



City of Burien

2016 Stormwater Management Program Plan (SWMP)

**City of Burien
Department of Public Works
400 SW 152nd St., Suite 300
Burien, WA 98166**

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City of Burien **2016 Stormwater Management Program (SWMP) Plan**

Background

This Stormwater Management Program (SWMP) Plan is required by the Western Washington Phase II NPDES Municipal Stormwater Permit (Permit). The current Permit was issued by the State Department of Ecology (Ecology) to the City of Burien (City) on August 1, 2012 and became effective on August 1, 2013. This Permit was appealed, and a modified Permit became effective on January 16, 2015. It provides general guidelines, procedures and regulations to support an effort to preserve, protect, and improve the State's water resources. This Permit is intended to reduce adverse impacts to water quality and aquatic habitat by instituting the use of controls on the unregulated sources of stormwater discharges that have the greatest likelihood of causing continued environmental degradation. Permit and SWMP related components are intended to support these goals and are required to be implemented by the specific dates provided in the permit. The current permit expires on July 31, 2018.

This document will be updated annually to reflect those items that have been implemented during the previous year in response to permit target dates. The SWMP should be viewed as a "working draft" as it appears here and in later annual updates. As required, by May 31st of each year, the updated document will be available for review and comment on the City of Burien Stormwater website. This SWMP is available on the City's website at <http://www.burienwa.gov/swmp>

Questions, suggestions and comments on the National Pollution Discharge Elimination System (NPDES) permit or SWMP development can be directed to Dan O'Brien at (206) 248-5538.

Discussion

The Permit identifies six major components of the SWMP:

1. Public Education and Outreach. (S5.C.1)
2. Public Involvement and Participation. (S5.C.2)
3. Illicit Discharge Detection/Elimination. (S5.C.3)
4. Controlling Runoff for new and redevelopment construction sites. (S5.C.4)
5. Pollution Prevention for Operations and Maintenance for Municipal Operations. (S5.C.5)
6. Monitoring and Assessment (S8)

A general description of these components, followed by a detailed listing of related requirements, is provided in the following pages. The City of Burien is responsible for implementing Permit requirements by the specified target dates, and updating the SWMP to reflect this implementation. Current component and item statuses are briefly addressed with notes generally following the appropriate requirement listings. This document constitutes the City of Burien's SWMP and will be revised and formalized as Plan implementation progresses.

1. PUBLIC EDUCATION AND OUTREACH

This section describes the permit requirements, current City activities, and planned actions. The education program may be developed locally or regionally. As required by the previous Phase II Permit, the City must have a public education and outreach program currently in place. This section will outline upcoming implementation deadlines required by the current Permit.

1.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to:

- Provide an education and outreach program for the area served by the MS4. The program shall be designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. **No later than February 2, 2016**, Permittees shall use the resulting measurements to direct education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors. Permittees may meet this requirement individually or as a member of a regional group.

1.2 Current Activities

Current City of Burien activities include:

- Car wash program, which includes providing car wash kits to local groups to use for fundraising events, or for residents for home use, free of charge.
- Spill kits and water quality BMP education for businesses.
- Miller and Walker Creek Basin Stewardship program.
- Having an Erosion and Sediment Control (ESC) brochure available for small construction sites.
- Distributing Low Impact Development (LID) information to interested audiences.
- Staffing a table at the Burien Farmer's Market to provide educational materials and information to the public.
- Posting allowable and prohibited discharge information on the City's website.
- Posting residential car wash information on the City's website.
- Posting Puget Sound Starts Here link information on the City's website.
- Sponsoring Natural Yard Care workshops.
- Advertising public education workshop information on the City's website.
- Providing stormwater information to the public in the quarterly City newsletter.
- Water quality audit program, assisted by King County.
- Posting a hotline number on the City's website for illicit discharge and hazardous material/oil spill reports.
- Continued ongoing Public Education programs with the Environmental Science Center for students, City staff, and the general public. The Environmental Science Center is a non-profit organization offering experiential environmental education programs for students and citizens in Burien and South King County.
- Documenting and maintaining information on public education/outreach activities.
- Implement a program or study to measure the understanding and adoption of targeted behaviors for at least one targeted audience, for the purpose of directing future education and outreach resources more effectively. See Appendix A for more information on the City's efforts in this area for 2015.
- In fall 2015, the Burien City Council approved an additional (1) FTE to be focused on stormwater public education and outreach efforts for the City. As of March 2016, the City is in the hiring process and hopes to have a new staff member beginning soon. This new employee will review the City's current education and outreach efforts, and begin to expand on our current efforts in this area.

