

## Attachment 1 - Stormwater Management Program (SWMP) Update

### ***BACKGROUND***

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the Federal Clean Water Act, which is intended to protect and restore waters for “fishable and swimmable” uses. The Federal Environmental Protection Agency has delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology). Since the City of Bonney Lake (City) operates a small municipal separate storm sewer system (MS4) that serves less than 100,000 people, it is designated as a Phase II community and must comply with Ecology’s NPDES Western Washington Phase II Municipal Stormwater Permit (Permit). The first Permit was issued to the City in 2007, and the current, updated Permit was issued in July 2019 and became effective as of August 1, 2019. The City has also applied for the next permit for coverage years 2024-2029.

The Permit allows municipalities to discharge stormwater runoff from the MS4 into the State’s water bodies (i.e. streams, rivers, lakes, wetlands, etc.) as long as municipalities implement measures to protect water quality to the “maximum extent practicable” through the application of Best Management Practices (BMPs). These required practices, specified in the Permit, are outlined in and implemented through the City’s Stormwater Management Program (SWMP). The SWMP focuses on the use of All Known and Reasonable Technologies (AKART) to reduce the discharge of pollutants into receiving waters, protect surface waters from water quality degradation, and conserve aquatic ecosystems.

Permit Section S5.A.2 requires that the City detail “activities for the upcoming calendar year” in order to meet Permit requirements. These activities are documented within the SWMP and organized according to the following program components as outlined in the Permit.

- Stormwater Planning (S5.C.1)
- Public Education and Outreach (S5.C.2)
- Public Involvement and Participation (S5.C.3)
- MS4 Mapping and Documentation (S5.C.4)
- Illicit Discharge Detection and Elimination (S5.C.5)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)
- Operations and Maintenance (S5.C.7)
- Source Control Program for Existing Development (S5.C.8)
- Monitoring and Assessment (S8)

Details on each of the SWMP components are included in this update.

## ***STORMWATER PLANNING***

The City of Bonney Lake began preparing for the new Stormwater Planning Program Permit requirements by including the applicable milestones and deadlines in the Watershed Protection Plan, completed by Parametrix Consultants in 2018. The City looks forward to expanding its stormwater planning efforts to better address high priority sub-basins in Bonney Lake and develop actionable steps for improving watershed health in the community.

### ***S5.C.1.a: Convene an Inter-disciplinary Team for the Stormwater Planning Program***

Development of an inter-disciplinary team was required as part of the Low Impact Development (LID) code review and revision process for the 2013-2019 Permit. This inter-disciplinary team also provided feedback during the Watershed Protection Plan kickoff meeting in 2017 and throughout comprehensive plan update meetings in 2018. In 2020, City staff reviewed the inter-disciplinary team membership and continued meeting to discuss Stormwater Planning Program efforts. The inter-disciplinary team convened again in 2021 to discuss the Watershed Protection Plan, the SMAP, and the SWMP. In 2022, the inter-disciplinary team met with Parametrix Consultants to begin planning for the Receiving Water Assessment, Receiving Water Prioritization, and the SMAP development efforts. In 2023, City staff collaborated with the inter-disciplinary team to discuss the Lower Fennel Creek Catchment Area SMAP and provide feedback on the final plan. In 2024, City staff will coordinate another team meeting to review the Lower Fennel Creek SMAP and discuss implementing the stormwater facility retrofits identified in the plan. The City will also discuss the new permit requirements and develop an implementation strategy to meet permit deadlines.

### ***S5.C.1.b: Coordinate with Long-Range Plan Updates to Address Water Quality***

In 2022, staff reviewed the City's long-range planning efforts and the status was reflected in the planning update submitted to Ecology by the January 1, 2023 deadline.

### ***S5.C.1.c: Continue Requiring LID Principles and BMPs When Updating City Codes & Standards***

Per the 2019-2024 Permit requirement, the City reviewed the following documents and code for LID requirements:

- Bonney Lake Municipal Code
- Pierce County Stormwater & Site Development Manual
- City of Bonney Lake Development Policies & Public Works Design Standards
- LID Technical Guidance Manual for Puget Sound

The City's Public Services Department continues to review and revise Development Standards in accordance with LID principles, and in 2020 worked to revise the standards for City street sections and landscaping details to align with LID standards. The City code is also written for the City adopted Pierce County Stormwater and Site Development Manual and the LID standards / requirements therein to be the most current version. City staff will continue to work with Public Services in 2024 to update, as needed, stormwater infrastructure design and BMP standards.

