



May 15, 2020

Brandi Lubliner
Washington State Department of Ecology
300 Desmond Dr. SE
Lacey, WA 98503

Dear Ms. Lubliner,

Attached you will find a SAM study proposal titled: "Mobile Businesses, Stormwater Source Control, and Multi-Jurisdiction Coordination". The intent of this study is to answer SAM priority topics 17 and 23.

We are excited about the opportunity to work with SAM, and we hope the selection committee also sees the value of this study.

Sincerely,

TODD HUNSDORFER

Todd Hunsdorfer, Water Quality Planner
King County Department of Natural Resources and Parks
Water and Land Division

Mobile Businesses, Stormwater Source Control, and Multi-Jurisdiction Coordination

Proposal for SAM Source Identification Study, 2020

**King County and
Aspect Consulting LLC**

May 15, 2020

Project Purpose and Objective

The purpose of this proposed project is to advance the resources available to municipal stormwater source control programs to address several issues related to mobile businesses. As a subset of commercial enterprises, mobile businesses have unique challenges related to stormwater and pollution prevention that will be better understood by a focused study. This project will develop and test new tools and guidance to support municipal stormwater permittees in tracking and inspecting mobile businesses for stormwater pollution prevention and source control efforts.

The primary goal of the project is to address questions from the Stormwater Action Monitoring (SAM) Priority Topic List, specifically Topics 17¹ and 23².

Topic 17 will be addressed by surveying municipal stormwater permittees and identifying potential barriers for proper waste handling by mobile businesses and by developing improved tools for inventorying mobile businesses. Topic 23 will be addressed by reviewing Illicit Discharge Detection and Elimination (IDDE) data on mobile businesses and using the business inventory tool along with best practices guidance developed for effective cross-jurisdiction coordination and enforcement of mobile businesses stormwater issues.

Ecology's "Minimum Performance Measures for Phase II Source Control Programs for Existing Development" (Phase II permit section S5.C.8) includes establishing an inventory of commercial and industrial properties that includes "*businesses...identified based on the presence of activities that are pollutant generating.*" Developing such business and property lists has been a challenge for permittees, especially for new source control programs. This is in part due to the incompleteness and lack of useable data from the business licensing process, which is done by the state Department of Revenue and/or by some individual jurisdictions.

To address this need, an objective of this project is to develop and test a procedure for getting more and better data about businesses from multiple sources that will serve as starter or updated lists of businesses that permittees can use in their Source Control programs. We are proposing a specialized data search and organizing process oriented around stormwater considerations based on licensing data, proprietary geospatial datasets (such as from ESRI Demographic and Business Data List or Google Places), and crowd-sourced business review data (such as from Yelp). By matching up NAICS and/or SIC codes with business name, references in mapping data sets, and keywords from customer reviews, the process will provide a list of businesses that match criteria that indicates likely pollutant-generating activities. The project will develop and test an improved procedure to identify properties and businesses for municipal source control program inclusion.

To confirm the usefulness of the business lists generated by the process outlined above, the proposed project includes a pilot program to test the process in several jurisdictions' Source Control programs in south King County with a focus on mobile businesses. To support the pilot program, another project objective is to develop a best practices guidance document for cross-jurisdiction

¹ 17. What additional regional or statewide regulatory systems or approaches would likely support local government oversight of mobile businesses that discharge waste to the MS4?

17.1 How can the business licensure process and requirements support proper waste handling?

17.2 What are barriers to proper handling of waste?

² 23. Evaluate the IDDE data reported by permittees and gather additional information needed to identify mobile and other multi-jurisdictional business' violations, to support coordinated and effective multi-jurisdiction enforcement.

coordination and enforcement of mobile businesses. Based on the outcomes and lessons learned from the pilot program, the business listing procedure and cross-jurisdiction best practices document can subsequently be used by other permittees across western Washington.

Measurable outcomes from this project will include:

- Improved permittees' and Ecology's knowledge of the number and variety of mobile businesses; where and how they operate; and what environmental pollution concerns are present.
- Municipal permittees can use the use business listing generation process to help identify mobile businesses that operate in their jurisdiction with the potential to cause stormwater pollution. This will be especially helpful to meet permit requirements for generating such lists by August 2022 (when Phase II permittees are required to establish an inventory of sites with the potential to generate pollutants to the municipal separated stormwater sewer).
- Permittees can use the best practices guidance document developed in this project to track and manage mobile businesses for their source control programs.
- Permittees and Ecology can learn about the outcomes of using the business listing procedure and the best practices guidance from a pilot project among jurisdictions in south King County.
- Ecology can use the survey results and analysis of mobile business IDDE data to better understand the potential impact of mobile businesses on stormwater regionally. This will be especially useful for IDDE incident data from 2020, which is required to be reported using the new data format in the current permit by March 2021.
- Ecology can use all outcomes from the project to inform and advance the permit source control program requirement.