2. PUBLIC INVOLVEMENT AND PARTICIPATION

This section describes the permit requirements, current City activities, and planned actions for providing opportunities for public involvement and participation in Stormwater Management Plan development. All cities shall create opportunities for the public to participate in the decision-making processes involving the development, implementation and updating of the Permittee's SWMP. Each city shall develop and implement a process for consideration of public comments on their SWMP.

2.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to:

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP.
- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the Permittee's SWMP.
- Post on its website the updated SWMP Plan and the annual report required under S9.A no later than May 31 each year. All other submittals shall be available to the public upon request.

2.2 Current Activities

- The City posts the latest version of the SWMP and Permit Annual Report on the City's website by May 31st each year.
- The City continues to solicit and receive public comments through the City's website and City newsletters.
- The City continues to involve the public through the Basin Stewardship program, including volunteer event coordination and providing a public liaison for stormwater questions and concerns with the Miller-Walker Basin Steward.
- Continue to implement the Farmer's Market staff tabling program, which will provide opportunities for the public to interact directly with City stormwater staff and make comments and suggestions for stormwater program improvements.
- Once hired, the City's Public Education and Outreach Specialist is expected to begin both working with the City Communication Officer on outreach and marketing materials, and working with the Miller-Walker Basin Steward on opportunities for improvement or expansion of that program.

3. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section describes the permit requirements, current City activities, and planned actions related to Illicit Discharge Detection and Elimination (IDDE). The City shall continue to provide an ongoing program designed to prevent, detect, characterize, track and eliminate illicit connections and illicit discharges into the MS4.

3.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to:

- Continue mapping the MS4 on an ongoing basis, including periodic updates as needed.
- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. **This program shall include field screening of at least 40% of the MS4 no later than December 31, 2017, and on average 12% each year thereafter.**
- Document IDDE Field Screening Methodology in the Annual Report.
- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.
- Train staff that are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connection, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.
- Track and maintain records of the activities conducted to meet the requirements of this section.

3.2 Current Activities

- The City continually updates its GIS stormwater map from existing as-built drawings and from new and re-development projects that contain either privately or publicly owned stormwater facilities.
- A GIS Stormwater Map is available on the City's website, and paper maps are available upon request from the Public Works Department.
- The hotline number for spills and illicit discharges is publicized on the City's website.
- The City performs field inspections and keeps records for all reported illicit discharges and connections, with technical assistance from King County and DOE.

- The City has a Water Quality Audit program, assisted by King County. This program provides inspections of businesses of which the City has received reports of spills or other activities that may have created an illicit discharge.
- The City has adopted a SWM ordinance to address Illicit Connection (IC) and Illicit Discharge Detection and Elimination (IDDE). The ordinance includes a list of allowable and prohibited discharges to the City's drainage system or streams.
- The City has developed an enforcement strategy and the SWM ordinance includes escalating enforcement procedures and actions.
- The City has prioritized receiving waters for visual inspection. The evaluation was based on potential pollution, flooding, and erosion. Prioritized water bodies within the city are listed as Miller Creek, Walker Creek, and Salmon Creek.
- Utilizing Ecology's 2013 Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (IDDE Manual) as a procedural guide, the City has begun to implement a combination of Catch Basin/Manhole and Outfall inspections as its IDDE Field Screening Methodology. The inspections will follow a "monitoring node approach", as described in Section 3 of the IDDE Manual, in which the inspection of a small drainage area is begun at an outfall, and each outfall or catch basin inspected will include up to 20 upstream catch basins, or an entire conveyance network, whichever is smaller. Each grouping of catch basins is considered a "node." Standard field screening techniques, based on the IDDE Manual, will be applied to these inspections. An electronic inspection form has been developed for the City's Cityworks Asset Management system, and was used for Field Screening inspections beginning in 2015. See Appendix B for more information on the City's efforts in this area for 2015.
- The City provides IC/IDDE trainings to City staff as needed on identification and reporting of illicit discharges. Follow up training is provided to City staff, as necessary, to address changes in procedures or requirements.
- The City keeps updated records for drainage complaints, spills, and IC/IDDE reports.

