City of Sammamish
NPDES PHASE II
Stormwater Management Program Plan
March 2023

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Introduction

The Purpose of the Stormwater Management Program Plan

This document constitutes the City of Sammamish 2023 Stormwater Management Program (SWMP) Plan as required to be annually updated under condition S5.A.2 of the *Western Washington Phase II Municipal Stormwater Permit (the Permit)*, which is part of the *Federal Clean Water Act* and to document the City's actions to protect the Underground Injection Control (UIC) facilities in accordance with the UIC Program, which is authorized under the *Federal Safe Drinking Water* Act. The purpose of the document is to detail actions that the City of Sammamish (City) proposes to take between January 1, 2023, and December 31, 2023, to maintain compliance with conditions in the Permit.

The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes and streams so they can support "beneficial uses" such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface waters regulated by the Federal Government (Waters of the US) must obtain permits and comply with certain conditions or face fines and other penalties. NPDES permits have been written for discharges from construction sites, concentrated animal feeding operations, industrial activities, publicly owned wastewater treatment plants, and municipal stormwater systems.

In Washington State, the US Environmental Protection Agency has delegated the authority over NPDES permits to the Washington State Department of Ecology (Ecology). Ecology has issued several general permits for discharges from stormwater systems that apply to municipalities with different sizes of populations, locations, and different regions of the State (Eastern and Western Washington). Phase I refers to municipalities with a population of greater than 100,000, and Phase II to those with a population of less than 100,000 according to the 1990 census.

The Western Washington Phase II Municipal Stormwater Permit

Sammamish has been identified as a Phase II municipal stormwater permittee and therefore must establish a stormwater program that complies with conditions in the Western Washington Phase II Municipal Stormwater Permit. The Permit allows municipalities to discharge stormwater from systems it owns and operates into "waters of the state" such as rivers, lakes, streams, and ground water as long as they implement programs to reduce pollutants in stormwater to the "maximum extent practicable." To do this, permittees must conduct programs and activities in the following program areas:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- Stormwater System (MS4) Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Municipal Operations and Maintenance

» Source Control for Existing Development

» Stormwater Action Monitoring

Department of Ecology Publication 21-10-024[1] describes how Phase II permittees can comply with UIC Program requirements. Sammamish will not develop a Stormwater Site Plan (SSP) or stand-alone SWMP plan for UIC's. Instead, as allowed by Ecology, the City will incorporate UIC elements into this SWMP Plan. Specifically, this version of the SWMP Plan also documents the City actions to protect UIC facilities it owns or operates in accordance with the UIC Program. UICs offer another approach to stormwater management and like the other components of the City's stormwater system, benefit from careful design, construction, and management. UIC Program requirements for City owned UICs can be met, substantially, by applying relevant SWMP actions.

The SWMP Plan must be prepared and submitted annually and must contain the planned actions and activities that will be used in the reporting year to maintain compliance with the Permit. In addition, the Permit requires the City to submit an Annual Compliance Report by March 31st of each year that details actions taken in the previous year to achieve compliance. The full text of the Permit can be viewed at:

https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater

Due to a website redesign slated for late 2022 all of the Sammamish web links in this document may be broken. All items can be searched by using the search tool on the main page of https://www.sammamish.us/

Permit History and Implementation

The original Western WA Phase II Permit was valid for five years, from February 17, 2007, to February 15, 2012, and allowed for phased implementation of stormwater management programs and actions. In 2012, Ecology reissued this Permit and extended the schedule to July 31, 2013, with no new permit conditions.

The second Permit became effective on August 1, 2012, and was modified on January 16, 2015. It was originally effective until July 31, 2018, and was extended until July 31, 2019. It required continued compliance with the substantial conditions of the previous Permit. It also allowed for phased implementation of new requirements over the permit cycle.

The current Permit became effective on August 1, 2019, and is set to expire July 31, 2024. As with past Permits, it requires continued compliance with the established substantial conditions and allows for phased implementation of new requirements. The table on page 6 provides an overall schedule timeline including implementation due dates. Sammamish continues to be in position to meet these deadlines and maintain full Permit compliance.

Current and Planned Activities

The SWMP Plan describes a set of actions and activities implemented to maintain permit compliance. The Plan is organized to address the program components noted in Condition S5.C of the Permit.

[1] *Underground Injection Control ((UIC) Stormwater Management Program (SWMP) Components*, Washington State Department of Ecology, June 2021.

The following sections of the SWMP Plan describe how Sammamish is currently meeting the requirements of the Permit, and how the City plans to continue to meet those requirements in 2023.

Sammamish does not currently operate their stormwater system in a location where a Total Maximum Daily Load (TMDL) Plan has been approved, thus TMDL (S7) compliance requirements have not been included in this plan.

Coordination and Responsibilities

Compliance with the Permit requires coordination and documentation of activities in several City departments. The Public Works Department Stormwater Division will coordinate City efforts and will meet with staff from other departments regularly to verify that current and planned activities meet Permit requirements. Activities required for Permit compliance will be carried out by the Public Works, Information Technology/GIS, Community Development, Parks and Recreation, City Manager's Office, and Finance Departments.