Project Description and Scope

Study Design

The design of this project is to develop and test new tools and guidance for municipal stormwater source control programs. With the goal of providing useful information to permittees to address Priority Topics 17 and 23, the tools, guidance, and data analysis will be developed with the input and guidance from a Technical Advisory Committee (TAC).

A data search and sorting process will be developed to help permittees identify businesses in their jurisdiction, with an emphasis on mobile business identification. A best practices guidance document will also be developed for cross-jurisdiction coordination on source control of mobile businesses. The business listing process and guidance document will be tested via a pilot project with source control programs at several jurisdictions in south King County, and the results and lessons learned will be applicable to all permittees to help begin, update, or improve their source control programs.

Tasks

1. Technical Advisory Committee and Project Administration

As the first task, the TAC will be convened to go over the project scope, schedule, and goals. Many TAC members representing Phase I and Phase II jurisdictions have already been identified as noted below, and letters of support from several of them are attached to this proposal. Other TAC members will be identified as part of this task, and we will seek to include representatives from Ecology's Local Source Control Partnership, the Washington Stormwater Center, and the Northwest Marketing Association. Five TAC meetings are planned that will include reviewing

project deliverables and discussing technical approaches and information that will inform the project products.

Project administration is also part of this task and will include quarterly invoices and project status reports, general communications, and contract administration. Invoicing will follow Ecology's invoice requirements, and status reports will indicate project progress and status of deliverables.

Deliverables: *TAC meeting agendas and minutes*

Quarterly invoices and status reports

2. Survey Permittees About Mobile Businesses and Source Control

This task will survey western Washington municipal National Pollutant Discharge Elimination System (NPDES) permittees on their stormwater source control and IDDE program practices. The survey will focus on how permittees identify, track, and coordinate on source control efforts at mobile businesses. The survey will:

- a. Build off of the Business Inspection Group (BIG) program report from January 2020, which includes relevant questions about mobile businesses
- b. Understand how jurisdictions create their business lists for their source control programs
- c. Identify ways that jurisdictions currently work together on source control and tracking mobile businesses
- d. Gather information from jurisdictions about barriers to compliance and proper waste handling for the variety of potential pollution-generating practices done by mobile businesses

Deliverables: *Survey questions*

Technical memo summarizing the results and findings from the survey

3. Business Listing Generation

The business listing and data organizing process will capture listings from state and local business licensing records, from proprietary geographical databases, such as ESRI business data or Google Places, and from online business review websites, such as Yelp. A process and workflow will be developed to cross-reference the data sources and create a list of likely mobile businesses by geographic area. Based on preliminary investigation into the data available, the business lists are expected to include business name, doing business as (DBA) name, contact information, and NAICS and SIC industry classification codes. A data match score will be created to indicate likelihood of the business or property having pollutant generating activities.

A procedure for sorting and parsing of data will also be developed based on a crosswalk developed to match common mobile business types, such as carpet cleaners, with the logical NAICS codes, such as 561740 for "Carpet and Upholstery Cleaning Services" or keyword mentions of the service provided in business review data. In this example, a list of carpet cleaners can be generated that may include mobile carpet cleaners who aren't included in state or local business licensing lists. The parsed and sorted list of business types can then be used by permittees to build, add, or update to the inventory lists to meet permit requirements.

Deliverables: *Draft and final technical memo describing the development, testing, and sorting procedures for developing mobile business lists with likely pollutant-generating activities*

4. Analyze Permittee IDDE Data on Mobile Businesses

This task will build off a previous SAM Source Identification study that evaluated IDDE data reported by municipal stormwater permittees in 2014³. The data analysis proposed for this project would be on data from 2020 as reported by permittees. The data review would focus on identifying the types and sources of pollutants generated by mobile businesses as well as the inspection frequency and technical assistance provided by permittees to mobile businesses.

