



City of Olympia

2020 Draft Stormwater Management Program Plan





City of Olympia

2020 Stormwater Management Program Plan (SWMP Plan)

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Introduction

Purpose of the Stormwater Management Program Plan (SWMP Plan)

All stormwater runoff flowing through Olympia's pipes, ponds, and ditches is managed according to the requirements of a permit first issued by the Washington State Department of Ecology (Ecology) in January of 2007. The *Western Washington Phase II Municipal Stormwater Permit; National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for discharges from Small Municipal Separate Storm Sewers in Western Washington* (Permit) requires the City to take actions such as; educating the public and encouraging non-polluting behaviors, responding to spills, looking for illegal dumping and cross-connections, enforcing erosion and sediment control at construction sites, and using best practices for land management and stormwater system maintenance.

This Stormwater Management Program Plan (SWMP Plan) is designed to reduce the discharge of pollutants from Olympia's regulated MS4 (municipal separate storm sewer system) to the maximum extent practicable, meet state AKART (all known and reasonable technologies) requirements, and protect water quality.

Implementation Timing

The City of Olympia currently operates under the 2019-2024 NPDES Permit. The permit was re-issued July 1, 2019 and became effective August 1, 2019. This is the third generation of the NPDES Permit.

Olympia Storm and Surface Water Utility - Other Activities

The Utility maintains over 157 miles of underground pipe, over 7,550 storm drains, and 50 stormwater ponds that carry stormwater runoff from roads and rooftops to our streams and Budd Inlet. We work on many levels to protect water quality, aquatic habitat, and prevent flooding. This involves working closely with residents, businesses and other government agencies to maintain a safe and healthy environment for people and wildlife.

Relationship to Other Plans

The Storm and Surface Water Utility is guided by the 2018 Storm and Surface Water Plan (Master Plan). The Master Plan was adopted on April 10, 2018 by the Olympia City Council. The Master Plan aligns with Olympia's Comprehensive Plan and focuses on the programs and policies of the Utility. This SWMP Plan represents a subset of the work performed by the Utility; specifically, those areas that are governed by the Permit.

The Permit as Document Map

This SWMP Plan generally follows section S5 of the Permit and is required to be updated each year. Planned activities will move to current activities when they are scheduled as work items for the upcoming calendar work year. The current activities listed are the City's ongoing, permit-related programs and practices.

The remainder of this document details the required elements of the SWMP Plan as noted in condition S5.C of the Permit and notes current and planned compliance activities.

Stormwater Planning

Permit Requirements

Permit section S5.C.1 Stormwater Planning is a new program requirement for the NPDES Permit. This program will inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

- Convene an interdisciplinary team to inform and assist in the development, progress and influence of this program.
- Prepare a report describing how stormwater management needs and protection and/or improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies.
- Continue to require LID Principles and LID BMPs when updating, revising and developing new local development-related codes, rules, standards, or other enforceable documents as needed.
- Conduct a *receiving water assessment* documenting and assessing existing information related to local receiving waters and contributing area conditions, to identify which receiving waters are most likely to benefit from stormwater management planning.
- Informed by the receiving water assessment, develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions (different than the existing new and redevelopment requirements S5.C.6)
- Develop a Stormwater Management Action Plan (SMAP) for at least one high-priority catchment area.

Current Activities

The NPDES Coordinator provided an update to the Public Works and Water Resources Leadership Teams in order to elevate the general importance of the NPDES Permit, as well as inform leadership about the new requirements of the stormwater planning program.

Planned Activities

Activities planned for the Stormwater Planning process for continued compliance with Permit section S5.C.1 are listed in Table 1 below.

