

Attachment B

City of Seattle Program Evaluation and Other Activities Narrative for the 2007 Phase I Permit Annual Report Form

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

Nancy Ahern
Deputy Director- Utility System Management
Seattle Public Utilities

This document contains the City of Seattle's (City) program narrative and other activities narrative (Attachment B) in support of the City's 2007 Phase I Permit Annual Report Form.

1. Changes in Authorization (G19.C)(S9.E.9)

There have been no changes to authorization pursuant to G19.C at the City during 2007.

2. Actions Taken Pursuant to S4F (S9.E.3)

The City, through Seattle Public Utilities (SPU), provided a general notification and a Lower Duwamish River notification to the Department of Ecology under S4.F of potential water quality and/or sediment problems that may be related to discharges from the City's municipal separate storm sewer system (MS4). Beginning with the Annual Report for 2008, the City will include a summary of its stormwater management efforts in basins that discharge to the lower Duwamish River.

The City continues to apply and implement its programs for stormwater management and to seek improvement to those programs through increased understanding of stormwater impacts and mitigation tools.

3. Assessment of Best Management Practice Appropriateness (S9.E.6 and S8.B.2)

3.1 Public Involvement and Participation (S5.C.4)

The permit required the City to develop and implement a process to create opportunities for the public to participate in the development of the Stormwater Management Program Documentation (SWMP) by August 16, 2007. The City's best management practice (BMP) used for public involvement and participation is to create opportunities for the public to learn about, comment on and question the City's approach to the management of stormwater. Participation is encouraged by providing multiple ways for public involvement such as opportunities to comment on how funding is allocated for the NPDES related programs and projects, stormwater program, input and review of codes describing the technical standards for control of stormwater discharges and enforcement of impacts to the MS4, and involvement in the ongoing development of stormwater management activities. Opportunities for the public to learn and comment on the City's stormwater program are provided on the City's web site, public meetings, and citizen advisory committees. The City has found that these methods of soliciting public comments are the most appropriate BMP for public participation because they reach a wide audience. The City received many comments during the Stormwater Code Revision Project that helped with the development of the Stormwater Codes and SWMP. Additional information on public involvement and participation can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.2 Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.5)

The only performance measure in S5.C.5 of the Permit for calendar year 2007 required the City to make available copies of Ecology's documents: "*Notice of Intent for Construction Activities*" and "*Notice of Intent for Industrial Activities*". The Department of Planning and Development (DPD) made copies of these NOI documents available to the public during 2007. These documents were made available to the public at the DPD Applicant Services Center (ASC), which is located on the 20th floor of Seattle Municipal Tower at 700 Fifth Ave. in downtown Seattle. Providing

the documents at the ASC is appropriate because the majority of people who seek permits from the City visit the ASC and have the opportunity to view and learn about the Ecology NOI requirements.

The City continued to implement its existing program to control runoff from new development, re-development and construction sites. This program is led by DPD and resulted in 3,086 temporary sediment and erosion control (TESC) inspections and 450 enforcement actions. DPD is working with SPU to adjust and revise the existing program to meet the 2007 Permit requirements.

Information on how the city will implement the 2008 minimum performance measures for controlling runoff from new development, redevelopment and construction sites can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.3 Structural Stormwater Controls (S5.C.6)

The 2007 NPDES Phase I Municipal Stormwater Permit did not require the City to implement any elements of the structural stormwater controls program during 2007 and therefore, a narrative program assessment is not available at this time. Information on how the city will implement the 2008 minimum performance measures for the structural stormwater controls program can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.4 Source Control Program for Existing Development (S5.C.7)

The 2007 NPDES Phase I Municipal Stormwater Permit did not require the City to implement any elements of the source control program for existing development during 2007 and therefore, a narrative program assessment is not available at this time. Information on how the city will implement the 2008 minimum performance measures for the source control program for existing development can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.5 Illicit Connections and Illicit Discharge Detection and Elimination (S5.C.8)

During 2007, SPU continued to lead the City's illicit connection and illicit discharge detection and elimination program (IDDE), which was first implemented to meet the requirements of the 1997 NPDES Municipal Stormwater permit. Citizens can report spills and complaints which may lead to a discharge to the City's MS4 by either calling the publicly listed 24 hour "water quality hotline" phone number or by using the internet-based form on the City website. In 2007 the hotline received 322 surface water quality calls. The water quality hotline and web based reporting mechanism enable the general public to take an active role in stormwater pollution prevention and enhance the City's ability to prevent illicit connections and discharges. This management practice has resulted in over 1,300 resolved cases from 1,900 calls to the hotline over the last 6 years showing that making a hotline number available to the public is one of the best management practices the City can use to identify and resolve illicit discharges.

There were seven illicit connections reported during 2007 which resulted in three notice of violations, and four corrective action letters. All seven illicit connections were eliminated within six months. The City has a procedure in place that specifies when and how Ecology should be

contacted regarding illicit connections and discharges. However, there were no referrals to Ecology from the City in 2007.