The Surface Water Management Utility - Other Activities

This SWMP Plan details actions and activities that fall under the purview of the Permit. Stormwater management is one part of the City's overall surface water management strategy as coordinated by the Surface Water Utility.

The Surface Water Utility conducts a suite of related programs that reduce flooding, protect, and improve water quality, and protect and restore aquatic habitat in the City's streams and lakes.

Sammamish's *Storm and Surface Water Comprehensive Plan* (Stormwater Comp Plan) was last updated in 2016 and is planned to be updated beginning in 2024. The Stormwater Comp Plan sets program goals, objectives, actions, and describes how the City manages storm and surface water runoff. The Stormwater Comp Plan also sets the framework for future budgeting by assessing existing conditions and forecasting future needs. The last update included extensive public involvement in the form of open houses, mailings, and web information. It is anticipated that the upcoming update will also include extensive public involvement.

For details on *Storm and Surface Water Comprehensive Plan* not addressed in this SWMP Plan, contact the Public Works Department at (425) 295-0500, or visit the City website here. At the time of this writing, the City's website is undergoing a redesign. If the above link is broken, a search on the City's main page for *Storm and Surface Water Comprehensive Plan* will direct you to the new link.

Permit Deadlines

Permit Section		Year (by Qtr)	2019		2020				2021				2022				2023				2024	
	Requirements	Deadline	3	4	*1*	*2*	*3*	*4*	*1*	*2*	*3*	*4*	*1*	*2*	*3*	*4*	*1*	*2*	*3*	*4*	*1*	*2*
S5.A.	**Stormwater Management Program Plan**																					
	Update SWMP Annually	March 31st			X				X				X				X				X	
	Continue to track SWMP costs	ongoing																				
S5.C.1.	**Stormwater Planning**																					
	Convene inter-disciplinary team	8/1/2020					X															
	Respond to Stormwater Annual Report questions for 2013-2019 permit cycle	3/31/2021							X													
	Respond to Stormwater Annual Report questions for current permit cycle	1/1/2023															X					
	Assess barriers to LID implementation	annually																				
	Complete Receiving Water Assessment	3/31/2022											X									
	Complete Receiving Water Prioritization	6/30/2022												X								
	Develop Stormwater Management Action Plan	3/31/2023															X					
S5.C.2.	**Public Education and Outreach**																					
	Continue education and outreach program	ongoing																				
	Evaluate existing program or adopt new program	7/1/2020					X															
	Evaluate program and use resulting measures to make changes to increase effectiveness	3/31/2024																			X	
	Create or partner with existing organizations to create stewardship opportunities	ongoing																				
S5.C.3	**Public Involvement and Participation**																					
	Ongoing public participation in SWMP development, post annual report and SWMP on Sammamish website (May 31st)	Annually post by May 31st				X				X				X				X				X
S5.C.4	**MS4 Mapping and Documentation**																					
	Continue GIS-based mapping program. Collect additional data of outfall size and material (1/1/2020) and connections from MS4 to private systems. (8/1/2023)	ongoing																				
S5.C.5	**Illicit Discharge Detection and Elimination (IDDE)**																					
	Continue implementing the enforceable mechanism to prohibit illicit discharges	ongoing																				
	Respond to spills and illicit connections into the MS4	ongoing																				
	Continue municipal staff training, IDDE response, and citizen reporting hotline	ongoing																				
S5.C.6.	**Control Runoff from New Development, Redevelopment, and Construction Sites**																					
	Continue program addressing construction and post construction runoff controls	ongoing																				
	Continue plan review, inspection, and enforcement of standards for new and redevelopment	ongoing																				
	Adopt and implement revised stormwater development codes to reduce impervious surface, protect vegetation, and minimize stormwater runoff	6/30/2022												X								
S5.C.7	**Municipal Pollution Prevention, Operation, & Maintenance**																					
	Continue to annually inspect all SW treatment and flow control BMPs/facilities; Inspect and, if needed, clean all catch basins every 2 years	ongoing																				

Permit Section	Year (by Qtr)	2019		2020				2021				2022				2023				2024	
	Requirements	**Deadline**	**3**	**4**	***1***	***2***	***3***	***4***	***1***	***2***	***3***	***4***	***1***	***2***	***3***	***4***	***1***	***2***	***3***	***4***	***1***	***2***
	Update maintenance standards	6/30/2022												X								
	Document policies, procedures, and practices that reduce stormwater impacts from municipal lands	12/31/2022														X						
S5.C.8	**Source Control for Existing Development**																					
	Adopt and implement code that requires pollution prevention source control BMPs for pollution generating activities/lands	8/1/2022													X							
	Establish inventory of sites that have the potential to generate pollutants to the stormwater system	8/1/2022													X							
	Implement inspection program of these sites; Provide inspections equal to 20% of sites annually	1/1/2023															X					
	Implement progressive enforcement policy to require sites to comply	1/1/2023															X					
S8	**Monitoring and Assessment**																					
	Participate in and pay annually into Regional Monitoring efforts	Pay annually by August 15th	X				X				X				X				X			
S9	**Reporting**																					
	Submit 2019 Annual Compliance Report	3/31/2020			X																	
	Submit 2020 Annual Compliance Report	3/31/2021							X													
	Submit 2021 Annual Compliance Report	3/31/2022											X									
	Submit 2022 Annual Compliance Report	3/31/2023															X					
	Submit 2023 Annual Compliance Report	3/31/2024																			X	

