



2007 Stormwater Management Program (SWMP) for  
City of Battle Ground, Washington

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# CITY OF BATTLEGROUND, WASHINGTON STORMWATER MANAGEMENT PROGRAM

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## I. INTRODUCTION

### I.1 Overview and Background

The recently issued *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Western Washington*, hereafter referred to as the Phase II Permit, outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act. All Phase II communities are expected to develop a Stormwater Management Program (SWMP) that includes all the required activities, implement those activities within the required timeframes of the permit term (i.e. 2007–2011), and submit annual reports to Ecology by March 31<sup>st</sup> each year to document progress toward complete program implementation.

The Phase II permit was issued by Ecology on January 17, 2007, and became effective on February 16, 2007. The permit covers a five-year period that expires on February 15, 2012. While the actual years of the permit run from February 16 to February 15 of the next year, the reporting requirements cover a calendar year from January 1 to December 31. The permit will be reviewed and renewed for a second five-year period, starting in 2012.

The Phase II Permit applies to cities with populations less than 100,000 located within or partially within, an urbanized area and that operate a municipal separate storm sewer system (MS4) which discharges to a water of Washington State. Urbanized areas are defined as population centers with greater than 50,000 people and densities of at least 1,000 people per square mile, and are based on the 2000 census. For future permits, the urbanized area will be based on the most recent federal census.

Ecology also can designate entities with a population of 10,000 or more that are located outside of urbanized areas as additional permittees. Designation criteria can include considerations such as discharge to sensitive waters, high population density, high growth or growth potential, contiguity to an urbanized area, significant contribution of pollutants to waters of the US, or ineffective protection of water quality by other programs. The City of Battle Ground has been designated by Ecology as a Phase II permittee based on the current population (approx. 16,240) and location within the Vancouver urbanized area.

Battle Ground is a high growth community that is the social and commerce hub in central and north Clark County, Washington. The City was incorporated on June 11, 1951 and operates under a Council-Manager form of government.

Battle Ground is a full-service City serving a population of approximately 16,240. The City provides municipal services such as police, fire, planning, building, streets, parks, and utilities (Water, Sewer, Storm Drainage). The City operates on a budget of approximately \$39 million and has approximately

75 full-time employees.

The City Manager is responsible for the operations of the City and is appointed by the City Council. The Mayor and City Council are responsible for establishing public policy. They have the fiscal responsibility for the City including: budget authority, power to set fees and charges, levying of taxes, and issuance of debt consistent with provisions of state laws. The citizens of Battle Ground elect the seven Councilmembers and, biennially, the Council selects one of their members to serve as Mayor.

The Public Works Operations Division is responsible for building, operating and maintaining public facilities and utilities within the City of Battle Ground, including streets, sewer, water, parks, street lights, and drainage systems. The Operations Division works hard to provide for the maintenance and operation of the City's storm drainage facilities. This Enterprise fund receives its revenues mostly from user fees. Good maintenance of the drainage facilities reduces the impact of heavy rain or prolonged wet weather conditions.

## 1.2 Department Implementation Responsibilities

Within the City organization, many staff will contribute toward meeting permit requirements. Currently, the stormwater management program is primarily the responsibility of the Public Works Department. Support is provided by the City Manager's office as well as the Finance Department for accounting, utility billing, information services, and customer service, the Police Department for Code Enforcement, and the Community Development Department for Development Review.

## 1.3 Document Organization

This report comprises written documentation of the City's SWMP that is required to be submitted with the Annual Report. In accordance with the Phase II Permit terms, the SWMP has been designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), meet state AKART requirements, and protect water quality. The following sections describe the actions that Battle Ground has, or will, take to comply with the requirements of the Phase II permit.

To aid in tracking NPDES permit requirements, this document has been organized into sections that correspond with the Special Conditions in the Phase II Permit and are outlined as follows:

- Section 2.0 - Public Education and Outreach, Special Condition S5.C.1
- Section 3.0 - Public Involvement and Participation, Special Condition S5.C.2
- Section 4.0 - Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.3
- Section 5.0 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.4
- Section 6.0 Pollution Prevention and Operation and Maintenance for Municipal Operations, Special Condition S5.C.5

Note that compliance with Special Conditions S7, S8 and S9 is not required to be included in the SWMP although S7 and S8 compliance activities must be included in the Annual Report.

Additional permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G20, also apply to permit holders, though they do not result in specific program activities, nor is the SWMP required to document compliance with these activities. These additional conditions cover topics such as who is covered by the Phase II Permit, what discharges are authorized under the permit, and legal guidelines for transferring, revoking, and appealing the permit. Penalties for non-compliance are also included in these conditions.