The IDDE data for this analysis will be from what was submitted in permittee annual reports for calendar year 2020. **No data request would be made of individual permittees.** Instead, a data request would be made from Ecology using its Water Quality Permitting and Reporting Information System (PARIS) system to obtain records from the annual reports for all western Washington municipal stormwater permittees. The timing for the data request (April 2021) was chosen based on when annual reports are due, and the period of data requested (calendar year 2020) was chosen to coincide with when Phase II permittees are required to begin reporting IDDE data using the new reporting format in the current permit (March 2021). The updated IDDE data reporting format under the current permit will support a reasonably small effort to analyze the data since they were reported according to standardized data fields and response options.

The analysis of IDDE data will support the business listing task above for identifying what mobile businesses and IDDE incidents are already captured in municipal IDDE efforts. By analyzing a recent year of IDDE data, the results will help inform permittees about what types of mobile businesses are out there, the sources and types of pollutants they generate, and what compliance or enforcement actions are used when needed. In addition, the IDDE data analysis will inform Ecology about the effectiveness of the updated IDDE reporting format in the current permits. The results of the data analysis will be prepared in a report with an accompanying database of mobile business IDDE incidents. The database will be provided as supporting material for the data analysis and not intended for ongoing use.

Deliverables: *Data request from Ecology*

Draft and final report of the IDDE data analysis on mobile businesses

Database of mobile business IDDE incident data from 2020 developed for the analysis

5. Create a Best Practices Guidance Document

This task will create a guidance document with best practices for multi-jurisdiction coordination of mobile businesses. The document will use information from a variety of sources, including the outcomes of the project survey, instructions for using the business listing tool, take-aways from the Business Inspection Program report (BIG, 2020)⁴, technical assistance information from the Local Source Control Partnership program, and outreach material examples targeted to mobile business types and activities. The document will contain recommended best practices on how jurisdictions can work together and share data on mobile businesses, from identification to inspection and from technical assistance to corrective action.

Deliverables: *Draft and final best practices guidance document for cross-jurisdiction coordination on mobile businesses*

³ Illicit Discharge Detection and Elimination Regional Data Evaluation for Western Washington, Ecology SAM Source Identification project, City of Lakewood and Aspect Consulting, 2016-2017

⁴ Business Inspection Program Report, January 2020, Business Inspection Group, Washington Stormwater Center

6. Mobile Business Source Control Pilot Program in South King County

This task will develop and implement a pilot program in south King County to test the business listing process and the best practices guidance document developed in Tasks 3 and 5, respectively. The outreach materials developed for mobile businesses in the best practices guidance (Task 5) will be used for the pilot program and customized per the specific marketing programs of the jurisdictions participating in the pilot program.

The period of the pilot program is expected to be six months and will be designed to capture information and case studies of how jurisdictions identify and inspect mobile businesses, coordinate to offer technical assistance, and follow-up on environmental compliance issues. A planning document for the pilot program will be prepared in coordination with the TAC to develop the specific methods and outreach materials and identify measurable goals.

During the pilot program, we will convene the participating jurisdictions to meet three times to facilitate cross-jurisdiction coordination, review status of joint source control efforts per the best practices guidance document, and discuss mobile businesses examples that can be used as case studies to represent the results of the program. At the end of the pilot program, participating jurisdictions will be surveyed to identify the program outcomes and lessons learned.

As of now, we have interest in participation in the pilot program from the cities of Kent and Covington and tentative interest from the cities of Des Moines, Maple Valley, Enumclaw, and Renton (see attached letters of support). Other south King County jurisdictions will be contacted to participate in the pilot program once the project is up and running.

Deliverables: Planning document on the procedures and design for the pilot program

Outreach materials developed for mobile businesses

Draft and final report on the outcomes and lessons learned from the pilot program

7. Communication Plan

The communication plan for this project includes timely sharing of milestones and deliverables with Ecology and municipal stormwater permittees. An approximate project schedule is included in the proposal and will be updated and refined based feedback during the proposal review and voting process. Communication of the project results will include presentations and a fact sheet as well as the project deliverables posted to the SAM project webpage.

