

Washington Department of Ecology

Electronic Submission Cover Letter



WQWebSubmittal - Submittal Submission Id: 1715564 - 3/31/2021 1:45:01 PM

Company Name	Signer Name	System Name
City of Pasco	Maria Serra	WQWebPortal

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for City of Pasco	Copy of Record CityofPasco Wednesday March 31 2021
WAR046503_24_03292021100436	2020 City of Pasco IDDE Report_24_03292021100436
WAR046503_6_03302021155807	2020 Public Education and Invo_6_03302021155807
WAR046503_1_03302021155017	2021 Stormwater Management Pro_1_03302021155017
WAR046503_4a_03312021133624	Barrier Elimination Memo_4a_03312021133624
Pasco_G20_SWMPPlan_2020	Pasco_G20_SWMPPlan_2020
WAR046503_51_03292021103922	WAR046503_PascoCity_S8.A.1_Par_51_03292021103922

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only



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+4Omp2YL5x7ucK4Dfm4P3Uh6EcBNlu49lkp9NwyabQ=



Water Quality Program

Permit Submittal Electronic Certification

Permittee: PASCO CITY

Permit Number: WAR046503

Site Address: 525 N 3RD AVE
PASCO, WA 99301

Submittal Name: MS4 Annual Report Phase II Eastern

Version: 1

Due Date: 3/31/2021

Questionnaire

Number	Permit Section	Question	Answer
1	S5.A.4.	Attach updated annual Stormwater Management Program Plan (SWMP Plan) or website address in the Comment field where it can be found. (S5.A.4.)	2021 Stormwater Management Pro_1_03302021155017 Comment: N/A for 2020. In accordance with the attached G20 issued for the CY2019 Annual Report, the complete 2021 Stormwater Management Program Plan (SWMPP) is being submitted along with the CY2020 Annual Report.
1.a	S5.A.4.	Cite website of SWMP if unable to attach	https://www.pasco-wa.gov/846/Stormwater
2	S9.C.6.	Attach a map and copy of any annexations, incorporations, or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.C.6.	Not Applicable Comment: No annexations were completed in 2020.
3	S5.A.5.a.ii.	Tracked the estimated costs of implementation of each component of the SWMP. (S5.A.5.a.ii.)	No
4	S5.A.6.b.	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.6.b.)	Yes
4a	S5.A.6.b.	Attach a written description of internal coordination mechanisms among departments within the jurisdiction to eliminate barriers to permit compliance. (Required to be submitted no later than March 31, 2021, S5.A.6.b.)	Barrier Elimination Memo_4a_03312021133624 Comment: N/A for 2020. Coordination mechanisms among departments within the City of Pasco to eliminate barriers to compliance with terms of the Permit are outlined in the attached 2021 SWMPP.
5	S5.B.1	Were elements of a regional program implemented to complete any part of your education and outreach program? (S5.B.1)	Yes

5a	S5.B.1	If yes, list the elements, and the regional program	Franklin Conservation District (FCD) performs public education and outreach efforts on behalf of City of Pasco and its neighboring cities. The FCD coordinates age appropriate educational lessons, public event outreach, and training for educators.
6	S5.B.1.a.i.-iii.	Attach description of public education and outreach programs and stewardship activities conducted per S5.B.1.a.i.-iii.	2020 Public Education and Invo_6_03302021155807
7	S5.B.1.a.ii.	Which types of businesses were targeted per S.5.B.1.a.ii.?	Contractors (home builders) and landscapers, through participation in the HOME and GARDEN SHOW (regional event). City includes bill inserts includes restaurants and car repair shops.
8	S5.B.1.b.	Used results of measuring the understanding and adoption of targeted behaviors among at least one audience in at least one subject area to direct education and outreach resources and evaluate changes in adoption of targeted behaviors. (Required no later than December 31, 1347, S5.B.1.b.)	Not Applicable Comment: By no later than December 31, 2021, the City will continue to coordinate with the Quad-Cities to measure the understanding and adoption of targeted behaviors among developers and engineers in the subject area of the SWMMEW.
9	S5.B.2.a.	Describe in Comments field the opportunities created for the public to participate in the decision making processes involving the development, implementation, and updates of the Permittee's SWMP. (S5.B.2.a.)	N/A for 2020. The 2021 SWMPP will be posted on the City's website on March 31, 2021 with a public comment period of at least 30 days.
10	S5.B.2.b.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31.	Yes Comment: See comment for 10a. 2021 SWMPP and CY2020 Annual Report are posted on the City's website.
10a	S5.B.2.b.	List the website address in Comments field. (S5.B.2.b.)	https://www.pasco-wa.gov/846/Stormwater

11	S5.B.3.a.	Maintained a map of the MS4 that includes the requirements listed in S5.B.3.a. (Updated maps required no later than August 1, 2023)	No Comment: The City continues to maintain and periodically update a map of the MS4 through ArcGIS, and is working towards documenting all required components listed in S5.B.3.a. The City anticipates that an amendment to its Comprehensive Stormwater Management Plan (which is budgeted for in this biennium) will help collect information needed to meet the MS4 map requirements by August 1, 2023.
12	S5.B.3.a.i.	Attach a spreadsheet that lists the known outfalls and discharge points, including the outfalls' size and material(s). (Required to update no later than August 1, 2023, S5.B.3.a.i.)	Not Applicable Comment: At this time, information on the outfalls is partial (known locations but not all sizes and materials are known). The City continues to maintain and periodically update a map of the MS4 through ArcGIS, and is working towards documenting all required components listed in S5.B.3.a. The City anticipates that a future amendment to its Comprehensive Stormwater Management Plan and a combined effort between Public Works Engineering and Operations division, along with IS division, will help collect all information needed to meet the MS4 map requirements by August 1, 2023.

13	S5.B.3.a.ix.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.B.3.a.ix. (Required no later than August 1, 2021)	No Comment: The City currently maintains an electronic map (ArcGIS) that includes all known stormwater infrastructure. Assets and attributes were set up a few years back and need to be revisited to ensure compliance with the mapping requirements established in the permit. Various city divisions (PW engineering, PW Operations and IS) plan to work together in documenting Mapping Standards.
14	S5.B.3.b.	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.B.3.b.	No Comment: The City plans to revise Pasco Municipal Code (PMC) Chapter 13.80 to effectively prohibit non-stormwater discharges into the MS4. See 2021 SWMP, Section 3.3.2 for more details.
15	S5.B.3.b.vii.	Updated ordinance or regulatory mechanism to meet the requirements of this permit, if necessary. (Required no later than February 2, 2023, S.5.B.3.b.vii.)	Not Applicable Comment: See comment for #14.
16	S5.B.3.b.vi.	Implemented a compliance strategy, including informal compliance actions as well as enforcement provisions of the regulatory mechanism described in S5.B.3.b. (S5.B.3.b.vi.)	No
17	S5.B.3.c.	Implemented procedures for conducting illicit discharge investigations in accordance with S5.B.3.c.	Yes
18	S5.B.3.c.iv.	Percentage of MS4 coverage area screened in reporting year per S5.B.3.c.iv. (Required to screen 12% on average each year, S5.B.3.c.iv.)	13 Comment: The City assessed 731 inlets in 2020, which is approximately 13% of the total number of inlets owned and operated by the City within the MS4 coverage area.

18a	S5.B.3.c.iv.	Cite field screening techniques used to determine percent of MS4 screened.	Public Works employees inspect each basin, drain, and outfall throughout the year using Vactor trucks for draining if necessary. Outfalls and basins are monitored for condition and debris and documented on the Cartegraph software. Percentage screened was determined by analyzing this data.
18b	S5.B.3.c.iv.	Percentage of total MS4 screened from permit effective date through end of the reporting year.	23
19	S5.B.3.c.v.	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.B.3.c.v.)	Stormwater hotline is advertised on the City's website, as well as on brochure handouts located at City hall (e.g. "Storm Drains: Do you know where the water goes?"). All outreach flyers and materials offered and displayed at public events/vendor booths include the stormwater hotline number.
20	S5.B.3.c.vi.	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.B.3.c.vi.	Yes
21	S5.B.3.c.vii.	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.B.3.c.vii.)	Distributed educational material at City Hall and other City facilities, displays on public announcement boards, educated students and teachers of Pasco Schools, and distributed materials at outreach events. Examples of educational materials distributed are shown in Attachment C of the 2021 SWMPP, which includes IDDE topics and reporting information.
22	S5.B.3.d.	Implemented an ongoing program designed to address illicit discharges, including spills and illicit connections into the MS4 per S.5.B.3.d.	Yes
23	S5.B.3.e.	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program, as described in S5.B.3.e.	Yes

24	S5.B.3.f.	Attach a report with data describing the actions taken to investigate, characterize, trace and eliminate each illicit discharge found by or reported to the permittee. The submittal must include all of the applicable information and must follow the format and timelines described in Appendix 7. (S5.B.3.f.)	2020 City of Pasco IDDE Report_24_0329202110 0436
25	S5.B.4.a.	Implemented an ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.	No
26	S5.B.4.a.i.-iv.	Adopted ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.a.i.-iv. (Required no later than December 31, 2022)	Not Applicable Comment: While the City's Design and Construction Standards and PMC adopt the SWMMEW by reference, and Erosion and sediment control BMPs are required and enforced in construction sites (for both public and private projects). The City plans to develop an ordinance to further address enforcement of erosion and sediment controls, and other construction-phase stormwater pollution controls at new development and redevelopment projects. In addition, sanctions will be considered to ensure compliance and provisions to review and inspect sites with high potential for sediment transport prior to clearing and grading. These actions will be taken to meet Permit requirement S5.B.4.a, and S5.B.4.e by December 31, 2022.
27	S5.B.4.b.	Reviewed site plans for all new development and redevelopment projects as described in S5.B.4.b.	Yes

27a	S5.B.4.b.i.	Number of site plans reviewed during the reporting period. (S5.B.4.b.i.)	70 Comment: 32 Building Permits have required onsite storm-drainage design. 8 subdivision plans have been reviewed for approval and construction. 30 grading plans have been reviewed for commercial industrial and residential developments. NOTE: REPORTING METHODOLOGY and QUERYING OF THE PERMIT SYSTEM WAS UPDATED FROM PREVIOUS YEARS.
27b	S5.B.4.b.i.	The number of construction sites that provided their intent to apply for the "Erosivity Waiver" during the reporting period as described in S5.B.4.b.i.	0
27c	S5.B.4.b.i.	The number of complaints investigated about sites that have received an "Erosivity Waiver" . (S5.B.4.b.i.)	Not Applicable
28	S5.B.4.	Implemented procedures for site inspection and enforcement of construction stormwater pollution control measures. (S5.B.4.)	Yes
28a	S5.B.4.c.i.	Number of permitted construction sites inspected during the reporting period. (S5.B.4.c.i.)	60 Comment: The ones permitted within the reporting period and approximately 20 permits carried over from prior reporting period. NOTE: REPORTING METHODOLOGY and QUERYING OF THE PERMIT SYSTEM WAS UPDATED FROM PREVIOUS YEARS.
28b	S5.B.4.f.	Number of enforcement actions taken during the reporting period based on construction phase inspections at new development and redevelopment projects. (S5.B.4.f.)	0 Comment: No enforcement needed to obtain compliance. Inspectors visit sites daily and inform contractor developer of corrections needed. Inspector has the ability to issue "stop work" order if no correction measures are accomplish in a reasonable timeline. No need for enforcement action was recorded in the reporting period.

