

Water Quality Program

Permit Submittal Electronic Certification

Permittee: WALLA WALLA COUNTY

Permit Number: WAR046509

Site Address: 314 W Main
WALLA WALLA, WA99362

Submittal Name: MS4 Annual Report Phase II Eastern

Version: 1

Due Date: 3/31/2021

Questionnaire

Number	Permit Section	Question	Answer
1	S5.A.4.	Attach updated annual Stormwater Management Program Plan (SWMP Plan) or website address in the Comment field where it can be found. (S5.A.4.)	Q 1 2020 SWMP_1_03102021080 349
1.a	S5.A.4.	Cite website of SWMP if unable to attach	Not Applicable
2	S9.C.6.	Attach a map and 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.C.6.	Q 2 Annexations 2020 Including_2_030820210 83203
3	S5.A.5.a.ii.	Tracked the estimated costs of implementation of each component of the SWMP. (S5.A.5.a.ii.)	Yes
4	S5.A.6.b.	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.6.b.)	Yes
4a	S5.A.6.b.	Attach a written description of internal coordination mechanisms among departments within the jurisdiction to eliminate barriers to permit compliance. (Required to be submitted no later than March 31, 2021, S5.A.6.b.)	Q 4a Internal Coordination Mec_4a_021720211426 03
5	S5.B.1	Were elements of a regional program implemented to complete any part of your education and outreach program? (S5.B.1)	Yes

5a	S5.B.1	If yes, list the elements, and the regional program	The Walla Walla County Regional Stormwater Group (WWCORSG) was formed in February of 2020 and meets bi-monthly to discuss PE&O opportunities, present and future collaborative efforts, and Permit requirements. One notable collaborating effort in 2020 was the Stormwater message stenciled vehicle traveling over 60 miles through a parade route, reaching an estimated 3,000 spectators. Other regional upcoming outreach and education efforts will include local Effectiveness Studies, messaging for pet waste and a slogan that all regional jurisdictions can utilize.
6	S5.B.1.a.i.-iii.	Attach description of public education and outreach programs and stewardship activities conducted per S5.B.1.a.i.-iii.	Q 6 PE&O_6_03082021081740
7	S5.B.1.a.ii.	Which types of businesses were targeted per S.5.B.1.a.ii.?	Businesses within the Permitted area including; the Walla Walla Regional Airport, gas stations (1 with car wash), and an irrigation parts manufacturer received new brochures (6) focusing on the hazards associated with illicit discharges, floor drain awareness, improper disposal of waste, proper spill cleanup, and dumpster management.
8	S5.B.1.b.	Used results of measuring the understanding and adoption of targeted behaviors among at least one audience in at least one subject area to direct education and outreach resources and evaluate changes in adoption of targeted behaviors. (Required no later than December 31, 1347, S5.B.1.b.)	Not Applicable
9	S5.B.2.a.	Describe in Comments field the opportunities created for the public to participate in the decision making processes involving the development, implementation, and updates of the Permittee's SWMP. (S5.B.2.a.)	Please see attachment for Question 9
10	S5.B.2.b.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31.	Yes

10a	S5.B.2.b.	List the website address in Comments field. (S5.B.2.b.)	http://www.countyroads.com/index.php/stormwater
11	S5.B.3.a.	Maintained a map of the MS4 that includes the requirements listed in S5.B.3.a. (Updated maps required no later than August 1, 2023)	No
12	S5.B.3.a.i.	Attach a spreadsheet that lists the known outfalls and discharge points, including the outfalls' size and material(s). (Required to update no later than August 1, 2023, S5.B.3.a.i.)	Q 12 Direct outfalls 2020 with_12_020820211121 01
13	S5.B.3.a.ix.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.B.3.a.ix. (Required no later than August 1, 2021)	Yes
14	S5.B.3.b.	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.B.3.b.	Yes
15	S.5.B.3.b.vii.	Updated ordinance or regulatory mechanism to meet the requirements of this permit, if necessary. (Required no later than February 2, 2023, S.5.B.3.b.vii.)	Not Applicable
16	S5.B.3.b.vi.	Implemented a compliance strategy, including informal compliance actions as well as enforcement provisions of the regulatory mechanism described in S5.B.3.b. (S5.B.3.b.vi.)	Yes
17	S5.B.3.c.	Implemented procedures for conducting illicit discharge investigations in accordance with S5.B.3.c.	Yes
18	S5.B.3.c.iv.	Percentage of MS4 coverage area screened in reporting year per S5.B.3.c.iv. (Required to screen 12% on average each year, S5.B.3.c.iv.)	33
18a	S5.B.3.c.iv.	Cite field screening techniques used to determine percent of MS4 screened.	1/3 of MS4 visually inspected for maintenance needs and potential Illicit connections. In addition, one priority water body is inspected annually within the permitted area.
18b	S5.B.3.c.iv.	Percentage of total MS4 screened from permit effective date through end of the reporting year.	66

19	S5.B.3.c.v.	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.B.3.c.v.)	Hotline telephone number is posted on the Walla Walla County Stormwater Website as well as 60 brochures with the hotline number and illicit discharge awareness information, sent to Creekside landowners, local businesses, contractors, and Homeowner's Associations. Additionally, brochures were handed out in the field to jobsite contractors and passed to the general public at the Public Works office.
20	S5.B.3.c.vi.	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.B.3.c.vi.	Yes
21	S5.B.3.c.vii.	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.B.3.c.vii.)	Annual Stormwater Pollution Prevention Plan (SWPPP) and illicit discharge awareness training for municipal employees who have the potential to affect Stormwater quality. 60 Brochures with illicit discharge awareness information mailed to residents living adjacent to Stone Creek, local businesses, contractors, Homeowner's Associations, and brochures handed out in the field to jobsite contractors and passed to the general public at the Public Works office.
22	S5.B.3.d.	Implemented an ongoing program designed to address illicit discharges, including spills and illicit connections into the MS4 per S.5.B.3.d.	Yes
23	S5.B.3.e.	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program, as described in S5.B.3.e.	Yes
24	S5.B.3.f.	Attach a report with data describing the actions taken to investigate, characterize, trace and eliminate each illicit discharge found by or reported to the permittee. The submittal must include all of the applicable information and must follow the format and timelines described in Appendix 7. (S5.B.3.f.)	WAR046509-2020-ImportedIDDEs_03102021075647
25	S5.B.4.a.	Implemented an ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.	Yes