Deliverables: Project schedule

Presentation to the Stormwater Work Group

Two-page fact sheet using the SAM fact sheet template

Presentation at a NPDES coordinators' forum, Local Source Control Partnership group, or other regional group to be determined

Data Request

A data request will be made from Ecology in April 2021 of IDDE records as provided by municipal permittees in their annual reports from calendar year 2020. The timing of this data request would be after the March 2021 annual reports are submitted, which is the deadline by which permittees are required to report IDDE data using the new format in the reissued municipal permits (Appendix 14 of the Phase I permit and Appendix 12 of the Phase II permit).

Deliverables

Deliverables for the project are generally noted above in the description of each task. The table below provides a summary of deliverable by project task.

Task	Deliverable
1. TAC and project administration	<ul style="list-style-type: none"> TAC meeting agendas and minutes Quarterly invoices and status reports
2. Survey of municipal permittees about mobile business source control practices	<ul style="list-style-type: none"> Permittee survey questions Technical memorandum of survey results
3. Business listing generation	<ul style="list-style-type: none"> Draft technical memorandum of business list development process Final technical memorandum of business list development process
4. Analyze mobile business IDDE data	<ul style="list-style-type: none"> Data request of Ecology of annual report IDDE data Draft report on mobile business IDDE data Final report on mobile business IDDE data Mobile business IDDE incident database
5. Create Best Practices Guidance Document	<ul style="list-style-type: none"> Draft Best Practices Guidance document Final Best Practices Guidance document
6. Pilot program in south King County	<ul style="list-style-type: none"> Pilot program plan Outreach materials for pilot program Draft report on outcomes of pilot program Final report on outcomes of pilot program
7. Communication Plan	<ul style="list-style-type: none"> Project schedule Presentation to Stormwater Work Group Two-page fact sheet Presentation to regional stormwater group

Project Team Description

Team

Lead Agency - Todd Hunsdorfer

King County, Department of Natural Resources and Parks
 206.263.0922 | thunsdorfer@kingcounty.gov

Todd Hunsdorfer’s role on the project will be managing the interagency agreement (IAA) contract with Ecology and the consultant contract, organizing the TAC, conducting regular working meetings for the project team, tracking workflow and budget expenditures, and providing biannual invoices and reports to Ecology according to contract agreement. In addition, Todd will provide support to Aspect Consulting on the development of the survey questions, he will review all project deliverables, and he will co-present the project results and outcomes with Aspect Consulting to the Stormwater Work Group.

Todd has 10 years of experience working on a variety of programs focused on improving stormwater quality. He has extensive experience collaborating with multiple agencies on developing coordinated solutions to stormwater management problems. In addition, he has a deep understanding of managing stormwater education and outreach programs, administering infrastructure operations and maintenance programs, Total Maximum Daily Load (TMDL) implementation, and commercial and construction code compliance programs. At King County, Todd implements water quality grants, manages regional watershed-based stormwater strategies, and works on a variety of other programs related to improving the County's environmental management.

Todd's relevant current and past projects include:

- Project Lead for Spill Hotline Feasibility study designed to examine the feasibility of a regional spill hotline to reduce barriers for the public to report illicit discharges and improve coordination across jurisdictional boundaries, Ecology SAM Source Identification study, 2018-present
- Project Manager for Our Green/Duwamish watershed-wide stormwater strategy, a multiagency effort to improve water quality and restore hydrology in the Green/Duwamish watershed, 2014-present, ongoing
- Project Manager for King County's Pollution Identification and Correction (PIC) program, a County wide effort to find and eliminate sources of bacteria that are polluting local waterways, ongoing
- Poverty Bay Shellfish Protection District Manager responsible for coordinating a multiagency effort to reduce bacteria loading to the tributaries of Poverty Bay and eliminate risk associated with the consumption of commercially harvested geoduck.

Project Partner - James Packman

Aspect Consulting

206-780-7723 | jpackman@aspectconsulting.com

James Packman's role on the project will be managing, coordinating, and leading the implementation of all technical aspects of the work. As the consultant project manager, James will work with the TAC and the County to develop and lead the survey, coordinate the business list development process, analyze the mobile business IDDE data, lead the development of the best practices guidance, lead the development of the pilot program and coordinate with the participants throughout, prepare the project communications, and lead the preparation of all project deliverables.

