in D4. Assume that some calls require significant staff time to address, including multiple site visits, record keeping, correspondence with property owners, resolution of problems, and possible enforcement actions.	Respond to pollution reporting hotline, visit sites and resolve problems, maintain records, and conduct enforcement as needed to eliminate any construction pollution problems.	
YEAR 3			
E2. Continue providing information to construction operators about training available on stormwater pollution prevention for construction sites consistent with NPDES permit or E. WA Stormwater Manual.	Assume that operators are informed of available training opportunities as a normal part of the agencies construction permitting or approval process. Provide flyers on state or trade group training opportunities for example.	Inform construction operators about available training on stormwater pollution prevention for construction sites.	
E3. Continue procedures for receipt and consideration of construction site problems reported by the public.	Assume hot line is the same one as in D4. Assume that some calls require significant staff time to address, including multiple site visits, record keeping, correspondence with property owners, resolution of problems, and possible enforcement actions.	Respond to pollution reporting hotline, visit sites and resolve problems, maintain records, and conduct enforcement as needed to eliminate any construction pollution problems.	
E4. Begin phasing-in site plan review, including review of stormwater pollution prevention plans (SWPPPs), as adopted in the Construction Stormwater Management Ordinance.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex (size, type, location, phased, etc.) and that site plan and SWPPP review is more time consuming. Costs included here are for enhanced review activities.	Continue reviewing construction site plans with emphasis placed on ensuring that proper ESC BMPs are selected and used. Review Construction SWPPPs. Assume significant interactions with project engineers/contractors.	
E5. Develop training materials and program for proper training of staff that will review construction erosion and sediment control site plans and SWPPPs. Include training on stormwater manual, hydrologic methods, sediment control BMP O&M, etc.	Assume that a formal on-going training program for site plan reviewers needs to be established and documented. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together.	Provide in-house training or send City Engineer to external training on proper ESC BMPs and SWPPP preparation and review.	
E6. Begin phasing-in site inspection and enforcement procedures, maintain records of inspection and enforcement actions, verify SWPPPs being followed, as adopted in the Construction Stormwater Management Ordinance.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Begin inspecting construction sites to ensure that proper ESC BMPs are selected, used, and maintained and SWPPP is being adhered to. Conduct enforcement as needed.	
E7. Develop training materials and program for proper training of site inspection and enforcement staff. Include training on sediment control BMP designs, reading engineering drawings, sediment control BMP O&M, identifying problems, enforcement procedures, etc.	Assume that a formal on-going training program for site inspectors and enforcement needs to be established and documented. Assume that construction and post-construction training is integrated together.	Provide in-house training or send inspection/enforcement staff to external training on proper ESC BMPs, SWPPP requirements, local enforcement procedures.	
YEAR 4			
E2. Continue providing information to construction operators about training available on stormwater pollution prevention for construction sites consistent with NPDES permit or E. WA Stormwater Manual.	Assume that operators are informed of available training opportunities as a normal part of the agencies construction permitting or approval process. Provide flyers on state or trade group training opportunities for example.	Inform construction operators about available training on stormwater pollution prevention for construction sites.	
E3. Continue procedures for receipt and consideration of construction site problems reported by the public, including publicizing a hot line phone number.	Assume hot line is the same one as in D4. Assume that some calls require significant staff time to address, including multiple site visits, record keeping, correspondence with property owners, resolution of problems, and possible enforcement actions.	Respond to pollution reporting hotline, visit sites and resolve problems, maintain records, and conduct enforcement as needed to eliminate any construction pollution problems.	
E4. Continue and ensure full enforcement of the Construction Stormwater Management ordinance - Implementation of adopted procedures for site plan review, including review of stormwater pollution prevention plans (SWPPPs).	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex (size, type, location, phased, etc.) and that site plan and SWPPP review is more time consuming. Costs included here are for enhanced review activities.	Continue reviewing construction site plans with emphasis placed on ensuring that proper ESC BMPs are selected and used. Review Construction SWPPPs. Assume significant interactions with project engineers/contractors.	
E5. Execute proper training for staff that review construction erosion and sediment control site plans and SWPPPs: Include training on stormwater manual, hydrologic methods, sediment control BMP O&M, etc.	Assume that a formal on-going training program for site plan reviewers is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send plan review staff to external training on proper ESC BMPs and SWPPP preparation and review.	
E6. Continue and ensure full enforcement of the Construction Stormwater Management ordinance - Implementation of adopted site inspection and enforcement procedures, maintain records of inspection and enforcement actions, verify SWPPPs being followed.	Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Continue inspecting construction sites to ensure that proper ESC BMPs are selected, used, and maintained and SWPPP is being adhered to. Conduct enforcement as needed.	

E7. Execute proper training for site inspection and enforcement staff. Include training on sediment control BMP designs, reading engineering drawings, sediment control BMP O&M, identifying problems, enforcement procedures, etc.	Assume that a formal on-going training program for site inspectors and enforcement is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send inspection/enforcement staff to external training on proper ESC BMPs, SWPPP requirements, local enforcement procedures.	
YEAR 5			
E2. Continue providing information to construction operators about training available on stormwater pollution prevention for construction sites consistent with NPDES permit or E. WA Stormwater Manual.	Assume that operators are informed of available training opportunities as a normal part of the agencies construction permitting or approval process. Provide flyers on state or trade group training opportunities for example.	Inform construction operators about available training on stormwater pollution prevention for construction sites.	