**S5.C.1.d: Stormwater Management Action Planning (SMAP)**

In 2023, the City finalized the Stormwater Management Action Planning requirements including the assessment of receiving waters, a receiving water prioritization method and process, and a stormwater action plan for one high priority catchment area. The City referenced the Stormwater Management Action Planning Guidance document published by Ecology during this development.

**S5.C.1.d.i: Document and Assess Receiving Waters and Create a Watershed Inventory**

The Receiving Water Assessment is the first phase of a three-step stormwater management action planning (SMAP) development process, and the results are used to inform the prioritization process. The assessment included preparation of an inventory of local receiving waters to which the MS4 discharges and their contributing watershed areas, and available water quality information to help identify receiving waters that would benefit most from stormwater management planning actions. The SMAP receiving water assessment method and process can be summarized as follows:

- Basin delineation and identification of receiving waters, including a map of the delineated basins and the associated receiving waters.
- Assessment of receiving water existing conditions and contributing areas for each delineated receiving water-scale basin and each receiving water body.
- Assessment of expected stormwater management influence documenting how data sources were used in the assessment of existing conditions and any identified data gaps.
- Evaluation of relative contributions and conditions summarized in a watershed inventory table, including the list of basins to be included in the prioritization process (S5.C.1.d.ii).

The findings of the assessment are summarized in a Watershed Inventory Table and Map, and also made available to the public on the SMAP website through an online storymap detailing this process. Additional input is solicited from the public through the storymap, which includes an interactive web map where public comments can be left and a project related survey can be submitted.

**S5.C.1.d.ii: Develop and Implement a Receiving Water Prioritization Method and Process**

The basin prioritization is the second phase of a three-step SMAP development process that follows the Receiving Water Assessment. The prioritization is intended to create a finalist list of the City's receiving waters and drainage analysis catchments most likely to benefit from stormwater management planning and actions. The SMAP basin prioritization method and screening process can be summarized by three principle steps:

- The preliminary screening involves a mathematical approach to the catchments based on estimated existing and forecasted water quality and flow impacts from the catchments to the receiving waters. The preliminary prioritization was conducted using a GIS/spreadsheet-based basin forecasting tool called FutureShed, which calculates, weights, and compares existing and future composite scores for flow and water quality pressures on receiving waters from each catchment.

- The secondary screening involves a further review of the catchments by the City’s Interdisciplinary Team (the cross-departmental City staff working on the SMAP development). The secondary screening considered additional qualitative factors and accounted for public input from the community and partner stakeholders. Examples of qualitative factors reviewed include catchments with high levels of public interest, prior investments in stormwater controls, or planned capital funding projects. After the secondary screening, the two remaining basins moved forward to the final prioritization.
- The final prioritization considered additional qualitative factors identified in the receiving water assessment to identify the single catchment with the most feasible actions identified that would be selected as the City’s SMAP highest-priority catchment. City staff and internal project partners engage in many steps of the process, and additional input was solicited from the public through the SMAP website and through an online storymap with an interactive web map and survey. Through review of all the input, the City selected Lower Fennel Creek as the final SMAP high-priority catchment area.

***S5.C.1.d.iii: Develop a Stormwater Management Action Plan (SMAP) for at Least One High Priority Catchment Area***

In the third and final phase of the SMAP process, the City identified stormwater management actions for the Lower Fennel Creek Catchment Area which the City selected as the high-priority catchment area. The SMAP Guide lays out expected findings and outcomes for the SMAP, which will describe the following:

- For the Stormwater Facility Retrofit component of the SMAP, the City’s existing stormwater management treatment coverage was mapped throughout the Lower Fennel Creek Catchment Area. Any areas currently lacking in treatment will be evaluated for potential retrofitting. Potentially viable projects identified in this treatment coverage mapping exercise will then be evaluated using a multi objective decision analysis to determine which projects should move forward to implementation in the SMAP.
- For the land management and development strategies component of the SMAP, actions that can be most readily and reasonably implemented to benefit the high priority catchment will be considered. One such consideration is minimizing stormwater impacts before they can occur by redirecting or locating development and land conversion (e.g., impervious surface conversions or native vegetation removal) through land use policies.
- For the stormwater management programming component of the SMAP, the City’s stormwater staff will review the existing stormwater management program components and selected elements that could be enhanced to benefit the high priority catchment area.

