

## City of Kent 2023 Annual Report

Number	Permit Section	Question
1	S5.A	<p>Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.</p> <p><b>Not Applicable</b></p>
2	S5.A	<p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)</p> <p><b>City of Kent 2023 Annual Repor_2_03282024162109</b></p>
3	S5.A	<p>Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.</p> <p><b>Yes</b></p>
4	S5.A.5.b	<p>Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)</p> <p><b>Yes</b></p>
5	S5.C.1.	<p>Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020</p> <p><b>Yes</b></p>
14	S5.C.1.b	<p>Did you submit a report as described in S5.C.1.b.i(b)? (Required to submit no later than January 1, 2023)</p>

**Yes**

15 S5.C.1.c Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)

**Yes**

16 S5.C.1.c From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)

**No**

20 S5.C.2 Did you choose to adopt one or more elements of a regional program? (S5.C.2)

**Yes**

20a S5.C.2 If yes, list the elements, and the regional program.

**Puget Sound Starts Here: -Natural Yard Care, -Scoop Every Poop - pet waste disposal, -Don't Drip and Drip - fix car leaks, -Drain Rangers - children's education and outreach program. Regional Dumpster Lid Social Marketing Campaign: -Shut It dumpster lid closure. ZeroPoo - pet waste cleanup challenge**

21 S5.C.2 Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.

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24 S5.C.2 Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)

**Yes**

25	S5.C.2	<p>Attach the report developed in accordance with S5.C.2.a.ii(e), which evaluated the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the program in order to be more effective. (Required no later March 31, 2024)</p> <p><b>City of Kent 2023 Annual Repor_25_03292024130624</b></p>
26	S5.C.2	<p>Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.</p> <p><b>Yes</b></p>
26a	S5.C.2	<p>Attach a list of stewardship opportunities provided.</p> <p><b>City of Kent 2023 Annual Repor_26a_03282024163044</b></p>
27	S5.C.3.	<p>Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)</p> <p><b>The city creates opportunities for public involvement and participation in the development and implementation of the SWMP Plan primarily by posting documentation online through the city's website and soliciting feedback through public notice. The same procedures were used to provide for public involvement and participation in the development and implementation of the SMAP. The following are specific ways the public may review and provide comment on Kent SWMP and SMAP documents and activities: The city NPDES Program webpage: <a href="http://www.kentwa.gov/npdes">www.kentwa.gov/npdes</a> In person, during normal business hours, or by appointment City Council and Public Works Committee Meetings Telephone and Kent's spill hotline: (253) 856-5600 Mail posted to: City of Kent, Public Works Department, Environmental Engineering, 400 West Gowe, Kent, WA 98032 Email: <a href="mailto:npdes@kentwa.gov">npdes@kentwa.gov</a></b></p>
28	S5.C.3.	<p>Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)</p>

**Yes**

28a S5.C.3. List the website address in Comments field.

**<https://www.kentwa.gov/NPDES>**

29 S5.C.4. Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?

**Yes**

30 S5.C.4. Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)

**Yes**

30a S5.C.4. Attach a spreadsheet that lists the known outfalls' size and material(s).

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31 S5.C.4. Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)

**Yes**

33 S5.C.5 Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)

**Yes**

33a S5.C.5 Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

**To ensure city employees, businesses, and the general public are aware of the hazards associated illicit discharges and improper disposal of waste, City staff are trained on**

these hazards and the preventative BMPs needed. These staff members then meet with members of the public, property owners, and business managers while completing field screening, private facility site inspections, and education and outreach events to educate on general hazards associated with illicit discharges, the use of BMPs for pollution prevention and proper waste disposal. These meetings may also be documented as part of the public education and outreach program described in S5.C.2: Public Education and Outreach. All staff training is also documented. Further efforts made by the city toward detection and response education and outreach for the general public include:

