



Water Quality Program

Permit Submittal Electronic Certification

Permittee: KENT CITY OF

Permit Number: WAR045520

Site Address: 220 4TH AVE S
KENT, WA 98032

Submittal Name: MS4 Annual Report Phase II Western

Version: 1

Due Date: 3/31/2025

Questionnaire

Number	Permit Section	Question	Answer
1	S9.D.6	Attach a map 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.	Not Applicable
2	S5.A.2; S9.D.1	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)	City of Kent 2024 Annual Repor_2_03282025171 508
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
5	S9.D.4	If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)	Not Applicable
6	S5.C.1.a	Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)	Yes
12	S5.C.1.c.i	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
13	S5.C.1.c.i(a)	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
19	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes

19a	S5.C.2	If yes, list the elements, and the regional program.	<p>Puget Sound Starts Here</p> <ul style="list-style-type: none"> •Scoop Every Poop – pet waste disposal •Don't Drip and Drive – fix car leaks •Drain Rangers – children's education and outreach program <p>Poverty Bay Shellfish Protection Area:</p> <ul style="list-style-type: none"> •Zero Poo - pet waste disposal <p>Regional Dumpster Lid Social Marketing Campaign</p> <ul style="list-style-type: none"> •Shut It – dumpster lid closure
20	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	City of Kent 2024 Annual Repor_20_03242025094929
24	S5.C.2.a.iii	Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
24a	S5.C.2.a.iii	Attach a list of stewardship opportunities provided.	City of Kent 2024 Annual Repor_24a_03242025094929

25	S5.C.3.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 and the SMAP.	<p>The city creates opportunities for public involvement and participation in the development and implementation of the SWMP 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's SWMP and SMAP documents and activities:</p> <ul style="list-style-type: none"> •The city NPDES Program webpage: www.kentwa.gov/npdes •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: npdes@kentwa.gov
25a	S5.C.3.a.i	Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)	<p>The City of Kent is committed to ensuring meaningful public engagement and participation, particularly among overburdened and highly impacted communities. Our engagement strategy prioritizes reaching all members of the community, acknowledging the prevalence of complex needs within a diverse city. Due to the city's widespread experience</p>

with socioeconomic and environmental challenges, our outreach events inherently connect with populations experiencing disproportionate impacts. According to the Washington Environmental Health Disparities Map, the whole City of Kent ranks very high (9 or 10 out of 10) for primary language other than English. The city strives to make the most of opportunities to engage with our citizens by ensuring that our education materials and participation opportunities are accessible to the top languages spoken within the city. The city creates opportunities for public involvement and participation in the development and implementation of the SWMP and SMAP primarily by posting documentation online through the city's website and soliciting feedback through public notice. The public may review and provide comment on Kent's SWMP and SMAP documents through the city's NPDES Program webpage: www.kentwa.gov/npdes. The city's website includes translation services to ensure accessibility to the diverse populations in Kent. Additionally, in 2024, the city translated one of our general stormwater educational brochures into the top 6 languages spoken in Kent. These brochures were distributed at stormwater education and outreach events and were available at

			<p>other community outreach events such as National Night Out and Drinks in the Driveway. Drinks in the Driveway connects the mayor and city officials with neighborhood councils and gives residents opportunities to discuss concerns, ideas for solutions, and learn more about city services.</p> <p>By providing language accessible materials and feedback mechanisms, and meeting residents in their own neighborhoods to solicit feedback on what matters to them, Kent provides opportunities for overburdened communities to be involved in shaping stormwater policies, projects, and programs, which ensures that our stormwater management efforts align with our diverse community needs.</p>
26	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
26a	S5.C.3.	List the website address in Comments field.	https://www.kentwa.gov/NPDES
27	S5.C.4.	Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?	Yes
32	S5.C.5.b	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)	Yes
32a	S5.C.5.b	Describe actions in Comments field. (S5.C.5.b)	The city promotes awareness among staff, businesses, and the general public of hazards associated with illicit discharges and improper disposal of wastes through city codes and standards, and procedures. Staff receive training on these risks and the required preventative Best Management Practices (BMPs). Inspectors and field staff actively

engage with the public, property owners, and business managers during field screenings, private facility inspections, and at education and outreach events. These interactions aim to educate on the hazards of illicit discharges, the importance of implementing and maintaining BMPs for pollution prevention, and proper waste disposal practices. These meetings may be recorded as part of the public education and outreach program outlined in S5.C.2: Public Education and Outreach. Additionally, all staff training is thoroughly documented.