Table 1 – 2020 Stormwater Planning

Action Item	Staff Involved	Schedule Notes
Create an interdisciplinary team to develop Stormwater Planning program.	Storm and Surface Water (SSW) Utility, CP&D Planning, Transportation, Parks Staff	Due no later than August 15, 2020
Report on water quality and watershed protection policies, strategies, codes to protect and improve local receiving water health in existing comprehensive plan.	SSW Utility, CP&D Planning Staff	Due no later than March 31, 2021
Report how water quality is being addressed, if at all, during this permit term in updates to the comprehensive plan.	SSW Utility, CP&D Planning Staff	Due no later than January 1, 2023
Continue to require LID principles and LID BMPs when updating, and developing new	SSW Utility, CP&D Planning Staff	Ongoing

Action Item	Staff Involved	Schedule Notes
local development-related codes, rules, standards, or other enforceable documents, as needed		
Develop a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas.	SSW Utility	Due no later than March 31, 2022
Develop and implement a receiving water prioritization method for stormwater retrofits.	SSW Utility, Transportation, Parks Staff	Due no later than June 30, 2022
Develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area.	SSW Utility, CP&D Planning Staff	Due no later than March 31, 2023

Public Education and Outreach

Permit Requirements

Permit section S5.C.2 outlines the required elements of a public education and outreach program. Specifically:

- To build general awareness, select one target audience and one subject area from a list of identified audiences within the permit.
- To affect behavior change, a minimum of one target audience and one BMP from those listed in the permit will be used to develop a community-based social marketing campaign and program evaluation plan.
- Create stewardship opportunities and encourage residents to participate in activities or events, such as: Stream Team, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- Summarize public education and outreach efforts annually and submit with an Annual Report.

Current Activities

The Olympia Storm and Surface Water Utility has a long-standing and robust public outreach and education program. Following are some of the current activities of our program:

- Contribute to the production of a quarterly Stream Team newsletter with regional distribution of over 10,450 copies annually. Approximately 2,325 copies are distributed in Olympia. Over 2,000 people receive this newsletter electronically.
- Feature stormwater-related messaging in the City's Utility Bill Insert, which is produced every two months. Articles include pet waste, car washing, keeping storm drains clear, natural lawn care, street sweeping and private stormwater facility maintenance.
- Distribute and install pet waste stations. Seven pet waste stations were installed in 2019. We also distributed 9,000 pet waste brochures to local veterinarians, pet supply stores, kennels, and joint animal services.
- Provide cost share incentives for the construction of rain gardens.
- Promote natural lawn care videos on TCTV, City of Olympia, and Stream Team websites. Sent quarterly natural lawn care tip emails to 211 residents in 2019.

- Continue to work with the local Jurisdictions, the Cities of Lacey and Tumwater and Thurston County, to produce regional education materials and campaigns. This programming is governed by an Interlocal government agreement (ILA) known as Regional Environmental Education Partnership (REEP).
- The Construction Stormwater Pollution Prevention (CSWPP) workgroup met regularly during 2019. This group developed an outreach plan, using social marketing strategies based on primary audience research conducted in 2018. We developed and produced the Temporary Erosion and Sediment Control Pocket Guide for distribution to construction professionals.
- Developed and distributed 750 of the 2020 Water Resources Stewardship Through Art calendars. This calendar raises awareness of stormwater pollution prevention and water conservation best practices. We identified 12 key messages to convey best practices, and invited Olympia middle school students to submit art depicting one of these messages. Artwork was selected and used for the calendar (one for each month of the year and accompany the key message depicted). Students and their families receive City Council recognition and a pizza party.

Planned Activities

The activities in Table 2 are planned for 2020, continuing Olympia's leadership and commitment to excellence in water quality programming.