Stormwater Planning

Stormwater Planning is a new section of the Permit (Section S5.C.1) that requires Sammamish to enhance its existing stormwater planning efforts and is designed to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. Receiving waters are defined as the natural or reconstructed naturally occurring surface water bodies, such as creeks, streams, rivers, wetlands, or groundwater to which stormwater flows.

Sammamish has operated its stormwater system since incorporation in 1999. This is done through best available science, regulatory/permit requirements, staff expertise, and citizen input to direct the work of the City with regards to storm and surface water management.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Interdisciplinary Team**: Sammamish has formed an inter-disciplinary team to inform and assist in the development, progress, and influence of the Stormwater Planning Program. This team meets quarterly and is comprised of members from the Planning Department, Transportation Division, and Stormwater Staff. Members may vary based on current tasks of the team.
- **Coordination with Long-Range Planning**: Sammamish exhibits strong internal coordination for long-range plan updates. The City will describe how stormwater management needs and protection/improvement of receiving water health are informing the planning update processes and influencing policies and implementation strategies through a series of annual report questions. The initial responses were due on March 31, 2021, for the timeframe of the 2013-2019 Permit and again on January 1, 2023, for the current 2019-2024 permit cycle.
- **Low Impact Development**: Sammamish continues to implement Low Impact Development (LID) code. LID shall remain the preferred and commonly used approach to site development as local development-related codes, rules, standards, and other enforceable documents are updated and revised. See our Low Impact Development website for more details. Due to an upcoming website redesign, if the following link does not work, please use the search bar on the City's main page using *Green Infrastructure & Low Impact Development (LID)*.
  https://www.sammamish.us/government/departments/public-works/storm-and-surface-water-management-program/green-infrastructure-low-impact-development-lid/
    - Sammamish staff will continue to assess and document any newly identified administrative or regulatory barriers to implementation of LID principles or LID BMPs and the measures developed to address the barriers.
- **Stormwater Management Action Planning**: Sammamish started the process of Stormwater Management Action Planning (SMAP) in 2020 by beginning work on the *City of Sammamish Retrofit Strategy and Guidance Manual*. This was adopted by City Council in the fourth quarter of 2021. Through the Retrofit Strategy, the City completed the first two steps of the process – assessment and prioritization of water bodies. The City plans to complete the final step of developing a Management Action Plan by March 15, 2023. Sammamish intends to complete this series of tasks with a combination of staff time and in partnership with a contracted consultant. As Sammamish continues to progress through the Management Action Plan, the City has and will continue to engage with community organizations and other entities in the plan development process. See below for a description of each activity.
    - **Assess receiving water bodies**. The City completed a watershed inventory which included a brief description of the relative conditions of the receiving water and contributing areas. The assessment was established consistent with Ecology guidance, *Building Cities in the Rain*

watershed prioritization guidance. The levels of importance and levels of degradation were the factors used in the prioritization matrix. The City used existing data from multiple sources including, but not limited to, Sammamish GIS system, Ecology 303(d) list, Washington State Department of Fish and Wildlife (WDFW) SalmonScape database, King County water quality monitoring data, and other historic and current data regarding Sammamish watersheds. The assessment is included with detailed descriptions in the City's Stormwater Retrofit Strategy.

- **Prioritize receiving water bodies**. The City developed and implemented a prioritization method and process to determine which receiving water bodies will receive the most benefit from implementation of stormwater retrofits, tailored implementation of SWMP actions, and other land/development management actions. The actions are designed to conserve, protect, or restore receiving water through stormwater and land management strategies that act as water quality management tools, reduce pollutant loading, and address hydrologic impacts from existing development as well as planned for and expected future buildout conditions. The results of the prioritization are included in the City's Stormwater Retrofit Strategy.
- **Create a Stormwater Management Action Plan (SMAP**). Using the background developed in the assessment and prioritization process, the City considered different high-priority catchment areas. Catchments are sub-areas within the different basins identified through the receiving water assessment. The City identified a high-priority catchment within the Laughing Jacobs drainage basin. Consultants are supporting City staff in finalizing retrofit opportunities and other strategies that can be applied within the high-priority catchment to improve water quality. The plan will propose an implementation schedule, identify budget sources, and provide a framework to assess the broader planning and implementation process. The plan is due March 31, 2023.