29	S5.B.4.d.	Trained the staff involved in permitting, plan review, field inspections, and enforcement for construction site runoff control. (S5.B.4.d.)	Yes
30	S5.B.4.e.	Provided information to construction site operators and design professionals about training available on how to comply with the requirements in Appendix 1 and the BMPs in the SWMMEW, or an equivalent document. Describe information provided in the Comments field. (S5.B.4.e.)	No
30a	S5.B.4.e.	Describe information provided in the Comments field. (S5.B.4.e.)	The City requires all plans to comply with the SWMMEW, and by reference of the SWMMEW those who submit plans are made aware of applicable training. The City plans to develop strategies to publicize training opportunities available for construction site operators and design professionals on how to comply with the requirements and BMPs in the SWMMEW.
31	S5.B.5.a.	Implemented ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a.	No Comment: While the City's Standards and PMC adopt the SWMMEW by reference, the City plans to develop a regulatory mechanism to further address enforcement of erosion and sediment controls, and other post construction stormwater pollution controls at new development and redevelopment projects. In addition, the ordinance(s) will enforce requirements set forth in S5.B.5.b(i) through S5.B.5.b(v) of the Permit. The City intends to work towards completing this action by December 31, 2022.
32	S5.B.5.a.	Revised ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a. (Adopted no later than December 31, 2022)	Not Applicable Comment: See comment for #31.
33	S5.B.5.b.ii.(a)	Allowed non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) techniques to be used. (S5.B.5.b.ii.(a))	Yes

34	S5.B.5.b.ii.(b)(2)	Required projects approved under S5.B.5. to retain runoff generate on-site for, at a minimum, the 10-year, 24-hour rainfall event or a local equivalent, using either on-site or regional stormwater facilities. (S5.B.5.b.ii.(b)(2))	Yes
35	S5.B.5.d.	Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment sites. (S5.B.5.d.)	Yes
35a	S5.B.5.d.i.	Number of new and redeveloped sites inspected during installation of structural BMPs during the reporting period. (S5.B.5.d.i)	70 Comment: For 2020: 32 building permits issued, 6 subdivisions approved for construction and 12 grading permits issued. Every permit issued is assigned to an inspector. Approximately 20 permits carried over from prior reporting period. The inspector oversees installation of BMPs and indicates when correction is needed. NOTE: REPORTING METHODOLOGY and QUERYING OF THE PERMIT SYSTEM WAS UPDATED FROM PREVIOUS YEARS.
35b	S5.B.5.d.i.	Number of new and redeveloped sites inspected upon final installation of BMPs or upon completion of the project during the reporting period. (S5.B.5.d.i.)	63 Comment: The following permitted sites received final inspections from current and prior reporting periods during the current reporting period. 7 grading permits, 3 subdivisions were completed in 2020, and 53 building permits (including issued in 2020 and 2019 that carried over). NOTE: REPORTING METHODOLOGY and QUERYING OF THE PERMIT SYSTEM WAS UPDATED FROM PREVIOUS YEARS.
36	S5.B.5.d.ii.	Inspected structural BMPs at least once every five years after final installation. (S5.B.5.d.ii.)	No Comment: Private BMPS are not allowed to connect to the City's MS4.

37	S5.B.5.d.	Number of enforcement actions taken as a result of these inspections during the reporting period? (S5.B.5.d.)	0
38	S5.B.5.e.	Trained the staff involved in permitting, plan review, inspection, and enforcement for post-construction stormwater control. (S5.B.5.e.)	Yes
39	S5.B.5.f.	Provided information to design professionals about training available on how to comply with the requirements in Appendix 1 and apply the BMPs in the SWMMEW, or an equivalent document. (S5.B.5.f.)	No
39a	S5.B.5.f.	Describe information provided and cite the manual used	The City requires all plans to comply with the SWMMEW, and by reference of the SWMMEW those who submit plans are made aware of applicable training. The City plans to develop strategies to publicize training opportunities available for construction site operators and design professionals on how to comply with the requirements and BMPs in the SWMMEW.
40	S5.B.6.a.	Reviewed and, if needed, updated Operations and Maintenance Plan. (Required no later than December 31, 2022, S5.B.6.a.)	Not Applicable Comment: While the City's O&M Plan currently addresses BMPs to protect water quality, reduce the discharge of pollutants to the MEP, and satisfy state AKART requirements, a revision will be completed by December 31, 2022.
41	S5.B.6.a.	Implemented the schedule of Operation and Maintenance activities for municipal operations. (S5.B.6.a.)	Yes
42	S5.B.6.a.i.(f) and (g)	Have NPDES permit coverage for all applicable Permittee construction projects and industrial facilities. (S5.B.6.a.i.(f) and (g))	Yes
43	S5.B.6.a.i.(h)	Implemented a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.B.6.a.i.(h))	No Comment: The City's current O&M Plan will be revised by December 31, 2022 to update the Stormwater Pollution Prevention Plan (SWPPP) in accordance with S5.B.6.a.i.(h).
44	S5.B.6.a.ii.(a)	Inspected stormwater treatment and flow control facilities (except catch basins) owned or operated by the Permittee at least once every two years. (S5.B.6.a.ii.(a))	Yes

44a	S5.B.6.a.ii.(a)	Number of facilities inspected during the reporting period.	87 Comment: Storm Basins (ponds): 32 Storm Manholes: 52 Storm Drywells: 3 Catch Basins are not accounted for in this total, but shown instead in following answers.
45	S5.B.6.a.ii.(b)	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? (Required at least once every two years, S5.B.6.a.ii.(b))	No
45a	S5.B.6.a.ii.(b)	Number of known catch basins.	5579
45b	S5.B.6.a.ii.(b)	Number of catch basins inspected during the reporting period.	665
45c	S5.B.6.a.ii.(b)	Number of known catch basins cleaned during the reporting period.	882
46	S5.B.6.a.ii.(b)	If used an alternative to standard schedule for catch basin inspections for all or a portion of the MS4, attach description of the method used. (S5.B.6.a.ii.(b))	Not Applicable Comment: The City will update its O&M Plan by December 31, 2022 and evaluate implementing an alternative to the standard approach of inspecting catch basins every two years in accordance with S5.B.6.a.ii(b), and update the SWPPP in accordance with S5.B.6.a.ii(h)
47	S5.B.6.a.ii.(c)	Conducted spot checks of stormwater facilities after major storms. (S5.B.6.a.ii.(c))	Yes
48	S5.B.6.b.	Trained the staff with primary construction, operations, or maintenance job functions that are likely to impact stormwater quality. (S5.B.6.b.)	Yes
49	S7.A.	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A.)	Not Applicable
50	S7.A.	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A.)	Not Applicable
51	S8.A.	Attach a summary of your participation in effectiveness study development and implementation during the reporting year. (S8.A.1. and S8.A.2.a.)	WAR046503_PascoCity_S8.A.1_Par_51_03292021103922
56	S8.A.	Was the SWMP updated to include effectiveness study activities? (S8.A.2.f.)	No Comment: N/A for 2020. 2021 SWMPP includes Effectiveness Study Activities.
57	G3.	Notified Ecology in accordance with G3. of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare, or the environment. (G3.)	Not Applicable

58	G3.A.	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	No
59	G20.	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20.)	Not Applicable
60	G20.	Number of non-compliance notifications provided in reporting year. (G20.)	1
60a	G20.	List permit conditions described in non-compliance notification(s)	G20 related to SWMP PLAN: S5.A.4.a-c, S5.B.2.a, S5.B.2.b, S8.A.2.f,S9.B-C.
61	S4.F.1.	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1.)	Not Applicable
62	S4.F.3.a.	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
63	S4.F.3.d.	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3. and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d.)	Not Applicable

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Maria Serra

3/31/2021 1:45:00 PM

Signature

Date

**Multiple Violations By Violation Type based on Date Observed
For the Period 1/1/2020 thru 12/31/2020**

PMC 10.65.020 (1)

Case Number	Observed	Status	Corrected
CEB2020-0543	3/5/2020	Corrected	3/26/2020
CEB2020-2123	12/1/2020	Corrected	
CEB2020-0717	3/30/2020	Corrected	
CEB2020-2200	12/17/2020	Corrected	

4 PMC 10.65.020 (1) violations

PMC 13.70.030

Case Number	Observed	Status	Corrected
CEB2020-1188	5/19/2020	Corrected	6/2/2020
CEB2020-1001	4/29/2020	Corrected	6/30/2020
CEB2020-0996	4/27/2020	Corrected	6/30/2020
CEB2020-0993	4/29/2020	Corrected	10/1/2020
CEB2020-0969	4/24/2020	Corrected	6/30/2020
CEB2020-0193	1/24/2020	Corrected	2/7/2020

6 PMC 13.70.030 violations

PMC 13.80.110

Case Number	Observed	Status	Corrected
CEB2020-1804	9/15/2020	Corrected	
CEB2020-1066	5/7/2020	Corrected	

2 PMC 13.80.110 violations

12 Grand Total of Violations



Public Services

128 North Second Street • Fourth Floor Courthouse • Yakima, Washington 98901
(509) 574-2300 • 1-800-572-7354 • FAX (509) 574-2301 • www.co.yakima.wa.us

LISA H. FREUND – Director

September 14, 2020

Andrea Jedel
WA State Department of Ecology
Central Regional Office
1250 Alder St
Union Gap, WA 98903

RE: Stormwater Management Program Effectiveness Studies
Eastern Washington Phase II Municipal Stormwater Permit Section/Paragraph: S1.D.3.c and
S8.A.1.a

Dear Ms. Jedel:

Yakima County (Permit No. WAR04-6014) is the lead entity for the BMP Inspection and Maintenance Responsibilities effectiveness study, which is currently being performed and will be completed June 2021. The City of Pasco (Permit No. WAR04-6503) is participating in the study and is relying on Yakima County to meet the permit obligations in S8.A.1.a. Please accept this letter as documentation of the permit obligations carried out by Yakima County and The City of Pasco's participation in the BMP Inspection and Maintenance Responsibilities effectiveness study.

If you have any questions with regards to this submittal, please feel free to contact Katie Otañez at 509-574-2397 or via email at katie.otanez@co.yakima.wa.us.

Best Regards,

Katie Otañez
Natural Resource Specialist-Water Resources
Yakima County

Cc: Amanda Mars, WA State Department of Ecology, Eastern Regional Office

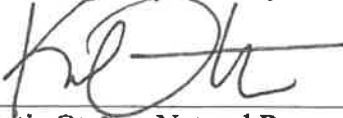
Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.

If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2300 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll-free relay service 1-800-833-6388 and ask the operator to dial 509-574-2300.

Yakima County

G19 Certification and Signature for Stormwater Management Program Effectiveness Studies,
Eastern Washington Phase II Municipal Stormwater Permit, Section/Paragraph: S8.1.A.1

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.



Katie Otanez, Natural Resource Specialist

9/15/2020

Date

City of Pasco

G19 Certification and Signature for Stormwater Management Program Effectiveness Studies,
Eastern Washington Phase II Municipal Stormwater Permit, Section/Paragraph: S8.1.A.1

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.



Maria Serra, CIP Manager

9/16/2020

Date



CITY OF PASCO
2021 STORMWATER MANAGEMENT PROGRAM PLAN (SWMPP)

**EASTERN WASHINGTON PHASE II
MUNICIPAL STORMWATER PERMIT
PERMIT NO. WAR04-6503**

Prepared By:
Public Works Engineering Department
525 N 3rd Avenue
Pasco, WA 99301

Date: March 2021

Permit Cycle(s):
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ACRONYMS AND ABBREVIATIONS

AKART	All Known, Available, and Reasonable methods of prevention, control, and Treatment
BMPs	Best Management Practice
CED	Community and Economic Development
CESCL	Certified Erosion and Sediment Control Lead
CIP	Capital Improvement Program
City	City of Pasco
CSMP	2016 Comprehensive Stormwater Management Plan
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
FCD	Franklin Conservation District
GIS	Geographic Information System
IDDE	Illicit Discharge Detection and Elimination
IS	Information Services
MEP	Maximum Extent Practicable
MS4(s)	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
Permit	Phase II Eastern Washington Municipal Stormwater Permit
Phase I	Phase I Municipal Stormwater Permit
PMC	Pasco Municipal Code
PW	Public Works
QAPP	Ecology-approved Quality Assurance Project Plan (QAPP)
Quad-Cities	Kennewick, Pasco, Richland, and West Richland
Standards	Design and Construction Standards and Specifications for Public Works Improvements
SWMMEW	Stormwater Management Manual for Eastern Washington
SWMPP	Stormwater Management Program Plan
UGA	Urban Growth Area
UIC	Underground Injection Control
WSDOT	Washington State Department of Transportation

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Section 1 Introduction and Background

The Washington State Department of Ecology (Ecology) issued the first Phase I Municipal Stormwater Permit (Phase 1) in 1995. Phase I required medium and large cities, or certain counties with populations of 100,000 or more, to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for stormwater discharges. The municipalities covered under Phase I include the City of Seattle, the City of Tacoma, and Snohomish, King, Pierce, and Clark counties.