E3. Continue procedures for receipt and consideration of construction site problems reported by the public, including publicizing a hot line phone number.	Assume hot line is the same one as in D4. Assume that some calls require significant staff time to address, including multiple site visits, record keeping, correspondence with property owners, resolution of problems, and possible enforcement actions.	Respond to pollution reporting hotline, visit sites and resolve problems, maintain records, and conduct enforcement as needed to eliminate any construction pollution problems.	
E4. Continue and ensure full enforcement of the Construction Stormwater Management ordinance - Implementation of adopted procedures for site plan review, including review of stormwater pollution prevention plans (SWPPPs).	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex (size, type, location, phased, etc.) and that site plan and SWPPP review is more time consuming. Costs included here are for enhanced review activities.	Continue reviewing construction site plans with emphasis placed on ensuring that proper ESC BMPs are selected and used. Review Construction SWPPPs. Assume significant interactions with project engineers/contractors.	
E5. Execute proper training for staff that review construction erosion and sediment control site plans and SWPPPs: Include training on stormwater manual, hydrologic methods, sediment control BMP O&M, etc.	Assume that a formal on-going training program for site plan reviewers is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send plan review staff to external training on proper ESC BMPs and SWPPP preparation and review.	
E6. Continue and ensure full enforcement of the Construction Stormwater Management ordinance - Implementation of adopted site inspection and enforcement procedures, maintain records of inspection and enforcement actions, verify SWPPPs being followed.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Continue inspecting construction sites to ensure that proper ESC BMPs are selected, used, and maintained and SWPPP is being adhered to. Conduct enforcement as needed.	
E7. Execute proper training for site inspection and enforcement staff. Include training on sediment control BMP designs, reading engineering drawings, sediment control BMP O&M, identifying problems, enforcement procedures, etc.	Assume that a formal on-going training program for site inspectors and enforcement is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send inspection/enforcement staff to external training on proper ESC BMPs, SWPPP requirements, local enforcement procedures.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
F. Post Construction Stormwater Management: Develop, implement, and enforce program to address post construction stormwater runoff to the MS4 from sites one or more acres in size.			
YEAR 1			
F1. Begin developing an ordinance for Post Construction Stormwater Management that requires stormwater controls and regulates sites at least 1+ acre in size (involve the public as required). Ordinance must be completed and adopted by permit year 3. Must include language to allow access by City staff to inspect site during and after construction to ensure compliance with BMP selection, design, installation, and O&M standards consistent with E. WA Stormwater Manual. Encourage preservation of natural drainages and reductions in impervious surfaces. Must require source control BMPs. Include mechanism requiring owners to ensure long-term care and proper O&M of BMPs.	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, develop an ordinance enforcement strategy, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt the ordinance, and place in local code. Assume staff time, possible consultant assistance, legal consultant review. Assume that ordinance will require a local post-construction stormwater permit or approval to be obtained.	Begin developing Post Construction Stormwater Management ordinance involving the public, stakeholders, and legal support. Includes development of ordinance enforcement strategy.	In progress
F2. Provide information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with NPDES permit or E. WA Stormwater Manual.	Assume that this only involves providing information about training executed by Ecology or other entities, therefore a local training program is not implemented by the permittee. Assume that material is distributed during normal development permitting process.	Obtain and provide information during normal development permitting and review process.	In progress
YEAR 2			
F1. Complete and adopt an ordinance for Post Construction Stormwater Management (involve the public as required). Ordinance must be completed and adopted by permit year 3.	Assume ordinance development work will start in year 1. Assume that it takes up to two years to fully develop an ordinance, develop an ordinance enforcement strategy, involve the public/stakeholders, complete legal review, coordinate internally, hold hearings, adopt the ordinance, and place in local codes. Assume staff time, possible consultant assistance, legal consultant review. Assume that ordinance will require a local post-construction stormwater permit or approval to be obtained.	Complete Post Construction Stormwater Management ordinance involving the public, stakeholders, legal review, hearing comments and responses, revisions, formal adoption, and placement in code.	
F2. Continue providing information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with NPDES permit or E. WA Stormwater Manual.	Assume that this only involves providing information about training executed by Ecology or other entities, therefore a local training program is not implemented by the permittee. Assume that material is distributed during normal development permitting process.	Obtain and provide information during normal development permitting and review process.	
YEAR 3			
F2. Continue providing information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with NPDES permit or E. WA Stormwater Manual.	Assume that this only involves providing information about training executed by Ecology or other entities, therefore a local training program is not implemented by the permittee. Assume that material is distributed during normal development permitting process.	Obtain and provide information during normal development permitting and review process.	
F3. Begin phasing-in enforcement of the Post Construction Stormwater Management ordinance - Implementation of adopted procedures for site plan review, including review of selected structural BMPs, stormwater calculations, O&M proposals, etc.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex (size, type, location, phased, etc.) and site plan review is more time consuming. Cost included here are for enhanced review activities.	Begin reviewing construction site plans, drainage reports, calculations, and O&M plans to ensure that proper long-term stormwater runoff controls are being used and properly maintained. Assume significant interactions with project engineers/ contractors.	
F4. Develop training materials and program for proper training of staff reviewing post construction stormwater site plans and BMPs. Include training on stormwater manual; hydrologic methods; treatment, detention, retention BMP designs; O&M, etc.	Assume that a formal on-going training program for site plan reviewers needs to be established and documented. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post construction training is integrated together.	Provide in-house training or send City Engineer to external training on proper post construction BMPs, design, selection, operation, maintenance, E. WA Stormwater Manual requirements, etc.	