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## 2. PUBLIC EDUCATION AND OUTREACH

This section describes the permit requirements, current city activities, and planned actions to be implemented.

### 2.1 Permit Requirements

Section S5.C.1 requires the following:

- Develop and administer an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The program must target residents, businesses, industry, and city employees at all levels.
- Develop a method to allow measurement and evaluation of the education program's effectiveness at changing targeted behaviors.
- Track and maintain records of public education and outreach activities.

### 2.2 Current Activities

The City of Battle Ground is currently providing the following educational information to the community during public meetings, during preconstruction meetings, and at the front counter:

- "Take the Stormwater Runoff Challenge" – Crossword Placemat – Handed out during the "2007 National Night Out" event.
- "Clean Water Everybody's Business" – Bookmark – Handed out during the "2007 National Night Out" event.
- "Stormwater and the Construction Industry" – Contractor handout available at the front counter
- "After the storm A citizen's Guide to Understanding" – Public handout available at the front counter.
- City municipal code requires all new subdivisions to include "Storm drain stenciling" with all new storm drains.

### 2.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Public Education and Outreach Program and meet the compliance deadlines in the Phase II Permit.

**Table 2-1**

**Public Education and Outreach**

**Purpose:** Develop an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.

**Applicability:** Target audiences as identified. May include general public, businesses, landscapers and property managers, engineers, contractors, developers, and/or City staff.

<b>Task ID</b>	<b>Task Description</b>	<b>Schedule Notes</b>
<b>EDUC-1</b>	Develop a public education and outreach strategy to supplement existing activities.	<b>Due Date of <u>February 15, 2009</u></b> Status: Under Development
<b>EDUC-2</b>	Develop and distribute educational materials.	<b>Due Date of <u>February 15, 2009</u></b> Status: Under Development
<b>EDUC-3</b>	Develop a system to track and maintain records of public education and outreach activities	<b>Due Date of <u>February 15, 2009</u></b> Status: Under Development

### 3. PUBLIC INVOLVEMENT

This Section describes the Permit requirements, and current and planned compliance activities.

#### 3.1 Permit Requirements

Section S5.C.2 of the Permit requires the City to:

- Provide ongoing opportunities for public involvement through advisory boards and commissions, watershed committees, public participation in developing rate structures and budgets, stewardship programs, environmental activities or other similar activities. The public must be able to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP document and Annual Report available to the public. Post these documents on either the City’s or Ecology’s website. Any other submittals required by Ecology also must be available on the website.

#### 3.2 Current Activities

City of Battle Ground staff has conducted two presentations to the City Council and the public regarding the development of the stormwater program. The public was encouraged during these meetings to provide input to the City Council regarding the program.

#### 3.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Public Involvement Program and meet the compliance deadlines in the Phase II Permit.

**Table 3-1**

**Public Involvement**

**Purpose:** Create opportunities for the public to participate in the decision making processes involved in the development, implementation and update of the City's SWMP.

**Applicability:** Applies to general public as well as advisory councils, watershed committees, stewardship programs, and other similar groups.

<b>Task ID</b>	<b>Task Description</b>	<b>Schedule Notes</b>
<b>PI-1</b>	Develop a stormwater flyer/brochure for distribution	<b>Due Date of February 15, 2008</b> Status: Under development
<b>PI-2</b>	Set-up public comment period during an upcoming City Council to provide an opportunity for the public to respond to the stormwater program distributed via the flyer/brochure	<b>Due Date of February 15, 2008</b> Status: Under development
<b>PI-3</b>	Post the SWMP, the Annual Report, and all other required permit submittals on the City's website, and make them available at City Hall.	<b>Due Date of March 31, 2008</b> Status: Required submittals will be posted on the City website as soon as possible

## 4. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section describes the permit requirements, programs, and planned activities related to Illicit Discharge Detection and Elimination (IDDE).

### 4.1 Permit Requirements

Section S5.C.3 of the Permit requires the City to:

- Implement an ongoing program to detect and remove illicit discharges, connections and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City.
- Develop a storm sewer system map, implement ordinances to prohibit illicit discharges, and create a program to detect and address illicit discharges.
- Publicize a hotline or other local telephone number for reporting of spills or other illicit discharges. Track illicit discharge reports and actions taken in response to calls.
- Adopt and implement procedures for IDDE program evaluation and assessment.
- Provide appropriate training to staff on identification and reporting of illicit discharges.
- Summarize all illicit discharges and connections reported to the City and response actions taken in the Annual Report; including updates to the SWMP document.