4. **CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES**

This section describes the permit requirements, current activities, and planned actions related to controlling runoff from new development, redevelopment, and construction sites. As required by the previous Permit, the City must have adopted an ordinance or other enforceable mechanism no later than February 16, 2010. The program shall apply to private or public development, including roads.

4.1 **Permit Requirements**

Section S5.C.4 requires the City to:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects. **The ordinance or other enforceable mechanism shall be adopted and effective no later than December 31, 2016.** The local program adopted to meet the requirements of S5.C.4.a (i) through (iii), shall apply to projects approved prior to January 1, 2017, which have not started construction by January 1, 2022.

The local program outlined above shall include:

- A permitting process with site plan review, inspection and enforcement capability to meet the standards listed in S5.C.4.b (i) through (iv), for both private and public projects, using qualified personnel. At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.4.a.i.
- Provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S5.C.4.b. **These provisions shall be in place no later than December 31, 2016.**
- The program shall make available as applicable copies of the “Notice of Intent for Construction Activity” and copies of the “Notice of Intent for Industrial Activity” to representatives of proposed new development and redevelopment. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- Each Permittee shall ensure that all staff whose primary job duties fall within this section are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.
- **Permittees shall address Low Impact code-related requirements, pursuant to S5.C.4.f (i) and (ii), no later than December 31, 2016,** and shall submit a summary of the results of the review and revision process with the annual report no later than March 31, 2017.

- Each Permittee that has all or part of its coverage area in a watershed selected by a Phase I county for watershed-scale stormwater planning under condition S5.C.4.c of the Phase I Permit shall participate with the watershed-scale stormwater planning process led by the Phase I county.

4.2 Current Activities

- The City has adopted the *2009 King County Surface Water Design Manual (KCSWDM)* to guide stormwater management from new development and redevelopment projects. The City expects to adopt the 2016 King County Surface Water Design Manual, once it gains equivalency to the 2012 SWMMWW. This will occur prior to the Permit deadline of December 31, 2016 for equivalent manual adoption.
- The City supports Low Impact Development (LID) techniques for City projects and private developments. The City revised its SWM ordinance in February 2010 to allow for LID techniques where feasible. In 2015 the City began the process of analyzing potential LID development code changes for the City to implement in order to comply with the 2012 DOE SWMMWW and section S5.C.4.f of the current Permit. After the analysis is complete, the City will determine what, if any, changes to its code to propose to better allow for and promote LID development principals. This process will be completed and new code adopted prior to the December 31, 2016 deadline.
- The adopted *2009 King County Surface Water Design Manual* includes stormwater maintenance standards and requirements that are equivalent to the *Washington State Department of Ecology's 2005 Stormwater Manual*.
- The City conducts site inspections for new development and redevelopment projects that disturb a land area one acre or greater, including projects less than one acre that are part of a larger common plan of development.
- An Erosion and Sediment Control (ESC) brochure for small project sites and a Small Project Drainage Requirements brochure have been created and are available to the public.
- The City conducts site inspections for new City-owned drainage facilities, and documents and maintains all records.
- The City purchased and implemented Azteca Cityworks, a Stormwater Asset Management system. The City is using the system to keep records of drainage inspections and maintenance, create work tickets, and track costs and time.
- The City provides routine training to City staff responsible for implementing the program to control runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspection, and enforcement.

- The City continually provides Certified Erosion and Sediment Control Lead (CESCL) training to all relevant City staff. In 2015, 1 City staff attended CESCL training and became certified or recertified. In 2016, 6 City staff members will attend CESCL training.
- The City has documented and maintained records for all training.
- The City has adopted an Ordinance that provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the City's MS4.
- The City SWM Ordinance allows for non-structural preventive actions and source reduction approaches, such as Low Impact Development (LID) Techniques, to minimize the creation of impervious surface and the disturbance of native soils and vegetation.
- The City has implemented a program designed to annually inspect and maintain all City-owned or operated permanent stormwater treatment and flow control facilities.
- The City has inspected all new stormwater treatment and flow control facilities privately owned or operated to identify maintenance needs and enforce compliance with maintenance standards as needed.
- The City has implemented a procedure for keeping inspection records and enforcement actions by staff, including inspection reports, warning letters, notices of violation, and other enforcement records, maintenance inspections and maintenance activities.
- The City SWM Ordinance identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures. This ordinance includes an enforcement strategy to respond to issues of non-compliance with regulations for qualifying projects.
- The City has implemented a long-term Operations and Maintenance (O&M) program for post-construction stormwater facilities and BMPs.
- The City inspects and maintains the records of post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects.
- The City has established maintenance standards that are as or more protective of facility function than those specified in KCSWDM.