F5. Begin phasing-in enforcement of the Post Construction Stormwater Management ordinance - implementation of adopted site inspection and enforcement procedures, maintain records of inspection and enforcement actions. Conduct follow-up inspections to ensure adequate maintenance performed for all structural BMPs.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Begin inspecting construction sites, including private sites, to ensure that proper post construction BMPs are selected, used, and maintained. Conduct enforcement as needed.	
F6. Develop training materials and program for proper training of site inspection and enforcement staff. Include training on treatment, detention, retention BMP designs; reading engineering drawings; long-term BMP O&M; identifying problems; enforcement procedures; etc.	Assume that a formal on-going training program for site inspectors and enforcement needs to be established and documented. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together.	Continue to provide in-house training or send inspection/enforcement staff to external training on proper post construction BMPs, stormwater manual requirements, local enforcement procedures, etc.	
YEAR 4			
F2. Continue providing information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with NPDES permit or E. WA Stormwater Manual.	Assume that this only involves providing information about training executed by Ecology or other entities, therefore a local training program is not implemented by the permittee. Assume that material is distributed during normal development permitting process.	Obtain and provide information during normal development permitting and review process.	
F3. Continue and ensure full enforcement of the Post Construction Stormwater Management ordinance - implementation of adopted procedures for site plan review, including review of selected structural BMPs, stormwater calculations, O&M proposals, etc.	Assume that some projects are complex (size, type, location, phased, etc.) and site plan review is more time consuming. Costs included here are for enhanced review activities.	Continue reviewing construction site plans, drainage reports, calculations, and O&M plans to ensure that proper long-term stormwater runoff controls are being used and properly maintained. Assume significant interactions with project engineers/ contractors.	
F4. Execute proper training for staff reviewing post construction stormwater site plans and BMPs. Include training on stormwater manual; hydrologic methods; treatment, detention, retention BMP designs; O&M, etc.	Assume that a formal on-going training program for site plan reviewers is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send plan review staff to external training on proper post construction BMPs, design, selection, operation, maintenance, E. WA Stormwater Manual requirements, etc.	
F5. Continue and ensure full enforcement of the Post Construction Stormwater Management ordinance - implementation of adopted site inspection and enforcement procedures, maintain records of inspection and enforcement actions. Conduct follow-up inspections to ensure adequate maintenance performed for all structural BMPs.	Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Continue inspecting construction sites, including private sites, to ensure that proper post construction BMPs are selected, used, and maintained. Conduct enforcement as needed.	
F6. Execute proper training for site inspection and enforcement staff. Include training on treatment, detention, retention BMP designs; reading engineering drawings; long-term BMP O&M; identifying problems; enforcement procedures; etc.	Assume that a formal on-going training program for site inspection and enforcement is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send inspection/enforcement staff to external training on proper post construction BMPs, stormwater manual requirements, local enforcement procedures, etc.	

YEAR 5			
F2. Continue providing information to design professionals (engineering consultants) about training available on how to comply with stormwater analysis and design procedures and other technical stormwater requirements consistent with NPDES permit or E. WA Stormwater Manual.	Assume that this only involves providing information about training executed by Ecology or other entities, therefore a local training program is not implemented by the permittee. Assume that material is distributed during normal development permitting process.	Obtain and provide information during normal development permitting and review process.	
F3. Continue enforcement of the Post Construction Stormwater Management ordinance - implementation of adopted procedures for site plan review, including review of selected structural BMPs, stormwater calculations, O&M proposals, etc.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex (size, type, location, phased, etc.) and site plan review is more time consuming. Cost included here are for enhanced review activities.	Continue reviewing construction site plans, drainage reports, calculations, and O&M plans to ensure that proper long-term stormwater runoff controls are being used and properly maintained. Assume significant interactions with project engineers/ contractors.	
F4. Execute proper training for staff reviewing post construction stormwater site plans and BMPs. Include training on stormwater manual; hydrologic methods; treatment, detention, retention BMP designs; O&M, etc.	Assume that a formal on-going training program for site plan reviewers is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send plan review staff to external training on proper post construction BMPs, design, selection, operation, maintenance, E. WA Stormwater Manual requirements, etc.	
F5. Continue enforcement of the Post Construction Stormwater Management ordinance - implementation of adopted site inspection and enforcement procedures, maintain records of inspection and enforcement actions. Conduct follow-up inspections to ensure adequate maintenance for all structural BMPs.	Assume that once ordinance is on the books, enforcement is phased-in starting later in year 3. Assume that some projects are complex and that site inspection and enforcement is more time consuming. Costs included here are for enhanced site inspection and enforcement activities.	Continue inspecting construction sites, including private sites, to ensure that proper post construction BMPs are selected, used, and maintained. Conduct enforcement as needed.	
F6. Execute proper training for site inspection and enforcement staff. Include training on treatment, detention, retention BMP designs; reading engineering drawings; long-term BMP O&M; identifying problems; enforcement procedures; etc.	Assume that a formal on-going training program for site inspection and enforcement is needed. Existing training (in-house or external) may be adequate for permit compliance but needs to be reviewed and updated/enhanced if necessary. Assume that construction and post-construction training is integrated together. Assume that level of effort drops because most training materials and procedures have already been established.	Continue to provide in-house training or send inspection/enforcement staff to external training on proper post construction BMPs, stormwater manual requirements, local enforcement procedures, etc.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List ✓
NPDES			
G. Pollution Prevention and Good Housekeeping for Municipal Operations: Develop and implement an on-going O&M program, including a staff training program, aimed at preventing or reducing pollutant runoff from municipal operations.			