### 4.2 Current Activities

Current City of Battle Ground activities in this area include:

- The City maintains an up-to date storm sewer map in multiple electronic formats and has standard operating procedures (SOPs) for keeping the municipal separate storm sewer system map and inventory up-to-date. The map is updated with new facilities or corrected for

inconsistencies based on field verification.

- The City relies upon the Street/Storm division of Public Works, the Fire Department, and Ecology for assistance with spill response.
- The City currently responds to citizens reports of illicit discharges or illicit dumping via the general phone number. A hot line has not been established at this time.

### 4.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the IDDE Program and meet the compliance deadlines in the Phase II Permit.

<b>Table 4-1</b>		
<b>Illicit Discharge Detection and Elimination</b>		
<b>Purpose:</b> Detect and remove illicit connections, illicit discharges, and improper disposals (including spills) into the MS4.		
<b>Applicability:</b> Applies to the City’s municipal separate storm sewer system (MS4).		
<b>Task ID</b>	<b>Task Description</b>	<b>Schedule Notes</b>
<b>IDDE-1</b>	Continue efforts to update all maps associated with outfalls, tributary areas, and stormwater facilities in electronic mapping format	<b>Due Date: February 15, 2011</b> Status: On going
<b>IDDE-2</b>	An ordinance specific to legal authority associated with Illicit Discharges to be prepared and adopted.	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>IDDE-3</b>	Document and implement a program for detecting and eliminating illicit discharges.	<b>Due Date: February 15, 2011</b> Status: Under Development
<b>IDDE-4</b>	Identify a phone number and advertise the hotline to allow the public to report spills and illicit discharges	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>IDDE-5</b>	Develop a system to track and maintain records on calls received and enforcement actions taken in response to calls.	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>IDDE-6</b>	Conduct training for Public Works staff (Engineering and O& M) who would respond to illicit discharge complaints	<b>Due Date: February 15, 2009</b> Status: Under Development

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## 5. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

This section describes the permit requirements, programs, and planned activities related to Controlling Runoff from New Development, Redevelopment and Construction Sites.

### 5.1 Permit Requirements

Section S5.C.4 of the Permit requires the City to:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff that enters the municipal separate storm sewer system from new development, redevelopment and construction site activities. The program must apply to both private and public projects.
- Adopt and implement a regulatory process with the necessary legal authority for plan review, inspection, and escalating enforcement procedures necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in either the 2005 Ecology Stormwater Management Manual for Western Washington, an equivalent Phase I Manual or one of the Manual options with a City-specific basin-planning overlay.
- Provide provisions to allow non-structural preventive actions and source reduction approaches such as Low Impact Development techniques (LID), and measures to minimize the creation of impervious surfaces and the disturbance of native soils and vegetation.
- Adopt regulations that include provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and best management practices in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter IV of the 2005 Ecology Stormwater Management Manual for Western Washington.
- Train staff on the new codes, standards, processes and procedures.
- Develop a process to record and track all inspections, maintenance and enforcement actions by staff for inclusion in the Annual Report.
- Summarize annual activities for the Annual Report; identify any update to Program document.

### 5.2 Current Activities

Current City of Battle Ground activities in this area include:

- The City has adopted the 1992 Puget Sound Manual to guide stormwater management of new development and redevelopment projects.
- The City has adopted the 2005 Western Washington Manual, Volume II, Construction Stormwater Pollution Prevention to guide clearing and grading and erosion control of new development and redevelopment projects.
- The City requires and completes construction and stormwater site inspections during pre- and post-construction phases.

- The City provides copies of the Notice of Intent to all developers during pre-application meetings.
- The City currently inspects all “public” stormwater facilities on an annual basis. All facilities are maintained at least 3 times per year.

### 5.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the program to control runoff from New Development, Redevelopment, and Construction Sites and meet the compliance deadlines in the Phase II Permit.

<b>Table 5-1</b>		
<b>Controlling Runoff From New Development, Redevelopment, and Construction Sites</b>		
<b>Purpose:</b> Establish a program to reduce pollutants in stormwater runoff from new development projects, redevelopment projects, and construction sites. Apply the minimum technical requirements of Appendix 1 of the Phase II Permit (or equivalent).		
<b>Applicability:</b> All new development, redevelopment, and construction sites that disturb one acre or greater and smaller projects that are part of a larger development plan.		
Task ID	Task Description	Schedule Notes
<b>CTRL-1</b>	Revise the existing stormwater management ordinance to bring it into compliance with NPDES Phase II requirements	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>CTRL-2</b>	Increase site plan review, construction and post-construction inspections, enforcement activities, and enhance permitting process where needed to handle full implementation of Phase II requirements	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>CTRL-3</b>	Revise existing stormwater facilities maintenance standards to bring it into compliance with NPDES Phase II requirements	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>CTRL-4</b>	Establish procedures for tracking and keeping records of development projects, inspections, enforcement actions, and maintenance inspections.	<b>Due Date: February 15, 2009</b> Status: Under Development
<b>CTRL-5</b>	Provide training for staff in permitting, plan review, inspection and enforcement procedures consistent with NPDES Phase II requirements	<b>Due Date: February 15, 2009</b> Status: Under Development

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## 6. POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This section describes the permit requirements, programs, and planned activities related to Pollution Prevention and Operation and Maintenance for Municipal Operations.