## ***PUBLIC EDUCATION & OUTREACH***

The City provides ongoing public education and outreach designed to reduce and eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. City staff utilize a variety of approaches to inform targeted audiences about stormwater issues and provides specific actions people can follow to minimize stormwater pollution.

### ***S5.C.2.a.i-ii: Implement an Education and Outreach Program to Build General Awareness and Affect Behavior Change for the Area Served by the City's MS4***

A summary of educational activities that occurred in 2023 and that are scheduled for 2024 is provided as follows:

- The city anticipates distributing stormwater pollution prevention informational flyers to City households regarding the general impacts of stormwater flows into surface waters and impacts from impervious surfaces including impacts from pet waste, vehicle fluids, household and lawn chemicals, car and impervious surface washing, and automotive and hazardous waste spills.
- The city will continue displaying the stormwater pollution prevention information and distributing informational flyers associated with proper hazardous waste disposal and information to implement used oil recycling, proper pet waste disposal, and environmentally friendly vehicle washing methods at the annual Bonney Lake Days event. The flyers also inform residents on natural yard care techniques and ways to conserve water and provides information on how and when to report an illicit discharge, pollution, and illegal dumping.
- The city plans to coordinate with volunteers and continue our storm drain marker program to label storm drains in residential neighborhoods. The curb markers help increase public awareness on the environmental effects of dumping in storm drains and remind the public of the direct connection between storm drains and our surface waters.
- Bonney Lake will continue to offer our “fish friendly” charity car wash kits which are designed to divert wash water to the sanitary sewer system and are loaned out by the City at no cost.
- Bonney Lake staff will continue to participate in regional forums that focus on stormwater education and permit requirements.
- The City of Bonney Lake will update our website stormwater page as needed.
- The City will continue to produce the monthly Bonney Lake Times newsletter which will cover a variety of topics on pollution prevention and general awareness of stormwater related issues. The newsletter is also used to inform the public about progress and implementation of the SWMP.

### ***S5.C.2.a.ii.(c)3: Develop a Strategy and Schedule for a New Target Audience and BMP Behavior Change Campaign***

To meet the Permit requirements (S5.C.2a.ii.), the City elected to develop a public education and outreach strategy and schedule to affect behavior change for a new target audience. The City developed a social marketing campaign focused on increasing the adoption of dumpster area best management practices (BMPs) at commercial and multifamily residential sites. The objective of this program is to protect water quality in City waterways by reducing sources of pollution.

The City developed the Dumpster Outreach Program, building from the foundation of the regional Dumpster Outreach Group’s social marketing-based campaign. The City launched the campaign by developing stormwater pollution prevention educational materials and outlining a plan to work in partnership with local businesses and apartment complexes with dumpsters to affect behavior changes. Educational training was provided on-site, and materials distributed included multi-lingual posters and decals promoting the message of “Shut the Lid” and “Keep it Clean.” As part of the campaign, a study group was identified, data was collected to evaluate the effectiveness of engagement strategies, and a report was developed that documents lessons learned and planned strategy changes for the implementation of the ongoing program.

**S5.C.2.a.iii: Provide and Advertise Stewardship Opportunities**

Bonney Lake will continue to provide stewardship opportunities for community members through various programs.

- Storm drain marking: Volunteers mark neighborhood storm drains with markers stating, “Dump No Waste – Drains To Habitat.” The purpose of these markers is to raise awareness regarding the connection between our neighborhoods and local water bodies.
- Adopt-A-Street: Local volunteers have adopted City of Bonney Lake streets and have committed to picking up litter along their designated segments quarterly. The City recognizes the individual or organizations stewardship efforts with a street sign along their segment.
- Beautify Bonney Lake: Members of the Bonney Lake community volunteer to remove litter at parks and along trails and perform miscellaneous improvement projects to enhance the beauty of the City.
- Restoration Planting: Community volunteers perform an annual restoration planting event along Fennel Creek where invasive weeds are removed and native trees and shrubs are planted to improve the quality and function of the creek habitat.

## ***PUBLIC INVOLVEMENT & PARTICIPATION***

The City encourages the public and interested parties to participate in the decision-making process involving the development and implementation of NPDES Permit related activities and programs.