26	S5.B.4.a.i.-iv.	Adopted ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.a.i.-iv. (Required no later than December 31, 2022)	Not Applicable
27	S5.B.4.b.	Reviewed site plans for all new development and redevelopment projects as described in S5.B.4.b.	Yes
27a	S5.B.4.b.i.	Number of site plans reviewed during the reporting period. (S5.B.4.b.i.)	8
27b	S5.B.4.b.i.	The number of construction sites that provided their intent to apply for the "Erosivity Waiver" during the reporting period as described in S5.B.4.b.i.	0
27c	S5.B.4.b.i.	The number of complaints investigated about sites that have received an "Erosivity Waiver" . (S5.B.4.b.i.)	Not Applicable
28	S5.B.4.	Implemented procedures for site inspection and enforcement of construction stormwater pollution control measures. (S5.B.4.)	Yes
28a	S5.B.4.c.i.	Number of permitted construction sites inspected during the reporting period. (S5.B.4.c.i.)	13
28b	S5.B.4.f.	Number of enforcement actions taken during the reporting period based on construction phase inspections at new development and redevelopment projects. (S5.B.4.f.)	0
29	S5.B.4.d.	Trained the staff involved in permitting, plan review, field inspections, and enforcement for construction site runoff control. (S5.B.4.d.)	Yes
30	S5.B.4.e.	Provided information to construction site operators and design professionals about training available on how to comply with the requirements in Appendix 1 and the BMPs in the SWMMEW, or an equivalent document. Describe information provided in the Comments field. (S5.B.4.e.)	Yes

30a	S5.B.4.e.	Describe information provided in the Comments field. (S5.B.4.e.)	Links to the NPDES Phase II Permit and appendices, the Stormwater Management Manual For Eastern Washington (SMMEW), the Construction Stormwater General Permit, and links to statewide Certified Erosion and Sediment control Lead (CESCL) classes are provided on the Stormwater website. Brochures handed to contractors & developers at the Public Works office and pre-application meetings contain the above-mentioned links. Walla Walla County hosts a CESCL re-certification class every 3 years and sends invitations to local jurisdictions, contractors, consultants, and the Eastern Washington Stormwater Group for interested participants.
31	S5.B.5.a.	Implemented ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a.	Yes
32	S5.B.5.a.	Revised ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a. (Adopted no later than December 31, 2022)	Not Applicable
33	S5.B.5.b.ii.(a)	Allowed non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) techniques to be used. (S5.B.5.b.ii.(a))	Yes
34	S5.B.5.b.ii.(b)(2)	Required projects approved under S5.B.5. to retain runoff generate on-site for, at a minimum, the 10-year, 24-hour rainfall event or a local equivalent, using either on-site or regional stormwater facilities. (S5.B.5.b.ii.(b)(2))	Yes
35	S5.B.5.d.	Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment sites. (S5.B.5.d.)	Yes
35a	S5.B.5.d.i.	Number of new and redeveloped sites inspected during installation of structural BMPs during the reporting period. (S5.B.5.d.i)	6

35b	S5.B.5.d.i.	Number of new and redeveloped sites inspected upon final installation of BMPs or upon completion of the project during the reporting period. (S5.B.5.d.i.)	8
36	S5.B.5.d.ii.	Inspected structural BMPs at least once every five years after final installation. (S5.B.5.d.ii.)	Yes
36a	S5.B.5.d.ii.	Number of BMPs inspected during the reporting period.	29
37	S5.B.5.d.	Number of enforcement actions taken as a result of these inspections during the reporting period? (S5.B.5.d.)	0
38	S5.B.5.e.	Trained the staff involved in permitting, plan review, inspection, and enforcement for post-construction stormwater control. (S5.B.5.e.)	Yes
39	S5.B.5.f.	Provided information to design professionals about training available on how to comply with the requirements in Appendix 1 and apply the BMPs in the SWMMEW, or an equivalent document. (S5.B.5.f.)	Yes
39a	S5.B.5.f.	Describe information provided and cite the manual used	Links to the NPDES Phase II Permit and appendices, the Stormwater Management Manual for Eastern Washington (SMMEW), the Construction Stormwater General Permit, and links to statewide Certified Erosion and Sediment Control Lead (CESCL) classes are provided on the Stormwater website and brochures at the Public Works office.
40	S5.B.6.a.	Reviewed and, if needed, updated Operations and Maintenance Plan. (Required no later than December 31, 2022, S5.B.6.a.)	Not Applicable
41	S5.B.6.a.	Implemented the schedule of Operation and Maintenance activities for municipal operations. (S5.B.6.a.)	Yes
42	S5.B.6.a.i.(f) and (g)	Have NPDES permit coverage for all applicable Permittee construction projects and industrial facilities. (S5.B.6.a.i.(f) and (g))	Yes
43	S5.B.6.a.i.(h)	Implemented a Stormwater Pollution Prevention Plan 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.B.6.a.i.(h))	Yes
44	S5.B.6.a.ii.(a)	Inspected stormwater treatment and flow control facilities (except catch basins) owned or operated by the Permittee at least once every two years. (S5.B.6.a.ii.(a))	Yes

44a	S5.B.6.a.ii.(a)	Number of facilities inspected during the reporting period.	44
45	S5.B.6.a.ii.(b)	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? (Required at least once every two years, S5.B.6.a.ii.(b))	Yes
45a	S5.B.6.a.ii.(b)	Number of known catch basins.	350
45b	S5.B.6.a.ii.(b)	Number of catch basins inspected during the reporting period.	106
45c	S5.B.6.a.ii.(b)	Number of known catch basins cleaned during the reporting period.	47
46	S5.B.6.a.ii.(b)	If used an alternative to standard schedule for catch basin inspections for all or a portion of the MS4, attach description of the method used. (S5.B.6.a.ii.(b))	Q 46 Facility Inspection Sched_46_0204202114 3902
47	S5.B.6.a.ii.(c)	Conducted spot checks of stormwater facilities after major storms. (S5.B.6.a.ii.(c))	Yes
48	S5.B.6.b.	Trained the staff with primary construction, operations, or maintenance job functions that are likely to impact stormwater quality. (S5.B.6.b.)	Yes
49	S7.A.	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A.)	Yes
50	S7.A.	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.)	Q 50 2020 TMDL_50_0310202109 0913
51	S8.A.	Attach a summary of your participation in effectiveness study development and implementation during the reporting year. (S8.A.1. and S8.A.2.a.)	Q 51 Effectiveness Participati_51_0308202 1084335
56	S8.A.	Was the SWMP updated to include effectiveness study activities? (S8.A.2.f.)	Yes
57	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.)	Not Applicable
58	G3.A.	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
58a	G3.A.	Actions taken to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Walla Walla County answered Yes(Y) to question 58. For clarification, there was no discharge into or from our MS4 during the reporting period which could constitute a threat to human health welfare, or the environment. We answered Yes(Y) as advised in the 2019-2024 EWA Annual Report Guidance Doc provided by Ecology.