Table 2 – 2020 Public Education and Outreach

Action Item	Target Audience	Goal and/or Behaviors Promoted
General awareness	General public or businesses	General impacts of stormwater on surface waters, low impact development (LID) principles and LID BMPs.
General awareness	Engineers, contractors, developers, or land use planners	Technical standards for stormwater site and erosion control plans, LID principles and LID BMPs, stormwater treatment and flow control BMPs/facilities.
Behavior change	Businesses	Use and storage of hazardous materials; prevention of illicit discharges; repair and maintenance BMPs for buildings, dumpsters and trash compactor maintenance; litter and debris prevention, and source control BMPs.
By February 1, 2021 develop a community based social marketing (CBSM) program	Businesses	Develop a strategy and schedule for a new target audience and BMP behavior change campaign.
By April 1, 2021 Implement the CBSM strategy	Businesses	Implement CBSM Strategy.
By March 31, 2024 submit report on CBSM strategy	Businesses	Evaluate and report on changes in understanding and adoption of targeted behaviors resulting from the implementation of the CBSM strategy, and any planned or recommended changes to the campaign in order to be more effective.

Action Item	Target Audience	Goal and/or Behaviors Promoted
Stewardship	Community	Provide and advertise opportunities which encourage residents to participate in Stream Team and Parks, Arts and Recreation Volunteer activities and events.

Public Involvement in SWMP Plan Development

Permit Requirements

The Permit (section S5.C.3) requires the following:

- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the SMAP and SWMP.
- Make the SWMP Plan and Annual Report available to the public, including on the City's website.

Current Activities

The most recent SWMP Plan is posted on the City's website, along with the most current Annual Permit Compliance Report.

Planned Activities

Activities planned for continued compliance with Permit section S5.C.3 are listed in Table 3 below.

Table 3 – 2020 Public Involvement in SWMP Plan Development

Action Item	Staff Involved	Schedule Notes
Present the 2020 SWMP Plan to the City's Utility Advisory Committee and provide opportunity for public comment.	SSW Utility	Scheduled for March 2020 Utility Advisory Committee meeting.
Post the 2020 SWMP Plan on the City's website.	SSW Utility	To be completed by May 31, 2020.
Update the SWMP Plan for 2021 planned activities.	SSW Utility, in coordination with other City staff	Begin December 2020.

Mapping and Documentation

Permit Requirements

The Permit (section S5.C.4) requires the City to include an ongoing program for mapping and documenting the MS4.

- Ongoing mapping requirements for:
 - Known MS4 outfalls and known MS4 discharge points.
 - Receiving waters, other than groundwater.
 - Stormwater treatment and flow control BMPs/facilities owned or operated by the City.
 - Geographic areas served by the MS4 that do not discharge stormwater to surface waters.

- Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems.
- Connections between adjacent jurisdictions.
- All connections to the MS4 authorized or allowed after February 16, 2007.
- New Mapping requirements:
 - Begin collecting size and material for all known MS4 outfalls during normal course of business (e.g. during field screening, inspections, or maintenance) and update records.
 - Complete mapping of all known connections from the MS4 to a privately-owned stormwater system.
 - Required format for mapping is electronic (e.g. Geographic Information System GIS, etc.) with fully described mapping standards.

Current Activities

Current mapping activities that are part of ongoing permit compliance include:

- Olympia maintains a GIS (geographic information systems) database of the MS4. Mapping of the public/private stormwater system continues. Standard procedures are in place for maintaining the GIS database to document new connections, changes/alterations to the existing system, and corrections based on field verification. Drainage areas and land use have been identified for outfalls 24" or greater in size. Maps are available to Ecology and other permittees (NPDES permitted jurisdictions) upon request.
- MS4 field screening is accomplished through multiple methodologies, including but not limited to video inspections, catch basin/manhole inspections, ditch inspections, and stormwater BMP (best management practices) inspections.

Planned Activities

Activities planned for continued compliance with Permit section S5.C.4 are listed in Table 4 below.