In December of 1999, the U.S. Environmental Protection Agency (EPA) adopted the National Pollutant Discharge Elimination System (NPDES) Phase II stormwater regulations. The federal rules thereof provide the minimum measures for compliance that are applicable to owners or operators of regulated small Municipal Separate Storm Sewer Systems (MS4). The NPDES Phase II regulations require urbanized areas, as defined by the U.S. Census Bureau and with small MS4s designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. The City of Pasco (City) is located in Franklin county, on the north margin of the Columbia River. The City is part of the metropolitan area/ urbanized area which includes Kennewick, Richland, and West Richland located across the river in Benton County (often referred as the Quad-Cities).

The Phase II Eastern Washington Municipal Stormwater Permit (Permit) is currently issued with a term from August 1, 2019 to July 31, 2024. Throughout the term of the Permit, certain requirements must be met by MS4 permittees, including the development and implementation of a Stormwater Management Program Plan (SWMPP).

1.1 Purpose

The purpose of the City's SWMPP is to inform the public of actions and activities that are planned during the upcoming annual reporting cycle of the MS4 Permit.

The SWMPP is updated annually and submitted to Ecology with the MS4 Annual Report in accordance with Permit Requirements S9. In general, the SWMPP is designed to reduce the discharge of pollutants from the City's regulated MS4 to the Maximum Extent Practicable (MEP), satisfy the state requirement under RCW 90.48 to apply All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART) prior to discharge, and to protect water quality.

1.2 Stormwater Utility

The City's stormwater management utility was formed by Ordinance No. 3386 in November 1999. This action by City Council established Chapter 13.80 (*prior code 13.60*) of the Pasco Municipal Code (PMC), which provides the management of City owned surface and stormwater operations, including maintenance and performance standards. PMC 13.80 also outlines the City's stormwater utility authority for illicit discharge detection and elimination, construction and post-construction responsibilities, rates and charges, and administrative enforcement procedures.

Under PMC 14.10, the construction, modification, extension, or improvements that directly, or indirectly, affect any MS4 infrastructure, is performed in accordance with the City's Design and Construction Standards and Specifications for Public Works Improvements (Standards). The City's Standards adopt and amend the Standard Specifications for Road, Bridge, and Municipal Construction published by Washington State Department of Transportation (WSDOT). These rules apply to work performed under any Public Works (PW) contract and private development within the City.

1.3 Stormwater Infrastructure

In general, the City's MS4 consists of conveyance through the storm sewer system, on-site collection and dissipation systems, or grassy swales along roadways. As identified in the City's 2016 Comprehensive Stormwater Management Plan (CSMP), the City's stormwater infrastructure, or MS4, consists of a network of piped conveyances and infiltration pipe. This includes 50+ miles of stormwater pipe, 13+ miles of infiltration pipe, 2,786 catch basins, 1,673 inlets, and 835 manholes.

The stormwater conveyance system is primarily situated in older areas of the City and accepts storm run-off from streets and sidewalks and directs the flow to outfalls into the Columbia River. Street drainage in newer areas is accomplished by the use of catch basins and infiltration facilities or grassy swales along the side of the street, or by detention/infiltration ponds. The arid and often windy climate, which evaporates moisture quickly, combined with the treatment capacity of the region's soils and deep-water table, enables these methods to function effectively and avoids potential impacts to the waters of the Columbia River.

Section 2 Permit Coverage Area

The permit coverage area includes the entire limits of the City. Areas within Urban Growth Area (UGA), but outside the City limits, are under the jurisdiction of Franklin County until such time they are annexed into the City. As identified in the City's proposed 2018-2038 Comprehensive Plan (Volume II), the existing land use within City limits includes approximately 21,237 acres with a population of 75,290.

Section 3 NPDES Phase II Permit Stormwater Management Program Plan (SWMPP)

This SWMPP describes the City's programs, practices and responsibilities that are implemented to effectively meet the Permit requirements. As outlined in S5.B of the Permit, the SWMPP is organized by the following components:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management for New Development and Redevelopment
- Municipal Operations and Maintenance

The SWMPP also serves as a guide for the general public to become familiar the City's plan to promote the health, safety, and welfare in the management of surface and stormwater runoff throughout the community. It will also provide information for upcoming education and outreach events, involvement opportunities, construction stormwater controls, maintenance and operations stormwater processes, and coordination that City staff performs to ensure Permit requirements are met each year.

In general, management and maintenance of the City's stormwater utility is performed by the Public Works (PW) department. This department also oversees the implementation of Capital Improvement Program (CIP) projects. For privately developed projects, the review of site plans and development plans is performed by the Community and Economic Development (CED) department. Other departments, for example, Administrative and Community Services (ACS), Finance, and Executive, coordinate in supporting roles for the stormwater utility through their divisions: Information Services (IS), Customer Service and Communications Services, respectively.

3.1 Public Education and Outreach

3.1.1 Permit Requirements (S5.B.1)

Permittees shall implement a public education and outreach program designed to educate the target audiences about the impacts of stormwater discharges to water bodies and the steps to take to reduce pollutants in stormwater. Outreach and educational efforts should include a multimedia approach and shall be targeted and presented to specific audiences for increased effectiveness. The education program may be developed and implemented locally or regionally.

The SWMPP shall, at a minimum address the following, based on the land uses and priority target audiences found within the community. Permittees shall provide subject area information to the target audience on an ongoing or strategic schedule.

The table below outlines the minimum performance measures for target audiences and applicable information that shall be provided to them:

Table 3-1

<u>S5.B.1.a.i</u> <i>General public, including homeowners, teachers, school-age children, or overburdened communities</i>	<ul style="list-style-type: none"> (a) The importance of improving water quality and protecting beneficial uses of waters of the State. (b) The potential impacts from stormwater discharges. (c) Methods for avoiding, minimizing, reducing, and/or eliminating the adverse impacts of stormwater discharges. (d) Actions individuals can take to improve water quality, including encouraging participation in local environmental stewardship activities and programs.
<u>S5.B.1.a.ii</u> <i>Businesses</i>	<ul style="list-style-type: none"> (a) Preventing illicit discharges, including what constitutes illicit discharges (e.g., Source Control BMPs to prevent illicit discharges). (b) The impacts of illicit discharges. (c) Promoting the proper management and disposal of waste. (d) Management of dumpsters and wash water. (e) The use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and other hazardous materials.
<u>S5.B.1.a.iii</u> <i>Engineers, construction contractors, developers, development review staff, and land use planners</i>	<ul style="list-style-type: none"> (a) Technical standards, and the development of stormwater site plans and erosion control plans. (b) Infiltration and underground injection control criteria. (c) Low Impact Development (LID). (d) Stormwater Best Management Practices (BMPs) for reducing adverse impacts from stormwater runoff from development sites. (e) Municipal stormwater code requirements.

By no later than August 1, 2023, new Permittees shall begin using the results of measurements to direct education and outreach resources more effectively, as well as to evaluate changes in adopted behaviors. Each Permittee shall measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. No later than December 31, 2021, Permittees shall use the resulting measurements to direct ongoing education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors.

3.1.2 Implementation of S5.B.1 in 2021

The City continues to promote education and awareness about stormwater to the target audiences, through Utility Bill Inserts to property owners and participation at local events, as well as education and outreach activities throughout the year. The City has contracted with the Franklin Conservation District (FCD) to provide public education and outreach related to stormwater pollution prevention awareness. FCD is dedicated to educating school-aged children in Franklin County about conservation of water and soil quality in the surrounding area. The curriculum for this education is specifically designed to engage school-aged children by involvement through specific programs. Teachers are also offered seminars to learn about the content of the program and incorporate material in their curriculum and class planning.

Due to COVID-19 restrictions, presentations for the FCD programs described below are not currently available in-person and will be offered virtually in 2021 unless otherwise posted.

Drain Rangers



The Drain Rangers program is designed for teachers and school-aged children (Grades 3-5) to develop an understanding of stormwater pollution control and specific actions that can be taken to improve the quality of water. Students are introduced to a problem-solving curriculum where they explore ways to overcome challenges for stormwater infrastructure. The lessons specifically designed to meet requirements of the Common Core and Next Generation Science Standards. Course content also includes information related to polluted stormwater runoff, engineering design, and literacy skills.

For more information, please visit the FCD website: <https://www.franklincd.org/drain-rangers>

Jr. Drain Rangers

Modeled after the Drain Rangers stormwater education program, the Jr. Drain Rangers is adapted to meet the learning needs of school aged children (Grades K-2). Presentations are given where students are able to identify problems in their community and develop solutions. Students participate in hands-on activities, games, and engage in discussion about stormwater challenges and how to prevent pollution.

For more information, please visit the FCD website: <https://www.franklincd.org/jr-drain-rangers-original>

Wheat Week



Wheat Week is a program designed for students (Grades 3-6) to explore how the wheat plant plays a vital role in the ecosystem. Over the course of 5 days, topical lessons are provided that include introducing the wheat plant as a system of parts, the water cycle, the importance of soil, wheat DNA, and wheat as an energy source for humans. Teachers can register for Wheat Week lessons and order educational kits from the local Wheat Week educator.

For more information, please visit the FCD website: <https://www.franklincd.org/wheat-week>

For informational purposes, **Attachment A** includes 2020 Education Reports from FCD for Jr. Drain Rangers, Drain Rangers, and Wheat Week.

Outreach to Businesses, Contactors, and Developers

Stormwater information for local businesses, contractors, developers, and other professional services involved with land development and re-development is available on the City's website, as well as in handouts that are available in the CED and Customer Service departments (examples provided in **Attachment C**).

Pasco is situated within the vicinity of three other cities, including Kennewick, Richland, and West Richland and many local businesses and contractors are active throughout this area. Although Kennewick, Pasco, Richland, and West Richland (Quad-Cities) own and operate different MS4s, ongoing coordination between the Quad-Cities will be implemented for outreach to these local businesses. Coordination efforts will include providing invites to contractors, developers, and engineers for education opportunities, such as virtual events for Regional Stormwater Training (e.g., Eastern Washington Stormwater Management Manual, General Construction Stormwater Permit, UIC registration, etc.).

The development community and CED department staff play an important contributing role through the site plan and development review process. This process is required for all building, land development, and re-development projects, where plans are submitted and examined by the CED department. The procedure for the plan review process is outlined in the City's Design and Construction Standards and Specifications for Public Works Improvements (Standards): <https://www.pasco-wa.gov/409/City-Standards-Specifications>

In accordance with the SWMMEW and the Phase II Municipal Stormwater Permit, the City's Standards include general requirements and guidance for stormwater improvements and construction best practices. Based on those general requirements and guidance, the CED department has made a Development Review Checklist available to inform the public of project elements that are required for the plan review process. For example, the checklist shows that a site stormwater plan and report are required to be prepared by an engineer licensed in the state of Washington and submitted to the City by the builder or developer.