### ***S5.C.3.a: Create Opportunities for the Public to Participate in the Development, Implementation, and Update of the City's SMAP and SWMP***

- Implementation of the City storm drain marker program utilizing Eagle Scout candidates and the public to install dump no waste curb markers adjacent to City storm drains.
- Install a staffed stormwater pollution prevention booth at Bonney Lake Days events and discuss the City stormwater pollution prevention public education materials with the community.
- The City's Stormwater webpage provides a general description of the Permit and displays the updated SWMP and the Annual Reports as they become available.
- Opportunities for public participation in the development of the SMAP was solicited from the public through the storymap, which included an interactive web map where public comments can be left and a project related survey can be submitted.

### ***S5.C.3.b: Post the SWMP Plan and Annual Report on the City's Website***

The Stormwater page on the City website displays the updated SWMP and the Annual Report. Opportunity for public comment and participation is made possible via email year-round.

## ***MS4 MAPPING & DOCUMENTATION***

The City of Bonney Lake works to maintain the most up to date and accurate maps possible with regard to the MS4. These maps assist with operations and maintenance of the stormwater system, private and public stormwater system inspections, IDDE source tracing and identification, and mitigating potential downstream impacts of stormwater pollution.

### ***S5.C.4.a: Maintain Ongoing Mapping Data***

In 2023, the City performed routine updates to the MS4 mapping for new development and redevelopment and corresponding as-builts. These efforts will be continued in 2024. Additionally, the Watershed Protection Plan will include basin boundaries and reviewed for possible adjustment and mapping updates.

### ***S5.C.4.b: Update Outfall Mapping & Complete Mapping of All Known Connections from the MS4 to Privately Owned Stormwater Systems***

Outfall inspections aimed at updating and improving map accuracy has been an ongoing effort. Inspection information is gathered and sent to the City GIS staff for inclusion in mapping updates. Any missing information on outfall size and material will be collected during the summer of 2024.

The City GIS-mapped all known connection points between the MS4 to privately owned stormwater systems. New, private stormwater infrastructure is updated in GIS on an ongoing basis, ensuring the most complete and up to date map at any given time. Mapping updates are requested when undocumented infrastructure is found through source control, IDDE, and private commercial site inspections. Additionally, any new development or construction that connects a private system to the public MS4 is mapped when the as-builts are submitted to GIS staff.

### ***S5.C.4.c: Utilize Electronic Format for Mapping***

The City has utilized GIS data and mapping since the early 2000's. The City continues to use ESRI ArcGIS and AutoDesk AutoCAD for electronic mapping.

In 2021, City staff completed documenting mapping standards, nomenclature, and processes to ensure fully described mapping standards were in place by the August 1, 2021 deadline.

### ***S5.C.4.d-e: Provide Mapping Information, Upon Request, to Ecology, Indian Tribes, Municipalities, and Other Permittees***

Mapping requests from the public, Ecology, Indian Tribes, Municipalities, and Other Permittees are met on an ongoing basis.



## ***ILLICIT DISCHARGE DETECTION & ELIMINATION***

The City of Bonney Lake maintains an ongoing Illicit Discharge Detection and Elimination (IDDE) program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

### ***S5.C.5.a: Include procedures for Identifying, Reporting, Correcting, and Removing Illicit Discharges and Illicit Connections in the IDDE program***

City staff continue to update the City's IDDE Field Procedures and Response Plan that outlines procedures for identifying, reporting, correcting, and removing illicit discharges and illicit connections. The plan is updated to include more consistent and timely enforcement measures to facilitate compliance and correct illicit discharges and corrections.

### ***S5.C.5.b: Inform Public Employees, Businesses, and the General Public about the Hazards Associated with Illicit Discharges and Improper Disposal of Waste***

City staff works to expand education and outreach efforts on various hazards associated with illicit discharges and improper disposal of waste. In 2024, staff will continue to review and revise these efforts, which include:

- Utilizing the updated IDDE Field Procedures and Response Plan for all applicable public employees to introduce them to the program and orient them with City procedures for investigating, identifying, enforcing, and eliminating illicit discharges and illicit connections;
- Increasing the volume of technical assistance letters that are issued as a result of IDDE and source control investigations where the potential for prohibited discharges exist. These letters will contain information about City code regarding prohibited discharges, City enforcement policies and procedures if prohibited discharges do occur, and information regarding operational and structural BMPs that can assist with prohibited discharge prevention;
- Placing educational stickers on dumpsters during routine source control site inspections that remind businesses and multi-family housing establishments to close their dumpster lids to avoid leachate and other prohibited discharges;
- Emphasizing the harmful effects of stormwater pollution when presenting to the general public at Bonney Lake Days booths and other local tabling events, and providing educational materials to citizens about residential BMPs, such as vehicle washing and proper pet waste disposal, and notifying them about City and County programs, such as the City's car wash kits and Pierce County's hazardous waste disposal resources;
- Educating participants in the City's Stream Team Program about the hazards of illicit discharges during training in the program.