Table 4 – 2020 MS4 Mapping

Action Item	Staff Involved	Schedule Notes
Begin to collect size and material for all known MS4 outfalls during normal course of business and update records.	SSW Utility	Due no later than January 1, 2020
Complete mapping of all known connections from the MS4 to a privately owned stormwater systems.	SSW Utility	Due no later than August 1, 2023
Required format for mapping is electronic with fully described mapping standards.	SSW Utility	Due no later than August 1, 2021

Illicit Discharge Detection and Elimination (IDDE)

Permit Requirements

The Permit (section S5.C.5) requires the City to implement an ongoing program to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

- The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.
- Inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.
- Implement a regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the stormwater system to the maximum extent allowable under state and federal law. Include escalating enforcement procedures and actions.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the stormwater system.
- Implement a compliance strategy that includes informal compliance actions, as well as the enforcement provisions of the regulatory mechanism.
- Implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns.
 - Complete field screening for an average of 12% of the MS4 and track total percentage screened each year.
- Publicly list and publicize a hotline for public reporting of spills and other illicit discharges.
- Implement an ongoing training program for all municipal field staff who might come into contact with, or observe an illicit discharge.
- Implement an ongoing program to address illicit discharges into the MS4. Program elements should include:
 - Procedures for characterizing the nature of any illicit discharge. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.
 - Procedures for tracing the source of an illicit discharge.
 - Procedures for eliminating the discharge.
- Train staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges and illicit connections to conduct these activities. Conduct follow-up training as needed to address changes in procedures, techniques, requirements or staffing.
- In the Annual Report, submit data for the illicit discharges, spills and illicit connections including those that were found by reported to, or investigated during the previous calendar year.

Current Activities

Current illicit discharge detection and elimination (IDDE) activities that are part of ongoing permit compliance include:

- Olympia Municipal Code chapter 13.16 prohibits illicit discharges and provides for escalating enforcement.
- MS4 field screening is accomplished through multiple methodologies including but not limited to video inspections, catch basin/manhole inspections, ditch inspections, and stormwater BMP (best management practices) inspections.
- The City advertises a Spills Hotline (360-753-8333) to the public for reporting spills and illicit discharges. Records are kept of calls and emails received, and follow-up actions are taken by City staff to investigate and respond appropriately.

- The City condition-rated a total of 67,200 lineal feet (8%) of stormwater pipe in 2019, with 651,728 total linear feet (76%) of the stormwater pipe system rated by December 31, 2019.
- Basic spills identification and reporting training was developed in July 2017, and has been included as part of the City's new employee orientation training. All new hires to the City of Olympia are required to take this training.

Planned Activities

In addition to continuing the IDDE programs required previously by the Permit, the activities in Table 5 are planned for 2020.

Table 5 – 2019 Illicit Discharge Detection and Elimination

Action Item	Staff Involved	Schedule Notes
Continue to refine and implement the Illicit Discharge Detection and Elimination program.	SSW Utility	Ongoing
Continue to televise and condition-rate stormwater pipe.	SSW Utility	Approximately 50,000 lineal feet of pipe will be screened in 2020.
Required to field screen 12% of the MS4 each year.	SSW Utility	Total of 92% of MS4 screened.

Controlling Runoff from New Development, Redevelopment and Construction Sites

Permit Requirements

The Permit (section S5.C6) requires Olympia to implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment and construction sites. The program applies to private and public development, including transportation projects.

Specifically:

- Implement an ordinance that addresses runoff from new development, redevelopment and construction site projects.
- Adopt and make effective a local program, no later than June 30, 2022, that meets the requirements of Appendix 1 of the NPDES Permit and shall apply to all applications submitted:
 - On or after July 1, 2022
 - Prior to January 1, 2017, that have not started construction by January 1, 2022
 - Prior to July 1, 2022, that have not started construction by July 1, 2027.
- Include a permitting process with site plan review, inspection and enforcement capability that meets standards listed in the NPDES permit.
- Review all stormwater site plans for proposed development activities.
- Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review.
- Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls.
- Manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed.
- Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.