5. POLLUTION PREVENTION AND OPERATIONS AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This section describes the permit requirements and current City activities related to pollution prevention and operations and maintenance for municipal operations. Per the current 2013 Permit, each City shall implement an Operations and Maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

5.1 Permit Requirements

Section S5.C.5 requires the City to:

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in Chapter 4 of Volume V of the *2012 Stormwater Management Manual for Western Washington*.
- Perform annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, and take appropriate maintenance actions in accordance with the adopted maintenance standards. The annual inspection requirement may be reduced based on inspection records.
- Conduct spot checks of potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events (greater than 10-year, 24-hour recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.
- **Inspect all catch basins and inlets owned or operated by the City at least once before August 1, 2017, and every two years thereafter.** Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *2012 Stormwater Management Manual for Western Washington*. Decant water shall be disposed of in accordance with Appendix 6 *Street Waste Disposal*.
- Establish compliance with the inspection requirements listed in S5.C.5.b, S5.C.5.c, and S5.C.5.d of the Permit, which shall be determined by the presence of an established inspection program designed to inspect all sites and achieving inspection of 95% of all sites.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City.
- Implement an ongoing training program for employees of the City whose construction, operations or maintenance job functions may impact stormwater quality. The training

program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. The City shall document and maintain records of training provided and staff trained.

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit, or another NPDES permit that authorizes stormwater discharges associated with the activity. A schedule for implementation of structural BMPs shall be included in the SWPPP. Generic SWPPPs that can be applied at multiple sites may be used to comply with this requirement. The SWPPP shall include periodic visual observation of discharges from the facility to evaluate the effectiveness of the BMP.
- Maintain records of inspections and maintenance or repair activities conducted by the City.

5.2 Current Activities

- The City adopted the *2009 King County Surface Water Design Manual (KCSWDM)* in February 2010, which includes the maintenance standard and requirements of drainage structures such as flow control, conveyance, and water quality.
- The City adopted the *2009 Stormwater Pollution Prevention Manual (KCSPPM)* in August 2009, which includes Best Management Practices (BMPs) for Commercial, Multi-Family and Residential Properties.
- Inspection of both City and privately owned drainage facilities occurs annually. City facilities are inspected by Burien staff, and private facilities are inspected by King County staff, through an Inter-Local Agreement (ILA) with the City. Beginning in 2016, inspection of private facilities will be performed by City staff, with King County available for additional services via the ILA. Concurrent with this change, inspection and/or maintenance records for both City-owned and private drainage facilities is tracked and documented utilizing the City's asset management system, Azteca Cityworks.
- Beginning in 2015, the City began to implement a mobile version of our Cityworks software, Freeance Mobile, to allow field staff to work more efficiently while performing site inspections and maintenance of City-owned assets. As of March 2016, Freeance Mobile is being utilized for public and private facility inspections, as well as catch basin inspections.
- In 2013, the City implemented a 2-year catch basin inspection cycle. All publicly owned catch basins south of 140th St were inspected in 2013, CBs north of 140th St

were inspected in 2014, and CBs south of 140th St were inspected again in 2015. The exception to this schedule currently includes public basins within drainage easements that lie on private property. These basins are being categorized and compiled for inclusion in the 2-year inspection cycle beginning in either 2015 or 2016. This North-South split on alternating years will continue into the future. Required maintenance on inspected basins is performed as required, as staffing and equipment availability allows.

- All inspection records and maintenance/repair activities are being properly documented and stored for future access.
- The City conducts spot checks of all City-owned detention/retention ponds after major storms, and documents these and all other inspections. One storm with a recurrence interval greater than 10yr/24hr occurred on 12/9/15, and two other major storms of less than that interval occurred on 3/15/15 and 11/14/15, which all warranted spot checks. Post-storm facility inspections on all three dates resulted in no facilities showing deficiencies/storm damage.
- The City will continue to utilize its adopted Standard Operating Procedure for Pest and Vegetation Management. The purpose of this procedure is to provide for mitigation and control of pests in environmentally-friendly ways and to direct operations and maintenance of the City that manages pests or vegetation on public lands, rights-of-way and bodies of water. This procedure applies to all properties and facilities owned or operated by the City.
- The City will continue to implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated in the areas subject to this permit that are not required to have coverage under the General NPDES Permit for stormwater discharges associated with Industrial Activities or another NPDES stormwater permit. The City's current SWPPP was reviewed and updated in 2015, and will continue to be revised as needed.