YEAR 1			
G1. City to continue performing existing storm system maintenance activities. Includes on-going inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.	Costs for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance will be included in years 3-5.	City to continue existing storm system inspection and maintenance activities. Costs for existing activities rolled-in during permit year 2 and assumed by SW Utility.	
G2. City to begin street sweeping program and other all season BMPs to reduce pollution into the MS4.	Costs for phasing-in enhanced/changed practices, improved materials, and for stormwater compliance staff to review and record practices and provide technical assistance will be included in years 3-5.	City to continue existing street sweeping program. Costs for existing program rolled-in during permit year 2 and assumed by SW Utility.	
G3. As of the effective date of the permit, have reviewed existing and near-term municipal construction projects and sought coverage under statewide NPDES Construction Stormwater General Permit for any projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all public construction projects after the effective date of the permit.	Assume that NPDES Construction Stormwater permits are being sought for public projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by Department/Division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects. Technical assistance to project proponent would cost more.	
G4. As of the effective date of the permit, have reviewed all municipal "industrial" facilities/sites and sought coverage under statewide NPDES Industrial Stormwater General Permit for municipal sites meeting criteria for coverage.	Assume that some work still needs to be accomplished and is conducted in year 1. Cost will be for NPDES MS4 Permit compliance staff to review facilities and recommend that the facilities seek coverage. Records of the process must be developed. Cost of seeking and compliance with permits will be borne by Department/Division being covered.	Need money and staff to review facilities, assess need for permit, create and maintain records of seeking and complying with industrial stormwater permits for municipal facilities/sites.	
YEAR 2			
G1. City to continue performing existing storm system maintenance activities. Includes on-going inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.	Costs for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance will be included in years 3-5.	City to continue existing storm system inspection and maintenance activities. Costs for existing activities rolled-in during permit year 2 and assumed by SW Utility.	
G2. City to continue existing street sweeping program and other all season BMPs to reduce pollution into the MS4.	Costs for phasing-in enhanced/changed practices, improved materials, and for stormwater compliance staff to review and record practices and provide technical assistance will be included in years 3-5.	City to continue existing street sweeping program. Costs for existing program rolled-in during permit year 2 and assumed by SW Utility.	
G3. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all public construction projects.	Assume that NPDES Construction Stormwater permits are being sought for public projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by Department/Division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects. Technical assistance to project proponent would cost more.	
G5. Begin developing a good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities aimed at preventing and reducing water quality impacts. Must be at least as protective as relevant chapters of the E. WA Stormwater Manual and must include provisions for record keeping. The O&M Plan must address the following types of facilities or activities that are present within the permittee's boundaries: stormwater collection and conveyance system O&M; road, highway, and parking lot O&M; vehicle fleet storage, washing, and maintenance; municipal building cleaning, washing, painting and other O&M activities; park and open space O&M activities; municipal construction projects (all types); municipal industrial sites and activities; material and equipment storage areas and maintenance areas; flood management projects; and all other facilities that can reasonably be expected to discharge contaminated runoff. The O&M Plan must include a schedule of inspections and requirements for record keeping, and identify the department (and as appropriate, specific staff) responsible for performing each activity. Must be completed by end of permit year 3.	Assume that it takes two years to fully develop the O&M Plan and that appropriate staff from the various Departments/Divisions are involved (this is a large effort and could easily take longer).	Begin developing a good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities aimed at preventing and reducing water quality impacts. Must be at least as protective as relevant chapters of the E. WA Stormwater Manual. Must include schedule for inspections and address methods of record keeping.	
YEAR 3			
G1. Begin implementing storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facilities (BMP) maintenance, and proper waste disposal.	Assume that it takes 2 years to fully phase-in enhanced activities. Assume that facilities do not exist for proper waste disposal. Assume that most necessary heavy equipment is available, however some specialized equipment may be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible departments/divisions.	
G3. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all public construction projects.	Assume that NPDES Construction Stormwater permits are being sought for public projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by department/division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects. Technical assistance to project proponent would cost more.	
G5. Complete development and begin implementation of the good housekeeping plan and schedule (O&M Plan) started in year 2.	Cost presented here assumes that leadership, technical support, advice, and record keeping is provided by stormwater compliance staff who work to complete the plan, and that some costs to carry out the new procedures are borne by the department/division responsible for a given activity (e.g., cost of changing road maintenance practices/procedures is paid by Road Maintenance Div).	Complete development of good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities. Begin implementation of the plan working with affected departments and divisions. Maintain records.	
G6. Begin developing a municipal good housekeeping staff training program (materials, schedules, who gets what training, etc.) to meet the needs of the O&M Plan completed in G5. Training must include all employees whose construction, operations, and maintenance job functions may impact stormwater quality. Training shall address the importance of protecting water quality, the requirements of the NPDES permit, proper O&M requirements, inspection procedures, ways to perform their job while protecting water quality, procedures for reporting water quality concerns and suspected illicit discharges.	Assume that it takes at least one year to develop the good housekeeping training program and that appropriate staff from the various departments/divisions are involved (this is a large effort and could easily take longer). Assume program development is lead by stormwater compliance staff and is a direct stormwater program cost.	Develop good housekeeping training materials and program, involve various affected departments/divisions and associated staff.	
G7. Begin implementing enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads, highways, parking lots. Need to address snow removal de-icing, snow disposal, material storage & application, and all season BMPs to reduce pollution into the MS4.	Assume that it takes 2 years to fully phase-in activities. Assume that street sweeping continues to be one of the preferred all season BMPs employed by City with additional water quality oriented weather report based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible departments/divisions.	