Regional Events

The City participates along with FCD and other Quad city members in regional events. A booth for stormwater pollution prevention awareness and resources for Illicit discharge reporting is planned for upcoming regional events, such as the Regional Home and Garden Show and Benton-Franklin Fair & Rodeo. These booths are a joint effort between the Quad-Cities and FCD, where visitors are engaged to win "stormwater pollution prevention" merchandise by responding to stormwater related questions. Best management practices and illicit discharge resources are provided at the booth, along with a PowerPoint presentation projected in the background, educational brochures that are handed out, and contact information for each City. Due to COVID-19 restrictions, events may need to be rescheduled or cancel, and at this time City tentatively plans to participate in these events in the Fall of 2021.



In 2021, the existing program for Public Education and Outreach will continue in accordance with S5.B.1 of the 2019-2024 Permit.

3.2 Public Involvement and Participation

3.2.1 Permit Requirements (S5.B.2)

Permittees shall provide ongoing opportunities for public involvement and participation such as advisory panels, public hearings, watershed committees, participation in developing rate-structures, or other similar activities. Permittees shall comply with applicable state and local public notice requirements when developing elements of the SWMP.

The table below outlines the minimum performance measures for public involvement and participation:

Table 3-2

<u>S5.B.2.a</u>	Permittees shall implement a program or policy directive to create opportunities for the public, including overburdened communities, to provide input during the decision-making processes involving the development, implementation and update of the SWMP, including development and adoption of all required ordinances and regulatory mechanisms.
<u>S5.B.2.b</u>	No later than May 31 each year, Permittees shall post on their website and make the latest version of the Annual Report and SWMP Plan available to the public. All other submittals should be available to the public upon request. Co-Permittees and other groups of Permittees that are developing the SWMP in a cooperative effort may post the updated SWMP Plan on a single entity's website. To comply with the posting requirement, a Permittee that does not maintain a website may submit the updated SWMP Plan in electronic format to Ecology for posting on its website.

3.2.2 Implementation of S5.B.2 in 2021

Existing Program: The City is open to comments and concerns from the public relating to the stormwater utility. The official Stormwater webpage includes general information about the utility, annual reporting, applicable web-links to Ecology's website, and the City's Standards. The Stormwater Hotline is also available if the public is having problems with road drainage, blocked storm drains, property or basement flooding, or to report illicit discharges to the City's stormwater system. See below for the Stormwater Hotline and City website:

- Stormwater Hotline: 509-543-5777
- <https://www.pasco-wa.gov/846/Stormwater>

Public Comment Period for 2021 SWMPP Update

In order to create opportunities for the public, including overburdened communities, to provide input during the decision-making processes involving the development, implementation, and update of this SWMPP, a public comment period will be implemented. A draft copy of the 2021 SWMPP update will be made available on the City's website for a public comment period through April 30, 2021. A final version of the SWMPP will be made available in May on the City's website.

In 2021, the existing program for Public Involvement and Participation will continue in accordance with S5.B.2 of the 2019-2024 Permit.

3.3 Illicit Discharge Detection and Elimination

3.3.1 Permit Requirements (S5.B.3)

Each Permittee shall implement and enforce a program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

The table below outlines the minimum performance measures for illicit discharge detection and elimination:

Table 3-3

<u>S5.B.3.a</u>	Each Permittee shall continue to maintain and periodically update a map of the MS4. Update maps, if necessary, to meet the requirement of this Section no later than August 1, 2023. At a minimum, the maps shall include information as described in S5.B.3.a of the permit.
<u>S5.B.3.b</u>	Each Permittee shall effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the MS4. Each Permittee shall implement an ordinance or other regulatory mechanism that prohibits illicit discharges and authorizes enforcement actions, including on private property, as described in S5.B.3.b of the permit.
<u>S5.B.3.c</u>	Each Permittee shall implement an ongoing program designed to detect and identify illicit discharges and illicit connections into the Permittee's MS4, as described in S5.B.3.c of the permit.
<u>S5.B.3.d</u>	Permittees shall implement an ongoing program designed to address illicit discharges, including spills, and illicit connections into the MS4. The program shall include elements described in S5.B.3.d of the permit.
<u>S5.B.3.e</u>	Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections to conduct these activities. Follow-up training shall be provided, as needed, to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.
<u>S5.B.3.f</u>	Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this Section. In the Annual Report, each Permittee shall submit data for the illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the Permittee during the previous calendar year. The data shall include the information specified in Appendix 7 and WQWebIDDE. Each Permittee may either use their own system or WQWebIDDE for recording this data. Final submittals shall follow the instructions, timelines, and format as described in Appendix 7.

3.3.2 Implementation of S5.B.3 in 2021

Existing MS4 Map: The City continues to maintain and periodically update a map of the MS4 (see Figure 1 below) through ArcGIS, which is a geographic information system (GIS) using maps to compile the City's utility

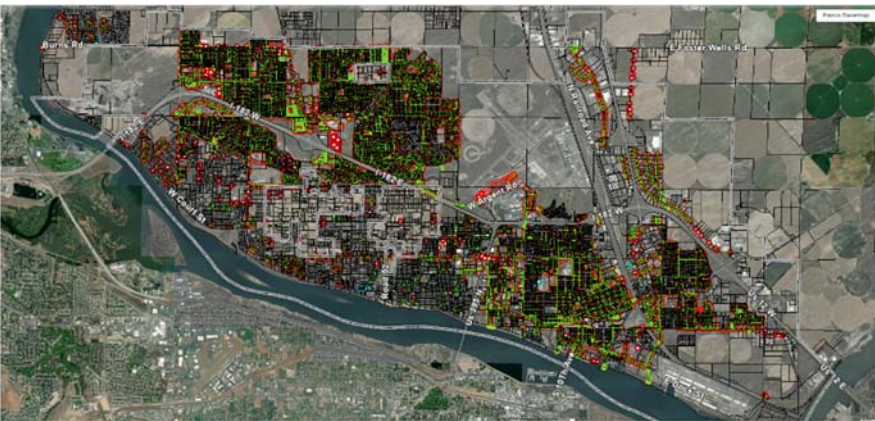


Figure 1 – Current ArcGIS Map of City's MS4

infrastructure. Known information for the City's MS4 that is compiled in ArcGIS includes outfalls and discharge points (including size and material where known), receiving waters, and connections between the MS4 owned and operated by the City. The City's map is capable of showing other information required by the Permit, such as areas served by the MS4 that discharge to ground (e.g., basins), private connections to the MS4 authorized by the City or

connections from the MS4 to a privately owned stormwater system, and connections between MS4 owned and operated by the City and Franklin County. Basins are anticipated to be included in the map as part of the update to the City's CSMP. Connections described above, if identified, will also be included as part of the update.

IDDE Program: The City has an Illicit Discharge Detection and Elimination (IDDE) program in place to detect, identify, address and eliminate illicit discharges, including spills, and connections to the City's MS4. This program is a collaborative effort of City staff between multiple departments. Additionally, the general public plays a vital role in this program by use of the Stormwater Hotline. This line of communication allows the City to provide a timely response and investigation into illicit discharges, including spills, as well as illicit connections. PMC Chapter 13.80 (prior code 13.60) outlines the City's stormwater utility authority for illicit discharge detection and elimination, construction and post-construction responsibilities, rates and charges, and administrative enforcement procedures.

When the City is notified of a potential illicit discharge, the Code Enforcement Division tracks the incident by use of computer-based software called TRAKiT, which is directly linked to the City's GIS database and provides a workflow management system for effectively capturing data related to code enforcement, inspections, permitting, and planning. The incident is verified by a Code Enforcement Officer, who is assigned to implement correction and enforcement actions, and document the incident for historical purposes.

Staff Training: As part of the IDDE program, annual training is provided to City staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections. The annual training includes videos, discussion, and a self-assessment test. Sign-in sheets and tests are filed for maintaining records. Additionally, the City ensures that site plan review and inspections are conducted by a Certified Erosion and Sediment Control Lead (CESCL).

Actions: The City anticipates that a future amendment to its Stormwater Comprehensive Plan will help collect more information needed to meet the MS4 map requirements of S5.B.3.a by **August 1, 2023**. This includes identifying fully described mapping standards, updating all outfall pipe information (i.e., size and material where known), and showing stormwater basins that discharge to the ground.

Additionally, the City plans to revise Pasco Municipal Code (PMC) Chapter 13.80 to effectively prohibit non-stormwater discharges into the MS4. The revision will address updated definitions for discharge types (e.g., Allowable, Conditionally Allowable, Prohibited), escalation of enforcement procedures and actions (e.g., fines and penalties for public/private property), and identify discharge types that are considered to be a significant source of pollutants to waters of the State. Additionally, the City plans to develop an effective compliance strategy in accordance with S5.5.3.vi(a) and (b). To meet the requirements of the Permit, this revision of the PMC will be done by **February 2, 2023**.

In 2021, the City's existing program for Illicit Discharge Detection and Elimination will continue in accordance with S5.B.3 of the 2019-2024 Permit.

3.4 Construction Site Stormwater Runoff Control

3.4.1 Permit Requirements (S5.B.4)

All Permittees shall implement and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that disturb one acre or more, and from construction projects of less than one acre that are part of a larger common plan of development or sale. Public and private projects, including projects proposed by the Permittee's own departments and agencies, shall comply with these requirements. The Permittee shall implement an ongoing process for ensuring proper project review, inspection, and compliance by its own departments and agencies.

The table below outlines the minimum performance measures for construction site stormwater runoff control:

Table 3-4

<u>S5.B.4.a</u>	Permittees shall implement an ordinance or other regulatory mechanism to require erosion and sediment controls, and other construction-phase stormwater pollution controls at new development and redevelopment projects. The ordinance or other regulatory mechanism shall include sanctions to ensure compliance. The ordinance or other regulatory mechanism shall include provisions to review site plans and inspect sites with high potential for sediment transport prior to clearing or grading. The ordinance, or other enforceable mechanism to implement S5.B.4.a.i through S5.B.4.a.v of the permit, shall be adopted and effective no later than December 31, 2022.
<u>S5.B.4.b</u>	Permittees shall implement procedures for site plan review which incorporates consideration of potential water quality impacts, as described in S5.B.4.b of the permit.
<u>S5.B.4.c</u>	Permittees shall implement procedures for site inspection and enforcement of construction stormwater pollution control measures, as described in S5.B.4.c of the permit.
<u>S5.B.4.d</u>	Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.
<u>S5.B.4.e</u>	Permittees shall provide information to construction site operators about training available on how to install and maintain effective erosion and sediment controls and how to comply with the requirements of Appendix 1 and apply the BMPs described in the Stormwater Management Manual for Eastern Washington, or another technical stormwater manual approved by Ecology.
<u>S5.B.4.f</u>	To comply with these provisions, Permittees shall keep records of all projects disturbing one acre or more, and all projects of any size that are part of a common plan of development or sale that is one acre or more, as described in S5.B.4.f of the permit.

3.4.2 Implementation of S5.B.4 in 2021

Existing Procedures: As outlined in PMC Chapter 13.80, Chapter 14.10, and Chapter 16.10, the City has adopted regulations to ensure construction site stormwater runoff is being controlled on both public and private projects. This includes the requirement of an approved storm water site plan, and erosion and sediment control plans, for any project subject to the Core Elements of the SWMMEW. When the threshold is met, a stormwater construction permit is required and must be applied for with the Department of Ecology (<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Construction-stormwater-permit>). City staff who perform plan review and inspections are trained in necessary erosion and sediment control measures and BMPs. Inspections include installation and maintenance of the required BMPs, where construction and post-construction activities are required to maintain BMPs for stormwater drainage facilities.