James is a hydrologist with 22 years of experience in the ecology, engineering, and management of terrestrial surface waters and sediment. James' areas of expertise include: technical assistance and compliance programs under the NPDES, Model Toxics Control Act (MTCA), and Superfund regulatory programs; assessing pollution source control activities and best management practices (BMPs) in port, municipal, commercial, construction, and industrial settings; monitoring surface water quality, sediment, and stormwater treatment effectiveness; organizing, reviewing, and analyzing data, including statistical data analysis; and writing reports and giving presentations. James has led and participated in several stormwater source identification and effectiveness projects for Ecology, which have included convening and leading technical advisory committees for guidance and feedback on project deliverables.

James' relevant current and past projects include:

- Consultant lead and project manager for Illicit Connections and Illicit Discharge Field Screening and Source Tracing Guidance Manual Update and Trainings, Ecology SAM Source Identification

study, King County, 2018 to present

- Consultant lead and project manager for Business Inspection Stormwater Source Control, Ecology SAM Effectiveness study, City of Lakewood, 2016-2018
- Consultant lead and project manager for Illicit Discharge Detection and Elimination Regional Data Evaluation for Western Washington, Ecology SAM Source Identification project, City of Lakewood, 2016-2017
- White paper: Synthesis of Stormwater Management Effectiveness Literature, Association of Washington Cities, 2013

Technical Advisory Committee

Todd Hunsdorfer, King County

James Packman, Aspect Consulting

Laura Haren and Heather Martin, City of Kent

Ben Parrish, City of Covington

Lisa Werre, City of Sammamish*

Ken Waldo, City of Redmond

Larry Shaffner, Thurston County

Bob Patterson, Clark County

Nikki Guillot, City of Vancouver

TBD, Washington Stormwater Center

TBD, Northwest Social Marketing Association

TBD, Local Source Control Partnership

Project Management Strategy

King County will manage the overall project as the lead agency. King County's activities will include contract management, project setup and management, conducting regular working meetings for the project team, tracking workflow and budget expenditures, and providing biannual invoices and reports to Ecology according to contract agreement. King County will review project deliverables and coordinate with Ecology for deliverable review and approval. In addition, King County's tasks will include organizing the TAC, including identifying TAC members and facilitating TAC meetings.

Aspect will implement the technical elements of the project and will manage the consultant activities and associated project management. Aspect uses the Deltek Ajera CRM project management and accounting system to track budgets in real time, forecast deliverable schedules and burn rate, resource loading, and generate custom invoicing. This program gives Aspect project managers the ability to check multiple budget metrics with little effort. They are able to detect budget or schedule deviations early and can implement corrections to keep our projects on schedule and within budget.

As a team, King County and Aspect Consulting have worked together on many projects across a wide variety of environmental disciplines, from stormwater to geotechnical engineering to landfill and solid waste management. Because of this familiarity and history and due to both parties' experience with SAM projects, King County and Aspect will be able to work together seamlessly on this project based on an established understanding of contracting and reporting and a successful history of implementing grant-funded projects performed under Interagency Agreements with Ecology.

Please see the attached letter of commitment to the project from Aspect Consulting.

Project Budget and Schedule

An approximate project budget is provided in the table below based on the project description in this proposal. Per RFP requirements, the budget is summarized by deliverable. The scope of work and budget will be refined and finalized during the scoping of the project based on feedback on the proposal.