- **Record Keeping**: Sammamish will continue to track and maintain records of stormwater planning activities and summarize these activities in the Annual Compliance Report.

- **Departments Engaged**: Public Works, Community Development, City Manager's Office, and Communications

***Post COVID-19 Considerations for 2023*:** Public engagement process for this plan in 2023 will use a hybrid approach both virtual and in the live allowing for increased opportunity for more people to engage in the decision-making process by eliminating the barrier of travel.

Public Education and Outreach

Sammamish provides and participates in a variety of stormwater education and outreach programs designed to build general awareness, reduce, or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts, and encourage the public to participate in stewardship activities.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Regional Participation**: Sammamish is an active participant and leader in regional education and outreach groups. Staff will continue to coordinate with other permittees in Western Washington through participation in the Stormwater Outreach for Regional Municipalities (STORM) and the North King County Stormwater Outreach Group (the SOGgies).
    - Sammamish participates in STORM's awareness campaign, Puget Sound Starts Here.
    - Sammamish is continuing to participate in implementation and evaluation of a behavior change campaign around dumpster management.
- **General Awareness Programs**: Sammamish will continue to provide general awareness education and outreach programs for a variety of target audiences, including program considerations for overburdened communities. Sammamish incorporates behavior change principles in its general awareness programs in order to promote not just education, but a change in behavior. Examples of programs include:
    - The City, in conjunction with King Conservation District, has, for an eighth year, implemented a learning program to educate school aged children in Sammamish. *Healthy Watershed, Healthy World* will be modified, adjusted, and implemented again in the 2023-24 school year.
    - The City plans to contract with Aspect Consulting to increase awareness and understanding of stormwater management among business owners, managers and employees and encourage businesses to practice pollution prevention and best management practices. This program reaches approximately 20 businesses annually and will run from June 2022 to June 2023.
    - The City has five interpretive watershed signs displayed. They are contracted to stay in place through 2024. The signs are titled "Our Urban Watershed" and are located at high traffic areas in five parks in Sammamish and explore the watershed we live in.
    - Pet waste stations and educational signage throughout the city at parks and other locations. The City will supply these stations with dog waste bags.
    - Storm Bandit and Engineering Records Vault are online mapping tools for property owners to explore and discover the LID facilities built on their properties and resources for maintenance support.
    - The City has contracted with AHBL to develop educational brochures to help property owners understand stormwater requirements for development.
    - General awareness promotion through a variety of media including neighborhood mailers, e-newsletter, social media, and Connect Sammamish *Help Keep our Waters Clean* interactive web page.
    - Continue to look for opportunities to translate outreach materials into the top languages spoken in Sammamish. Examples of translation services: Sammamish's new website redesign will have a translation service for non-English speaking audiences.

- Updates to our website "Help Keep Stormwater Clean," which offers helpful information and activities to prevent pollution in our stormwater. Due to website redesign, this link may not work. https://www.sammamish.us/government/departments/public-works/storm-and-surface-water-management-program/help-keep-stormwater-clean/

- **Behavior Change Campaign**: Based on the results of the evaluation completed in 2019 and 2020, Sammamish is implementing a new behavior change campaign for the 2019-2024 Permit cycle.
  - Dumpster management: Sammamish is actively engaging in the regional planning effort around the Dumpster Management Behavior Change Campaign. To date, staff have actively engaged in the development of the campaign by participating in the working group, attending the Dumpster Summit, soliciting responses to a barriers assessment survey, collecting and analyzing the data from regional responses, and supporting the development of the strategy and schedule for the campaign. The strategy and schedule were finalized February 1, 2021. The City conducted a pilot campaign in April 2021 that was completed in October 2021. Data evaluation from the pilot was evaluated and utilized for broadscale implementation. The program began broadly in the summer of 2022 with plans to compile and document campaign effectiveness data for reporting in 2024.
- **Stewardship Opportunities**: Sammamish will continue to provide stewardship opportunities for community members through various programs.
  - Storm drain marking: Volunteers mark neighborhood storm drains with labels stating, "Puget Sound Starts Here – Only Rain Down the Drain." The purpose of these markers is to raise awareness regarding connection between our neighborhoods and local water bodies.
  - In October 2021 the City launched a new Adopt-a-Drain Program with seven other jurisdictions across the Puget Sound. To date the region has 13 jurisdictions currently involved. This program is under contract through 2024. See www.adopt-a-drain.org/wa.
  - Ongoing opportunities to volunteer in wetland and riparian restoration activities. There are typically 5 to 10 planting events organized through the Volunteer Coordinator in the Parks and Recreation department.
  - Sammamish Stewards: Volunteers sponsor the "Adopt-a-Stormwater Pond" project to encourage planting of native species around stormwater facilities where appropriate and allowable. Typically, one new location is selected annually, currently six locations are ongoing and maintained. In 2023 the program is anticipated to continue. The program is located here: https://www.sammamish.us/government/departments/public-works/storm-and-surface-water-management-program/help-keep-stormwater-clean/
  - https://www.sammamish.us/community-involvement/volunteer/stewardship-programs/.
- **Record Keeping**: Sammamish will continue to track and maintain records of public education and outreach activities and summarize these activities in the Annual Compliance Report.
- **Departments Engaged**: Public Works, Parks and Recreation, City Manager's Office, and Communications