G8. Begin conducting all vehicle and equipment washing and maintenance in self-contained building or wash area and/or maintenance areas where all wash water is kept out of the MS4.	Assume that physical facilities are not available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G9. Begin implementing pollution prevention and good housekeeping practices established in the O&M Plan for maintenance activities at all City-owned buildings.	Cost can vary substantially (e.g., transit areas, airport, etc.). Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	

G10. Begin implementing pollution prevention and good housekeeping practices established in the O&M Plan at all municipally owned parks and open spaces.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Begin developing Stormwater Pollution Prevention Plans (SWPPPs) to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit.	Assume that it takes at least one year to identify/screen all known facilities, evaluate practices, develop SWPPPs, and identify training needs. Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site.	Develop Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial SW General Permit.	
G12. Begin implementing provisions to address water quality considerations in the design of all new flood management projects, including minimization of site hydrology impacts where possible.	Assume that normal SEPA, HPA, Critical Areas, Shorelines, and other permitting processes adequately consider and address water quantity and quality for new flood protection projects.	Permit compliance staff interface with development review processes to obtain and keep records per NPDES requirements.	
G13. Locate and map all stormwater treatment and flow control facilities owned or operated by the permittee. Inspect each facility, making notes of conditions, maintenance needs, or other related concerns. Track all new systems coming into public ownership as development occurs.	Assume that locating and mapping these systems begins in the year that inspections have to be performed and that required mapping overlaps with illicit discharge program (D.1). City must inspect City-owned and operated stormwater treatment and control facilities at least once by end of Yr 3 and again by end of Yr 5. Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide training and data forms, provide technical assistance, and ensure that records are kept. Costs to rectify problems will be covered by other stormwater budget categories.	Verify location and map all stormwater treatment and flow control facilities owned or operated by the City. Inspect stormwater treatment and flow control facilities. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G14. Begin conducting spot checks at City-owned and operated stormwater treatment and flow control facilities after major rainfall events (greater than 10 year recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G15. As soon as practicable, execute any repair and/or maintenance projects needed based on observations made during regular inspections or spot checks of City-owned or operated stormwater treatment and flow control facilities.	Could involve anything from light maintenance to major reconstruction. Cost estimate here will generally assume that few major construction or reconstruction projects are needed (or will help be paid for by multiple departments/divisions). Cost here is for stormwater compliance staff to provide technical support and approval of needed repairs, ensure that records are kept, and provide some funding for the project.	Fix or repair observed problems at City-owned and operated stormwater treatment and flow control facilities after major storm events. Keep records of repairs and costs.	
YEAR 4			
G1. Continue phasing-in and implementing enhanced storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facilities (BMP) maintenance, and proper waste disposal.	Assume that it takes 2 years to fully phase-in enhanced activities. Assume that facilities do not exist for proper waste disposal. Assume that most necessary heavy equipment is available, however some specialized equipment may be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible departments/divisions.	
G3. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all public construction projects.	Assume that NPDES Construction Stormwater permits are being sought for public projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by department/division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects. Technical assistance to project proponent would cost more.	
G6. Finish developing and execute a municipal good housekeeping training program for the various staff groups.	Assume that it takes 2 years to develop the O&M Plan and that appropriate staff from the various Departments/Divisions are involved. Assume training is provided to approximately 5 groups, including streets, shop, engineering, inspection/enforcement, etc - this is a large effort including formal day of training in-house and full day in field. Assume training is lead by stormwater compliance staff and is a direct stormwater program cost. Costs to send staff to training is borne by Department/Division that staff represent.	Conduct good housekeeping training program for various affected Departments/Divisions and associated staff.	
G7. Continue phasing-in and implementing enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads, highways, parking lots. Need to address snow removal, de-icing, snow disposal, material storage & application, and all season BMPs to reduce pollution into the MS4.	Assume that it takes 2 years to fully phase-in activities. Assume that street sweeping continues to be one of the preferred all season BMPs employed by City with additional water quality oriented weather report based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Departments/Divisions.	
G8. Continue conducting all vehicle and equipment washing and maintenance in self-contained building or wash area and/or maintenance areas where all wash water is kept out of the MS4.	Assume that physical facilities are not available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Division.	
G9. Continue phasing-in and implementing pollution prevention and good housekeeping practices established in the O&M Plan for maintenance activities at all municipally owned buildings.	Cost can vary substantially (e.g., transit areas, airport, etc.). Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G10. Continue phasing-in and implementing pollution prevention and good housekeeping practices established in the O&M Plan at all municipally owned parks and open spaces.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Finish developing and begin implementing Stormwater Pollution Prevention Plans (SWPPPs) to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit. Develop training materials and execute training as needed.	Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site. Assume that level of effort drops in years 4-5 because training materials, training program, and procedures have already been established.	Complete Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas, conduct training, implement SWPPPs.	
G12. Continue implementing provisions to address water quality considerations in the design of all new flood management projects, including minimization of site hydrology impacts where possible. Review existing flood management projects, prioritize them based on water quality concerns, and select at least five to review and evaluate whether or not changes or additions should be made to improve water quality.	Assume that normal SEPA, HPA, Critical Areas, Shorelines, and other permitting processes adequately consider and address water quantity and quality for new flood protection projects. Prioritize and review at least 5 existing flood management projects that drain to the MS4 to determine whether changes/additions should be made to improve water quality. Assume cost is for review process. Evaluation process and definition of desired improvements occurs in year 5.	Permit compliance staff interface with development review processes to obtain and keep records per NPDES requirements. Develop criteria and protocol for review, conduct review of existing flood management projects for water quality concerns, select five to evaluate if changes or additions should be made to improve water quality.	
