

STORMWATER MANAGEMENT PROGRAM PLAN

CITY OF RENTON MUNICIPAL STORMWATER PROGRAM

Prepared for
City of Renton

Prepared by
Herrera Environmental Consultants, Inc.



Note:

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Prepared for
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INTRODUCTION AND BACKGROUND

In 1987, Congress amended the federal Clean Water Act to address municipal stormwater discharges through the National Pollution Discharge Elimination System (NPDES) permits. In Washington State, the Washington State Department of Ecology (Ecology) is responsible for issuing and renewing these permits. In 2007, NPDES Municipal Stormwater permits were issued in Washington for two groups of permittees: Phase I jurisdictions and Phase II jurisdictions. Phase I permits were issued to large municipalities and county governments with populations over 100,000 (as of the 1990 census). Phase II Permits were issued to smaller governmental entities generally with populations between 10,000 and 100,000. The City of Renton (City) is covered under Western Washington's Phase II Municipal Separate Stormwater Sewer System (MS4) NPDES permit (Phase II Permit).

Discharges from MS4s (systems designed to collect and convey stormwater runoff) are regulated by Ecology under the NPDES program. The municipal NPDES permit seeks to control or reduce pollutant discharge to the maximum extent practicable, primarily through programmatic efforts. The City is regulated by Ecology as a Phase II permittee. The Phase II Permit became effective on February 16, 2007, was modified in 2009, and expired on February 15, 2012. Ecology extended the 2007-2012 Phase II Permit requirements until July 2013. A new permit with updated requirements (2013-2018 Phase II Permit) was issued on August 1, 2012 and became effective on August 1, 2013. For fiscal year 2015 (July 1, 2014, through June 30, 2015), the City was charged an annual permit fee of \$50,024 by Ecology. This annual fee will likely increase with future Phase II Permit updates.

The Phase II Permit requires the City to develop a Stormwater Management Program (SWMP). The SWMP must include the following components:

1. A public education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities
2. A process for involving the public in the development, implementation, and update of the SWMP
3. An ongoing illicit discharge detection and elimination (IDDE) program to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4
4. A program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities
5. An operation and maintenance (O&M) program to prevent or reduce pollutant runoff from municipal operations

In addition, the Phase II Permit requires that the City prepare written documentation of the SWMP and update that documentation annually. This SWMP plan satisfies this requirement. In addition to the five components listed above, this SWMP plan also includes a discussion of the monitoring and reporting requirements of the Phase II Permit. This SWMP plan also includes a description of the City's internal coordination mechanisms as required by S5.A.b (Appendix A).

PUBLIC EDUCATION AND OUTREACH

The City's public education and outreach program currently includes a wide range of educational brochures for a variety of audiences. The City partnered with the Environmental Coalition of South Seattle (ECOSS) to provide stormwater spill kits and spill response education training to small businesses in 2014 and 2015. The City also has a drain marker volunteer program. This section describes the Phase II Permit requirements related to Public Education and Outreach, including the City's planned compliance activities.

2013–2018 Phase II Permit Requirements

Section S5.C.1 of the 2013–2018 Phase II Permit requires the City to develop and implement a public education and outreach program. Education and outreach efforts shall be prioritized in the following areas:

1. Provide an education and outreach program to build general awareness, and effect behavioral change, that selects from the following target audiences:
 - a. General public (including school age children)
 - b. Engineers, contractors, developers, and land-use planners
 - c. Businesses (including home-based and mobile businesses)
 - d. Residents, landscapers, and property managers/owners
2. Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
3. Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area.
4. Use results to direct education and outreach resources most effectively (no later than **February 2, 2016**) as well as to evaluate changes in adoption of targeted behaviors.

Planned and Recommended Activities

Table 1-1 summarizes the City's planned activities associated with Public Education and Outreach. Table 1-2 summarizes recommended public education program elements that the City may initiate depending on available staffing and funding.