Site Plan Review: Through direction of the PW Director, work performed under a PW contract is managed by the CIP Manager. This work is designed by City engineering staff, or City hired engineering consultants, who are licensed in the State of Washington. Contrary to private development, CIP projects focus specifically on improvements to City owned facilities and infrastructure (e.g., water treatment, wastewater treatment, sewer, MS4, streets), where stormwater and drainage improvements are required to be planned, designed, permitted, constructed, and maintained in accordance with PMC 13.80. Since the type of work is unique for each CIP project, the associated plans and specifications may implement special provisions that differ from the City's Standards and provide more stringent measures for stormwater facilities/BMPs. All plans and specifications are reviewed by the CIP department, and in some cases require building permits where site plan review is further conducted by the CED department.

The City requires that private development (e.g., commercial, industrial, residential) is planned, designed, permitted, constructed, and maintained in accordance with the Stormwater Management Manual for Eastern Washington (SWMMEW) and the City's Standards. All plans for private development are required to be reviewed through the Community and Economic Development (CED) department. This process ensures the proposed work will implement BMPs and incorporates consideration of potential water quality impacts due to stormwater runoff at projects.

Staff Training: As discussed in Section 3.3.2 of this SWMPP, annual training is provided to City staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections. The annual training includes videos, discussion, and a self-assessment test. Sign-in sheets and tests are filed for maintaining records. Additionally, the City ensures that site plan review and inspections are conducted by a Certified Erosion and Sediment Control Lead (CESCL), where CESCL certifications are pursued and renewed on a regular basis by CED and PW staff.

Inspections: City inspectors conduct routine observations of construction sites, as well as inspect project elements and milestones during the work. Enforcement of construction stormwater pollution control measures is done through means of directives such as Stop Work or Correction Notices. Contractors, developers, and property owners also play a vital contributing role by ensuring all work performed in conformance with the SWMMEW, approved plans, specifications, and permits.

Record Keeping: The City keeps records of all projects disturbing one acre or more and all project of any size that are part of a common plan of development or sale that is one acre or more. This is accomplished by filing hardcopy records or use of computer-based software called TRAKiT, which is directly linked with the City's GIS database and provides a workflow management system for effectively capturing data related to code enforcement, inspections, permitting, and planning.

Actions: While the City's Standards and PMC adopt the SWMMEW by reference, the City will begin work towards developing an ordinance(s) to further address enforcement of erosion and sediment controls, and other construction-phase stormwater pollution controls at new development and redevelopment projects. In addition, the sanctions will be considered to ensure compliance and provisions to review and inspect sites with high potential for sediment transport prior to clearing and grading. These actions will be taken to meet Permit requirement S5.B.4.a, and S5.B.4.e by **December 31, 2022**.

The City also plans to develop strategies to publicize training opportunities available for construction site operators and design professionals on how to comply with the requirements and BMPs in the SWMMEW.

In 2021, the existing program for Construction Site Stormwater Runoff Control will continue in accordance with S5.B.4 of the 2019-2024 Permit.

3.5 Post-Construction Stormwater Management for New Development and Redevelopment

3.5.1 Permit Requirements (S5.B.5)

All Permittees shall implement and enforce a program to address post-construction stormwater runoff to the MS4 from new development and redevelopment projects that disturb one acre or more, and from projects of less than one acre that are part of a larger common plan of development or sale. The program shall ensure that controls to prevent or minimize water quality impacts are in place. Public and private projects, including projects proposed by the Permittee's own departments and agencies, shall comply with these requirements. The Permittee shall implement an ongoing process for ensuring proper project review, inspection, and compliance by its own departments and agencies.

The table below outlines the minimum performance measures for post-construction stormwater management for new development and redevelopment:

Table 3-5

<u>S5.B.5.a</u> and <u>S5.B.5.b</u>	No later than December 31, 2022, Permittees shall implement an ordinance or other regulatory mechanism that requires post-construction stormwater controls at new development and redevelopment projects. The ordinance or other regulatory mechanism shall include mechanisms to ensure compliance. The local program shall be adopted no later than December 31, 2022 to meet the requirements described in S5.B.5.b of the permit. The ordinance or other enforceable mechanism shall, at a minimum: <ul style="list-style-type: none"> • Apply to new development and redevelopment sites that discharge to the MS4 and that disturb one acre or more or are less than one acre and are part of a larger common plan of development or sale. • Require project proponents and property owners to adhere to the minimum technical requirements in Appendix 1 of the permit, and shall include BMP selection, design, installation, operation, and maintenance standards necessary to protect water quality, reduce the discharge of pollutants to the MEP, and satisfy state AKART requirements. • Include provisions for both construction-phase and post-construction access for Permittees to inspect stormwater BMPs on private properties that discharge to the MS4. • Include appropriate escalating enforcement procedures and actions. • Implement an enforcement strategy and the enforcement provisions of the ordinance or other regulator mechanisms.
<u>S5.B.5.c</u>	Permittees shall implement procedures for site plan review which incorporate consideration of potential water quality impacts, as described in S5.B.5.c of the permit.
<u>S5.B.5.d</u>	Permittees shall implement procedures for site inspection and enforcement of post-construction stormwater control measures, as described in S5.B.5.d of the permit.
<u>S5.B.5.e</u>	Permittees shall provide adequate training for all staff involved in permitting, planning, review, inspection, and enforcement to carry out the provisions of this SWMP component.
<u>S5.B.5.f</u>	Permittees shall provide information to design professionals about training available on how to comply with the requirements of Appendix 1 of the permit and apply the BMPs described in the Stormwater Management Manual for Eastern Washington, or another technical stormwater manual approved by Ecology.
<u>S5.B.5.g</u>	To comply with these provisions, Permittees shall keep records of all projects disturbing one acre or more, and all projects of any size that are part of a common plan of development or sale that is one acre or more, as described in S5.B.5.g of the permit.

3.5.2 Implementation of S5.B.5 in 2021

Site Plan Review: For publicly funded projects, all plans and specifications are required to be reviewed by the CIP department, and in some cases require building permits where site plan review is further conducted by the CED department. The City also requires that plans for private development (e.g., commercial, industrial, residential) are reviewed through the Community and Economic Development (CED) department. This process ensures the proposed work will implement BMPs and incorporates consideration of potential water quality impacts due to stormwater runoff at projects.

Inspections: City inspectors conduct routine observations of construction sites, as well as inspect project elements and milestones during the work. Enforcement of construction stormwater pollution control measures is done through means of directives such as Stop Work or Correction Notices. Contractors, developers, and property owners also play a vital contributing role by ensuring all work performed in conformance with the SWMMEW, approved plans, specifications, and permits. The City provides available information to design professionals about available training opportunities on Permit compliance and the SWMMEW. This is typically done through communications that are coordinated between the Quad-Cities, during the plan review processes implemented by the CIP and CED departments, and periodic interactions the City has with design professionals.

Staff Training: As discussed in Section 3.3.2 and 3.4.2 of this SWMPP, annual training is provided to City staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections. The annual training includes videos, discussion, and a self-assessment test. Sign-in sheets and tests are filed for maintaining records. Additionally, the City ensures that site plan review and inspections are conducted by a Certified Erosion and Sediment Control Lead (CESCL), where CESCL certifications are pursued and renewed on a regular basis by CED and PW staff.

Record Keeping: The City keeps records of all projects disturbing one acre or more and all project of any size that are part of a common plan of development or sale that is one acre or more. This is accomplished by filing hardcopy records or use of computer-based software called TRAKiT, which is linked to the City's GIS database and provides a workflow management system for effectively capturing data related to code enforcement, inspections, permitting, and planning.

Actions: While the City's Standards and PMC adopt the SWMMEW by reference, the City will begin work towards developing an ordinance(s) to further address enforcement of erosion and sediment controls, and other post construction stormwater pollution controls at new development and redevelopment projects. In addition, the ordinance(s) will enforce requirements set forth in S5.B.5.b(i) through S5.B.5.b(v) of the Permit. The City intends to work towards completing this action by **December 31, 2022**.

The City also plans to develop strategies to publicize training opportunities available for construction site operators and design professionals on how to comply with the requirements and BMPs in the SWMMEW.

In 2021, the existing program for Construction Site Stormwater Runoff Control will continue in accordance with S5.B.5 of the 2019-2024 Permit.

3.6 Municipal Operations and Maintenance

3.6.1 Permit Requirements (S5.B.6)

Permittees shall implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

The table below outlines the minimum performance measures for municipal operations and maintenance:

Table 3-6

<u>S5.B.6.a</u>	<p>Permittees shall implement a schedule of municipal Operation and Maintenance activities (an O&M Plan). Permittees shall review and, if needed, update the O&M Plan no later than December 31, 2022. The schedule shall include BMPs that, when applied to the municipal activity or facility, will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy state AKART requirements.</p> <p>The Stormwater Management Manual for Eastern Washington provides a selection of appropriate BMPs that meet these requirements for various types of facilities. Operation and maintenance standards in the O&M Plan shall be at least as protective as those included in the Stormwater Management Manual for Eastern Washington, or another technical stormwater manual approved by Ecology. Recordkeeping shall be done pursuant to the requirements in S9 – Reporting and Recordkeeping.</p> <p>The O&M shall include elements as described in S5.B.6.a.i through S5.B.6.a.iii of the permit.</p>
<u>S5.B.6.b</u>	<p>Permittees shall provide training for all employees who have primary construction, operations, or maintenance job functions that are likely to impact stormwater quality. Training shall address the importance of protecting water quality, operation and maintenance requirements, relevant SWPPPs, inspection procedures, and ways to perform their job activities to prevent or minimize impacts to water quality. Follow-up training shall be provided, as needed, to address changes in procedures, methods or staffing.</p>

3.6.2 Implementation of S5.B.6 in 2021

O&M Plan: The City currently implements a schedule of Operations and Maintenance, otherwise called an O&M Plan, that includes BMPs to protect water quality, reduce the discharge of pollutants to the MEP, and satisfy state AKART requirements. Standards in the O&M Plan are based on those included in the SWMMEW. The O&M Plan focuses on housekeeping of the following City assets:

- MS4, including regular inspections, cleaning, and street waste disposal.
- Roads, highways, and parking lots, including street cleaning, deicing, anti-icing and snow removal, snow disposal and runoff, material laydown areas, and all season BMPs.
- Vehicle Fleets, including storage, washing, maintenance, repair, and fueling.
- Municipal buildings, including cleaning, washing, painting, and other maintenance activities.
- Parks and open spaces, including fertilization, pesticides/herbicides, pet waste BMPs, sediment/erosion control, landscape maintenance and disposal BMPs, trash management, and BMPs for exterior building maintenance.

In general, the schedule of housekeeping activities is done through computer-based software called Cartegraph. This software is linked to the City's GIS database and provides a real-time workflow management system for managers and crews to effectively capture data related to the aforementioned housekeeping activities.

Staff Training: As discussed in Section 3.3.2, 3.4.2, and 3.5.2 of this SWMPP, annual training is provided to City staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges,

including spills, and illicit connections. The annual training includes videos, discussion, and a test. Sign-in sheets and tests are filed for maintaining records. Additionally, the City ensures that site plan review and inspections are conducted by a Certified Erosion and Sediment Control Lead (CESCL).

Actions: While the City's O&M Plan currently addresses BMPs to protect water quality, reduce the discharge of pollutants to the MEP, and satisfy state AKART requirements, a revision will be completed by **December 31, 2022** to update a Stormwater Pollution Prevention Plan (SWPP) and modify the schedule of MS4 inspections to align with S5.B.6 requirements. The City will revisit its O&M Plan and evaluate implementing an alternative to the standard approach of inspecting catch basins every two years in accordance with S5.B.6.a.ii(b), and update the SWPPP in accordance with S5.B.6.a.ii(h).