G13. Continue to inspect stormwater treatment and flow control facilities owned or operated by the permittee, making notes of conditions, maintenance needs, or other related concerns. Track all new systems coming into public ownership as development occurs.	City must inspect City-owned and operated stormwater treatment and control facilities at least once by end of Yr 3 and again by end of Yr 5. Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide training and data forms, provide technical assistance, and ensure that records are kept. Costs to rectify problems will be covered by other stormwater budget categories. Assume that costs split in years 4-5 since all facilities to be re-inspected by end of Yr 5.	Inspect stormwater treatment and flow control facilities. Identify repair or maintenance needs, resolve concerns, and maintain records.	

G14. Conduct spot checks at City-owned and operated stormwater treatment and flow control facilities after major rainfall events (greater than 10 year recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G15. As soon as practicable, execute any repair and maintenance projects needed based on observations made during regular inspections or spot checks of City-owned or operated stormwater treatment and flow control facilities.	Could involve anything from light maintenance to major reconstruction. Cost estimate here will generally assume that few major construction or reconstruction projects are needed (or will help be paid for by multiple departments/divisions). Cost here is for stormwater compliance staff to provide technical support and approval of needed repairs, ensure that records are kept, and provide some funding for the project.	Fix or repair observed problems at muni-owned and operated stormwater treatment and flow control facilities after major storm events. Keep records of repairs and costs.	
G16. Begin using source control and good housekeeping BMPs during other City activities and at other City sites that would reasonably be expected to discharge contaminated runoff.	Assume that it takes at least one year to identify all other municipal facilities, evaluate practices, identify appropriate BMPs to be implemented to protect water quality, and provide necessary training. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work. Assume that there are several facilities meeting criteria.	Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
YEAR 5			
G1. Fully implement enhanced storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.	Assume that facilities now exist for proper waste disposal (shared jointly between the two cities and the County). Assume that most necessary heavy equipment is available, however some specialized equipment may be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible Departments/Divisions.	
G3. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all public construction projects.	Assume that NPDES Construction Stormwater permits are being sought for public projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by department/division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects. Technical assistance to project proponent would cost more.	
G6. Update good housekeeping training of staff groups as needed.	Assume training is provided to approximately 5 groups, including streets, shop, engineering, inspection/enforcement, etc - this is a large effort including formal day of training in-house and full day in field. Assume training is lead by stormwater compliance staff and is a direct stormwater program cost. Costs to send staff to training is borne by Department/Division that staff represent.	Evaluate need for training update. Update and repeat good housekeeping training program for various affected departments/divisions and associated staff.	
G7. Fully implement enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads, highways, parking lots. Need to address snow removal de-icing, snow disposal, material storage & application, and all season BMPs to reduce pollution into the MS4.	Assume that it takes 2 years to fully phase-in activities. Assume that street sweeping continues to be one of the preferred all season BMPs employed by City with additional water quality oriented weather report based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Divisions.	
G8. Fully implement all vehicle and equipment washing and maintenance in self-contained building or wash area and/or maintenance areas where all wash water is kept out of the MS4.	Assume that physical facilities are readily available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the Department/Division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Division.	
G9. Fully implement pollution prevention and good housekeeping practices established in the O&M Plan for maintenance activities at all municipally owned buildings.	Cost can vary substantially (e.g., transit areas, airport, etc.). Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G10. Fully implement pollution prevention and good housekeeping practices established in the O&M Plan at all municipally owned parks and open spaces.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Fully implement Stormwater Pollution Prevention Plans (SWPPPs) to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit. Update training materials and execute training as needed.	Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site. Assume that level of effort drops in years 4-5 because training materials, training program, and procedures have already been established.	Implement Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas, conduct training, implement SWPPPs.	
G12. Fully implement provisions to address water quality considerations in the design of all new flood management projects, including minimization of site hydrology impacts where possible. Evaluate five existing flood management projects and determine whether or not changes or additions should be made to improve water quality.	Assume that normal SEPA, HPA, Critical Areas, Shorelines, and other permitting processes adequately consider and address water quantity and quality for new flood protection projects. Improvements to be identified, but any projects required will occur in 2nd permit term.	Permit compliance staff interface with development review processes to obtain and keep records per NPDES requirements.	
G13. Continue to inspect stormwater treatment and flow control facilities owned or operated by the permittee, making notes of conditions, maintenance needs, or other related concerns. Track all new systems coming into public ownership as development occurs.	City must inspect municipally owned and operated stormwater treatment and control facilities at least once by end of Yr 3 and again by end of Yr 5. Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide training and data forms, provide technical assistance, and ensure that records are kept. Costs to rectify problems will be covered by other stormwater budget categories.	Inspect all remaining stormwater treatment and flow control facilities. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G14. Conduct spot checks at City-owned and operated stormwater treatment and flow control facilities after major rainfall events (greater than 10 year recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G15. As soon as practicable, execute any repair and maintenance projects needed based on observations made during regular inspections or spot checks of City-owned or operated stormwater treatment and flow control facilities.	Could involve anything from light maintenance to major reconstruction. Cost estimate here will generally assume that few major construction or reconstruction projects are needed (or will help be paid for by multiple departments/divisions). Cost here is for stormwater compliance staff to provide technical support and approval of needed repairs, ensure that records are kept, and provide some funding for the project.	Fix or repair observed problems at City-owned and operated stormwater treatment and flow control facilities after major storm events. Keep records of repairs and costs.	