Table 1-1. Planned Public Education and Outreach Activities.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Special recycling events	Coordinate two collection events for household hazardous wastes such as oil, antifreeze, oil filters, and batteries.	Solid Waste Division	May and September 2015
Partner with local Hazardous Waste Management Program	City provides Natural Yard Care Program classes in English and Spanish that teach yard care strategies to eliminate reliance on pesticides, herbicides and chemical fertilizers.	Solid Waste Division	Fall 2015
King County Salmon Watcher Program	Participate as a host municipality for the King County Salmon Watcher program.	Water Utility Division	Fall 2015
Business education and outreach ^a	Partner with ECOSS to provide spill kits and spill response education/ training for restaurants.	Surface Water Utility (SWU) Engineering	December 31, 2015
Participate in STORM (<i>the Regional NPDES Education and Outreach Forum</i>)	Consider participation in STORM program and promoting the Puget Sound Starts Here campaign messaging.	SWU Engineering	Ongoing
Volunteer Storm Drain Marker Program	Coordinate citizen volunteers to mark stormwater drains.	SWU Engineering	Ongoing
WRIA 8 and WRIA 9	Partner with WRIA 8 Salmon Recovery Council and WRIA 9 Watershed Ecosystem Forum.	Water Utility Division	Ongoing
Aquifer Protection Program	Provide water quality and conservation education, e.g., booklets distributed to businesses: <i>Employee Training for Aquifer Protection</i> , and <i>Shop Guide for Dangerous Waste Management</i> .	Water Utility Division	Ongoing
Evaluate and modify Public Education and Outreach Program	Measure the understanding and adoption of a targeted behavior. Modify the evaluated public education program to address the results of the evaluation.	SWU Engineering	February 2, 2016

^a This planned public education and outreach activity also can be used to meet S5.C.3.c.iv - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

Table 1-2. Recommended Public Education and Outreach Activities.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Expand educational materials available through existing programs and streamline stormwater outreach messaging and public handouts	<ul style="list-style-type: none"> Integrate stormwater public education and outreach into existing Public Works programs. Develop consistent stormwater outreach messaging among various City departments. Combine handouts based on target audiences and eliminate handouts with redundant information. 	SWU Engineering	TBD (depending on funding and staffing)
Update website	Consider reorganizing City website so that information can be found more easily.	SWU Engineering	TBD (depending on funding and staffing)
Promote community stewardship	Encourage community involvement with stream teams, stormwater monitoring, or riparian planting.	SWU Engineering	TBD (depending on funding and staffing)
Expand Adopt a Neighborhood Program	Evaluate the addition of a stormwater BMP component to the City's Adopt a Neighborhood Program.	SWU Engineering	TBD (depending on funding and staffing)
Add a stormwater component to the Citizen's Academy ^a	Consider adding a surface water/storm component to the "Citizen's Academy" that emphasizes IDDE topics and maintenance.	SWU Engineering, Citizen's Academy	TBD (depending on funding and staffing)
Car wash kits	Provide car wash kits for groups holding charity car wash events.	Water Utility Division	To be continued (depending on funding and staffing)
Develop and circulate new public education materials ^b	Consider developing an illicit discharge handout, mailing handouts to single-family residences, and providing relevant handouts at pre-application meetings.	SWU Engineering	TBD (depending on funding and staffing)
Illicit discharge education and outreach ^b	Consider developing a brochure or handout to provide to companies that respond to spills associated with automobile accidents.	Interdepartmental Team	TBD (depending on funding and staffing)

TBD = to be determined

^a Citizen's Academy is a City program designed to educate City residents and business owners in how the Public Works Department operates.

^b This planned public education and outreach activity also can be used to meet S5.C.3.c.iv - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

PUBLIC INVOLVEMENT AND PARTICIPATION

Public input is important to the development and implementation of the SWMP. The City actively solicits public participation by making stormwater information available for review and providing opportunities for comment. This section describes the Phase II Permit requirements related to public involvement, including planned compliance activities.

2013–2018 Phase II Permit Requirements

Section S5.C.2 of the 2013–2018 Phase II Permit requires that the City shall create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the SWMP, and comply with applicable state and local public notice requirements. The two main components include:

1. Developing and implementing a process for consideration of public comments on the City’s SWMP
2. Posting the Annual Report and the SWMP Plan, on the City’s website no later than May 31 of each year (note: no Annual Report is required to be submitted in 2014).

Planned Activities

Table 2-1 summarizes the City’s planned activities associated with public involvement and participation.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Revise SWMP Plan	Update SWMP Plan with planned activities for 2015.	SWU Engineering	Update SWMP Plan in January 2015; post on City’s website by May 31, 2015
Prepare and submit Annual Report to Ecology	Prepare and submit Annual Report; submittal should include SWMP Plan and other supplemental documentation (if applicable).	SWU Engineering	March 31, 2015
Public involvement in the SWMP	Solicit feedback on website.	SWU Engineering	Ongoing

ILLICIT DISCHARGE DETECTION AND ELIMINATION

An illicit discharge is defined as any discharge into the stormwater system that is not composed entirely of stormwater, or of non-stormwater discharges allowed as specified in the Phase II Permit. Illicit discharges may be from a variety of sources and activities including illegal dumping, sanitary sewer overflow, swimming pool cleaning, and incidental spills (such as oil, gas, diesel fuel, paints, or solvents). This section describes the Illicit Discharge Detection and Elimination (IDDE) Phase II Permit requirements, as well as the City's planned compliance activities.