- Verify that a maintenance plan is completed and the responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities.
- Compliance with the inspection requirements shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term shall be determined by achieving at least 80% of required inspections.
- The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records.
- An enforcement strategy shall be implemented to respond to issues of non-compliance
- Require legal authority to inspect private stormwater facilities and enforce maintenance standards.
- Conduct post-construction inspections to ensure proper installation of stormwater system elements.
- Make available the “Notice of Intent for Construction Activity” to representatives of proposed new development and redevelopment. Continue to enforce local ordinances controlling runoff from sites that are covered by other stormwater permits issued by Ecology.
- Train 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. Conduct follow-up training as needed to address changes to procedures, techniques or staffing. Keep training records.

Current Activities

For many years, Olympia has had a program to control stormwater runoff from new development, redevelopment and construction sites. The following are some of Olympia’s ongoing program activities.

- The Drainage Design and Erosion Control Manual for Olympia is equivalent to the Department of Ecology’s 2012 Stormwater Management Manual for Western Washington.
- Community Planning and Development and Public Works departments coordinate a program to review development plans, inspect sites during construction, and to take enforcement action when necessary.
- Records of reviews, construction inspections, and enforcement actions are maintained by both Community Planning and Development and Public Works department staff.
- The Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity applications are available for project applicants on the City’s development applications online web portal SmartGov.
- Staff receive training on erosion control, LID techniques, and stormwater design, inspection and modeling on an ongoing basis as needed.
- Post-construction inspections of private stormwater systems are performed by storm and surface water staff, according to the Permit’s regulated timelines. Records of these inspections and maintenance compliance are maintained by storm and surface water staff.

Planned Activities

The activities listed in Table 6 below are planned for 2020 to continue our compliance with permit requirements.

Table 6 – 2020 Controlling Runoff from New Development, Redevelopment and Construction Sites

Action Item	Staff Involved	Schedule Notes
Continue to refine and implement Olympia's program to control runoff from new development, redevelopment and construction sites.	Community Planning & Development, SSW Utility, PW Engineering	Ongoing
Adopt a program that meets requirements of Appendix 1 in the NPDES Permit.	Community Planning & Development, SSW Utility, PW Engineering	Due no later than June 30, 2022

Operations and Maintenance

Permit Requirements

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

- Implement maintenance standards at least as protective as those specified in Volume V, Chapter 4 of the 2012 Stormwater Management Manual for Western Washington.
- Develop a maintenance standard for facilities which have none.
- For private stormwater facilities, implement an enforceable mechanism that clearly identifies the party responsible for maintenance in accordance with maintenance standards, requires inspection of facilities, and establishes enforcement procedures.
- Ensure at least 80% of required inspections are achieved for facilities permitted in accordance with requirements adopted pursuant to Ecology municipal stormwater permits (2007-present).
- Perform annual inspections of all municipally-owned or operated permanent stormwater treatment and flow control BMPs/facilities, and take appropriate maintenance actions in accordance with maintenance standards.
- Perform spot checks of potentially damaged, permanent stormwater treatment, and flow control BMPs/facilities after major storm events. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards, based on the results of the inspections.
- Inspect all catch basins and inlets owned or operated by the City every two years. Clean catch basins if the inspection indicates cleaning is needed, to comply with the maintenance standard. Properly dispose of decant water (water that has separated from sludge and is removed from the layer of water above the settled sludge).
- Implement and document practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, including road maintenance activities under functional control of the City.
- Implement an ongoing training program for employees whose primary construction, operations or maintenance job functions may impact stormwater quality.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned by the City.
- Ensure SWPPPs include:
 - A detailed description of the operational and structural BMPs in use at the facility, and a schedule for implementation of additional BMPs when needed.
 - Annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed.

- An inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to rain or runoff, which could result in stormwater pollution.
- A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.
- A plan for preventing and responding to spills at the facility which could result in an illicit discharge.
- Maintain records of inspections and maintenance or repair activities.

Current Activities

The following ongoing programs have been developed to comply with permit requirements.