G16. Fully implement source control and good housekeeping BMPs during other City activities and at other City sites that would reasonably be expected to discharge contaminated runoff.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work. Assume that there are several facilities meeting criteria.	Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
H. Compliance with Total Maximum Daily Load Allocations: WRIA 35 - Middle Snake Watershed.			
YEAR 1			
H1. Participate in the development of TMDLs.	Assume this is required to know and control City liability. Assume that this involves staff time to review material, attend meetings, prepare and submit correspondence.	Participation in TMDL development may be desirable.	
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).	Compliance with the NPDES Phase II Permit is the only requirement the City presently needs to fulfill to be in compliance with applicable TMDLs.	None	
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.	Assume recording keeping and tracking status of TMDL implementation minimal. Status of TMDL implementation included as part of annual report.	Track status of TMDL implementation and keep records.	
YEAR 2			
H1. Participate in the development of TMDLs.	Assume this is required to know and control City liability. Assume that this involves staff time to review material, attend meetings, prepare and submit correspondence.	Continued participation in TMDL development may be desirable.	
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).	Compliance with the NPDES Phase II Permit is the only requirement the City presently needs to fulfill to be in compliance with applicable TMDLs.	None	
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.	Assume recording keeping and tracking status of TMDL implementation minimal. Status of TMDL implementation included as part of annual report.	Track status of TMDL implementation and keep records.	
YEAR 3			
H1. Participate in the development of TMDLs.	Assume this is required to know and control City liability. Assume that this involves staff time to review material, attend meetings, prepare and submit correspondence.	Continued participation in TMDL development may be desirable.	
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).	Compliance with the NPDES Phase II Permit is the only requirement the City presently needs to fulfill to be in compliance with applicable TMDLs.	None	
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.	Assume recording keeping and tracking status of TMDL implementation minimal. Status of TMDL implementation included as part of annual report.	Track status of TMDL implementation and keep records.	
YEAR 4			
H1. Participate in the development of TMDLs.	Assume this is required to know and control City liability. Assume that this involves staff time to review material, attend meetings, prepare and submit correspondence.	Continued participation in TMDL development may be desirable.	
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).	Compliance with the NPDES Phase II Permit is the only requirement the City presently needs to fulfill to be in compliance with applicable TMDLs.	None	
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.	Assume recording keeping and tracking status of TMDL implementation minimal. Status of TMDL implementation included as part of annual report.	Track status of TMDL implementation and keep records.	
YEAR 5			
H1. Participate in the development of TMDLs.	Assume this is required to know and control City liability. Assume that this involves staff time to review material, attend meetings, prepare and submit correspondence.	Continued participation in TMDL development may be desirable.	
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).	Compliance with the NPDES Phase II Permit is the only requirement the City presently needs to fulfill to be in compliance with applicable TMDLs.	None	
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.	Assume recording keeping and tracking status of TMDL implementation minimal. Status of TMDL implementation included as part of annual report.	Track status of TMDL implementation and keep records.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
I. Monitoring and Program Evaluation Requirements			
YEAR 1			
I1. Recommend that City participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for City to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies (Asotin County, City of Clarkston, and others) conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
YEAR 2			
I1. Recommend that City participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for City to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies (Asotin County, City of Clarkston, and others) conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
YEAR 3			
I1. Recommend that City participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for City to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies (Asotin County, City of Clarkston, and others) conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
YEAR 4			
I1. Recommend that City participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for City to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies (Asotin County, City of Clarkston, and others) conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
I2. Continue preparing for participation and implementation of a future comprehensive long-term Stormwater Management Program (SWMP) effectiveness monitoring program. Have developed at least two suitable questions, selected sites where future monitoring will be conducted, and developed a specific monitoring plan for each question posed. Include a summary of the proposed questions and describe status of developing the monitoring plan in 4th annual report.	Actual Stormwater Management Program effectiveness monitoring to occur in 2nd permit term. Assume that this involves staff time to develop suitable questions to assess program effectiveness, sites where monitoring will be conducted, and development of a monitoring plan for each question posed, which includes proposed purpose, design, and methods.	Complete work to develop suitable questions, select monitoring sites or targeted activities for evaluation, and develop specific monitoring plan for each question posed to evaluate effectiveness of SWM Program. Include status in 4th annual report (March 31, 2011).	
YEAR 5			
I1. Recommend that City participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for City to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies (Asotin County, City of Clarkston, and others) conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
NPDES			
J. Reporting and Record Keeping Requirements			
YEAR 1			
J1. Develop written Stormwater Management Program (SWMP) for submittal in permit year 2 with annual report, follow program component format established by Ecology.	Must submit a copy of SWMP to Ecology with the annual report beginning no later than March 31, 2008. Assume that development of the SWMP begins during permit year 1.	Prepare SWMP according to Ecology format. Assume a significant effort by multiple staff, public and stakeholder involvement per C1, review/approval by elected leaders.	