Additional efforts by the city toward detection and response education and outreach for the general public include:

- Source Control inspection program that provides education and technical guidance to businesses and/or sites that have the potential to pollute to our MS4
- Education and outreach material available in various languages
- Pocketalk 2-way translation device used to educate effectively across language barriers
- Spill Hotline 253-856-5600
- Spill Kit Program for Source Control Facilities
- Single family residential environmental compliance inspections
- Operation and Maintenance compliance inspections
- City website to inform the public about stormwater pollution: National Pollutant Discharge Elimination

			<p>Program</p> <ul style="list-style-type: none"> •Social media posts •Attend public events educate about the risks of stormwater pollution, proper methods of waste disposal and good housekeeping practices •Planet Protectors Summit event for elementary aged children •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 •Kent Recycling and Hazardous Waste Collection Day •Kent Police Prescription Drug Take-Back Day
33	S5.C.5.c	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5.d.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5.d.i	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.9 of this document regarding Municipal Operations and Maintenance.

The Environmental Compliance Specialist team conducts field screening of private storm sewer systems at commercial, industrial, and single and multi-family properties, as well as in response to spill and IDDE complaints in Kent. This screening process follows the same methodology used for the MS4 mentioned above.

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 2025.
36	S5.C.5.d.i(a)	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	49
36a	S5.C.5.d.i(a)	Cite field screening techniques used to determine percent of MS4 screened.	The percentage of MS4 coverage area screened is determined by the percentage of public catch basins in our MS4 inventory that are inspected through our screening process. This does not include private storm system inspections and screening performed as a result of customer complaints and IDDE screening.

37	S5.C.5.d.ii	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)	<p>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:</p> <ul style="list-style-type: none"> •Printed on education and outreach materials, such as brochures, posters, door hangers, magnets, and stickers. •Printed on the back of city staff business cards •Printed on the back of utility billing envelopes •Advertised in the 2024 Utility Rate Brochure •Posted on city website •Bumper stickers on city vehicles •Posted on social medial •Advertised on city hall information sign board •Advertised on city telephone “on hold” message <p>All phone calls received through public works environmental engineering and the spill hotline are logged and documented.</p>
38	S5.C.5.d.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
39	S5.C.5.e	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
40	S5.C.5.f	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.	Yes
41	S5.C.5.g	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 13.	WAR045520-2024-ImportedIDDEs_03282025171531

42	S5.C.6.b.i-iii	Continued to implement 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
44		Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?	Yes
44a		If yes, state the title of the Stormwater Management Manual and which Phase I Program.	The City of Kent Surface Water Design Manual adopts the King County Surface Water Design Manual.
45	S5.C.6.b.i. and Section 5 of Appendix 1	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.b.i., and Section 6 of Appendix 1	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.c.i	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.c.i	Number of site plans reviewed during the reporting period.	44
48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii?	No
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii.	88
49b	S5.C.6.c.iv	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv?	Yes
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)	Yes
51	S5.C.6.	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)	Yes
52	S5.C.6.c.viii	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)	4
53	S5.C.6.c.vi	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes

54	S5.C.6.d	Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.e	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)	Yes
56	S5.C.7.b	Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)	City of Kent 2024 Annual Repor_56_0328202517 1345
57	S5.C.8.b	Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years)	Yes
57a	S5.C.8.b	Number of total sites identified for the inventory.	1215
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d.	City of Kent 2024 Annual Repor_58_0327202508 4808
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d.	City of Kent 2024 Annual Repor_59_0327202508 4808
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e?	Yes
61	S5.C.9.a	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.9.a?	Yes
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a)	No
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes
64a	S5.C.9.a.ii	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable

65	S5.C.9.b.i(a)	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 S.5.C.9.b.i(a)?	Yes
66	S5.C.9.b.i(b)	Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)	Yes
66a	S5.C.9.b.i(b)	Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?	No
66b	S5.C.9.b.i(b)	If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).	Not Applicable
67	S5.C.9.b.ii	Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
68	S5.C.9.c.i	Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	Yes
68a	S5.C.9.c.i	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	694
68b	S5.C.9.c.i	Number of facilities inspected during the reporting period.	694
68c	S5.C.9.c.i	Number of facilities for which maintenance was performed during the reporting period.	27
69	S5.C.9.c.i	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.	Not Applicable
70	S5.C.9.c.ii	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
71	S5.C.9.c.iii	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.9.c.iii)	Yes
71a	S5.C.9.c.iii	Number of known catch basins and inlets?	20842
71b	S5.C.9.c.iii	Number of catch basins and inlets inspected during the reporting period?	10209
71c	S5.C.9.c.iii	Number of catch basins and inlets cleaned during the reporting period?	1732
72	S5.C.9.c.iii	Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.	Not Applicable
73	S5.C.9.d	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.9.d)	Yes

79	S5.C.9.f	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.9.f)	Yes
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)	Yes
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Not Applicable
82	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)	Not Applicable
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8.A.2.a, S8.A.2.b	Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b.	Yes
85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
86	S8.B.2.a, or S8.B.2.b.	Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b.	Yes
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)	Not Applicable
89	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)	Yes
90	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
91	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)	Yes
92	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
93	Compliance with standards	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

94	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)	Yes
95	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	2 Comment: S5.C.7.a.ii (cleaning and maintenance - Parks)

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.

Chad Bieren

3/28/2025 6:06:26 PM

Signature

Date