59	G20.	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20.)	Not Applicable
60	G20.	Number of non-compliance notifications provided in reporting year. (G20.)	0
61	S4.F.1.	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.)	Not Applicable
62	S4.F.3.a.	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
63	S4.F.3.d.	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.)	Not Applicable

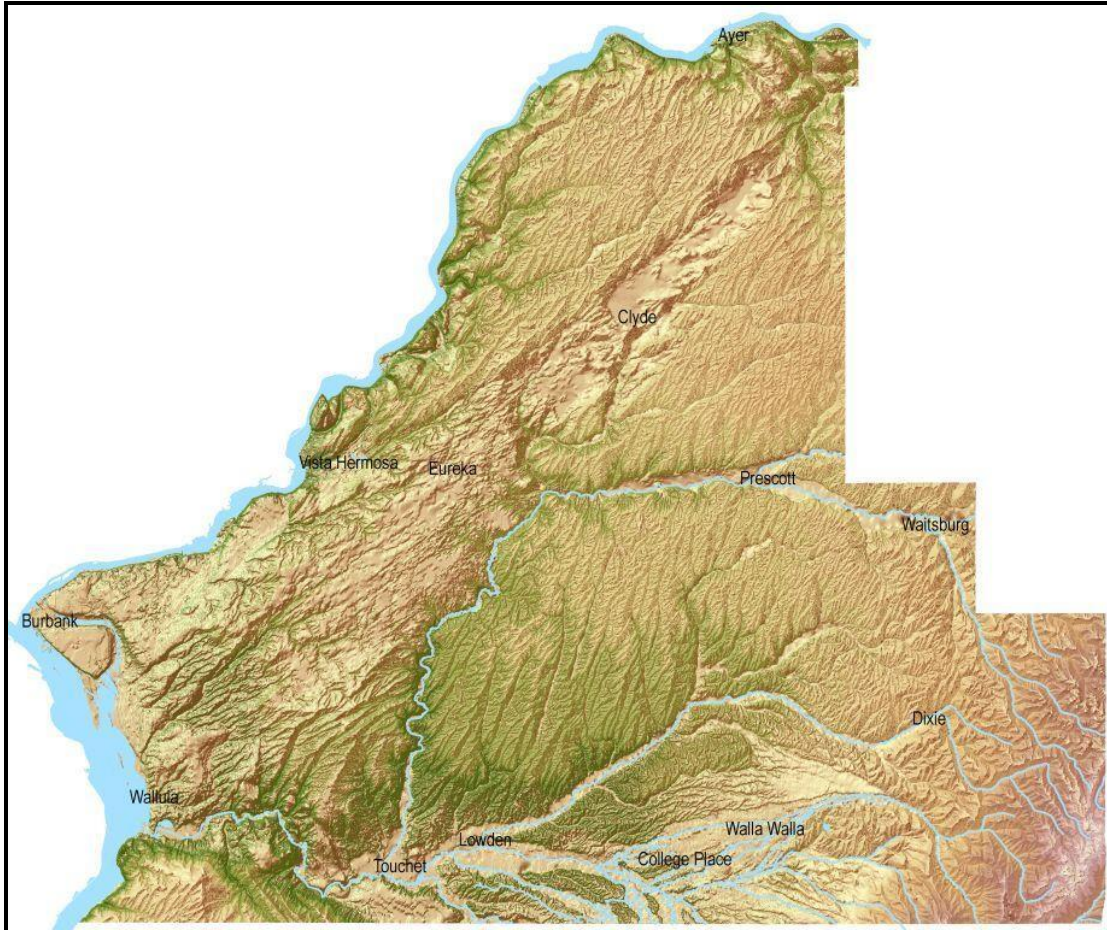
I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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 knowing violations.

Tony Garcia

3/19/2021 2:30:37 PM

Signature

Date



Walla Walla County Stormwater Management Program

2020 Annual Stormwater Report

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Introduction

Urban areas that collect stormwater runoff in storm sewers and discharge it to surface waters are required to have a permit under the Environmental Protection Agency’s Clean Water Act. The Department of Ecology develops and administers the stormwater permits for Washington State, and issued the *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Eastern Washington*, hereafter referred to as the Phase II Permit, on February 16, 2007. The Phase II Permit outlines stormwater program activities and implementation milestones that permittees must follow to comply with the Clean Water Act.

All Phase II communities are expected to develop a Stormwater Management Program (SWMP) that includes the required activities, implement those activities within the required timeframes of the permit term, which is five years, and submit annual reports to Ecology by March 31st each year to document progress.

At the direction of 2012 legislation, Ecology reissued the Eastern Washington Phase II permits without modification for a period of two years, effectively extending the Permit period from five years to seven. Ecology issued an updated and expanded Phase II Permit for Eastern Washington on August 1, 2012, with an effective date of August 1, 2014. Currently, Walla Walla County operates under the third term of the Phase II Permit, which is effective from August 1, 2019 – July 31, 2024.

The Phase II Permit automatically applies to cities and counties with populations less than 100,000 located within or partially within a federally designated urbanized area and that operate a Municipal Separate Storm Sewer System (MS4) which discharges to a “water” of Washington State (i.e., a river, stream, wetland, etc.). Urbanized areas are defined as population centers with greater than 50,000 people and densities of at least 1,000 people per square mile. 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. Walla Walla County (County) has been designated as a Phase II Permittee by Ecology based on the current population of approximately 55,200 and location within the Tri-Cities urbanized area. The Phase II Permit applies to the portion of Walla Walla County that lies within the Urban Growth Areas (UGAs) of the cities of Walla Walla and College Place, and the urbanized areas in and around unincorporated Burbank.