The SPU Spill Response Program is staffed by a Senior Spill Coordinator and a network of on-call Spill Coordinators. Spill Coordinators work in 3 or 4 day on-call shifts and are available 24 hrs/ 7 days week. Spill Response calls are dispatched through the Operations Response Center (ORC) and are received via a publicly available phone number 206-386-1800. The Water Quality Hotline Number advises citizens who are reporting an active spill to call the ORC to report the spill. Once a spill call is received, the Dispatcher contacts the on-call Spill Coordinator and advises them of the situation. Spill Coordinators follow written procedures for investigation, clean up and reporting to appropriate agencies.

Resource Venture, a contracted consultant of SPU, provides free site visits, spill kits and education to Seattle businesses to assist them with development of a spill prevention plan and proper clean up and disposal of spills. The spill kit program is promoted on the web and a workshop for high risk potential polluters group is offered each year. Spill Plans are reviewed by Resource Venture and businesses receive training with the spill kit. Resource Venture is an effective method of providing businesses with BMPs so they can voluntarily comply with the City's Stormwater Code.

Spill kits are an appropriate BMP for use and storage of automotive chemicals, hazardous cleaning supplies, and other hazardous materials because resources and information are provided directly to the general public which helps to reduce behaviors the cause or contribute to adverse stormwater impacts.

Information on how the city will implement the 2008 minimum performance measures for the illicit connection and illicit discharge detection and elimination program can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.6 Operation and Maintenance Program (S5.C.9)

The 2007 NPDES Phase I Municipal Stormwater Permit did not require the City to implement any elements of the operation and maintenance program during 2007 and therefore, a narrative program assessment is not available at this time. Information on how the city will implement the 2008 minimum performance measures for the operation and maintenance program can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

3.7 Education and Outreach Program (S5.C.10)

The 2007 NPDES Phase I Municipal Stormwater Permit did not require the City to implement any elements of the education and outreach program during 2007 and therefore, a narrative program assessment is not available at this time. Information on how the city will implement the 2008 minimum performance measures for the education and outreach program can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

4. Information on Structural Stormwater Controls Program (S5.C.6)

The Structural Stormwater Controls Program is described in Section III.6 of the City's SWMP documentation, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

5. Summary of Actions Taken to Comply with Applicable TMDL Requirements (S9.E.4)

There are no applicable Total Maximum Daily Loads (TMDL) listed in Appendix 2 of the 2007 NPDES Phase I Municipal Permit for receiving waters to which the City's MS4 drains. Therefore, implementation of the action outlined in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form, constitutes compliance with TMDLs affecting such water bodies for the City.

6. Stormwater Monitoring Summary (S9.E.6)

A brief description of any stormwater monitoring or studies conducted by or for the City's MS4 in accordance with S8.B.1 during 2007, follows:

6.1 Water Quality

Pollutant Source Control Sampling - This monitoring was conducted by SPU in support of and associated with the Water Quality Hotline, IDDE, and business inspections for source control from existing development.

Lower Duwamish source sediment samples - In 2007, SPU continued to collect source sediment samples (i.e., catch basins, inline sediment traps, and inline grab samples) to support the source control program for the Lower Duwamish Waterway superfund site.

6.2 Natural Drainage Systems

Green Roof Facility Monitoring - SPU conducted flow monitoring from green roofs on Ballard Library and Fire Station 10. Monitoring these facilities enables the collection of data in order to provide more accurate stormwater credit information for Code compliance.

Cistern Facility Monitoring - SPU conducted monitoring of flow and water quality associated with cisterns used to collect roof runoff. Monitoring is helping to determine what flow control cisterns can provide, pollutant loads from roofs, and whether cisterns provide any water quality treatment.

Bioretention Facility Monitoring - SPU conducted this monitoring to determine what level of flow control is provided by bioretention facilities.

Natural Drainage System (NDS) Monitoring - SPU led monitoring to evaluate the performance of NDS systems built by the city and evaluate non-traditional means of meeting our surface water requirements.

Street Sweeping Pilot Study - SPU conducted this monitoring to determine whether more frequent street sweeping will reduce need for catch basin cleaning.

7. Operation and Maintenance Schedules

7.1 Justification of Reduced Inspection Frequency

As this is the first year of the Permit, there is no data available to justify reducing the inspection frequency pursuant to S5.C.9.b.ii(3), S5.C.9.b.iii(1) and S5.C.9.b.iv(2).

7.2 Stormwater Facility Maintenance or Repairs greater than \$25,000 (S5.C.9.b.v)

The 2007 NPDES Phase I Municipal Stormwater Permit did not require the City to implement any elements of the operation and maintenance program during 2007 and therefore, a narrative program assessment is not available at this time. Information on the operation and maintenance program can be found in the City's SWMP, submitted as Attachment A of the City's 2007 Phase I Permit Annual Report Form.

8. Notification of any Annexations, Incorporations, or Jurisdictional Boundaries (S.9.E.8)

There were no annexations, incorporations or changes in jurisdictional boundaries in the geographic area served by the City's MS4 during the 2007 reporting period.