### 6.1 Permit Requirements

Section S5.C.5 of the Permit requires the following from the City:

- Develop and implement an operations and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Establish maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the 2005 Stormwater Management Manual for Western Washington.
- Conduct inspections of stormwater flow control and treatment facilities and catch basins according to required frequencies, unless previous inspection data show that a reduced frequency is justified.
- Establish and implement procedures to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities including but not limited to streets, parking lots, roads or highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- Develop and implement an ongoing training program for staff whose job functions may impact stormwater quality. Document the training program.
- Prepare Stormwater Pollution Prevention Plans (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City that are not covered by an Industrial Stormwater General Permit.
- Summarize annual activities for the Annual Report. Include any updates to the SWMP document.

### 6.2 Current Activities

Current City of Battle Ground activities in this area include the following:

- The City operates an operations and maintenance (O&M) program with the ultimate goal of minimizing pollutant runoff from municipal operations on a periodic basis although it does not currently meet the requirements outlined in the NPDES Phase II program as of yet.
- City crews have in place a program for monthly street and gutter sweeping, water quality facility maintenance and catch basin cleaning although it does not currently meet the 2005 Stormwater Management Manual for Western Washington for O&M of the municipal storm system.
- The City also completes maintenance and inspections of storm drain and conveyance facilities on an as needed basis in addition to annual cleaning operations.

- City staff receives limited training on maintenance procedures.
- The City has in place a program to inspect critical locations after major storm events.

### 6.3 Planned Actions

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Operations and Maintenance Program and meet the compliance deadlines in the Phase II Permit.

<b>Table 6-1</b>		
<b>Pollution Prevention and Operations and Maintenance</b>		
<b>Purpose:</b> Develop and O&M program to prevent or reduce pollutant runoff from municipal operations.		
<b>Applicability:</b> All stormwater treatment and flow control facilities, catch basins, streets and roadways, and non-roadway public properties managed by the City.		
<b>Task ID</b>	<b>Task Description</b>	<b>Schedule Notes</b>
<b>O&amp;M-1</b>	Establish a formal annual inspection program for permanent stormwater treatment and flow control facilities, including necessary maintenance and incorporate a tracking mechanism	<b>Due Date: February 15, 2010</b> Status: Begin Development
<b>O&amp;M-2</b>	Review and update the spill response program and incorporate a tracking mechanism	<b>Due Date: February 15, 2010</b> Status: Begin Development
<b>O&amp;M-3</b>	Review formal program for the inspection and maintenance of catch basins and inlets and incorporate tracking mechanism	<b>Due Date: February 15, 2010</b> Status: Begin Development
<b>O&amp;M-4</b>	Conduct periodic training for all O& M and other appropriate staff during staff meetings.	<b>Due Date: February 15, 2010</b> Status: Begin Development
<b>O&amp;M-5</b>	Identify and screen all known public facilities, evaluate practices, develop SWPPPs and identify training needs at facilities	<b>Due Date: February 15, 2010</b> Status: Begin Development

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## 7. TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

This section describes the permit requirements, programs, and planned activities related to Total Maximum Daily Load Requirements (TMDLs) for TMDLs listed in Appendix 2 of the Phase II Permit. For all other applicable TMDLs, compliance with the Phase II Permit is considered compliance with the TMDL and no additional SWMP documentation is required.

### 7.1 Permit Requirements

Section S7 of the Permit requires the City to comply with the requirements of applicable TMDLs as follows:

- For applicable TMDLs listed in Appendix 2 of the permit, comply with the specific requirements identified in Appendix 2. Maintain records of all required actions that are relevant to applicable TMDLs. TMDL implementation shall be included as part of the annual report submitted to Ecology.
- Where monitoring is required in Appendix 2 of the permit, conduct the monitoring according to a Quality Assurance Project Plan (QAPP) approved by Ecology.
- For applicable TMDLs not listed in Appendix 2 of the permit, compliance with the permit shall constitute compliance with those TMDLs.
- For TMDLs that are approved by EPA after this Permit is issued, Ecology may establish TMDL related permit requirements through future permit modification if Ecology determines implementation of actions, monitoring or reporting necessary to demonstrate reasonable further progress toward achieving TMDL waste load allocations, and other targets, are not occurring and shall be implemented during the term of this Permit or when this Permit is reissued. The City is encouraged to participate in development of TMDLs within their jurisdiction and to begin implementation.