Stormwater Management Program Components

The Phase II Permit is broken down into six components, and the implementation and enforcement of the six components is accomplished through a jurisdiction’s SWMP. The six program components are:

1. Public Education and Outreach

2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management for New Development and Redevelopment
6. Municipal Operations and Maintenance

In addition to these six minimum components, the Phase II Permit also requires the following:

1. Compliance with Total Maximum Daily Load (TMDL) Requirements
2. Monitoring and Assessment
3. Reporting and Record Keeping

The SWMP is designed to reduce the discharge of pollutants from municipalities to the maximum extent practicable, and to satisfy the state requirement to apply “All Known, Available, and Reasonable methods of prevention, control and Treatment” (AKART) prior to stormwater discharge. The Phase II Permit requires increasing implementation and enforcement of the components shown above to achieve full compliance at the end of each permit term.

Stormwater Program Planning

Walla Walla County’s Implementation Schedule for 2021 is included as **Appendix A**. It represents the culmination of various work and related analyses completed by County staff. The Implementation Schedule is a guide for compliance with the Phase II Permit. Stormwater program planning is on-going, and planned activities for the upcoming year are listed and detailed in the matrices of **Appendix A**.

In 2009, the County adopted a new Title of the Walla Walla County Code addressing stormwater, including a chapter establishing a stormwater utility to manage, govern, and fund stormwater management activities. Stormwater Utility billing rolls were completed in 2010 and the County assessed a stormwater service charge for the first time in March of 2011. The following tables show the revenue collected from 2011-2020.

2011	2012	2013	2014	2015
\$253,774	\$285,585	\$270,724	\$277,322	\$235,020
2016	2017	2018	2019	2020
\$256,464	\$233,242	\$301,684	\$245,213	\$330,927

Stormwater Management Program (SWMP)

The following sections of this SWMP describe the actions that the County has taken or will take to comply with the requirements of the Phase II Permit.

It should be noted that Special Conditions S7 (Compliance with TMDL Requirements), S8 (Monitoring and Assessment), and S9 (Reporting and Record Keeping) also apply to permit holders. Beginning in 2019 compliance activities are required to be included in the SWMP and compliance with S7, S8 and S9 are to be addressed in the Annual Report to Ecology. The Permit and annual reporting requirements for these conditions are described as they relate to the implementation of the County's overall stormwater program. In addition, permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G21, 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; legal guidelines for transferring, revoking, and appealing the permit; and penalties for Permit violations.

Public Education and Outreach – Program Component S5.B.1

Regulatory Requirements

The County is required to develop & implement a formal Public Education and Outreach (PE&O) plan aimed at distributing educational materials to the public about the impacts of stormwater discharges to surface water. The County has identified target audiences for public education and outreach. The County must also keep records of all PE&O activities.

Status of Existing Activities

The County began a formal PE&O Program during the first term. The primary focus of the County's PE&O program is to collaborate with entities already engaged in environmental education, and to incorporate information about the natural and beneficial role of stormwater and the impacts of stormwater pollution. Collaborating with entities already engaged in environmental education has multiple benefits: more people can be reached for less money, increasing the impact of the County's program; coupling stormwater with other local environmental concerns makes stormwater less of a "dry" subject, and will encourage people to consider pollution prevention from a whole-watershed approach; and stormwater education will be undertaken by experienced teachers who have honed their communication skills and already know how to reach their audience. The County is continually building partnerships to support the PE&O program.

Due to COVID-19 restrictions, Walla Walla County made efforts to modify and adapt public education and outreach activities in 2020. The National Night Out event was changed to a parade of local jurisdiction first responder vehicles. The City of Walla Walla, taking the lead in messaging, worked in conjunction with Walla Walla County and the City of College Place, to add a stormwater stenciled vehicle (Only Rain Down the Drain) to the celebration. The vehicle traveled approximately 60 miles over a 3-hour parade route reaching an audience of all ages and occupations estimated at 3,000. Informational mailing to residents living adjacent to Stone Creek was achieved in the same manner as previous years.

Additional efforts made to reach the public under the 2020 restrictions include two new brochures. The first aimed at reaching local contractors & construction site operators. The

second targets local businesses within the Permitted area. Further, the Stormwater FAQ at our front desk was revised, but limited numbers were passed to the public due to the Public Works office being closed to public access. Walla Walla County also continues to maintain the website; <http://wwcountyroads.com/index.php/stormwater> to disseminate stormwater information to the public. Finally, a Walla Walla County Public Works representative attended 46 roundtable/pre-application meetings in 2020 with potential developers and disseminated construction stormwater erosion and sediment control information and, as applicable, post-construction stormwater information.

2021 Activities

Planned education and outreach activities for 2021 include:

- Partner with the Walla Walla Regional Stormwater Group to measure understanding and adoption of targeted behaviors for at least one target audience in at least one subject area
- Expanded informational mailing to creekside residents to discuss best practices to reduce yard care and pet waste contaminants
- Handout/mail informational brochures to contractors/construction site operators at jobsites and pre-construction meetings
- Mail informational brochures to businesses within the Permitted area
- Send invitations for CESCL re-certification class (hosted by WW County) to local jurisdictions, contractors, consultants, and the Eastern Washington Stormwater Group for interested participants
- Update the stormwater webpage
- Partner/sponsor used tire collection event, contingent on funding
- Continue storm drain stenciling
- Work with Walla Walla Community College's Water & Environmental Center and City of Walla Walla to provide school-age outreach and education presentations, as school attendance and public health and safety allow
- Participate in community events such as National Night Out, the Walla Walla County Fair, and Return to the River
- Partner with schools adjacent to creeks to provide pet waste stations; sponsor contest to have kids develop informational signage to accompany the pet waste stations

Walla Walla County is committed to collaborative PE&O efforts and intends to partner with the City of Walla Walla for many upcoming education and outreach activities. In addition, Walla Walla County, the City of Walla Walla, and the City of College Place plan to meet bi-monthly in 2021 to update our respective outreach and education programs. In particular, the intention is to incorporate TMDL requirements, such as pet waste messaging, into our upcoming outreach and education events. Further messaging includes providing more information to contractors about proper concrete washout procedures for both public and private construction sites.

A matrix of probable activities and timeframe for completion is included in **Appendix A**, Education and Outreach.

Public Involvement and Participation – Program Component S5.B.2

Regulatory Requirements

The County is required to create opportunities for the public to participate in the decision-making process, and to involve the public in the development, implementation, and update of the County's SWMP and stormwater ordinances.

Status of Existing Activities

The County Board of Commissioners adopted an official public involvement policy in March of 2008 to create opportunities for the public to provide input during the decision-making process involving the development, implementation and update of the SWMP.