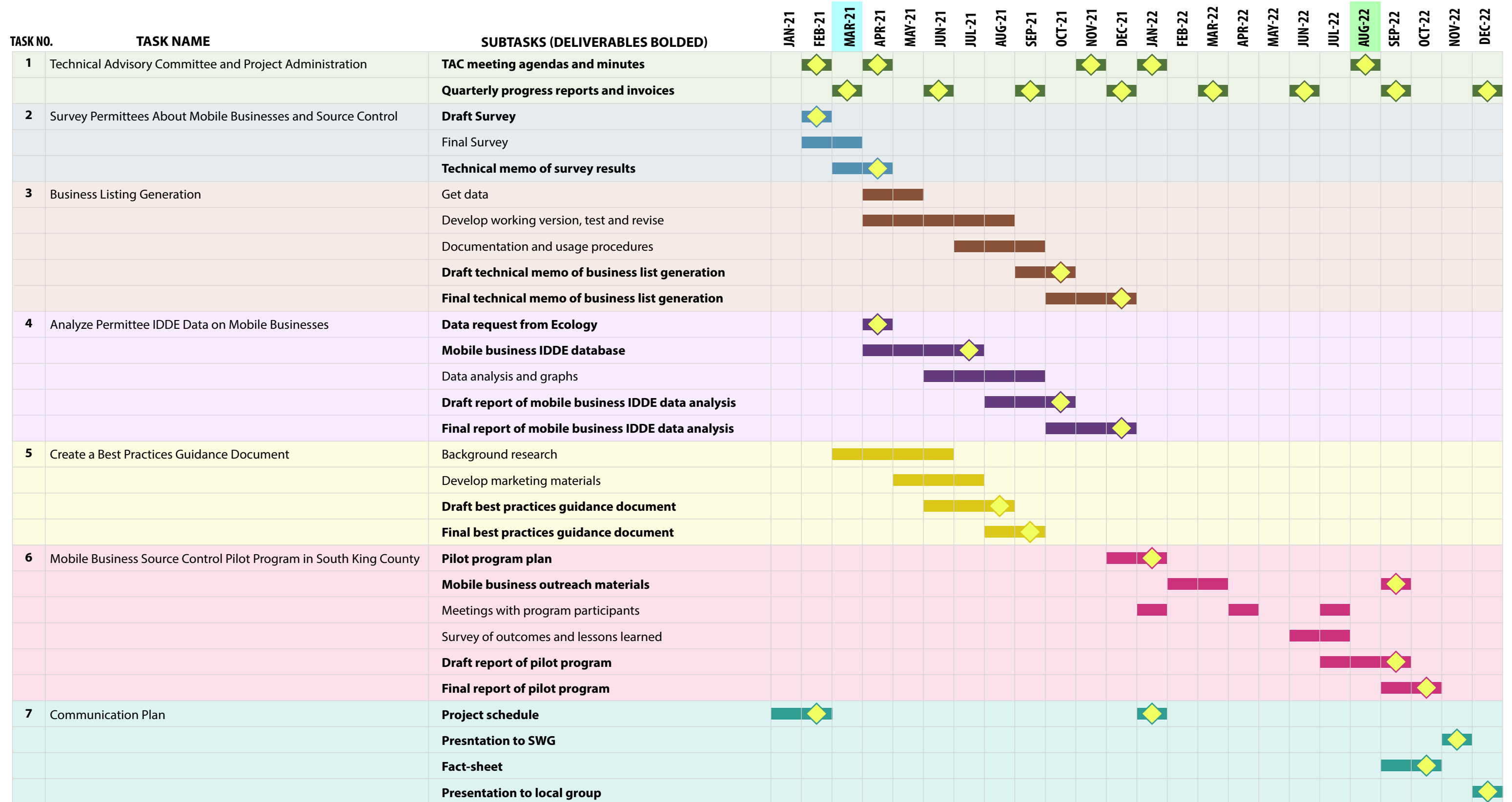
A project schedule is also provided below that shows the overall timeline and two-year duration of the project and the expected timeframes for each task. Dates in the schedule were selected based on an assumed project start date of January 2021 and include consideration of holiday periods, permittee annual reporting, and permit deadlines.

The completion of this project per the schedule proposed is based partly on two permit deadlines. These include March 2021 for permittees to begin reporting IDDE data in annual reports using the format in Appendix 12 of the current permit, and August 2022 when permittees are required to establish an inventory of sites with the potential to generate pollutants to the MS4.

Deliverable Number	Deliverable	Aspect		King County	Total Cost
		Labor	ODCs*	Labor and Indirect Costs	
1a	TAC meeting agenda and minutes	\$ 8,999	\$ 313	\$ 1,800	\$ 11,113
1b	Quarterly status reports	\$ 15,217		\$ 5,326	\$ 20,778
2a	Draft survey to permittees	\$ 7,154			\$ 9,186
2b	Technical memorandum of survey results	\$ 5,830		\$ 1,166	\$ 9,502
3a	Draft technical memorandum of business list development process	\$ 25,342			\$ 21,155
3b	Final technical memorandum of business list development process	\$ 3,008		\$ 602	\$ 1,845
4a	Data request of Ecology of annual report IDDE data	\$ 832			\$ 832
4b	Draft report of mobile business IDDE data	\$ 24,506			\$ 24,578
4c	Final report of mobile business IDDE data	\$ 7,598		\$ 1,520	\$ 9,118
4d	Database of mobile business IDDE incidents	\$ 6,938			\$ 5,702
5a	Draft Best Practices guidance document	\$ 29,835			\$ 30,041
5b	Final Best Practices guidance document	\$ 6,671		\$ 1,334	\$ 8,203
6a	Pilot program plan	\$ 14,833		\$ 2,967	\$ 20,699
6b	Outreach materials for pilot program	\$ 5,361			\$ 3,426
6c	Draft report on pilot program outcomes	\$ 27,303	\$ 188		\$ 25,917
6d	Final report on pilot program outcomes	\$ 7,910		\$ 1,582	\$ 8,945
7a	Project schedule	\$ 2,391			\$ 1,535
7b	Presentation to Stormwater Work Group	\$ 5,510	\$ 63	\$ 1,102	\$ 6,675
7c	2-page fact sheet	\$ 2,988			\$ 2,988
7d	Presentation to other group	\$ 2,778	\$ 63		\$ 2,841
Total		\$ 211,006	\$ 627	\$ 17,398	\$ 229,031