Public Involvement

Sammamish is committed to providing ongoing opportunities for the public, including overburdened communities, to provide input into the development of this annual plan and into other initiatives and plans designed to improve water quality.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Opportunities for Public Input**: The City welcomes comments from the public throughout the year.
  - Community feedback —The City encourages public comment in the development and implementation of the City's SWMP. The process to obtain feedback continues at public meetings concerning NPDES Phase II requirements and through email, in writing, or by phone. The latest program document and annual report are posted on the City's website.
  - Water Quality Monitoring and Basin Planning – The City has developed and will continue to develop web pages to share and receive information as well as give feedback on these strategies. The City also uses social media platforms to receive input on plans, projects, and stormwater management.
  - Sammamish also seeks to involve the public in other stormwater management and clean water related decisions by engaging the public during the planning and construction of stormwater infrastructure projects, the ditch and drainage maintenance program, and through the in-process stormwater management action planning effort.

- **Accessibility**: Sammamish is currently updating and redesigning the City's website. The redesign is anticipated to launch in the first quarter of 2023. New features will include a more intuitive and visual based experience, as well as a translating service. Computers are available at City Hall for customer service.

- **Transparency**: Sammamish posts their annual Stormwater Management Program Plan and Annual Compliance Reports to our website each year before May 31st. These documents can be found on this website: https://www.sammamish.us/government/departments/public-works/storm-and-surface-water-management-program/npdes-stormwater-permit/ . Due to the website redesign, if the link is broken, search "*Stormwater Management Program Plan"* in the search bar on the City's main page.

- **Record Keeping**: Sammamish will continue to track and maintain records of public involvement activities and summarize these activities in the Annual Compliance Report.

- **Departments Engaged**: Public Works, Information Technology, City Manager's Office, and Communications.

Stormwater System (MS4) Mapping and Documentation

Sammamish maintains an internal and external facing GIS-based map of the stormwater system.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Mapping:** Sammamish will continue to maintain and build on the existing map of the municipal stormwater system. This will include attributes of stormwater system outfalls with size, and material, discharge points, receiving waters (other than groundwater), stormwater treatment and flow control BMPs/facilities owned and operated by the City, geographic areas that do not discharge stormwater to surface waters, tributary conveyances to all known outfalls and discharge points (24-inch diameter or larger), connections between other municipalities and public entities, all connections authorized after February 16, 2007, and all known connections from the MS4 to privately-owned stormwater systems.
    - Updating and managing GIS data is done according to documented procedures and quality control standards. Sammamish receives record drawings, including stormwater infrastructure, from development activities. These are field verified by Public Works staff prior to being integrated into the online GIS map.
    - GIS resources will continue to support the SMAP process as needed.
    - GIS resources will be focused on fully describing (from a geospatial standpoint) UICs.
    - Sammamish actively improves their maps by incorporating data that is gathered from field inspections (CCTV, catch basin inspection, IDDE, etc.) to progressively update and improve the accuracy of the stormwater system map.
    - This process builds the public and private stormwater treatment and flow control inspections lists. The inspections are performed under the Operations and Maintenance section of this Plan.

- **Transparency**: Sammamish maintains a public facing GIS-based interactive map of their stormwater system. The map can be found on this website: https://www.sammamish.us/government/departments/public-works/maps-and-gis-data/ . Maps are available to Ecology and other permittees upon request in electronic format. Due to website redesign, this link maybe broken. Search "*maps"* in main search bar.

- **Record Keeping**: Sammamish will continue to track and maintain records of MS4 Mapping and Documentation activities and summarize these activities in the Annual Compliance Report.

- **Departments Engaged**: Public Works and Information Technology

Illicit Discharge Detection and Elimination (IDDE)