The County is also required to make available the most recent version of the SWMP to the public. The SWMP is updated on an annual basis, usually in the early spring and is a living document, available online at: <http://wwcountyroads.com/index.php/stormwater>. Walla Walla County welcomes and accepts public input to the SWMP. Public comments are considered and, where practicable, incorporated into the SWMP. Changes to the SWMP, if deemed necessary, can be made at any time during the year.

2021 Activities

The County will post the latest version of the SWMP with the 2020 Annual Report and create volunteer opportunities in conjunction with the PE&O program and post updated information on the Stormwater website. Many of the PE&O activities will also meet the requirements of this component of the SWMP.

A matrix of probable activities and timeframe for completion is included in **Appendix A**.

Illicit Discharge Detection and Elimination (IDDE) – Program Component S5.B.3

Regulatory Requirements

The County is required to develop, implement, and enforce a program to detect and eliminate illicit discharges to the municipal storm sewer system (MS4). To meet this requirement, the County must: continue to implement and enforce the Illicit Discharge Ordinance prohibiting illicit discharges to the MS4, continue to map the MS4, continue to implement the Illicit Discharge Detection and Elimination (IDDE) Program, and continue to inspect outfalls on priority waterbodies along with discharge points and facilities serving priority areas for evidence of illicit discharges during dry weather flows.

During the 2019-2024 Permit cycle, Walla Walla County is required to comply with Special Conditions S7 & S8. Beginning August 1, 2020, the County will annually select a minimum of two outfall locations for sampling. Samples will be tested for fecal coliform and turbidity in the outfall pipe at each sampling location during two separate storm events, spring and fall. The data collected will be used to trace and remedy fecal coliform sources as part of the Illicit Discharge & Elimination efforts (NPDES Permit-Appendix 2, TMDL Requirements).

Samples were collected from the School Ave outfall at Yellowhawk Creek in December 2020 and January 2021 and from the Abbott Road catch basin discharging to Yellowhawk Creek in January 2021. Sample results are included in the 2020 Annual Report. Starting in 2021 Walla Walla County intends to include sampling results and a discussion of possible sources and actions taken to trace and eliminate those possible sources in the SWMP. Walla Walla County intends to continue sampling in 2021, whenever rainfall events result in actual discharges. There are only two direct outfalls to creeks with TMDLs within the County's Phase II Permit area, and neither discharge stormwater unless there has been intense rainfall. In 2021, Walla Walla County intends to consider increasing street sweeping frequency of roads that drain to the sampled discharge points. The County also intends to conduct dry-weather visual inspections of upstream catch basins and manholes, and to provide targeted outreach about pet waste and yard care best practices to neighborhoods that may drain to these discharge points.

Status of Existing Activities

The County adopted the stormwater code in November of 2009 that prohibits illicit discharges and connections to the MS4 and regulates construction and post-construction stormwater discharges. The County continues to map its MS4 as new components are discovered; the MS4 in the Phase II Permit area is mapped and has been incorporated into the County's GIS. The County will review the IDDE code in 2021 to ensure all provisions are timely, relevant, and unambiguously and unequivocally meet the requirements of the Phase II Permit.

The County Public Works Department has a spill prevention plan for its facilities and equipment, and spill prevention plans are required for contracted construction projects. The County will respond to and investigate reports of spills and illicit connections from outside sources; the County's website and the four brochures targeting businesses, contractors, creek side landowners, and the public include information on reporting illicit discharges. Source tracing and removal activities are conducted on an as-needed basis. The County documents all phone call complaints and the follow-up activities that occurred to remediate the situation.

In 2010, Walla Walla County identified 3 of the 8 creeks within the Permitted area as priority waterbodies. These 3 priority creeks were inspected in 2010 for illicit connections. Since that time, the County has considered each creek within the Permitted area as priority and has been inspecting all the creeks on an 8-year rotating basis. These inspections are limited to the UGA of the County's Permitted area, during the dry season (July, August, September).

The County annually inspects all discharge points i.e., locations where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate, for illicit connections, illicit discharges, and maintenance deficiencies. One priority waterbody, Stone Creek, was field assessed for evidence of illicit discharges in 2020. Visual inspections and mapping were limited to the portions of the creek within the Phase II Permit area. No illicit connections were found.

The County also inspects 1/3 of the MS4 (catch basins/drywells) for evidence of pollution, illicit connections, and maintenance needs annually. Walla Walla County does not own or

operate a sanitary sewer system, and has a very limited MS4, so illicit connections are extremely rare.

Mill Creek outfalls, within the City of Walla Walla jurisdiction, are currently inspected annually (visual inspection only) by the Walla Walla County Mill Creek Flood Control District. Extensive inspections, i.e., sampling, source tracing, mapping, and other IDDE & Total Maximum Daily Load responsibilities, including record keeping duties are the responsibility of the City of Walla Walla.

2021 Activities

The County continues to develop and refine internal procedures for implementing its Stormwater Code. The County will continue to conduct its IDDE program, including inspecting outfalls, tracing sources of illicit discharges, staff training, field assessments, spill response and containment, source tracing, sampling/analyzing, source removal, interfacing with other agencies, and program evaluation.

One priority creek (Caldwell Creek) will be inspected for illicit connections in 2021. Prior to inspection, the County will send adjacent landowners an informational brochure.

A matrix of probable activities and timeframe for completion is included in **Appendix A**.

Construction Site Stormwater Runoff Control – Program Component S5.B.4

Regulatory Requirements

The County must develop, implement, and enforce a program to reduce pollutants in stormwater runoff to its MS4 from construction activities, including private and public projects. This element of the SWMP requires that the County: (1) develop and adopt an ordinance that requires erosion and sediment controls during construction-phase work, including sanctions to ensure compliance; (2) implement procedures for site plan review, including review of Stormwater Pollution Prevention Plans (SWPPPs) prior to construction; (3) implement procedures for site inspection and enforcement of construction stormwater pollution control measures; (4) provide adequate training for all permitting, planning, review, inspection, and enforcement staff, and; (5) maintain records of activities related to site plan review, inspection, and enforcement.

Status of Existing Activities

The Critical Areas Ordinance (CAO) and the State Environmental Policy Act (SEPA) checklist provide some direction for management of construction stormwater, and the CAO includes enforcement language. The County adopted the stormwater code in November of 2009 that prohibits illicit discharges and connections to the MS4 and regulates construction and post-construction stormwater discharges. The County currently reviews site plans with respect to erosion and sediment control and construction stormwater management and enforces its stormwater regulations. SWPPPs are required and reviewed, except for those projects qualifying for an erosivity waiver. The County has qualified personnel to perform site plan review, inspection, and enforcement. Qualified personnel are Certified Erosion and Sediment Control Lead (CESCL) and have received plan-check training. The County

provides information to contractors and developers about training available on erosion and sediment control, Best Management Practices (BMPs), and development of SWPPPs for construction activities.