Furthermore, an internal Public Works team will be working to engage the general public in understanding what work the Public Works division does in the community and also create more visible and accessible modes for citizens to report issues found within the City, including illicit discharges.

***S5.C.5.c: Implement an Ordinance or Other Enforceable Mechanism to Prohibit Illicit discharges into the City's MS4***

City ordinance 1330 prohibits non-stormwater discharges into the City's MS4 and Bonney Lake Municipal Code Chapter 15.13 lists prohibited, allowable, and conditional discharges into Bonney Lake waters and storm drainage systems. Examples of illicit discharges include trash, food wastes, construction materials, petroleum products, sewage, paint, pesticides, fertilizers, soap, and sediment. The City implements escalating enforcement procedures and actions pursuant to those outlined in the code.

***S5.C.5.d-e: Implement an Ongoing Program to Detect, Identify, and Address Illicit Discharges, Including Spills and Illicit Connections, into the City's MS4***

In 2023, the City met the Permit requirement for screening the stormwater system for illicit connections through video inspections, visual inspections of the open stormwater conveyance system and inlet structures, and visual inspections of stormwater facilities. This program is ongoing and in 2024 City staff will:

Continue to inspect private commercial stormwater systems that discharge into the City's MS4 to ensure maintenance complies with standards outlined in the Permit. In 2024, staff will emphasize source control best practices, operational and structural, to help commercial property owners better understand how to prevent prohibited discharges on a short and long-term basis. Staff will work to incorporate more feedback mechanisms from property owners and managers to ensure outreach methods and materials are accessible and effective and will use the collected data to update outreach efforts for commercial sites.

Continue to collect and analyze data on commercial site inspection results, enforcement actions, water quality violations, and compliance timelines to better perform commercial site and source control inspections.

In 2023, City staff continued to use the Eden data management and Cityworks programs to report illicit discharges and connections, track staff response logs, and document enforcement actions. Analysis of this information coupled with evaluation of enforcement actions and compliance timelines will allow City staff to better target outreach and technical assistance efforts to reduce common illicit discharges.

***S5.C.5.f: Provide IDDE Staff Training***

The City will continue providing training to all City of Bonney Lake field staff in the identification of illicit discharges and notification to appropriate authorities. Additionally, all maintenance personnel and inspectors are trained in spill response and first responder hazard awareness. City staff will continue to review field procedures for identifying, tracing, reporting, and documenting all reported illicit discharges.

**S5.C.5.g: *Track and Maintain Records of IDDE Program Activities***

In 2023, City staff continued utilizing management software systems to track and record all reported water quality violations and associated documents, including: photographs, site maps, correspondence, and final resolution. Commercial site inspections and source control inspections are tracked through Cityworks and active construction sites are tracked through the City's permitting system, Eden. In 2024, City staff will continue utilizing Cityworks for recordkeeping activities associated with IDDE investigations, private commercial site inspections, and source control inspections.

### ***CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, & CONSTRUCTION SITES***

Construction site runoff is a major contributor to water quality degradation in the greater Puget Sound region. To address this issue, the City adopted the current Pierce County Stormwater and Site Development Manual. Changes were also made to the Bonney Lake Development Policies and Public Works Design Standards to make Low Impact Development (LID) the preferred approach in site development.

#### ***S5.C.6.a-b: Implement an Ordinance or Other Enforceable Mechanism to Address Runoff from New Development, Redevelopment, and Construction Sites***

City of Bonney Lake Development Policies and Public Works Design Standards and the Pierce County Stormwater and Site Development Manual include minimum requirements for stormwater design and construction for the protection of water quality and the reduction of pollutant discharge.

#### ***S5.C.6.c: Apply a Permitting Process with Site Plan Review, Inspection, and Enforcement Capability for New Development, Redevelopment, and Construction Sites***

In 2024, the Public Services Department will continue to implement the City's permitting process, including civil/site plan review and approval for compliance with City of Bonney Lake standards. Public projects in the right-of-way that trigger local permits will be reviewed by internal stormwater staff. During construction, Public Services staff will continue to conduct site inspections to ensure implementation of proper temporary erosion and sediment control (TESC) BMPs. City inspectors have the authority to enforce TESC standards for both private and public projects in order to reduce pollutants in stormwater runoff to the MS4 and surface waters from new development, redevelopment, and construction site activities.