- Publicly owned and operated stormwater treatment and flow control facilities are inspected annually. If an inspection identifies exceedance of an applicable maintenance standard, the timelines in S5.C.5.a.ii are followed.
- Catch basins are inspected and cleaned when the maintenance standard is exceeded, on a schedule that meets Permit requirements. Of the 7,554 known catch basins, over 4,054 (53%) were inspected and cleaned in 2019.
- Environmental Planning and O&M staff worked together to develop an abbreviated Erosion Control Plan to be used for ground-disturbing work when affecting more than 100 square feet of earth, and any saw cutting or ditching activities.
- Ongoing pollution prevention training is provided to municipal maintenance and operations field staff.
- SWPPPs have been developed and are continuously implemented at the Olympia Public Works Maintenance Center and Olympia Parks' Priest Point Park Maintenance facilities. Staff will review existing SWPPPs to determine whether updates are needed.
- Staff maintains a "hot spot" list of potentially vulnerable stormwater infrastructure. These sites are monitored during and after major storm events.

Planned Activities

Activities planned for 2020 in order to continue compliance with permit requirements are listed in Table 7 below.

Table 7 – 2020 Pollution Prevention and Operation and Maintenance for Municipal Operations

Action Item	Staff Involved	Schedule Notes
Continue to implement and refine pollution prevention and operation and maintenance activities and programs.	SSW Utility, O&M staff citywide	Ongoing
Develop maintenance standards for facilities which have none.	SSW Utility, O&M staff citywide	Due no later than June 30, 2022
Document practices, policies, and procedures to reduce stormwater impacts.	SSW Utility, O&M staff citywide, Transportation, Facilities	Due no later than December 31, 2022
Update site SWPPPs as necessary.	SSW Utility, Facilities, Fire, Waste ReSources	Due no later than December 31, 2022

Source Control Program for Existing Development

Permit Requirements

The Permit (section S5.C.8) requires the City to implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.

The program shall include:

- Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities or both, to pollution-generating sources associated with existing land uses and activities.
- Inspections of pollution-generating sources at publicly and privately-owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
- Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.
- No later than August 1, 2022, adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant-generating sources associated with existing land uses and activities.
 - Operational source control BMPs shall be required for all pollution-generating sources.
 - Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollution-generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls.
- Establish an inventory that identifies publicly and privately-owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4.
- Implement an inspection program for sites identified pursuant to S5.C.8.b.ii.
 - All identified sites with a business address will be provided information about activities that may generate pollutants and the source control requirements applicable to those activities.
 - The City will annually complete the number of inspections equal to 20% of the businesses and/or sites listed in the source control inventory to assess BMP effectiveness and compliance with source control requirements.
 - Inspect 100% of sites identified through credible complaints.
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- Train staff who are responsible for implementing the source control program to conduct these activities.

Current Activities

The following activities have been developed in order to meet permit requirements.

- Staff began working in early 2019 with other municipal stormwater agencies to develop and establish a Western Washington Workgroup identified as the Business Inspection Group (BIG). This group now has greater than 35 phase I and II municipalities participating. The group developed and conducted a survey of all phase I and some phase II municipalities with existing source control programs. A report compiling results is currently being finalized and is scheduled to be released sometime in late February or early March 2020.
- Olympia has an Integrated Pest Management (IPM) Plan that was developed by the Olympia Parks Department.

Planned Activities

Activities planned for 2020 in order to continue compliance with permit requirements are listed in Table 8 below.

Table 8 – 2020 Source Control Program for Existing Development

Action Item	Staff Involved	Schedule Notes
Adopt and make effective an ordinance(s) or other enforceable documents.	SSW Utility, Community Planning & Development	Due no later than August 1, 2022
Establish an inventory of publicly and privately-owned businesses.	SSW Utility, Community Planning & Development	Due no later than August 1, 2022
Implement an inspection program for identified sites.	SSW Utility	Due no later than January 1, 2023
Implement a progressive enforcement policy.	SSW Utility, Community Planning & Development	Due no later than January 1, 2023

Coordination

Permit Requirements

Permit section S5.A.5 requires that there is coordination between permittees, as well as within departments within the City, in order to eliminate barriers to compliance with the terms of the Permit.