- Education and outreach materials for Source Control best management practices
- A website has been developed to inform the public about stormwater pollution: National Pollutant Discharge Elimination Program
- The city is a partner in the 'Puget Sound Starts Here' stormwater educational campaign; an initiative to reduce pollution in the Puget Sound, and greater Puget Sound area.
- The Shut It regional dumpster lid campaign aimed at encouraging businesses staff to keep the dumpster lid closed while not in use to prevent the discharge of pollutants into the storm system.
- Home hazardous waste collection service for eligible seniors and residents with disabilities
- King County Wastemobile Program
- Source Control inspections
- Single family residential environmental compliance inspections
- Public events are held each year to educate the public about the risks of stormwater pollution and improper disposal of waste including:
- Kent Recycling and Hazardous Waste Collection Day
- Kent Police Prescription Drug Take-Back Day
- Spill Kit Program for Source Control Facilities
- Kent Police Prescription Drug Take-Back Day
- Public Works Week Open House Day
- Single family residential environmental compliance inspections

34	S5.C.5	<p>Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.</p> <p><b>Yes</b></p>
35	S5.C.5	<p>Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.</p>

Yes

35a

S5.C.5

Cite field screening methodology in Comments field.

**MS4 field screening is implemented by city staff utilizing a methodology that is linked to the operations and maintenance inspections of catch basins, and the inspections of flow control and water quality treatment BMPs; and is comparable to the method recommended in the permit: Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual. Prepared for Washington State Department of Ecology. Herrera Environmental Consultants. May 2020 Revision. For additional information regarding the city's field screening method associated with scheduled inspections, refer to chapter S5.C.7 of this document regarding Municipal Operations and Maintenance. Pollutant Source Tracing Program: As a part of our Mill Creek Stormwater Management Action Plan (SMAP), Kent hired Aspect Consulting to sample for the presence of pollutants at 7 locations within the MS4 in 2023. These locations were strategically selected in areas that capture runoff from a variety of source control sites within the Lower Mill Creek Basin. The pollutants sampled for included those expected to be associated with the industrial source control properties in the area. Any pollutants found in the MS4 beyond target threshold levels would be investigated using Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual. Prepared for Washington State Department of Ecology. Herrera Environmental Consultants. May 2020 Revision to focus in on the area where the pollutant originated. This Enhanced IDDE field screening program will continue to monitor water quality in the Lower Mill Creek Basin in 2024. Field screening of the private storm sewer systems at commercial, industrial, and single and multi-family properties in Kent is completed by our Environmental Compliance Inspectors. This field screening methodology is identical to the method used for the MS4 referred to above.**

36

S5.C.5

Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)

55

36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.  <b>The percentage of MS4 coverage area screened is determined by the percentage of catch basins in our MS4 inventory that are inspected through our screening process. This does not include private system inspections and screening performed as a result of customer complaints and IDDE screening.</b>
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)  <b>218</b>
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)  <b>The city has developed and publicized a spill hotline, telephone number: (253) 856-5600, that is maintained for the public to report suspected spills and illicit discharges. This hotline number is publicized through the following methods: • Printed on education and outreach materials such as brochures, door hangers, magnets, and stickers. • Printed on the back of utility billing envelopes • Advertised in the 2022 Utility Rate Brochure • Posted on city website • Bumper stickers on city vehicles • Posted on social media • Advertised on city hall information sign board • Advertised on city telephone "on hold" message All phone calls received through public works environmental engineering and the spill hotline are logged and documented.</b>
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.  <b>Yes</b>
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.