2013–2018 Phase II Permit Requirements

Section S5.C.3 of the 2013–2018 Phase II Permit requires the City to include an ongoing IDDE Program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the stormwater system. The specific Phase II Permit requirements are as follows:

1. Continuing mapping of the MS4 on an ongoing basis.
2. Publicize a public hotline number for reporting of spills and other illicit discharges; and track all calls and follow-up actions taken.
3. By **February 2, 2018**, adopt an updated ordinance that effectively prohibits non-stormwater, illegal discharges, or dumping into the City's stormwater system to the maximum extent allowable by state and federal law.
4. By **December 31, 2017**, complete field screening of 40 percent of the stormwater system. After **December 31, 2017**, the City is required to complete field screening on an average of 12 percent of the stormwater system per year.
5. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, which includes procedures for characterizing the nature and potential threats of an illicit discharge, procedures for tracing the source of an illicit discharge, and procedures for eliminating the discharge.
6. Implement an ongoing IDDE staff training program.
7. Distribute information to public employees, businesses, and the general public of the hazards associated with illicit discharges and improper disposal of wastes.

Planned Activities

Table 3-1 summarizes the planned activities associated with the City's IDDE program.

Table 3-1. Planned Illicit Discharge Detection and Elimination Activities.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Illicit discharge education and outreach	Develop a new outreach approach for addressing illicit discharges associated with exposed aggregate driveway projects.	SWU Engineering, Development Engineering, Building Inspectors	December 31, 2015
Illicit discharge and illicit connection field screening	Develop drainage basins associated with each branch of the catch basin network as a basis of evaluation for the field screening requirement.	SWU Engineering, Stormwater (SW) Maintenance	December 2015
Update storm system mapping	Verify Parks Department storm system mapping. Continue to work with King County to gather storm drainage system information for annexed areas. Update mapping with newly constructed facilities and newly discovered facilities.	SWU Engineering, SW Maintenance, Airport, Parks/Golf, Facilities	Ongoing
Illicit Discharge Program Plan implementation	Implement Illicit Discharge Program plan requirements.	SWU Engineering, Community and Economic Development (CED) Development Engineering, CED Construction Inspectors, CED Building Inspectors, CED Code Compliance, Fire Department, Parks/Golf, Airport, SW Maintenance	Ongoing
Staff training	Refresher training on IDDE general awareness and IDDE response.	Interdepartmental Team	Ongoing
Illicit discharge and illicit connection field screening	Implement a field screening methodology (or methodologies) to meet the field screening requirement.	SW Maintenance, Parks/Golf, Facilities, Airport	Perform field screening on 40% of the storm system by December 31, 2017
Illicit discharge ordinance	Incorporate minor modifications into the illicit discharge ordinance for consistency with the permit.	SWU Engineering	February 2018

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

The Development Services Division is responsible for permitting, inspection, and code enforcement actions for construction-related activities in the City. The Surface Water Utility Engineering Division is responsible for the private stormwater facility inspection program. This section describes the Phase II Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including planned activities.

2013–2018 Phase II Permit Requirements

Section S5.C.4 of the 2013–2018 Phase II Permit requires the City to develop and implement a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction activities. The specific Phase II Permit requirements are as follows:

1. Implement an ordinance or ordinance revision that addresses runoff from new development, redevelopment, and construction sites and adopt Ecology's *Stormwater Management Manual for Western Washington*, or equivalent, by **December 31, 2016**. Include provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities.
2. Review all stormwater site plans for proposed development activities.
3. Conduct inspections of construction sites prior to clearing and construction, during construction, and upon completion of construction.
4. Conduct annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the stormwater system and were permitted by the City since 2007 (unless maintenance records justify a reduced inspection frequency).
5. Ongoing training program for staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites.
6. Review, revise, and make effective local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs by **December 31, 2016**. Submit a summary of the results of the review and revision process with the annual report due no later than **March 31, 2017**.

Planned Activities

Table 4-1 summarizes the City's planned activities associated with controlling runoff from new development, redevelopment, and construction sites.