- Develop coordination mechanisms to clarify roles and responsibilities for the control of pollutants between physically interconnected MS4s.
- Coordinate stormwater management activities for shared water bodies among permittees to avoid conflicting plans, policies and regulations.
- Develop a written description of internal coordination mechanisms among departments, to eliminate barriers to compliance with permit terms.

Current Activities

Listed below are ongoing coordination activities:

- Public Works Water Resources performs a lead role in coordinating Permit and municipal stormwater-related activities among City departments. Most departments in the City are affected in some way by Permit requirements.
- Olympia staff participate in a regional Stormwater Technical Advisory Committee (StormTAC) that includes staff from the other Phase II Permittee jurisdictions (Lacey, Tumwater, and Thurston County), as well as both local Phase II Secondary Permittees (Port of Olympia, Washington State Department of Enterprise Services (DES)) and LOTT wastewater alliance. StormTAC meets bi-monthly and discusses stormwater topics related to the Phase II Permit, as well as other watershed planning projects and studies. Participating jurisdictions rotate the responsibility of hosting these meetings on a yearly basis. The City of Olympia coordinated this effort from 2016 – 2018. The City of Lacey is currently hosting these meetings.

Planned Activities

Coordination activities planned for 2020 are listed in Table 6 below.

Table 9 – 2020 Coordination

Action Item	Staff Involved	Schedule Notes
Continue to implement current coordination activities.	City staff, staff from adjacent Phase II Permit jurisdictions, LOTT	Ongoing
Continue to convene StormTAC meetings with neighboring jurisdictions.	City staff, staff from adjacent Phase II Permit jurisdictions, secondary permittees, LOTT	Ongoing Bi-monthly meetings
Written description of internal coordination mechanisms.	SSW Utility	Due no later than March 31, 2021

Compliance with Total Maximum Daily Load (TMDL) Requirements

Permit Requirements

Olympia has additional requirements that stem from the Henderson Inlet Watershed and Deschutes River, Percival Creek and Budd Inlet Tributaries TMDLs (Appendix 2).

- For areas discharging to Henderson Inlet via the MS4, require phosphorus control for new and redevelopment projects that discharge via MS4 to Woodard Creek and meet the project thresholds in Appendix 1.
- Revise the City's coordinated plan with the City of Lacey to monitor and reduce fecal coliform bacteria discharges from the Fones/Taylor wetland treatment facilities.
 - Submit a revised program plan to Ecology that includes a timeline for implementation, sampling frequencies, and identifies, at the minimum, who will be responsible for sampling, investigations and enforcement.
 - If sampling results indicate potential illicit discharge, conduct an investigation in accordance with S5.C.5 of the Permit.
 - Submit a summary of the coordinated efforts with sampling, investigation and enforcement actions taken with each annual report.
- In all areas regulated under the City of Olympia's municipal stormwater permit and discharging to water bodies listed within the specific requirement on the TMDL section, annually report on temperature reduction measures in the watershed.

Current Activities

Current activities for the Henderson and Deschutes TMDL:

- Development and redevelopment projects that are located within city limits and discharge via MS4 to Woodard Creek and meet the project thresholds in Appendix 1 are required to include phosphorus control in the stormwater design of their project.
- Staff revised the coordinated sampling plan with City of Lacey and submitted the update on January 2, 2020.

- Annually report on temperature-reduction measures in the Deschutes River watershed where TMDL requirements apply.

Planned Activities

In 2020, the following additional Henderson TMDL related activities are planned and listed in Table 10 below.