Public Services Department staff updated the City's development standards which includes a review of LID criteria. This review is part of the City's effort to utilize LID principles and LID BMPs and make it the preferred approach to site development. City staff will continue the ongoing revision process of the Development Standards to improve clarity and review potential updates to LID criteria.

The City has an ongoing program to verify that long term operation and maintenance (O&M) of post construction stormwater facilities and BMPs is implemented. The City requirements for maintenance standards are identified under the current Pierce County Stormwater and Site Development Manual Appendix I-A, Maintenance Checklists. In 2024, Public Works staff will continue post construction inspections prior to release of warranty bonds and will review post construction inspection procedures in conjunction with the Development Standards update. Furthermore, Public Works staff will work on implementing increased site assessment procedures that align with the updated Department of Ecology Standards for new development, redevelopment, and construction activities on plats, single family projects, and commercial sites.

#### ***S5.C.6.d: Provide Notice of Intent (NOI) for Proposed New Development and Redevelopment***

The City's program to control runoff from new development, redevelopment, and construction sites has linked the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for

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

***S5.C.6.e: Ensure Staff Training for Implementation of Runoff Control Program***

Plan reviewers are managed by a professional licensed engineer and all City staff responsible for approval and/or inspection of new development, redevelopment, and construction are certified erosion and sediment control leads (CESCL). City inspectors are also trained with material from the American Public Works Association and EXCAL Visual. In 2024, APWA and EXCAL Visual training will continue for new employees and to our existing team as an ongoing training program. Furthermore, management will also continue researching training opportunities for inspectors and field staff responsible for implementing the runoff control program.

## ***OPERATIONS & MAINTENANCE***

The City of Bonney Lake has an ongoing program to reduce stormwater impacts associated with maintenance and operations of City streets, facilities, and properties. The program applies to drainage infrastructure, which includes catch basins, pipes, open channels, and retention/detention facilities.

### ***S5.C.7.a: Implement Maintenance Standards***

In 2024, City of Bonney Lake staff will continue to implement maintenance standards as outlined in the adopted and current Pierce County Stormwater and Site Development manual. All inspection criteria utilized in stormwater system inspections are followed directly from this source.

### ***S5.C.7.b: Maintain Stormwater Facilities Regulated by the Permittee***

In 2024, City staff will continue inspecting stormwater treatment and flow control facilities regulated by the City, as required by the Permit. Facilities permitted by the City that discharge to the City's MS4 will be inspected to verify maintenance requirements.

### ***S5.C.7.c: Maintain Stormwater Facilities Owned or Operated by the Permittee***

- In 2024, City staff will continue inspecting known municipally owned and operated stormwater treatment and flow control facilities as required by the Permit. Control structures, retention/detention ponds, and bioswales are inspected and maintained annually. Maintenance records are documented for all stormwater infrastructure maintained in the MS4.
- City staff will continue to inspect facilities vulnerable to surface water related problems before, during, and after major storm events to ensure the systems are functioning properly, and to determine/conduct any maintenance or repair needs.
- The City of Bonney Lake will continue to inspect and clean when necessary catch basins owned by the City. In 2022, the City incorporated an annual assessment into the City's catch basin inspection program. Annual assessments will include a review of the City's circuit schedules, inspection results, and cleaning and maintenance records. Staff will use this assessment to adjust the City's circuits in order to comply with the requirements of an alternate inspection schedule under the current Permit cycle (2019-2024).
- The City will continue implementing an inspection program using mobile technology that provides accurate measuring and tracking of catch basin sediment levels and catch basin conditions. In 2024, field staff will continue working with GIS staff to record, update, and report catch basin inspection data.

### ***S5.C.7.d: Implement Practices, Policies, and Procedures to Reduce Stormwater Impacts Associated with Runoff from All City Owned or Maintained Lands, and City-Controlled Road Maintenance Activities***

City staff implemented new procedures and practices for managing the stormwater infrastructure maintenance program. Included in the updated program were changes in tracking and recording of

maintenance activities. In 2024, staff will continue updating the City's maintenance Standard Operating Procedures (SOPs) to form the City's Maintenance Manual.

Staff will also review Streets and Parks O&M SOPs for adherence to permit requirements for reduction of stormwater impacts associated with maintenance activities.