**The City Battle Ground is not affected by any TMDLs listed in Appendix 2 of the permit as of yet.**

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## 8. MONITORING

This section describes the permit requirements and planned activities related to water quality monitoring.

### 8.1 Permit Requirements

Section S8 of the Permit requires water quality sampling or other testing only if TMDLs apply or testing is required for characterizing illicit discharges. However, the Annual Report must include the following items:

- Provide a description of stormwater monitoring or studies conducted during the reporting period. If stormwater monitoring was conducted on behalf of the City, or if studies or investigations conducted by other entities were reported to the City, a brief description of the

type of information gathered or received shall be included in the Annual Report.

- An assessment of the appropriateness of the best management practices identified by the City for components of the Stormwater Management Program and justification for any changes made or anticipated.
- Preparation for comprehensive, long-term water quality monitoring efforts. Future stormwater monitoring will characterize stormwater runoff quantity and quality at a limited number of locations to allow analysis of pollutants and changes in conditions over time and across the City. The monitoring plans shall include, at a minimum, stormwater, sediment or receiving water monitoring of physical, chemical and/or biological characteristics.
- Identification of 2 outfalls where permanent stormwater sampling stations can be installed and operated for future monitoring. The 2 outfalls must represent commercial use, high-density residential and industrial land uses.
- Identification of two suitable Program questions and sites where targeted Program effectiveness monitoring can be conducted together with development of a monitoring plan for these questions and sites. The proposed effectiveness monitoring should address the degree of effectiveness of the targeted action and if it is achieving the targeted outcome.

## 8.2 Planned Actions

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Monitoring Program and meet the compliance deadlines in the Phase II Permit.

<b>Table 6-1</b>		
<b>Pollution Prevention and Operations and Maintenance</b>		
<b>Purpose:</b> Prepare to participate in a long term monitoring program.		
<b>Applicability:</b> Stormwater monitoring site selection applies to Phase II Cities with populations greater than 10,000 and phase II Counties with populations greater than 25,000. Program effectiveness questions and site identification applies to all Phase II Permitties.		
Task ID	Task Description	Schedule Notes
MON-1	Select Monitoring Sites for next permit Cycle	Due Date: February 15, 2011 Status: Begin Development

## 9. REPORTING

This section describes the permit requirements and planned activities related to water quality monitoring.

### 9.1 Permit Requirements

Section S9 of the Permit requires the following of the City:

- Submit an annual report to Ecology by March 31, 2008. The reporting period for the first annual report will be from the effective date of the permit through December 31, 2007. The reporting period for subsequent annual reports will be the previous calendar year. The Annual Report shall include the SWMP, Annual Report form, and notification of jurisdictional boundary changes that affect the geographic area of permit coverage, together with any implications for the SWMP.
- Plan to keep all records related to the permit and SWMP for at least five years. Submit records to Ecology upon request.
- Make records related to the permit and SWMP available to the public at reasonable times during business hours. Provide a copy of the most recent annual report to any individual or entity upon request.

## 9.2 Planned Actions

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Reporting Program meet the compliance deadlines in the Phase II Permit.

Table 9-1		
Reporting		
<b>Purpose:</b> Document SWMP activities and submit annual reports to Ecology.		
<b>Applicability:</b> All City stormwater program activities related to Phase II Permit compliance.		
Task ID	Task Description	Schedule Notes
RPT-1	Submit First Annual Report and copy of initial 2007 SWMP	<b>Due Date: March 31, 2008</b> Status: Complete
RPT-2	Submit Second Annual Report and copy of current SWMP	<b>Due Date: March 31, 2009</b> Status: Begin Development
RPT-3	Submit Third Annual Report and copy of current SWMP	<b>Due Date: March 31, 2010</b> Status: Begin Development
RPT-4	Submit Fourth Annual Report and copy of current SWMP	<b>Due Date: March 31, 2011</b> Status: Begin Development

## 10. CONCLUSION

This SWMP has been prepared to demonstrate compliance with the requirements of the NPDES Phase II Permit. The implementation tables indicate planned activities as of March 2008. This SWMP is a living document that will be updated annually to reflect progress with implementing the stormwater management program components required for compliance with the Phase II Permit.