Table 4-1. Planned Activities to Control Runoff from New Development, Redevelopment, and Construction Sites.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Single family residential requirements	Revise the building permit requirements pertaining to work on driveways and exposed aggregate.	CED Development Engineering and SWU Engineering	June 2015
Stormwater site plan review	Develop additional tools (checklists and sizing tables) for implementation of stormwater site plan review.	CED Development Engineering	December 2015
Public education and outreach	Add minimal excavation foundations and compost amended soils to the BMP list in the <i>Residential Building Permit Drainage Review</i> Handout.	CED Development Engineering	December 2015
Permit requirements outreach	Consider incorporating permit requirements and thresholds and distributing the <i>CED – Instructions for Small Lot Drainage Requirements</i> handout to property owners.	CED Development Engineering	December 2015
Staff training	Pursue training opportunities for plan review and inspection staff.	CED Planning	Ongoing
Stormwater site plan review	Review all stormwater site plans for proposed development activities.	CED Development Engineering (private) and Capital Improvement Program (CIP) Lead (public)	Ongoing
Preconstruction inspections	Inspect construction sites prior to construction if they exhibit high sediment transportation potential.	CED Development Engineering and CED Planning	Ongoing
Construction inspections	Inspect all sites during construction to verify proper installation and maintenance of required erosion and sediment controls.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Post-construction inspections	Inspect all sites after construction to ensure proper installation of permanent stormwater facilities.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Private stormwater facility inspections	Continue private facility inspection program for stormwater facilities constructed since adoption of the <i>2009 King County Surface Water Design Manual (SWDM)</i> .	SWU Engineering	Ongoing

Table 4-1 (continued). Planned Activities to Control Runoff from New Development, Redevelopment, and Construction Sites.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Notice of Intent availability	Provide copies of the "Notice of Intent for Construction Activity" to representatives of proposed new development and redevelopment.	CED Development Engineering	Ongoing
Preconstruction meetings	Consider requiring all contractors to attend an ESC meeting with City staff prior to the preconstruction meeting.	CED Development Engineering and CED Planning	June 2016
Public education and outreach	Develop educational materials describing low impact development (LID) best management practices (BMPs), their purpose, and maintenance requirements.	SWU Engineering	June 2016
Review and adopt new stormwater manual	Review the latest Ecology <i>Stormwater Management Manual for Western Washington</i> and King County SWDM (if approved by Ecology) and determine which manual the City should adopt.	CED Development Engineering, CED Planning, and SWU Engineering	Before December 31, 2016
Integrating LID into local codes	Review and revise codes, rules, standards, and other enforceable documents to incorporate and require LID principles and LID BMPs.	CED Development Engineering, CED Planning, and SWU Engineering	Before December 31, 2016
Summarize the results of the code review and revision process	The summary shall include a list of participants, documents reviewed, and revisions made.	CED Development Engineering, CED Planning, and SWU Engineering	Include as an attachment to the March 31, 2017, annual report

MUNICIPAL OPERATIONS AND MAINTENANCE

This section describes the Phase II Permit requirements related to municipal O&M, including planned activities.

2013–2018 Phase II Permit Requirements

Section S5.C.5 of the 2013–2018 Phase II Permit requires the City to develop and implement an O&M program with the ultimate goal of preventing or reducing pollutant runoff from the municipal separate stormwater system and municipal O&M activities. The specific Phase II Permit requirements are as follows:

1. Implement maintenance standards that are at least as protective as those specified in Ecology's *Stormwater Management Manual for Western Washington*.
2. Perform annual inspections of all City-owned or operated permanent stormwater treatment and flow control BMPs/facilities, other than catch basins, and take appropriate maintenance actions.
3. Spot check potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events; and conduct maintenance and repairs as needed.
4. Perform routine catch basin and inlet inspections. Clean as needed based on maintenance standards.
5. Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City and road maintenance activities under the functional control of the City.
6. Implement an ongoing training program for City staff whose primary construction, operations, or maintenance job functions may impact stormwater quality.
7. Implement Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.
8. Maintain records of inspections and maintenance or repair activities.

Planned Activities

Table 5-1 summarizes the City's planned activities associated with municipal O&M.

Table 5-1. Planned Municipal Operations and Maintenance Activities.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Maintenance procedure and standards	Implement O&M program.	SW Maintenance	Ongoing
Stormwater Pollution Prevention Plan (SWPPP)	Implement the SWPPP for the Maintenance Shops Facility.	Public Works Maintenance	Ongoing
Stormwater treatment and flow control facility/BMP inspections and spot checks	Ongoing inspection program for City-owned or operated stormwater facilities.	SW Maintenance, Parks/Golf, Facilities, Airport	Ongoing
Record keeping	Utilize a Maintenance Management System (MMS) to record time and resources spent on all O&M activities, tracking of inspections, and maintenance performed.	SW Maintenance, Parks/Golf, Facilities, Airport	Ongoing
Staff training	Pursue training opportunities for maintenance staff.	SW Maintenance, Parks/Golf, Facilities, Airport	Ongoing
Review and adopt new maintenance standards	Review the latest Ecology <i>Stormwater Management Manual for Western Washington</i> and King County SWDM (if approved by Ecology) and determine which maintenance standards the City should adopt.	SWU Engineering, SW Maintenance, Parks/Golf, Facilities, Airport	Before December 31, 2016
Catch basin inspection program	The City is currently implementing Option 3 (cleaning all pipes, ditches, catch basins, and inlets once during the permit term).	SW Maintenance, Parks/Golf, Facilities, Airport	Before July 2018

TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

This section provides a brief discussion of the Phase II Permit total maximum daily load (TMDL) requirements.