**S5.C.7.e: Ensure Staff Training for Operations and Maintenance Personnel**

City field staff are trained in IDDE and spill response procedures. In 2024, field staff responsible for construction operations, street maintenance, parks, and facilities maintenance will also receive training in construction BMPs and review of Stormwater Pollution Prevention Plan (SWPPP) and TESC requirements. Licensed maintenance personnel are also trained for pesticide / herbicide application and this program will continue in 2024.

**S5.C.7.f: Implement a Stormwater Pollution Prevention Plan for All Heavy Equipment, Maintenance, or Storage Yards, and Material Storage Facilities Owned or Operated by the Permittee**

In 2022, staff reviewed and updated the Stormwater Pollution Prevention Plan for the existing Public Works Center and storage yard facilities. This plan included a drainage map of the yard and material storage locations, and spreadsheets that document staff responsibilities, inspection results, spill events, staff training, and associated BMPs. Staff also developed a SWPPP for the new Public Works Center and corresponding heavy equipment, storage yard, and material storage in 2022.

In 2024, staff will work with the Parks Division to identify additional City-owned storage yards or facilities that may require SWPPPs, and will develop SWPPPs for these sites if necessary in accordance with Permit Section S5.C.7.f.

In 2024, staff will continue reviewing policies and procedures to ensure proper pollution management practices are consistently being implemented and documented, and will update the training materials provided to staff for the annual SWPPP training.

**S5.C.7.g: Maintain Records of Operations and Maintenance Program Activities**

In 2020, a review of records retention and data collection was continued as part of the updated procedures and practices for operation, maintenance, and repair. In 2024, staff will continue refining the implementation plan for digitizing all O&M and repair records as well as standardizing maintenance records procedures.

## ***SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT***

In recent years, staff has identified a growing need to include more preventative measures within the stormwater management program. One of the primary actions identified was to implement a source control inspection program within the Stormwater Division. This program will allow staff to better engage business owners in conversations about stormwater pollution, provide business-specific BMPs to prevent illicit discharges, and enforce illicit discharges if found during inspections.

### ***S5.C.8.a: Implement a Program to Prevent and Reduce Pollutants in Stormwater Runoff***

Staff identified a need to include more preventative actions within the stormwater management program. One of the primary ways identified was to implement a source control inspection program within the Stormwater Division. In 2022, staff completed an inventory and captured businesses that have a high potential for generating stormwater pollution. Staff also educated business owners and managers on the causes and harmful effects of stormwater pollution, what constitutes a water quality violation and how the City enforces such violations, and how operational and structural BMPs tailored to their business activities can assist with stormwater pollution prevention.

### ***S5.C.8.b.i: Adopt an Ordinance or Other Enforceable Documents Requiring Source Control BMPs***

In 2022, staff completed the planning and code review process to determine the most effective method for adopting an Ordinance or other enforceable documents requiring source control BMPs for existing sites. In 2023, a Source Control Ordinance was adopted and the requirement for source control BMPs was codified in Bonney Lake Municipal Code 15.13 Stormwater Management.

The City adopted an ordinance requiring the application of operational and structural source control best management practices (BMPs) associated with existing land uses and for pollution generating activities and sources identified in Appendix 8 of the NPDES Phase II Permit (Permit). The BMP requirements were met using the Pierce County Stormwater and Site Development Manual, and additional guidance was sourced from a variety of resources including Ecology, EPA, and the WA Stormwater Center.

### ***S5.C.8.b.ii: Establish an Inventory of Public and Private Sites with Potential to Pollute MS4***

Staff created an inventory of businesses with potential pollution-generating activities. The inventory includes information on the business name, business location, potential pollution sources, inspection history, and enforcement measures taken, if any. This inventory was updated to include automotive-related businesses, gas stations, and restaurants. Staff will continue to evaluate and revise the inventory as necessary to account for changes in land use and development. SIC codes for each business will be added to the inventory as outlined in Permit Appendix 8.

The City established an official program inventory through a comprehensive review of business sites with the potential to generate pollutants to the MS4. Businesses were identified based on the business types listed in Appendix 8 of the Permit, using the North American Industry Classification System (NAICS) major group numbers, using active business license, tax account, and reseller permits issued by the Department of Revenue. The City chose to include multi-family housing, an optional inclusion, in their 2023 inspection program based on director discretion. The total number of businesses identified in 2023 was 170, and the city identified a requirement to inspect 20%, or 34 sites annually.