Sammamish's Illicit Discharge Detection and Elimination (IDDE) program is designed to prevent contamination of surface water and groundwater by monitoring, tracking, and removing non-stormwater discharges into the stormwater drainage system. The City's IDDE program covers areas of the City that discharge to waters of the sate via the MS4 as well as those that discharge via UICs.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Ongoing IDDE program to detect and address non-stormwater discharges and illicit connections**: The City's on-going IDDE program is designed to characterize, trace the source, and eliminate illicit discharges, including spills and illicit connections, into the municipal stormwater system.
  - The City responds to and investigates all calls and reports regarding environmental concerns such as illegal dumping, spills, illicit discharges, and illicit connections.
  - Spills Hotline: 425-295-0500, is Sammamish's hotline for reporting of spills, water quality concerns, and other illicit discharges and is publicized as a 24-hour, 7-days a week hotline.
    - During regular business hours, calls are received and followed up on by the storm operations and maintenance crew and stormwater staff of Public Works.
    - After-hour calls are managed by Sammamish's emergency dispatch and standby maintenance crews.
    - Sammamish investigates all calls received and records are kept of calls received and actions taken as a result of these calls.
    - The hotline is publicized on the City's website, social media, in the business pollution prevention brochure guide, Sammamish's erosion and sedimentation control plans, and on business cards/email signatures of select staff.
  - In 2020 the City implemented a new cell phone application "My Sammamish" or "SeeClickFix" for citizens and staff. This prompts the reporter for specific information which immediately reaches appropriate spill response staff.
  - Sammamish takes pride in exceeding permit requirements for IDDE program response and in most cases spill response and investigation is performed the day of reporting. The Permit requires that all activities are performed at these minimum timelines:
    - Immediately respond to all illicit discharges which constitute a threat to human health, welfare, or the environment
    - Investigate within 7 days any potential illicit discharge
    - Initiate an investigation within 21 days for any suspected illicit connection
    - Use of a compliance strategy to eliminate illicit connections within 6-months
  - Documentation of IDDE procedures are detailed in the City's IDDE Program Manual and internal spill response and reporting protocol, which is adapted from the 2020 Illicit Connection and Illicit Discharge Field Screening & Source Training Manual.
  - Sammamish educates public employees, businesses, and the general public about illicit discharges and the hazards associated with improper disposal of waste through a business spill kit program and general awareness campaigns, neighborhood mailings and social media.

- **Sammamish Development Code (SDC): 21.03.050(F) Water Quality:**
    - Sammamish Development Code (SDC) 21.03.050(F)(2) prohibits non-stormwater, illicit discharges into Sammamish's stormwater system and provides the regulatory authority and framework for enforcement. Sammamish code adopted the Permit definitions for allowable discharges and conditionally allowable discharges. The code section is updated periodically to support the program.
    - Code Implementation:
        - The on-going IDDE compliance strategy strives to achieve compliance initially through public education and technical assistance. When education, technical assistance, and voluntary correction agreements do not achieve compliance, SDC 21.03.050(F)(4) provides for progressive enforcement.
        - Pollution discharged into the municipal storm drain system and/or surface and ground waters (illicit discharges) violates SDC 21.03.050(F)(2) and subjects the violator(s) to fines and/or cleanup costs imposed by City and/or State agencies per SDC 21.03.050(F)(4).
        - In 2023 the City will review existing stormwater enforcement standards and procedures for any identifiable gaps. In addition, policy and procedures for progressive enforcement of stormwater standards and the application of non-compliance, civil penalties, and costs to the City, will be developed. If necessary, the City will adopt code amendments to implement these enforcement measures.
- **MS4 Screening**: Sammamish has an on-going program to screen the stormwater system for potential sources of non-stormwater discharges and illicit connections. Sammamish performs this screening through catch basin inspection. During each inspection, staff observe the structural integrity of the catch basin and adjoining pipes, sediment accumulation levels, and if there is any unusual flow, odor, color, or other visual indicators that would suggest a pollutant is present. If there is a water quality concern, staff will report a spill through SeeClickFix. This will trigger a notification to the storm maintenance crew to respond and maintain storm structures affected and the water quality team for further investigation and follow up.
    - The City field screens on average at least 12% of the stormwater system each year and annually tracks the percentage screened as well as the total percentage screened beginning August 1, 2019.
- **Training**: Sammamish has an on-going training program for City staff, including field staff, on the identification, reporting, and response to illicit discharges into the municipal stormwater system. Additionally, Sammamish ensures that all IDDE response staff is trained on the characterization, source tracing, and elimination of illicit discharges, including spills and illicit connections, into the stormwater system. Sammamish provides this training through a combination of on-line and in-person training annually.
- **Record Keeping**: Sammamish will continue to track and maintain records of illicit discharge detection and elimination activities and summarize these activities in the Annual Compliance Report.
    - Sammamish will maintain their own internal data tracking system and also import data into Ecology's Water Quality Web IDDE portal. Data upload into this system began in 2020.
- **Departments Engaged**: All City departments - Public Works, Community Development, City

Manager's Office, Communications, Information Technology, and Parks and Recreation.

Controlling Runoff from New Development, Redevelopment and Construction Sites

Sammamish reviews development plans and inspects development sites during construction to ensure erosion and sediment control best management practices are in place and stormwater facilities (including UICs) are installed and maintained as designed. In addition, the City requires the use of Low Impact Development stormwater practices and principles. Sammamish plans to carry forward these policies and approaches in 2023.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Ongoing Program: Stormwater Management Standards for Development, Redevelopment, and Construction Sites.** The program applies to private and public development, including transportation projects.
  - Sammamish Development Code (SDC) Chapter 21.03.050(D) addresses runoff from new development, redevelopment and construction sites and provides authority to inspect and enforce adopted standards.
  - Sammamish previously adopted the 2016 King County Surface Water Design Manual (KCSWDM) effective January 1, 2017. These stormwater design standards are equivalent to the minimum technical requirements in Appendix 1, as required by the Permit.
  - Sammamish adopted the 2021 KCSWDM in June 2022, effective June 30, 2022. The stormwater design standards are equivalent to the minimum technical requirements in Appendix 1, as required by the Permit.
  - Sammamish will continue to track the number of adjustments granted to the minimum requirements in Appendix 1. Sammamish does not currently grant exceptions or variances.