Table 10 – 2020 Total Maximum Daily Load

Action Item	Staff Involved	Schedule Notes
Draft updated Coordinated Sampling Plan with City of Lacey	City of Lacey, SSW Utility	Complete updated plan by December 31, 2019
Draft summary of coordinated sampling activities for annual report	SSW Utility	Attach summary to annual report each year
Annually report on temperature reduction measures in Deschutes River watershed where TMDL requirements apply	SSW Utility	Attach summary to annual report each year

Monitoring and Assessment

Permit Requirements

Section S8 of the Permit outlines requirements for monitoring and assessment.

- Notify Ecology in writing which option selected to meet monitoring requirements. The options available are to make annual payments into a collective fund to implement regional receiving water status and trends monitoring and effectiveness and source identification studies, or develop a monitoring program for the City consistent with permit section S8.C.1.a-d.
- Provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects. Requests will be limited to records of SWMP activities and associated data tracked and/or maintained in accordance with reporting requirements.

Current Activities

Current activities to meet monitoring and assessment needs include:

- Stormwater Action Monitoring (SAM) is a collaboration of municipal stormwater permittees working together as a group to improve stormwater management, reduce pollution, improve water quality and reduce flooding. The City of Olympia meets Permit requirements by funding SAM in the areas of status and trends monitoring, effectiveness studies and source identification monitoring.
- The City submitted notification to Ecology acknowledging the decision to make payments into the collective fund for both status and trends monitoring and effectiveness and source identification studies.
- Other stormwater monitoring or studies will be undertaken periodically in association with TMDL requirements and as otherwise needed.

Planned Activities

Table 11 below lists the monitoring or assessment activities planned for 2020.

Table 11 – 2020 Monitoring and Assessment

Action Item	Staff Involved	Schedule Notes
Continue funding SAM for Puget Sound monitoring activities.	SSW Utility	Annual payment of \$23,670 is due annually, on August 15 th .
Contract with Thurston County Environmental Health Department to conduct monthly sampling on Percival, Chambers, and Moxlie Creeks.	SSW Utility and Thurston County Environmental Health	Not required by the Permit, but sampling of local creeks has been an ongoing activity of the SSW Utility for over a decade.
Provide information as requested for effectiveness and source identification studies.	SSW Utility	A maximum of three requests during the permit term from SAM coordinator. 90 days to provide requested information.

Glossary

AKART means all known, available, and reasonable methods of prevention, control and treatment. See also State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

All known, available and reasonable methods of prevention, control and treatment refers to the State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

Best Management Practices are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by Ecology that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

BMP means Best Management Practice.

IDDE means Illicit Discharge Detection and Elimination

Illicit discharge means any discharge to a MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3).

Illicit Discharge Detection and Elimination is an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

Maximum Extent Practicable refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: "Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants."

MEP means Maximum Extent Practicable.

MS4 means municipal separate storm sewer system.

Municipal Separate Storm Sewer System means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains):

- (i) Owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of Washington State.
- (ii) Designed or used for collecting or conveying stormwater.
- (iii) Which is not a combined sewer;
- (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.; and
- (v) Which is defined as "large" or "medium" or "small" or otherwise designated by Ecology pursuant to 40 CFR 122.26.

Stormwater Management Action Plan is the document required by Ecology to assess and complete a receiving water assessment and prioritization of at least one priority catchment area located within the City's jurisdiction.

Stormwater Management Program means a set of actions and activities designed to reduce the discharge of pollutants from the MS4 to the MEP and to protect water quality, and comprising the components listed in S5 (for cities, towns, and counties) or S6 (for Secondary Permittees) of this Permit and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 *Compliance with TMDL Requirements*, and S8 *Monitoring and Assessment*.

SWMP means Stormwater Management Program.

TMDL means Total Maximum Daily Load.

Total Maximum Daily Load means a water cleanup plan. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the water body can be used for the purposes the state has designated. The calculation must also account for seasonable variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each water body, for example, drinking water supply, contact recreation (swimming), and aquatic life support (fishing), and the scientific criteria to support that use. The Clean Water Act, section 303, establishes the water quality standards and TMDL programs.