**S5.C.8.b.iii.a-d: Implement an Inspection Program for Pollutant-Generating Sites**

In 2023, City Staff began conducting regular source control site inspections throughout the City, using the inventory for scheduling and as a recordkeeping document for inspections and completed the 20% business inventory inspection requirement by the permit deadline.

- a) The City created a Business Source Control Inspection Program story map accessible through the City's stormwater page to inform all residents of the new program, available at: <https://tinyurl.com/BLSCIP>. The City also mailed out welcome packets to the 34 sites that would receive inspections in 2023. Mailed materials included a welcome letter with QR codes linking the story map and a survey to schedule their site visit, fact sheets for BMPs applying to all sites, and Dumpster Outreach Program materials (including dumpster decals). For sites that did not schedule using the online survey, additional attempts were made to call and email sites the program welcome materials to ensure fairness.
- b) The City identified 34 required site visits for 2023. The City performed 37 site visits in 2023. It can be broken down as follows: 30 initial site inspections, 6 follow-up site compliance inspections, and 1 attempted inspection resulting in a denial of entry.
- c) The City received no source control complaints in 2023.
- d) The City was denied entry at one site in 2023, there did not appear to be any environmental threats that required escalation to Ecology occurring on the site at the time of attempted inspection.

**S5.C.8.b.iv.a-d: Implement a Progressive Enforcement Policy for Stormwater Compliance**

Following a source control inspection in which a potential water quality violation is observed, staff will issue a technical assistance letter to the business informing them about the potential violation, harmful effects of stormwater pollution, and BMPs they can implement to prevent illicit discharges from occurring. When an illicit discharge is found during a source control inspection, staff will issue a formal Notice of Water Quality Violation that contains similar information to the technical assistance letter, but also outlines required corrective actions to eliminate the discharge and a deadline by which to complete these actions. All of these enforcement actions are recorded in the source control inspection inventory.

- a) The City issued follow-up communications via email and performed follow-up inspections at sites requiring additional BMP implementation at the time of inspection.
- b) The City was able to resolve outstanding site deficiencies through ongoing communication with site operators and follow-up site inspections.
- c) Records of all site inspections and contact with operators have been maintained as part of program requirements. Records include PDF inspection form with photos for each site visit, and records of communications/contacts (mailed letters/emails).
- d) The City did not encounter any site conditions resulting in violations that required escalation to Ecology during the 2023 inspection process.

***S5.C.8.b.v: Ensure Staff Training for Source Control Program***

Staff that perform source control inspections were trained in the source control inspection program with an emphasis on inspection procedures, recordkeeping, and commercial-related BMP resources. Staff members involved with the source control program are also required to attend the Illicit Discharge Detection and Elimination training to ensure proper identification and notification of illicit discharges if found during source control inspections.

The City hired a consultant team to assist with the Source Control Inspection Training Program. A full day training course was held where all Source Control Program staff participated in a seminar and an inspection with the guidance of the consultant team. This training will be held as needed to integrate new program staff or to reflect changes to program procedures.

## ***MONITORING***

A collaborative monitoring program is paid for by Western Washington NPDES Permittees, administered by Ecology, and designed to monitor and evaluate the effectiveness of the best management practices specified in the Permit. The goal of the monitoring program is to provide an unbiased assessment of whether stormwater management actions are resulting in genuine progress towards regional water quality targets. In 2024, the City will continue to pay into the collective fund and support the implementation of the three components of the Regional Stormwater Monitoring Program:

- Status and trend monitoring studies to measure whether the health of lowland streams and shorelines in Puget Sound is improving or declining;
- Stormwater effectiveness studies to provide widely applicable information about what best management practices work, or don't work, and how to improve stormwater management; and
- Source Identification Information Repository designed to share information about source identification and elimination methods and identify opportunities for regional solutions to common illicit discharges and pollution problems.

***CONCLUSION***

Links to the 2024 Annual Report and SWMP update are posted on the City of Bonney Lake website at [https://www.ci.bonney-lake.wa.us/government/departments/public\\_services/public\\_works/stormwater](https://www.ci.bonney-lake.wa.us/government/departments/public_services/public_works/stormwater)

If at any time the City is unable to comply with the terms and conditions of the permit, staff must notify the Washington State Department of Ecology within 30 days of becoming aware that non-compliance has occurred. Written notification must include a description of the non-compliance issue and steps planned or taken to achieve compliance. The City remains in compliance with the Permit and is using all known, available, and reasonable methods of prevention, control, and treatment to prevent pollution into the surface waters of Washington State.