- **Review Plans and Inspect Development/Redevelopment Sites**
  - Sammamish implements a program (permitting process) to review plans, inspect sites during construction, and take enforcement action against those failing to follow approved guidelines or to provide stormwater facilities (including UICs) as required during plan review. This program ensures proposed development projects comply with the 2021 King County Surface Water Design Manual and Sammamish Addendum.
  - The City's cross-departmental permitting process includes civil/site plan review and approval process, inspection, and enforcement to meet standards established by the permit for all qualifying new and redeveloped sites. This established approach will carry forward in 2023. The City's oversight of new and redevelopment projects occurs in phases: (1) prior to construction during the plan review and acceptance process; (2) before the site is cleared during an initial site construction inspection; (3) during construction via construction site inspections; and (4) post construction as part of the stormwater infrastructure acceptance inspection. Proposals for public and private projects are reviewed by City engineers or qualified engineering firms for compliance with Sammamish's standards, including LID requirements. City staff inspect qualifying public and private construction sites on a continuous basis to ensure that the proper temporary erosion and sediment control measures have been selected, properly placed,

and installed correctly.

- City inspectors also inspect the stormwater drainage systems that can potentially be impacted by home construction activity. This occurs, at a minimum, every six months until 90% of the lots have been built out, or when construction has stopped, and the site is stabilized. If facilities and stormwater conveyance require cleaning during home construction, responsible parties perform maintenance/cleaning.
- Sammamish inspectors have the authority to enforce Sammamish Development Code 21.03.050(D), using corrective action notices and stop work orders, to ensure the protection of receiving waters from construction impacts.

- **Notice of Intent**: Sammamish will continue to provide copies of or links to the "Notice of Intent for Construction Activity" on the City's website. Due to website redesign, search "Notice of Intent" in the search bar on the City's main page

- **Training**
  - Staff continues to increase their knowledge by remaining current with new/revised stormwater regulations, along with attending internal and external trainings on erosion control, LID techniques, stormwater design models, standards, and practices. Development Review Engineers, Public Works Inspectors and other appropriate staff maintain Certified Erosion and Sediment Control Lead (CESCL) certifications.

- **Record Keeping**: Sammamish will continue to track and maintain records of actions related to controlling runoff from development, redevelopment, and construction sites and summarize these activities in the Annual Compliance Report.

- **Departments Engaged**: Public Works, and Community Development

Operations and Maintenance

Sammamish has a robust Operations and Maintenance (O&M) program that ensures the stormwater system is inspected and maintained in a manner that prevents or reduces potential impacts to stormwater drainage and receiving waters.

Sammamish's Plan to Meet the Requirements of the Permit

- **Maintenance Standards**: Sammamish implements maintenance standards from the King County Surface Water Design Manual, Sammamish Addendum, and proprietary system recommendations as necessary, such as Contech's Filterra system. In addition, the City of Sammamish created the City Facility Maintenance Manual in 2016 and anticipates ongoing updates to occur in 2023.

- **Ongoing Program to Inspect and Maintain the MS4:**

  Public System:

  - Sammamish inspects all municipally owned catch basins and inlets every two years. If inspection indicates that cleaning or repair is needed, those activities are completed within the permit allowed timelines, within 6 months.
  - Sammamish inspects all municipally owned and operated water quality treatment and flow control facilities. If inspection indicates that cleaning or repair is needed, those activities are completed within the permit allowed timelines, within 1 year.
  - Sammamish spot checks multiple locations throughout the storm and surface water system, including stormwater treatment and flow control facilities, after storm events. If these spot checks indicate widespread damage or maintenance needs, Sammamish will continue to investigate and take maintenance actions on affected areas/facilities.
  - Sammamish will continue to maintain compliance by achieving at least 95% of required inspections.

  Private System:

  - The City operates a program to annually inspect and require maintenance of private water quality treatment and flow control facilities regulated by Sammamish that discharge to the MS4 and were permitted after the initial Western Washington Phase II NPDES permit in 2007. Maintenance standards are established in the King County 2021 Surface Water Design Manual (Appendix A). SDC 21.03.050(D) establishes enforcement procedures. Sammamish will continue to achieve at minimum 80% of required inspections and will keep records of all actions taken through this program.

  UIC Systems:

  - Sammamish will continue an inspection program of its municipally owned UICs in 2023. Inspections will be consistent with UIC program requirements. Inspections will emphasize the long-term viability of UICs through appropriate maintenance.