Since 2013, WWCO has hosted a CESCL recertification class for current card holders. Every three years, the County reaches out to local jurisdictions, contractors, consultants, and the Eastern Washington Stormwater Group for interested participants.

2021 Activities

The County continues to refine procedures for implementing its stormwater code. County Public Works staff work closely with the City's Stormwater Coordinator to train development staff, to establish plan check, inspection, and record-keeping procedures, and to ensure construction stormwater and post-construction stormwater code is enforced. County Public Works staff will attend all Pre-Application/Technical Review meetings and will discuss stormwater requirements with applicants.

A matrix of probable activities and schedule for completion is included in **Appendix A**.

Post-Construction Stormwater Management for New Development and Redevelopment – Program Component S5.B.5

Regulatory Requirements

The County must develop, implement and enforce a program to address post-construction stormwater runoff to the MS4 from new development and redevelopment projects that disturb one acre or more, and from projects of less than one acre that are part of a common plan of development or sale. The program shall ensure that controls to prevent or minimize water quality impacts are in place.

This element of the SWMP requires that the County (1) develop and adopt an ordinance that requires post-construction stormwater controls at new development and redevelopment projects; (2) develop procedures for site plan review to protect water quality during and after construction; (3) implement procedures for site inspection and enforcement of post-construction stormwater control measures; (4) provide training for relevant staff and educate the public; and (5) keep records of all projects disturbing more than one acre that are approved.

Status of Existing Activities

The County adopted the stormwater code that prohibits illicit discharges and connections to the MS4 and regulates construction and post-construction stormwater discharges. The County currently reviews site plans with respect to construction and post-construction stormwater management and enforces its stormwater regulations. Storm drainage plans are considered part of the site plan review and approval process. The County inspects post-construction stormwater runoff controls at the time of installation. The County provides information upon request to landowners, contractors and developers about available resources and training for compliance with construction and post-construction stormwater regulations and BMP design, construction, and maintenance.

2021 Activities

The County continues to refine procedures for implementing its stormwater code. County Public Works staff work closely with the City's Stormwater Coordinator to train development staff, to establish plan check, inspection, and record-keeping procedures, and to ensure construction stormwater and post-construction stormwater code is enforced. County Public Works staff will attend all Pre-Application/Technical Review meetings and will discuss stormwater requirements with applicants.

A matrix of probable activities and schedule for completion is included in **Appendix A**.

Municipal Operations and Maintenance – Program Component S5.B.6

Regulatory Requirements

The County must develop and implement an Operations and Maintenance (O&M) plan to address stormwater pollution from County operations and facilities, with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The O&M Plan includes pollution prevention/good housekeeping practices for municipal operations. In addition, this element requires the County to: develop and implement SWPPPs for material storage areas, heavy equipment storage areas and maintenance areas; implement catch basin cleaning, stormwater system maintenance, scheduled structural BMP inspections and maintenance, spot checks for stormwater treatment and flow control facilities after major storm events and implement provisions to assess water quality impacts in the design of all new flood management projects.

Status of Existing Activities

The County has reviewed existing and near-term municipal construction projects and sought coverage under the statewide NPDES Construction Stormwater General Permit (CSGP) for all projects that meet the criteria for coverage. The County has implemented cyclical inspection and cleaning of catch basins, system lines, and drywells, along with a formal record-keeping process for maintenance. The County currently cleans UIC structures and catch basins with re-occurring sediment levels on an as needed basis derived from field inspection data.

The County has had a formal O&M Plan in place since 2011 and trained the staff with primary construction, operations, or maintenance job functions likely to impact stormwater quality. The County provides annual training for the North and South District County crews, the County Garage employees, and County Fairgrounds maintenance personnel covering applicable SWPPPs, Illicit Discharge awareness, spill cleanup & response, and understanding BMPs.

The County conducts expanded street sweeping within urban areas to remove pollutants before they enter the storm system. Over 67 lane miles were swept in 2020 and approximately 92 cubic yards of debris were removed from the roadways, as well as approximately 3.25 yards of liquified storm system material removed from the MS4 and disposed of at the City of Walla Walla decant facility.

2021 Activities

The County will continue to perform storm system maintenance and inspection, and expanded street sweeping. The County will continue to seek coverage under the statewide NPDES CSGP for projects meeting criteria for coverage. The County will continue to construct storm drainage upgrades to relieve or eliminate stormwater flooding and/or discharges to surface water.

A matrix of probable activities and schedule for completion is included in **Appendix A**.

Compliance with Total Maximum Daily Load (TMDL) Requirements – Special Condition S7

Regulatory Requirements

The County is required to comply with the TMDLs for fecal coliform bacteria in the Walla Walla River Basin during the 2019-2024 Permit cycle. Compliance with TMDLs will be addressed through the required elements of the SWMP:

1. Inventory and inspect the stormwater system to develop a map and descriptions of known and suspected illicit connections and potential sources of fecal coliform bacteria.

The County has developed and maintains a GIS-based map of our MS4 and conducts in-depth inspections of Yellowhawk Creek and Garrison Creek, the two creeks within our Phase II Permit area with TMDLs, under our existing IDDE Program. Walla Walla County does not own or operate any outfalls to Mill Creek. The County owns two functioning outfalls to Yellowhawk Creek; one, located on School Avenue, is solely drainage from the City of Walla Walla and is piped through the County's jurisdiction to Yellowhawk Creek. The second outfall consists of two catch basins owned by the County on Abbott Road which discharge to Yellowhawk Creek. The Abbott Road discharge point is part of a funded project that will eliminate the direct outfall to Yellowhawk Creek in 2023. The School Avenue discharge point is part of an unfunded transportation project and ultimately the goal is to also eliminate this direct outfall. Walla Walla County does not own or operate any outfalls to Garrison Creek.

Walla Walla County does not own or operate a sanitary sewer system. Land use under the County's jurisdiction adjacent to waterbodies with TMDLs is primarily low-density residential. Some of this area is on City of Walla Walla sanitary sewer, some of it is large parcels with individual houses on septic. Most of it is still open space and there are some hobby farms, pastures, etc.