3.7 Compliance with Total Maximum Daily Load Requirements

3.7.1 Permit Requirements (S7)

For applicable TMDLs listed in the Permit, Appendix 2, *Total Maximum Daily Load Requirements* (TMDL), affected Permittees shall comply with the specific requirements identified in Appendix 2.

The City does not currently have additional permit requirements based on applicable TMDLs in accordance with Special Condition S7 of the permit.

3.8 Reporting and Recordkeeping

3.8.1 Permit Requirements (S8)

The City will continue to participate in implementation of the Ecology-approved studies that were selected pursuant to Section S8.B in the 2014-2019 Permit. Yakima County is the lead entity for the BMP Inspection and Maintenance Responsibilities effectiveness study, which is currently being performed and will be completed by June 2021. To meet the permit requirements in S8.A.1.a, the City is participating in the study in the role of a reviewer and survey volunteer (**see Attachment B**).

The City will also continue to coordinate with the cities of Kennewick, Richland, and West Richland by participating in a Quad-Cities effectiveness study. In accordance with the schedule outlined in S8.2, the scope of the Quad-Cities effectiveness study will be submitted to Ecology by June 30, 2021, followed by a detailed study design proposal by September 30, 2022, a completed Ecology-approved Quality Assurance Project Plan (QAPP) by July 31, 2023, and then conduct the study on or before December 1, 2023. The agreement between the Quad-Cities will be documented in a forthcoming G19, *Certification and Signature for Stormwater Management Program Effectiveness Studies*.

Attachment A
2020 Education Reports

Franklin Conservation District Education Report
 Drain Rangers, Jr. Drain Rangers and Wheat Week
 January – March 2020

Jr. Drain Rangers	# Students	# Teachers	# of Lessons
Kennewick	88	5	4
Cottonwood Elementary	88	5	4
Pasco	435	24	18
Maya Angelo Elementary	75	3	3
Rowena Chess Elementary	40	2	2
Whittier Elementary	186	14	8
McClintock Elementary	134	5	5
Richland	302	36	15
Jefferson Elementary	85	12	5
Orchard Elementary	124	8	5
Marcus Whitman Elementary	93	16	5
West Richland	102	6	5
William Wiley Elementary	102	6	5
Grand Total	927	71	42

Drain Rangers	# Students	# Teachers	# of Lessons
Kennewick	109	6	4
Cascade Elementary	109	6	4
Pasco	96	5	4
Mark Twain Elementary	96	5	4
Grand Total	205	11	8

Wheat Week	# Students	# Teachers	# Weeks
Pasco	283	12	3
Marie Curie Elementary	127	5	1
Ruth Livingston Elementary	85	3	1
Three Rivers Elementary	71	4	1
Richland	257	17	2
Lewis and Clark Elementary	116	8	1
White Bluffs Elementary	141	9	1
Grand Total	540	29	5

Total Drain Ranger, Jr. Drain Ranger & Wheat Week in the Quad Cities
 (January – March 2020)

Students = 1,672

Teachers = 111

Franklin Conservation District Education Report
 Drain Rangers, Jr. Drain Rangers and Wheat Week
 September – December 2020

Jr. Drain Rangers	# Students	# Teachers
Kennewick	110	6
Amistad Elementary	110	6
Pasco	246	15
Columbia River Elementary	80	4
Maya Angelou Elementary	111	5
Whittier Elementary	135	6
Richland	225	8
Jefferson Elementary	90	4
Lewis and Clark Elementary	55	4
Grand Total	581	29

Wheat Week	# Students	# Teachers
Kennewick	45	2
Hawthorn Elementary	23	1
Bethlehem Lutheran School	22	1
Pasco	208	9
Emerson Elementary	100	4
Rowena Chess Elementary	75	3
Kingspoint Christian School	11	1
St. Patrick's Catholic School	22	1
Richland	202	9
Ridgeview Elementary	120	5
Sacajawea Elementary	82	4
Richland	65	3
Richland Virtual School	65	3
West Richland	91	4
William Wiley Elementary	91	4
Grand Total	611	27

Drain Rangers Teacher Workshops held virtually:

November 18, 2020 – 3 Teachers

Total Drain Ranger, Jr. Drain Ranger & Wheat Week in the Quad Cities
 (September – December 2020)

Students = 1,192

Teachers – 59

Attachment B

G19 Certification and Signature (Yakima County)



Public Services

128 North Second Street • Fourth Floor Courthouse • Yakima, Washington 98901
(509) 574-2300 • 1-800-572-7354 • FAX (509) 574-2301 • www.co.yakima.wa.us

LISA H. FREUND - Director

September 14, 2020

Andrea Jedel
WA State Department of Ecology
Central Regional Office
1250 Alder St
Union Gap, WA 98903

RE: Stormwater Management Program Effectiveness Studies
Eastern Washington Phase II Municipal Stormwater Permit Section/Paragraph: S1.D.3.c and
S8.A.1.a

Dear Ms. Jedel:

Yakima County (Permit No. WAR04-6014) is the lead entity for the BMP Inspection and Maintenance Responsibilities effectiveness study, which is currently being performed and will be completed June 2021. The City of Pasco (Permit No. WAR04-6503) is participating in the study and is relying on Yakima County to meet the permit obligations in S8.A.1.a. Please accept this letter as documentation of the permit obligations carried out by Yakima County and The City of Pasco's participation in the BMP Inspection and Maintenance Responsibilities effectiveness study.

If you have any questions with regards to this submittal, please feel free to contact Katie Otañez at 509-574-2397 or via email at katie.otanez@co.yakima.wa.us.

Best Regards,

Katie Otañez
Natural Resource Specialist-Water Resources
Yakima County

Cc: Amanda Mars, WA State Department of Ecology, Eastern Regional Office

Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.

If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2360 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll-free relay service 1-800-833-6388 and ask the operator to dial 509-574-2300.

Yakima County

G19 Certification and Signature for Stormwater Management Program Effectiveness Studies,
Eastern Washington Phase II Municipal Stormwater Permit, Section/Paragraph: S8.1.A.1

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.



Katie Otanez, Natural Resource Specialist

9/15/2020

Date

City of Pasco

G19 Certification and Signature for Stormwater Management Program Effectiveness Studies,
Eastern Washington Phase II Municipal Stormwater Permit, Section/Paragraph: S8.1.A.1

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.



Maria Serra, CIP Manager

9/16/2020

Date

Attachment C

Public Education and Outreach Materials



SÓLO LA LLUVIA POR EL DESAGÜE

La protección del agua de nuestras ciudades de cosas como los coches con fugas de aceite, fertilizantes de las granjas y hogares, excrementos de perro, incluso tanques sépticos deficientes. Todas estas fuentes se suman a un gran problema de contaminación. Pero cada uno de nosotros podemos hacer cosas pequeñas para ayudar a limpiar el agua también.

Ser la solución contaminación!

Para informar de descarga ilegal o dumping llame:

Kennewick: 509-585-4419
Pasco: 509-543-5777
Richland: 509-942-7480
West Richland: 509-967-5434



Read the label. Follow the instructions.

Many people use fertilizers, weed killers, and pesticides to enhance their yards and gardens. If you use too much of these products or apply them at the wrong time, runoff can easily carry them from your lawn or garden into storm drains and ditches. From there they can end up in lakes, streams, rivers and marine waters.

Like in the garden, fertilizer in lakes and rivers makes plants grow. But too much algae and other aquatic plant growth can make boating, fishing and swimming unpleasant. What's more, as the algae and other plants decay, they use up the oxygen in the water that fish and other aquatic life need.

Lea la etiqueta. Siga las instrucciones.

Muchas personas usan fertilizantes, herbicidas y pesticidas para mejorar sus patios y jardines. Si utiliza demasiada cantidad de estos productos o los aplica en el momento equivocado, la escorrentía puede llevarlos fácilmente de su césped o jardín a los alcantarillas y zanjas. Desde allí puede terminar en lagos, arroyos, ríos y aguas marinas.

Al igual que en el jardín, fertilizantes en lagos y ríos hacen que las plantas crezcan. Pero el exceso de algas y crecimiento de otras plantas acuáticas pueden hacer paseos en bote, pesca y natación desagradable. Lo que es más, a medida que las algas y otras plantas se descomponen, utilizan el oxígeno en el agua que los peces y otra vida acuática necesitan.



ONLY RAIN DOWN THE DRAIN!

Protect our cities' water from things like cars leaking oil, fertilizers from farms and homes, dog waste, even failing septic tanks. All these sources add up to a big pollution problem. But each of us can do small things to help clean up our water too.

Be the pollution solution!

To report illegal discharge or dumping call:

Kennewick: 509-585-4419
Pasco: 509-543-5777
Richland: 509-942-7480
West Richland: 509-967-5434





Scoop the poop! Bag it. Trash it.

Dog poop is more than just an icky nuisance. It's a health risk to dogs and people, especially children. It's full of bacteria that can make people sick. And it's a source of water pollution.

Bacteria from dog poop threatens drinking water for both people and livestock and can end up in shellfish. Nutrients from dog poop can also feed the growth of aquatic plants and algae. As these decay, they use up oxygen in the water that fish and other aquatic life need.

Pick up after your dog in your yard every few days— more often if you have small children who play there.

¡Recoja los excrementos de perro! Embólselos. Bótelos a la basura.

Los excrementos de perro son algo más que una molestia repulsiva. Es un riesgo para la salud de los perros y personas, especialmente niños. Están llenos de bacterias que pueden causar enfermedades. Y son una fuente de contaminación del agua.

Las bacterias de los excrementos de perro ponen en peligro el agua potable para las personas y el ganado y pueden terminar en los mariscos. Los nutrientes de los excrementos de perro también pueden alimentar el crecimiento de las plantas acuáticas y algas. A medida que estas se descomponen, utilizan el oxígeno en el agua que los peces y otra vida acuática necesitan.

Recoja los desechos de su perro en su patio cada pocos días- más a menudo si usted tiene niños pequeños que juegan allí.



Check for leaks. Recycle used motor oil.

What's the problem with motor oil? Oil does not dissolve in water. It lasts a long time and sticks to everything from beach sand to bird feathers. Oil and other petroleum products are toxic to people, wildlife, and plants. One pint of spilled oil in the water can make a slick larger than a football field.

Oil that leaks from our cars onto roads and driveways is washed into storm drains, and then flows directly to a lake or stream. Used motor oil is the largest single source of oil pollution in our lakes, streams and rivers.

Americans improperly dispose of 200 million gallons of used oil each year and a sizeable portion reaches our waters.

Revise si tiene fugas. Recicle el aceite del motor usado.

¿Cuál es el problema con el aceite de motor? El aceite no se disuelve en agua. Dura mucho tiempo y se pega a todo, desde la arena de la playa a las plumas de las aves. Aceite y otros productos derivados del petróleo son tóxicos para las personas, la fauna y la flora. Un litro de aceite derramado en el agua puede causar una mancha más grande que un campo de fútbol.

El aceite que se escapa de nuestros vehículos en las carreteras y caminos de entrada se escurre a las alcantarillas, y luego fluye directamente a lagos o arroyos. El Aceite de motor usado es la mayor fuente de contaminación por hidrocarburos en nuestros lagos, arroyos y ríos.

Los estadounidenses descartan incorrectamente 200 millones de galones de aceite usado cada año y una parte considerable llega a nuestras aguas.



Don't leave a sheen. Prevent drips, spills, and overfills.

Many boaters may not be aware they've spilled fuel. Unless you take precautions, drips can end up in the water when fuel back-splashes out of the tank, when it discharges out of the vent from over-filling or expansion, or when it drips off the nozzle.

It can kill fish and other aquatic life, and can cause long-term damage to the surrounding habitat.

What will you do to help? Know how much fuel your tanks hold. Fill only to 90% capacity to leave room for expansion, especially during warm weather. Don't top off your tanks.

No deje manchas de aceite. Evite goteos, derrames y desbordes.