**Yes**

41 S5.C.5 Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.

**Yes**

42 S5.C.5 Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.

**Imported from WQWebIDDE**

43 S5.C.6. Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.

**Yes**

45 S5.C.6. Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)

**0**

46 S5.C.6. Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)

**0**

47 S5.C.6. Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)

**Yes**



47a	S5.C.6.	Number of site plans reviewed during the reporting period. <b>35</b>
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential? <b>Yes</b>
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)? <b>Yes</b>
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. <b>Yes</b>
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. <b>45</b>
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? <b>Yes</b>
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) <b>Yes</b>

51	S5.C.6.	<p>Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)</p> <p><b>Yes</b></p>
52	S5.C.6.	<p>Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii)</p> <p><b>2</b></p>
53	S5.C.6.	<p>Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)</p> <p><b>Yes</b></p>
54	S5.C.6.	<p>Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)</p> <p><b>Yes</b></p>
55	S5.C.6.	<p>All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)</p> <p><b>Yes</b></p>
56	S5.C.7.	<p>Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?</p> <p><b>Yes</b></p>
58	S5.C.7.	<p>Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the</p>

Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)

**No**

59 S5.C.7. Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.

**No**

59a S5.C.7. Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.

**Not Applicable**

60 S5.C.7. Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?

**Yes**

61 S5.C.7. Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)

**Yes**

61a S5.C.7. If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)

**Not Applicable**

62 S5.C.7. Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)

**Yes**

63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)  <b>Yes</b>
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)  <b>640</b>
63b	S5.C.7.	Number of facilities inspected during the reporting period.  <b>621</b>
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.  <b>36</b>
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.  <b>Not Applicable</b>
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.  <b>Yes</b>
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)  <b>Yes</b>
66a	S5.C.7.	Number of known catch basins?  <b>20423</b>

66b	S5.C.7.	Number of catch basins inspected during the reporting period? <b>11205</b>
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? <b>1463</b>
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c)) <b>Not Applicable</b>
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d) <b>Yes</b>
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) <b>Yes</b>
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f) <b>Yes</b>
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) <b>Yes</b>

74a	S5.C.8	Number of total sites identified for the inventory. <b>1194</b>
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). <b>Yes</b>
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). <b>Yes</b>
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. <b>City of Kent 2023 Annual Repor_77_03272024154621</b>
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. <b>City of Kent 2023 Annual Repor_78_03282024163833</b>
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? <b>Yes</b>
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) <b>Not Applicable</b>
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)

**Not Applicable**

- |    |                           |  |
|----|---------------------------|--|
| 82 | S8                        | Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)<br><br><b>Yes</b> |
| 84 | S8                        | Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?<br><br><b>Yes</b>  |
| 87 | S8                        | If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)<br><br><b>Not Applicable</b>                       |
| 88 | G3                        | Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)<br><br><b>Yes</b>  |
| 89 | G3                        | Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.<br><br><b>Yes</b>   |
| 90 | Compliance with standards | Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)<br><br><b>Yes</b>     |

91	Compliance with standards	<p>If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.</p> <p><b>Not Applicable</b></p>
92	Compliance with standards	<p>Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)</p> <p><b>Not Applicable</b></p>
93	G20	<p>Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)</p> <p><b>Yes</b></p>
94	G20	<p>Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.</p> <p><b>1</b></p>
94a	G20	<p>List permit conditions described in non-compliance notification(s).</p> <p><b>The City of Kent is out of compliance with section S5.C.7.a.ii of the Permit. City owned and operated catch basins, flow control, and water quality facilities were inspected in 2022 as required by the Permit. However, the city was unable to complete the cleaning of all catch basins in need of maintenance within the timelines required. The current expectation is that cleaning and repairs will be completed by the end of October 2023. The city owns and maintains 44 parks and other facilities with a combined 566 catch basins and 85 flow control/water quality facilities. These facilities were inspected in December 2022, but due to an unexpected staffing shortage, maintenance was delayed. Of these 44 facilities 38 facilities had catch basins that needed cleaning totaling 206 catch basins that are past due for cleaning. The staffing shortage was exacerbated by the new NPDES Source Control and Planning requirements that necessitated a prioritized approach by staff. Crews are currently planning the work. Some maintenance items will be completed by city</b></p>



**maintenance staff, while others will be contracted out. Some of the larger repair items will likely be accomplished by capital construction contracts and will be scheduled in accordance with permit section S5.C.7.a.ii. While unanticipated staffing shortages are difficult to accommodate, our programs have added staffing and efficiencies to prevent future non-compliance occurrences.**