Walla Walla County actively engages with local partner entities through the Mill Creek Work Group to identify opportunities for creek habitat protection and expansion. No egregious polluting sites have been identified; the Mill Creek Work Group prioritizes identification and remediation of fish passage barriers, including

water quality problems. Participation in this group will help the County continue to look for sources of fecal coliform to waterbodies with TMDLs.

Yellowhawk Creek is a distributary of Mill Creek and many water rights in the Walla Walla Valley are held and served through Yellowhawk Creek. Irrigation uptake and return waters are likely one of the larger potential sources of fecal coliform, but this is outside the purview of a Municipal stormwater program and falls outside of the Phase II stormwater permitted area. Possible sources of fecal coliform from the MS4 include pet waste, makeshift camping sites, hobby farms, and illicit connections.

2. Develop and implement a pet waste education program for residents of Walla Walla County.

Based on initial sample results at School Avenue and Abbott Road on Yellowhawk Creek from fall of 2020, the County intends to partner with Walla Walla Public Schools for permission & cooperation in placing ‘mutt mitt’ stations on their property upstream from the sampled outfalls. Walla Walla County also intends to conduct targeted outreach activities directed towards homeowners in neighborhoods that discharge to those outfalls, with information on yard care and pet waste best practices.

3. Consider during SEPA review the potential for projects to increase runoff and sources of fecal coliform, and the need for mitigation measures to reduce these adverse impacts to the MS4 and surface waters.

Ongoing, through Construction Stormwater Requirements. Walla Walla County Public Works participates in weekly Pre-Application/Technical Review roundtable meetings with the County’s Community Development Department and reviews SEPA applications routinely for water quality impacts. This is also part of review conducted under the County’s Shoreline Program.

4. Beginning August 1, 2020, annually select a minimum of two outfall locations for sampling. Sample bacteria and turbidity in the outfall pipe at each outfall during two separate storm events (in spring and fall).

Walla Walla County is required to comply with Special Conditions S7 & S8. Walla Walla County began checking sampling locations in the fall of 2020 at two outfall locations: School Avenue at Yellowhawk Creek and Abbott Road at Yellowhawk Creek. These outfalls did not discharge until a heavy rain in late December; from our initial season of monitoring, our data shows we must receive more than 0.25-inch of rain in 24 hours before there is a stormwater discharge. Samples were tested for fecal coliform and turbidity from the outfall pipe (according to the Department of Ecology ‘Collecting Grab Samples from Stormwater Discharges’, Standard Operating Procedure Version 1.1, July 2018, Publication 18-10-023). We will continue this general procedure, sampling at least twice at each outfall during two separate storm events, spring and fall. The data collected will be used to trace and remedy fecal coliform sources as part of the County’s IDDE efforts.

5. **Starting January 1, 2020, for each outfall drainage area investigated under the IDDE program, the County shall submit to Ecology in the Annual Report summarizing results of any outfall monitoring.**

Sampling requirements did not begin until August 1, 2020; Walla Walla County has sampled and analyzed outfall samples since the fall of 2020.

Monitoring and Assessment – Special Condition S8

Regulatory Requirements

The County shall provide, in each Annual Report, a description of any Stormwater monitoring or Stormwater-related studies conducted during the reporting period. If other Stormwater monitoring or Stormwater-related studies were conducted on behalf of the Permittee during the reporting period, or if Stormwater-related investigations conducted by other entities were reported to the County during the reporting period, a brief description of the type of information gathered or received shall be included in the Annual Report.

Every Municipal Stormwater Phase II Permittee in Eastern Washington shall collaborate with one another to select, propose, develop, and conduct Ecology-approved studies to assess, on a regional or sub-regional basis, effectiveness of Permit-required SWMP activities and BMPs.

Status of Existing Activities and Needs

Walla Walla County is a collaborative partner with the Eastern Washington Stormwater Group (EWSG) in developing Program Effectiveness Studies. On June 20, 2016, Walla Walla County submitted 14 Program Effectiveness Study questions to Ecology for review, per requirement S8.B.2 and S8.B.3 of the Phase II Permit. Walla Walla County continues to participate, as requested, with Yakima & Spokane Counties (Lead agencies in two separate studies) to satisfy the Effectiveness Study requirement from the 2014-2019 Permit cycle.

Yakima County is Lead on the BMP Inspection and Maintenance Responsibilities Study and has enlisted Walla Walla County to serve as Technical Advisory Group (TAG) members for the Quality Assurance Project Plan (QAPP). Spokane County is Lead on the Bioretention Soil Media Study and has carried most duties within their jurisdiction, while reporting the progress of the Study at the Eastern Washington Stormwater Group (EWSG) regular meetings.

Walla Walla County is required to report the final results of each Study and recommend future actions based on the findings no later than six months after completion of the Study and by other means and timelines identified in the approved QAPPs (S8.B.10. 2014-2019 NPDES Permit).

Walla Walla County is required to participate in an additional Stormwater Management Program Effectiveness Study with local jurisdictions. Bi-monthly meetings with the City of Walla Walla have included discussions of Study ideas and implementation. Both jurisdictions are interested in effectiveness studies that will have immediate practical application. One potential effectiveness study would look at construction site track-out and attempt to determine the most effective way to reduce track-out, be it through education, enforcement,

or BMP redesign specific to soil type. Further meetings are intended to determine the path forward, paying attention to applicable deadlines. The City of Walla Walla and Walla Walla County plan to select a lead entity and enter into a memorandum of understanding in March/April 2021.

Reporting and Record Keeping – Special Condition S9

Regulatory Requirements

The County is required to prepare and submit Annual Reports to Ecology. The Reports must include the most current version of the County's SWMP and status of compliance with the various conditions outlined in the permit. The Annual Reports must include: (1) the status of implementation of each SWMP component; (2) an assessment of the County's progress in meeting the minimum performance standards; (3) a description of activities implemented, including the number and type of inspections, enforcement actions, PE&O activities, and illicit discharges detected and eliminated; and (4) other reporting requirements including TMDL outfall sampling results.

Status of Existing Activities and Needs

The County is continuing to implement and refine a formal on-going process for gathering, recording, maintaining, and using information to track the development and implementation of the SWMP. The Community Development Department uses a database system to track all development activity. Public Works uses this system to track construction and post-construction stormwater projects and monitor compliance. Further, Walla Walla County conducts inspections and keeps internal records of the following; Illicit discharge inspections and investigations, BMP inspections prior to clearing and grading and follow-up erosion and sediment control inspections during construction, enforcement inspections prior to and during construction (if applicable), Post-construction inspections of structural BMPs during installation and inspections of structural BMPs after installation, annual Post-construction inspections of structural BMPs, and O&M spot checks of treatment and flow control facilities.