Muchos navegantes pueden no ser conscientes de que han derramado combustible. A menos que tome precauciones, goteos pueden terminar en el agua cuando el combustible salpica fuera del tanque, cuando se derrama el combustible por la ventilación debido a desbordes o por expansión, o cuando gotea de la boquilla.

Puede matar peces y otros organismos acuáticos, y puede causar daños a largo plazo al hábitat circundante.

¿Qué vas a hacer para ayudar? Sepa cuánto combustible cabe en sus tanques. Llene sus tanques sólo al 90% de su capacidad para dejar espacio para la expansión, sobre todo durante el verano. No colme sus tanques.



STORM DRAINS:

ALCANTARILLAS PARA AGUA DE LLUVIA

Do you know where the water (and any debris) goes?

¿Sabe hacia dónde se dirige el agua (y la suciedad)?



(We bet you'll be surprised...)
(Suponemos que quedará sorprendido...)

Little known facts about our storm drains:

Información desconocida acerca de las alcantarillas:



Storm water is generally not treated before flowing into our rivers and underground aquifers. *Generalmente, el agua de lluvia no es tratada antes de ingresar a los ríos y los acuíferos subterráneos.*



Motor oil, paints, animal waste and other pollutants flow directly to our waterways. When it rains, water runs over the ground and picks up these pollutants and carries them to our rivers. In fact, one gallon of oil can contaminate up to one million gallons of water. *El aceite de motor, la pintura, los excrementos de los animales y otras sustancias contaminantes fluyen directamente a nuestros canales. Cuando llueve, el agua corre por el suelo y arrastra dichas sustancias a nuestros ríos. De hecho, un galón de aceite puede contaminar casi un millón de galones de agua.*



Storm drains are designed to prevent flooding from natural rains. They are not for hosing off grass clippings, yard debris, car washing soap, washing, cement sludge, etc. from your property. This can cause clogging as well as affect the quality of Pasco's water and downstream watersheds. *Las alcantarillas están diseñadas para prevenir inundaciones causadas por las lluvias naturales. No son para almacenar el agua que acarrea el pasto que es cortado, los residuos del jardín, el jabón para limpiar el carro, otros jabones, la lechada de cemento, etc. de su propiedad. Esto puede causar que las alcantarillas se tapen, así como afectar la calidad del agua de Pasco y las cuencas aguas abajo.*

REPORT ANY ILLEGAL DISCHARGE OR SPILLS.
DENUNCIA CUALQUIER DESCARGA O DESBORDE ILEGAL.

Call the Stormwater Hotline: (509) 543-5777
or visit www.pasco-wa.gov/stormwater

Llame a nuestra línea directa para Agua de Lluvia:
(509) 543-5777 o visite www.pasco-wa.gov/stormwater





USE YOUR BRAIN ONLY RAIN DOWN THE DRAIN...

USE SU CÉREBRO, SÓLO AGUA DE LLUVIA A LAS ALCANTARILLAS...

**FIGHT
F.O.G.™**

**Keep Fats, Oils & Grease
Out of Your Drain!**

Mantenga las grasas y aceites
fuera de la boca del drenaje.

P.O. Box 293
Pasco, WA 99301
509-545-3463

What Can I Do?

Follow these simple steps to help prevent sewer backups:

Siga estos pasos para ayudar a evitar cañerías obstruidas y derrames de las alcantarillas:

1. Pour cold fats, oils and grease into a covered, disposable container and throw it into your garbage. Never pour fats, oil, or grease down sink drains or toilet.

Coloque las grasas y los aceites fríos en un recipiente desechable con tapa y tirelo a la basura. Nunca tire las grasas en los desagües de su casa.



2. Soak up spilled oils and grease with an absorbent material such as paper towels or kitty litter and throw into your garbage.

Absorba las grasas y los aceites restantes con un material absorbente como servilletas de papel o arena sanitaria y tirelos en la basura.

3. Before you wash dishes, scrape food scraps, fats, oils and grease into your garbage.

Antes de lavar los platos, tire los restos de alimentos, grasas y aceites en la basura.



4. Use sink strainers to catch any remaining food waste while washing dishes.

Utilice coladores para fregaderos al lavar los platos para atrapar los restos de comida.

For more information, contact the City of Pasco
F.O.G. Squad 509-545-3463 (Sewer Collections)
or www.pasco-wa.gov



**PREVENTION, REDUCTION AND ELIMINATION
OF FATS, OILS AND GREASE**

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2020 Public Education and Involvement Activities

Quad Cities MOA Wheat Week, Drain Rangers and Jr. Drain Rangers

This continuing agreement between the Quad Cities (Pasco, Kennewick, Richland, West Richland) and the Franklin Conservation District performs classroom stormwater education and teacher workshops. In 2020, the programs transitioned from in-person to online classes and sessions to adapt to COVID-19 restrictions. For Pasco, the programs reached 1,268 students and 66 teachers from January to December 2020 (See Attachment A).

Wheat Week topics/lessons: <https://www.franklincd.org/wheat-week>

Drain Rangers topics/lessons: <https://www.franklincd.org/drain-rangers>

Jr. Drain Rangers topics/lessons: <https://www.franklincd.org/jr-drain-rangers>

Regional Home & Garden Show

February 2020 - The Franklin Conservation District was contracted to prepare a vendor booth and educational materials for distribution (with input from the Quad Cities.) Employees from the Conservation District and all four of the Quad Cities manned the booth during the three-day Show. Materials included brochures (see Attachment B), water timers, and pet disposable waste bags.

Benton Franklin Fair

Due to COVID-19, the Benton Franklin Fair was cancelled for 2020.

Yakima County Effectiveness Study

Yakima County is the lead entity for the BMP Inspection and Maintenance Responsibilities effectiveness study, which is currently being performed and will be completed by June 2021. The City is participating in the study to meet the permit requirements, in the roles of reviewer and survey volunteer.

2020 COP Design and Construction Standards Update

June 2020 – The City of Pasco revised the Design and Construction Standard Drawings and Specifications, which apply to private development review. The standards include the requirement of a stormwater report being prepared, sealed, and submitted to accompany construction plans. The stormwater report shall be developed in accordance with the Stormwater Management Manual for Eastern Washington, with an emphasis on runoff and drainage facilities sizing calculations, and maintenance plan for proposed public and private facilities.

Attachment A 2020 Education Reports

Franklin Conservation District Education Report Drain Rangers, Jr. Drain Rangers and Wheat Week January – March 2020

Jr. Drain Rangers	# Students	# Teachers	# of Lessons
Kennewick	88	5	4
Cottonwood Elementary	88	5	4
Pasco	435	24	18
Maya Angelo Elementary	75	3	3
Rowena Chess Elementary	40	2	2
Whittier Elementary	186	14	8
McClintock Elementary	134	5	5
Richland	302	36	15
Jefferson Elementary	85	12	5
Orchard Elementary	124	8	5
Marcus Whitman Elementary	93	16	5
West Richland	102	6	5
William Wiley Elementary	102	6	5
Grand Total	927	71	42

Drain Rangers	# Students	# Teachers	# of Lessons
Kennewick	109	6	4
Cascade Elementary	109	6	4
Pasco	96	5	4
Mark Twain Elementary	96	5	4
Grand Total	205	11	8

Wheat Week	# Students	# Teachers	# Weeks
Pasco	283	12	3
Marie Curie Elementary	127	5	1
Ruth Livingston Elementary	85	3	1
Three Rivers Elementary	71	4	1
Richland	257	17	2
Lewis and Clark Elementary	116	8	1
White Bluffs Elementary	141	9	1
Grand Total	540	29	5

Total Drain Ranger, Jr. Drain Ranger & Wheat Week in the Quad Cities
(January – March 2020)

Students = 1,672

Teachers = 111

Franklin Conservation District Education Report
 Drain Rangers, Jr. Drain Rangers and Wheat Week
 September – December 2020

Jr. Drain Rangers	# Students	# Teachers
Kennewick	110	6
Amistad Elementary	110	6
Pasco	246	15
Columbia River Elementary	80	4
Maya Angelou Elementary	111	5
Whittier Elementary	135	6
Richland	225	8
Jefferson Elementary	90	4
Lewis and Clark Elementary	55	4
Grand Total	581	29

Wheat Week	# Students	# Teachers
Kennewick	45	2
Hawthorn Elementary	23	1
Bethlehem Lutheran School	22	1
Pasco	208	9
Emerson Elementary	100	4
Rowena Chess Elementary	75	3
Kingspoint Christian School	11	1
St. Patrick's Catholic School	22	1
Richland	202	9
Ridgeview Elementary	120	5
Sacajawea Elementary	82	4
Richland	65	3
Richland Virtual School	65	3
West Richland	91	4
William Wiley Elementary	91	4
Grand Total	611	27

Drain Rangers Teacher Workshops held virtually:

November 18, 2020 – 3 Teachers

Total Drain Ranger, Jr. Drain Ranger & Wheat Week in the Quad Cities
 (September – December 2020)

Students = 1,192

Teachers – 59

Attachment B

Stormwater Utility Handout



SÓLO LA LLUVIA POR EL DESAGÜE

La protección del agua de nuestras ciudades de cosas como los coches con fugas de aceite, fertilizantes de las granjas y hogares, excrementos de perro, incluso tanques sépticos deficientes. Todas estas fuentes se suman a un gran problema de contaminación. Pero cada uno de nosotros podemos hacer cosas pequeñas para ayudar a limpiar el agua también.

Ser la solución contaminación!

Para informar de descarga ilegal o dumping llame:

Kennewick: 509-585-4419
Pasco: 509-543-5777
Richland: 509-942-7480
West Richland: 509-967-5434



Read the label. Follow the instructions.

Many people use fertilizers, weed killers, and pesticides to enhance their yards and gardens. If you use too much of these products or apply them at the wrong time, runoff can easily carry them from your lawn or garden into storm drains and ditches. From there they can end up in lakes, streams, rivers and marine waters.

Like in the garden, fertilizer in lakes and rivers makes plants grow. But too much algae and other aquatic plant growth can make boating, fishing and swimming unpleasant. What's more, as the algae and other plants decay, they use up the oxygen in the water that fish and other aquatic life need.

Lea la etiqueta. Siga las instrucciones.

Muchas personas usan fertilizantes, herbicidas y pesticidas para mejorar sus patios y jardines. Si utiliza demasiada cantidad de estos productos o los aplica en el momento equivocado, la escorrentía puede llevarlos fácilmente de su césped o jardín a las alcantarillas y zanjas. Desde allí puede terminar en lagos, arroyos, ríos y aguas marinas.

Al igual que en el jardín, fertilizantes en lagos y ríos hacen que las plantas crezcan. Pero el exceso de algas y crecimiento de otras plantas acuáticas pueden hacer pascos en bote, pesca y natación desagradable. Lo que es más, a medida que las algas y otras plantas se descomponen, utilizan el oxígeno en el agua que los peces y otra vida acuática necesitan.



ONLY RAIN DOWN THE DRAIN!

Protect our cities' water from things like cars leaking oil, fertilizers from farms and homes, dog waste, even failing septic tanks. All these sources add up to a big pollution problem. But each of us can do small things to help clean up our water too.

Be the pollution solution!

To report illegal discharge or dumping call:

Kennewick: 509-585-4419
Pasco: 509-543-5777
Richland: 509-942-7480
West Richland: 509-967-5434





Scoop the poop! Bag it. Trash it.

Dog poop is more than just an icky nuisance. It's a health risk to dogs and people, especially children. It's full of bacteria that can make people sick. And it's a source of water pollution.

Bacteria from dog poop threatens drinking water for both people and livestock and can end up in shellfish. Nutrients from dog poop can also feed the growth of aquatic plants and algae. As these decay, they use up oxygen in the water that fish and other aquatic life need.