6. MONITORING AND ASSESSMENT

This section describes the permit requirements, current activities, and planned actions related to monitoring and assessment of stormwater related issues.

6.1 Permit Requirements

Section S8.A requires the City to:

- Provide, in each annual report, a description of any stormwater monitoring or stormwater-related studies conducted by the Permittee during the reporting period.

Section S8.B requires the City to:

- Notify Ecology by December 1, 2013, which of the options for Status and Trends Monitoring the City chooses to carry out during this permit cycle. These choices are either to pay into a collective fund for monitoring in the Regional Stormwater Monitoring Program (RSMP), or to conduct status and trends monitoring themselves, according to section S8.B.2 of the Permit.

Section S8.C requires the City to:

- Notify Ecology by December 1, 2013, which of the options for Stormwater Management Program Effectiveness Studies Monitoring the City chooses to carry out during this permit cycle. These choices are either to pay into a collective fund for monitoring in the Regional Stormwater Monitoring Program (RSMP), or to conduct effectiveness study monitoring themselves, according to section S8.C.2 of the Permit.

Section S8.D requires the City to:

- Pay into a collective fund to implement the RSMP Source Identification Information Repository (SIDIR). This fund will manage the Source Identification and Diagnostic Monitoring required by the Permit.

6.2 Current Activities

- The City conducted no stormwater monitoring in 2015.
- The City has taken the “pay-in” option for all three RSMP Monitoring tasks.

Appendix A

City of Burien 2015 Public Education and Outreach Efforts Measuring the Understanding and Adoption of Targeted Behaviors

The City of Burien's efforts to measure behavior change in 2015:

The City utilized its annual contract with the Environmental Science Center (ESC) to implement a program to measure behavior change in 2015. The ESC created a program called *Managing Our Stormwater and Toxic Algae (MOSATA)*, which they used to incorporate the City's need to measure effectiveness and behavior change in the target audience, which in this case was local high school students. To measure changes in behavior, ESC staff conducted surveys of participating students both before and after the program. The pre-assessment survey occurred just prior to the start of the program in early October 2015, and the post-assessment survey was conducted in early December 2015, one month after program completion. The topics included in the surveys were picking up pet feces, car washing practices, car maintenance including oil leaks, disposal of hazardous materials, topping off the gas tank, and using alternative forms of transportation.

Overall, the effectiveness of the program in changing behavior was incremental at best, but more generally, program results were inconclusive. General trends across all topics showed improvement after the program, but none by margins significant enough to confirm the program's success at promoting permanent behavior changes in the target audience.

Using the results of this program, City staff will be working with the ESC in the coming year to either improve this program to increase its effectiveness to promote behavior change, or implement an alternative program that will be more effective.

Appendix B

City of Burien 2015 IDDE Program Field Screening Efforts

In 2015, City staff began performing IDDE Field Screening inspections per current permit requirements. Inspectors began by inspecting all accessible outfalls within the southern half of the City (south of 140th St). The majority of the outfalls were free of any signs of illicit discharges, and further inspections of associated upstream CB networks (i.e. “node” approach) has been deemed unnecessary. The outfalls that showed signs of possible illicit discharges, including flow during the dry weather inspections, were flagged as such. However, upstream CB inspections following the “node” approach were not conducted concurrently, so those outfalls and corresponding subbasins will need to be reinspected to satisfy permit requirements. For 2016, the remainder of the City’s outfalls will be inspected (north of 140th St), and corresponding upstream CB inspections will be performed for any outfalls showing signs of possible illicit discharges. Additionally, the flagged outfalls from 2015 will be reinspected in 2016 (or 2017 based on time constraints), including upstream CB “node” inspections where necessary. In total, an estimated 15% of the City’s MS4 was inspected in 2015, per Burien’s IDDE Field Screening methodology described in Section 3.2 above.