Internal Coordination Mechanisms and Coordination Among Permittees – S.5.A.6

Regulatory Requirements – Internal Coordination

No later than March 31, 2021, the County is required to submit a written description of internal coordination mechanisms to eliminate barriers to compliance with the terms of this Permit, in the Annual Report. (S5.A.6.b.).

The County has attached a revised document in this year's Annual Report to satisfy S5.A.6.b. which includes the specifics of how internal coordination is achieved in relation to each Permit section. A summary of the departments that assist Public Works in achieving Permit compliance has been added to the attachment and includes the following: (1) A description of the various departments at the County and how they interact to achieve permit compliance. (2) Department meetings, their frequency, and participating departments i.e., Department Head meetings which include the County's Elected Officials and occur once per

month. Public Works (PW) staff meetings include the PW director and PW department heads and occur weekly. The County PW Development Team meets with the Community Development Team for weekly project roundtable discussions. (3) Other departments are on an as needed basis including but are not limited to; County Treasury, the County Assessor's Office, Technology Services, and the Board of County Commissioners.

Regulatory Requirements – Coordination Among Permittees

The County is required to include in the SWMP any coordination mechanisms clarifying roles and responsibilities for the control of pollutants between physically interconnected MS4s covered by a Municipal Stormwater Permit and coordinating stormwater management activities for shared water bodies or watersheds among Permittees, to avoid conflicting plans, policies, and regulations. (S5.A.6.a.i & S5.A.6.a.ii).

In July of 2015, the City of Walla Walla proposed to Walla Walla County that stormwater pipes crossing jurisdictional lines should be maintained by the upstream jurisdiction until the pipe reaches a facility belonging to the neighboring MS4. Upstream facilities would be owned and maintained by the upstream jurisdiction and downstream facilities would belong to the downstream neighbor. The County agreed.

The City of College Place is a new Permittee beginning this Permit cycle and has no previous arrangement or agreement with its neighbors regarding multi-jurisdictional stormwater.

On February 27, 2020, the County held the first of what is now a bi-monthly (once every other month) meeting with the City of Walla Walla and the City of College Place with the goal of standardizing the internal coordination procedures of the three above-mentioned jurisdictions. Our local jurisdictions agreed to call our consensus group the Walla Walla County Regional Stormwater Group (WWCORSG). Future meetings will address TMDL requirements, PE&O updates, local effectiveness studies and general information sharing.

Beginning in 2020, the County began sampling outfalls in compliance with the TMDL requirements. High fecal coliform counts at an outfall pipe on School Avenue prompted the County to meet with the City of Walla Walla to discuss pipe testing upstream of the outfall, which is solely the City of Walla Walla's jurisdiction. The City volunteered to sample at some manholes upstream from the County outfall. Upstream sampling results are pending additional sampling.

Appendix A – Implementation Schedule

**Appendix A
Implementation Schedule, 2021**

Outreach & Education, Public Involvement and Participation

Format/Distribution	Objective	2021 Schedule				Responsible Party	Benchmark
<i>Describe type of educational material and how it will be distributed</i>	<i>List desired outcome of educational effort; include target audience</i>	w	sp	su	f	<i>List departments, organizations, etc responsible for material development and distribution</i>	
Post updated info on stormwater website	Keep public up-to-date with SWMP activities; general public, County-wide	x	x	x	x	Public Works Dept. (Storm Tech)	Update website annually
Storm drain stenciling	Increase awareness that materials placed in catch basins discharge to creeks; general public, county-wide			x	x	Public Works Dept. (Storm Tech)	Ongoing program
Brochure mailing to creekside landowners	Educate public about SW pollution prevention; general public, County-wide		x			Public Works Dept. (Storm Tech)	Annually
Brochure mailing to businesses in Phase II Permit Area	Educate businesses of IDDE awareness, including IDDE hotline, and proper waste disposal; businesses, Phase II Permit Area		x			Public Works Dept. (Storm Tech)	Annually
Provide information to contractors about proper concrete washout procedures	Education for contractors on both public and private construction projects, at pre-construction meetings; contractors	x	x	x	x	Public Works Dept. (Storm Tech, Tech IV)	Ongoing program beginning in 2020
Work with school-age children at National Night Out Events to educate students about stormwater pollution prevention	Educate kids about surface water quality and ways to reduce SW pollution; school children				x	Public Works Dept. (Tech IV)	Ongoing program contingent on COVID-19
Pet waste program - Targeted mailing to homeowners near Yellowhawk Creek	Inform public Yellowhawk may have high concentrations of fecal coliform bacteria, and that their actions can have an impact		x			Public Works Dept. (Storm Tech) & Kooskooskie Commons	Ongoing program beginning in 2021
Pet waste program - Partner with City of Walla Walla and Walla Walla Public Schools to install pet waste stations at creek-side schools	Provide pet waste bags to reduce pet waste in stormwater runoff; school children, general public		x	x		Public Works Dept. (Storm Tech) & Kooskooskie Commons	Ongoing program beginning in 2021
Pet waste program - Partner with City of Walla Walla and Walla Walla Public Schools to provide in-class activities to students about pet waste and water pollution	Enlist school children as partners to reduce pet waste on school property; school children			x	x	Public Works Dept. (Storm Tech) & Kooskooskie Commons	Annually

**Appendix A
Implementation Schedule, 2021**

<i>Illicit Discharge Detection & Elimination</i>		2021											
Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Publicize hotline number													
Continue mapping existing and new outfalls													
Field assess 1 priority water body													
Outfall sampling and source tracing													
Compliance with TMDL requirements													
<i>Construction Site Stormwater Runoff Control</i>		2021											
Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Outreach & education for construction sw													
Plan check & inspection, SEPA review													
Update training													
Track all projects > 1acre													
Handout brochures to contractors at pre-construction meetings													
<i>Post-construction Stormwater Management</i>		2021											
Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Plan check & inspection													
Update training													
Track projects and inspect BMPs every 5 yrs													
Inspect BMPs upon final installation or project completion													
<i>Municipal Operations and Maintenance</i>		2021											
Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
O&M training													
Continue catch basin cleaning, stormwater system maintenance, BMP inspections and maintenance, and pollution prevention/good housekeeping practices													
Street sweeping													
Assess water quality impacts in the design of all new flood management projects													
Track projects and inspect BMPs every 5 yrs													