Pick up after your dog in your yard every few days—more often if you have small children who play there.

¡Recoja los excrementos de perro! Embóselos. Bótelos a la basura.

Los excrementos de perro son algo más que una molestia repulsiva. Es un riesgo para la salud de los perros y personas, especialmente niños. Están llenos de bacterias que pueden causar enfermedades. Y son una fuente de contaminación del agua.

Las bacterias de los excrementos de perro ponen en peligro el agua potable para las personas y el ganado y pueden terminar en los mariscos. Los nutrientes de los excrementos de perro también pueden alimentar el crecimiento de las plantas acuáticas y algas. A medida que estas se descomponen, utilizan el oxígeno en el agua que los peces y otra vida acuática necesitan.

Recoja los desechos de su perro en su patio cada pocos días: más a menudo si usted tiene niños pequeños que juegan allí.



Check for leaks. Recycle used motor oil.

What's the problem with motor oil? Oil does not dissolve in water. It lasts a long time and sticks to everything from beach sand to bird feathers. Oil and other petroleum products are toxic to people, wildlife, and plants. One pint of spilled oil in the water can make a slick larger than a football field.

Oil that leaks from our cars onto roads and driveways is washed into storm drains, and then flows directly to a lake or stream. Used motor oil is the largest single source of oil pollution in our lakes, streams and rivers.

Americans improperly dispose of 200 million gallons of used oil each year and a sizeable portion reaches our waters.

Revise si tiene fugas. Recicle el aceite del motor usado.

¿Cuál es el problema con el aceite de motor? El aceite no se disuelve en agua. Dura mucho tiempo y se pega a todo, desde la arena de la playa a las plumas de las aves. Aceite y otros productos derivados del petróleo son tóxicos para las personas, la fauna y la flora. Un litro de aceite derramado en el agua puede causar una mancha más grande que un campo de fútbol.

El aceite que se escapa de nuestros vehículos en las carreteras y caminos de entrada se escurre a las alcantarillas, y luego fluye directamente a lagos o arroyos. El aceite de motor usado es la mayor fuente de contaminación por hidrocarburos en nuestros lagos, arroyos y ríos.

Los estadounidenses descartan incorrectamente 200 millones de galones de aceite usado cada año y una parte considerable llega a nuestras aguas.



Don't leave a sheen. Prevent drips, spills, and overfills.

Many boaters may not be aware they've spilled fuel. Unless you take precautions, drips can end up in the water when fuel back-splashes out of the tank, when it discharges out of the vent from over-filling or expansion, or when it drips off the nozzle.

It can kill fish and other aquatic life, and can cause long-term damage to the surrounding habitat.

What will you do to help? Know how much fuel your tanks hold. Fill only to 90% capacity to leave room for expansion, especially during warm weather. Don't top off your tanks.

No deje manchas de aceite. Evite goteos, derrames y desbordes.

Muchos navegantes pueden no ser conscientes de que han derramado combustible. A menos que tome precauciones, goteos pueden terminar en el agua cuando el combustible salpica fuera del tanque, cuando se derrama el combustible por la ventilación debido a desbordes o por expansión, o cuando gotea de la boquilla.

Puede matar peces y otros organismos acuáticos, y puede causar daños a largo plazo al hábitat circundante.

¿Qué vas a hacer para ayudar? Sepa cuánto combustible cabe en sus tanques. Llene sus tanques sólo al 90% de su capacidad para dejar espacio para la expansión, sobre todo durante el verano. No colme sus tanques.



November 6, 2020

Amanda Mars
Washington State Department of Ecology
Water Quality Program
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205

**SUBJECT: CITY OF PASCO G20 – NOTICE OF NON-COMPLIANCE FOR SWMP PLAN,
PERMIT WAR04-6503**

Dear Ms. Mars,

Per the Eastern Washington Phase II Municipal Stormwater Permit (Permit), General Condition G20, municipalities are required to provide notification of any non-compliance actions in regards to the terms and conditions of the Permit.

This letter is intended to provide Ecology notice that the City of Pasco (City) did not complete the requirements by the associated deadlines noted in the table below. These items were discussed during the City's Annual Report Review meeting on October 9, 2020. One outcome of that meeting was an agreement to provide a G20 – Non-compliance Notification that reflects the City's agreed-upon plan for compliance.

The following table outlines the outstanding issues that the City needs to address, including anticipated dates for completion and action items to prevent reoccurrence of non-compliance.

Items of Non-Compliance with the Eastern Washington Phase II Permit (between 2014-2020)¹

Annual Report Question	Permit Section	Conditions of Non-Compliance	Corrective Action to be Taken	Date to be Corrected
1	S5.A.4.a-c	<i>Each Permittee shall prepare written documentation of the SWMP, called the SWMP Plan.</i> The City has been operating with the understanding that a Comprehensive Stormwater Plan was sufficient to meet this requirement, and did not develop a SWMP Plan as per S5.A.4.a-c of the Permit. Therefore, this Permit condition	A complete SWMP Plan will be written to accommodate the 2019-2024 Permit for the upcoming calendar year (CY2021), and submitted along with the CY2020 Annual Report on March 31, 2021.	March 31, 2021

¹ Non-compliance period spans the 2014-2019 Eastern Washington NPDES Phase II Permit and 2019-2024 Eastern Washington NPDES Phase II Permit. Annual Report questions and Permit sections referenced in the table are from the 2019-2024 Permit.

		was not met throughout 2014-2020.		
9	S5.B.2.a	<p><i>Permittees shall implement a program... to provide input during the decision-making processes involving the development, implementation, and update of the SWMP, including development and adoption of all required ordinances and regulatory mechanisms.</i></p> <p>While the City has provided opportunities for the public to comment on our SWMP, such as during development and adoption of stormwater ordinances, the City understands that a written SWMP Plan was not developed as per S5.A.4.a-c of the Permit, and that the Plan has not been made available for the public to provide input. Therefore, this Permit condition was not met throughout 2014-2020.</p>	<p>A complete SWMP Plan will be written to accommodate the 2019-2024 Permit for the upcoming calendar year (CY2021), and subsequently made available for the public to provide input on the City's decision-making processes involving the development, implementation, and update of the SWMP Plan.</p>	March 31, 2021
10	S5.B.2.b	<p><i>No later than May 31 each year, Permittees shall post on their website and make the latest version of the Annual Report and SWMP Plan available to the public.</i></p> <p>The City has posted all Annual Reports and the Comprehensive Stormwater Plan to the City's website by the required due dates; however, the City is now aware that the Comprehensive Plan is not the same as a written SWMP Plan, as described by S5.A.4 in the Permit. Therefore, this Permit condition was not met throughout 2014-2020.</p>	<p>A complete SWMP Plan will be written to accommodate the 2019-2024 Permit, and inform the public of planned SWMP activities and actions for the upcoming calendar year (CY2021). The City's SWMP Plan will then be posted to the City's website by May 31, 2021, and updated annually and posted by May 31 every year thereafter.</p>	May 31, 2021
56	S8.A.2.f	<p><i>Include effectiveness study activities (e.g. assigned duties; participation in meetings, proposal development, project reviews; and study implementation) in the Permittee's updated SWMP.</i></p> <p>The City has been operating with the understanding that a Comprehensive</p>	<p>A complete SWMP Plan will be written to accommodate the 2019-2024 Permit for the upcoming calendar year (CY2021), and describe the City's Effectiveness Study activities completed to-date as well as planned actions for the upcoming calendar year of 2021.</p>	March 31, 2021

		Stormwater Plan was sufficient to meet this requirement and did not develop a SWMP Plan to include up-to-date effectiveness study activities. Therefore, this requirement was not met throughout 2014-2020.		
----	S9.B-C	<p><i>Each Permittee shall make all records related to this Permit and the Permittee's SWMP available to the public at reasonable times during business hours. (S9.B)</i></p> <p><i>Each Annual Report shall include... A copy of the Permittee's current Stormwater Management Program Plan (SWMP Plan), as required by S5.A.4. (S9.C.1)</i></p> <p>The City recognizes that a SWMP Plan was not developed as described by S5.A.4 in the Permit. As such, the document was not made available to the public, nor was it included with the City's Annual Report submittals throughout 2014-2020.</p>	<p>A complete SWMP Plan will be written to accommodate the 2019-2024 Permit, and made available to the public at reasonable times during business hours. The CY2021 SWMP Plan will be attached to the upcoming CY2020 Annual Report, due March 31, 2021. All future Annual Report submittals will include a copy of the City's SWMP Plan, which will be updated annually.</p>	March 31, 2021

The City appreciates Ecology providing technical assistance to detail Permit requirements and outline a course of action for compliance. The City remains fully committed to complying with its Permit. Should you have any questions regarding this Non-compliance Notification, please do not hesitate to contact me.

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Respectfully,



Maria L. Serra, PE
CIP Manager

cc: Steve Worley, PE, Public Works Director – City of Pasco

Memo



To: File

From: Maria Serra, PE. CIP Manager

Date: 3/30/2021

Re: Stormwater Permit Compliance

Coordination between departments and elimination of barriers for compliance

Compliance with the Stormwater Municipal Permit Phase II for City of Pasco is achieved by a combination of efforts from many departments and its divisions.

While the overall coordination for compliance is spear headed by Public Works engineering, the Operations division (also in Public Works Department) performs most of the inspections and maintenance to the system.

Additionally, Community and Economic Development (CED) Department, through the building and engineering divisions ensures that private development is compliant with the design and construction of stormwater improvements and Erosion and Sedimentation Control BMPS. These BMPS are vetted by Public Works and CED and standards are applied to both public and private projects alike.

Also in CED department resides the Code enforcement group, which investigates illicit discharges, issues notice of violations and follows up on cases including hearings and fines. When these incidents are identified, PW operations, PW Engineering and Ecology (if applicable) are notified. The key coordinator for this information to flow is through the Environmental Compliance Coordinator (a position [previously hosted in PW Operations, which is transitioning TO PW Engineering in 2021).

All tracking of the reviews, permitting, and Code Enforcement cases are tracked and distributed with the use of a software called TRAKIT, where records for each item are stored and are retrievable by City employees. This software connects to the GID mapping system Administrative and Community Services department maintains, with the GIS staff.

This GIS map is also the base and integrated with Cartograph, a software used by Public Works to track inspection and maintenance activities and resources. The GIS map is updated by submittal of as-built documentation and survey data provided by CED Engineering (public infrastructure built as part of private development) and PW Engineering (public infrastructure built as part of public projects). GIS map viewer is available to all city employees and a public site is available also in the city's website for the general public.

Finally, Finance Department and the Communication Services Division (a part of the Executive Department) are responsible for outreach efforts via bill inserts and social media.

Memo



Internal training is provided to all departments, specially to staff with outdoors roles (PW Operations staff, PW Engineering and CED Engineering, Parks and Rec staff, Facilities and park maintenance staff, Building Division inspectors and Code Enforcement staff) on Stormwater pollution prevention, BMP, illicit discharge identification and detection, spill response, CESCL certifications, etc. Instruction and training scheduled is typically implemented with assistance of the Safety Specialist, a position within the Human Resources Department.

Emails and phone calls are used as mechanisms for communication between staff members. Software (ArcGIS, Trakit and cartegraph) supports the documentation of activities, and existing infrastructure, as well as permits and reviews for proposed infrastructure. Training is KEY for all staff to be familiar with the requirements, understand the nomenclature, and know how to response when faced with an incident stormwater related. Strong, clear and frequent coordination between department heads and/or managers keeps functions operating in a manner that is focused on the joint objective of ensuring compliance.

With the transition of the Environmental Compliance Coordinator position into Public Works Engineering in 2021, quarterly meetings will be scheduled for keeping targets and exploring opportunities to improve methodologies for coordination and communication between all parties playing a part in the achievement and maintenance of compliance.