- **Practices, Policies, and Procedures to Reduce Stormwater Impacts of Municipal Operations.** The City O&M program implements practices, policies, and procedures to reduce stormwater impacts associated with runoff from land owned or maintained by Sammamish and road maintenance activities.

- **Stormwater Pollution Prevention Plan (SWPPP) for Sammamish's Maintenance Facilities.** SWPPPs for the City's two Public Works Maintenance Facility locations, which qualify as heavy equipment/material maintenance or storage yards, are being implemented. The SWPPP includes detailed descriptions of the operational and structural BMPs in use, inspection schedule and results, an inventory of materials and equipment stored on-site, a list of activities conducted that may be exposed to rain, a map of the facilities' stormwater drainage, discharge points, and areas of potential pollutant exposure, and a plan for responding to spills.

- **Training:** Maintenance staff receives training annually in conjunction with IDDE training.

- **Record Keeping**: Sammamish will continue to track and maintain records of Operations and Maintenance activities and summarize these activities in the Annual Compliance Report.

- **Departments Engaged**: Public Works and Parks and Recreation

Source Control

The Source Control Program is a new NPDES permit requirement. The program is designed to prevent and reduce pollutants in runoff from areas of existing development that discharge to the stormwater system by implementing an inspection and enforcement program. The City has developed the program and implementation will begin January 1, 2023. The program introduction can be found here: https://www.sammamish.us/government/public-works/stormwater/source-control/

Sammamish's Plan to Meet the Requirements of the Permit

- **Source Control Ordinance**: Sammamish adopted an ordinance to require source control BMPs for pollutant generating sources on existing development in June of 2022.

- **Source Control Program Development**: This new program required activities are listed below. Sammamish hired a consultant in 2022 to assist in program development and will begin program inspection in 2023. See details below.
    - **Establish an inventory**: This inventory identifies institutional, commercial, and industrial sites that have the potential to generate pollutants to the stormwater system and was completed by August 1, 2022.
    - **Inform all Sites**: Inform all sites on the inventory about activities that may generate pollutants and the source control requirements applicable to those activities by January 1, 2023. Sammamish regularly provides education to residents and businesses about preventing pollution at the source. Sammamish introduced the program to all businesses on the business inventory list in November of 2022. In December of 2022 inspection notification letters were sent to all applicable sites, notifying of an upcoming source control inspection.
    - **Establish Inspection Program**: Sammamish is required to implement an inspection program that supports these sites in applying operational and/or structural BMPs to prevent illicit discharges or violations of surface water, ground water, or sediment management standards as well as practices to reduce pollution from the application of pesticides, herbicides, and fertilizers by January 1, 2023. Staff and/or a consultant will annually complete the number of inspections equal to 20% of the businesses or sites listed in the inventory and 100% of sites identified through credible complaints. Sammamish is prepared for this program launch and has retained a consultant that established the program and will perform inspections. Further details about the program, are listed below.
        - **Enforce the Program**: Sammamish will take follow-up action for any site that has failed to adequately implement BMPs, prioritizing technical assistance and support to achieve compliance. These actions may include phone calls, letters, emails, follow-up inspections, or enforcement.
        - **Maintain Records**: Sammamish will maintain program records including documentation of each site visit, inspection records, denial of entry occurrences, warning letters, notices of violation, and other enforcement records that demonstrate an effort to bring sites into compliance.
        - **Train Staff**: Sammamish has provided training in 2022 and will continue training in 2023 for all staff responsible for implementing the program. Training topics will

include the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures.

- **Departments Engaged**: Public Works, and Community Development

Monitoring and Assessment

An important part of understanding impacts of management actions on the health of stormwater is to monitor and assess progress. The Permit allows for jurisdictions to undertake monitoring and assessment in their jurisdiction or contribute to a regional fund called the Stormwater Action Monitoring (SAM) Group where studies are undertaken by consensus of the contributing members.

Sammamish's Plan to Meet the Requirements of the Permit:

- **Regional Participation:** Sammamish has opted to participate in the SAM Group for both (Permit section S8.A) Regional Status and Trends Monitoring and (Permit section S8.B) Effectiveness and Source Identification Studies. The City is an active member in the decision-making process and participates in SAM through several sub-committees. Additionally, staff provide data for regional SAM studies as requested.
  - Regional Status and Trends Monitoring: Sammamish contributes annually to this program and will pay by the required due date of August 15th.
  - Effectiveness and Source Identification Studies: Sammamish contributes annually to this program and will pay by the required due date of August 15th.

- **Sammamish Monitoring Programs**: Sammamish conducts water quality sampling and aquatic macroinvertebrate (bug) sampling in several creeks and small lakes to evaluate water body health. While not required under the permit, these activities complement and inform other permit activities.

- **Record Keeping**: Sammamish will continue to track and maintain records of Monitoring and Assessment activities and summarize these activities in the Annual Compliance Report

- **Departments Engaged**: Public Works