J2. Develop and implement an ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes tracking the number of inspection performed, enforcement actions taken, types of public education activities as required for each SWMP component.	Assume that this involves lead permit compliance staff: (1) itemizing the types of recordkeeping needed for each category of permit requirement; (2) meeting with various department/divisions to learn about current record keeping activities; (3) assessing the need for new processes or changes or enhancements to existing processes; (4) creating or modifying record keeping forms as needed; (5) and working with various directors/managers/staff to ensure implementation of the new processes.	Itemize the types of recordkeeping needed for permit; meet with various department/divisions; assess need for new or changed processes; create record keeping forms/protocols; work with directors/managers/staff to implement. Significant effort by staff at multiple levels.	
YEAR 2			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 3 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff, public and stakeholder involvement, review/approval by elected leaders.	
J2. Continue ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes tracking the number of inspection performed, enforcement actions taken, types of public education activities as required for each SWMP component.	Assume that this involves reviewing and modifying the process developed as needed.	Complete development of record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume this is a relatively simple process that considers the activities detailed for each SWMP component and cross-check them against records (e.g., reaching target audiences, site plan review and inspection program goals, storm system maintenance inspection goals, and other measurable goals established). Also cross-check activities against established literature, studies, and accepted BMP manuals to assess impact to water quality. Assume that this analysis is presented/discussed in a narrative portion of the annual report.	Develop evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Develop and implement a process to track the cost of development and implementation of the SWMP.	Assume this involves lead permit compliance staff: (1) estimating which departments/divisions will need to begin tracking costs, for what, and when; (2) learning about cost tracking methods and options within each affected department or division (prioritized based on when they need to start); (3) checking with each department/division to ensure implementation of cost tracking methods; and (4) obtaining cost tracking information in a timely manner so that the annual report can include it.	Funding to cover staff time needed to interface with Financial Department accounting staff and develop tracking budgets and reports.	
J5. Prepare and submit year 1 annual report and SWMP to Ecology. Use annual report form established by Ecology. The annual report must describe the status of compliance with permit conditions, including: (1) the status of implementation of each component of the SWMP; (2) an assessment of progress towards meeting the minimum performance standards (measurable goals) established for each minimum control measure of the SWMP; (3) a description of activities being implemented to comply with each component of the SWMP (including number of inspections, site plans reviewed, illegal connection removed, enforcement actions, educational activities, etc.); (4) proposed SWMP implementation schedule and status (plus comparison with schedule in the permit, discussion of missed deadlines and why, when missed deadline activities will be implemented); and (5) summary of SWMP evaluation (including evaluation of effectiveness of SWMP and appropriateness of BMPs selected). Note annexations during the reporting period and their influence on permit coverage areas. Note if relying upon another entity for implementation of any BMPs or other p	Reports are due no later than March 31 each year beginning in 2008. Assume that in later years, it takes a fairly senior staff person working half time from January 1 to March 31 to prepare the report - including gathering all of the records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
YEAR 3			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 4 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff, public and stakeholder involvement, review/approval by elected leaders.	
J2. Continue ongoing process for gathering, recording, maintaining and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes tracking the number of inspection performed, enforcement actions taken, types of public education activities as required for each SWMP component.	Assume that this involves reviewing and modifying the process developed as needed.	Enact record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume that this involves reviewing the evaluation/analysis conducted in permit year 2 and updating it as needed.	Review/update evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Continue process to track the cost of development and implementation of the SWMP.	Assume that this involves reviewing and modifying the process developed as needed.	Funding to cover staff time needed to interface with Financial Department accounting staff and develop tracking budgets and reports.	
J5. Prepare and submit year 2 annual report and updated SWMP to Ecology. Update prior year annual report and address the same considerations as described in permit year 2.	Reports are due no later than March 31 each year. Assume that in later years, it takes a fairly senior staff person working half time from Jan 1 to March 31 to prepare the report - including gathering all records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
YEAR 4			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 5 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff, public and stakeholder involvement, review/approval by elected leaders.	
J2. Continue ongoing process for gathering, recording, maintaining and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes tracking the number of inspection performed, enforcement actions taken, types of public education activities as required for each SWMP component.	Assume that this involves reviewing and modifying the process developed as needed.	Enact record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume that this involves reviewing the evaluation/analysis conducted in permit year 3 and updating it as needed.	Review/update evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Continue process to track the cost of development and implementation of the SWMP.	Assume that this involves reviewing and modifying the process developed as needed.	Funding to cover staff time needed to interface with Financial Department accounting staff and develop tracking budgets and reports.	
J5. Prepare and submit year 3 annual report and updated SWMP to Ecology. Update prior year annual report and address the same considerations as described in permit year 3.	Reports are due no later than March 31 each year. Assume that in later years, it takes a fairly senior staff person working half time from Jan 1 to March 31 to prepare the report - including gathering all records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	

YEAR 5			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 1 (2nd permit cycle) with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff, public and stakeholder involvement, review/approval by elected leaders.	
J2. Continue ongoing process for gathering, recording, maintaining and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes tracking the number of inspection performed, enforcement actions taken, types of public education activities as required for each SWMP component.	Assume that this involves reviewing and modifying the process developed as needed.	Enact record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume that this involves reviewing the evaluation/analysis conducted in permit year 4 and updating it as needed.	Review/update evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Continue process to track the cost of development and implementation of the SWMP.	Assume that this involves reviewing and modifying the process developed as needed.	Funding to cover staff time needed to interface with Financial Department accounting staff and develop tracking budgets and reports.	
J5. Prepare and submit year 4 annual report and updated SWMP to Ecology. Update prior year annual report and address the same considerations as described in permit year 4.	Reports are due no later than March 31 each year. Assume that in later years, it takes a fairly senior staff person working half time from Jan 1 to March 31 to prepare the report - including gathering all records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	