2013–2018 Phase II Permit Requirements

Section S7 of the NPDES Phase II Permit lists the following requirements:

1. Implement the specific requirements identified in Appendix 2 of the Phase II Permit for applicable TMDLs listed in Appendix 2.
2. Compliance with the permit constitutes compliance with applicable TMDLs not listed in Appendix 2 of the Phase II Permit.
3. Comply with permit modifications and TMDL implementation plans prepared by Ecology for TMDLs that are approved by the US Environmental Protection Agency (EPA) after the Phase II Permit has been issued.

Planned Activities

The City is currently not affected by any TMDLs listed in Appendix 2 of the NPDES Phase II Permit.

MONITORING

This section provides a brief discussion of the Phase II Permit monitoring requirements, including planned activities.

2013–2018 Phase II Permit Requirements

Section S8 of the 2013–2018 Phase II Permit requires the City to do the following:

1. Provide a description of any stormwater monitoring or stormwater-related studies conducted during the reporting period
2. Pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP) that includes the following three components:
 - Status and trends monitoring
 - Stormwater management program effectiveness studies
 - Source identification and diagnostic monitoring

The City is not required to conduct water quality monitoring for compliance with total maximum daily loads (TMDLs) pursuant to Section S7 and Appendix 2 of the Phase II Permit, since the City is currently not affected by any TMDLs listed in Appendix 2 of the NPDES Phase II Permit.

Planned Activities

The City decided to opt in to the RSMP and started contributing to the RSMP fund beginning in August 2014. Annual payments into the RSMP, begun in August 2014, include the following:

- Status and trends monitoring: \$21,055
- Stormwater management program effectiveness studies: \$35,082
- Source identification and diagnostic monitoring: \$3,253
- **Annual Total: \$59,390**
- **2013–2018 Phase II Permit Total: \$237,560**

REPORTING

This section provides a brief discussion of Phase II Permit reporting requirements, including planned activities.

2013–2018 Phase II Permit Requirements

Section S9 of the 2013–2018 Phase II Permit lists the following requirements:

1. Submit an annual report to Ecology no later than March 31 of each year (beginning in 2015).
2. Keep all records related to the NPDES Phase II Permit and the SWMP for at least 5 years.
3. Make records related to the NPDES Phase II Permit and the SWMP available to the public at reasonable times during business hours.
4. Additional reporting requirements included in other NPDES Phase II Permit sections include:
 - a. **March 31, 2015 Annual Report:** Include a written description of internal coordination mechanisms (to eliminate barriers to permit compliance among City departments)
 - b. **March 31, 2017 Annual Report:** Include a summary of the results of the review and revision process for local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs. This summary shall include, at a minimum:
 - i. A list of the participants (job title, brief job description, and department represented)
 - ii. Codes, rules, standards, and other enforceable documents reviewed
 - iii. Revisions made to those documents which incorporate and require LID principles and LID BMPs

Planned Activities

The City plans to meet all of the reporting requirements outlined in the 2013–2018 Phase II Permit. Internal coordination mechanisms implemented in 2014 are described in Appendix A.

APPENDIX A

Internal Coordination Mechanisms

INTERNAL COORDINATION MECHANISMS

The City formed a NPDES Interdepartmental Team in the fall of 2014 that includes staff from the following City Departments/Divisions:

- Public Works Department
 - Surface Water Utility (SWU) Engineering
 - Public Works Maintenance
 - Stormwater (SW) Maintenance
- Community and Economic Development (CED) Department
 - Development Engineering
 - Planning
 - Construction Inspections
 - Building Inspections
 - Code Compliance
- Renton Fire Department Response Operations
- Renton Municipal Airport
- Community Services
 - Parks and Golf Course Division
 - Facilities Division

The Interdepartmental Team developed a permit compliance matrix that lists Phase II Permit requirements, Ecology deliverables or documentation in the Annual Report, task leads, task support, and deadlines. The Interdepartmental Team will continue to coordinate Phase II Permit implementation activities during the duration of the permit, to ensure that the City meets the requirements of the Phase II Permit.