* ODCs: other direct costs, includes mileage for meeting attendance

Schedule



◆ Completion dates of **deliverables**

MAR -21 Date by when municipal stormwater permittees are required to begin reporting IDDE data using current permit schema (see Appendix 12 of Phase II permit)

AUG-22 Date by when municipal stormwater permittees are required to establish an inventory of commercial and industrial properties that includes “businesses...identified based on the presence of activities that are pollutant generating” (permit section 55.C.8).

Letters of Commitment and Support



Todd Hunsdorfer
King County Department of Natural Resources and Parks
Water & Land Resources
KSC-NR-0600
201 S. Jackson St.
Seattle, WA 98104

May 13, 2020

Dear Mr. Hunsdorfer,

I am writing to express Aspect Consulting's support for our proposal with King County for a Stormwater Action Monitoring Effectiveness and Source Identification study related to stormwater source control for mobile businesses. We see the direct value the project will provide to municipal stormwater permittees for improving how they inventory, track, and inspect mobile businesses for source control programs, and how permittees can coordinate on source control efforts across jurisdictional boundaries.

We are excited about the study's emphasis on developing useful and improved tools and guidance for municipal stormwater source control programs. As someone with highly relevant experience supporting municipal stormwater permittees, especially for source control and IDDE, James Packman is the perfect choice for developing and managing the technical components of the project.

The outcomes and recommendations from this study will directly support permit-required source control inspections, education, and code enforcement and will improve our regional understanding of how mobile businesses impact stormwater. We are excited to be part of this work and express our commitment to implementing this project with you if the proposal is accepted.

Sincerely,

A handwritten signature in black ink, appearing to read "Owen Reese", is written over a white background.

Owen Reese, P.E.
Sr. Associate Water Resources Engineer





May 5, 2020

Todd Hunsdorfer
King County Department of Natural Resources and Parks
Water & Land Resources
KSC-NR-0600
201 S. Jackson St.
Seattle, WA 98104

Dear Mr. Hunsdorfer

This letter is in support of your efforts to develop a Stormwater Action Monitoring effectiveness study to address a variety of issues related to mobile businesses. The study will identify current practices of pollution prevention for mobile businesses, then develop best management practices for tracking, inspecting, and educating the operators. The study will focus on ensuring a cross-jurisdictional approach so that mobile businesses in the region will understand there are consistent regulations amongst cities and the county.

Previous efforts have been informative, but they have fallen short on execution. We are excited about the direction this study is taking and look forward to participating in the effort. In addition, we understand how this study can help inform the development of a business database to support permit required source control inspections, education, and code enforcement.

The outcomes and recommendations from this study could have a significant regional impact on how stormwater is managed, pollution sources are prioritized, and how mobile businesses are given the resources needed to reduce their risk of noncompliance.

Sincerely,

Laura Haren

City of Kent
Environmental Conservation Analyst



April 28th, 2020

Todd Hunsdorfer
King County Department of Natural Resources and Parks
Water & Land Resources
KSC-NR-0600
201 S. Jackson St.
Seattle, WA 98104

Subject: Letter of Support - Mobile Business Stormwater Action Monitoring Effectiveness Study

Dear Mr. Hunsdorfer,

I am writing on behalf of the City of Enumclaw to express support for King County's proposal for a Stormwater Action Monitoring Effectiveness study to address a variety of issues related to tracking, inspecting, and coordinating across jurisdictional boundaries on the source control efforts of mobile businesses.

Previous efforts have been informative but they have fallen short on execution. We are excited about the direction this study is taking, and look forward to testing the proposed tracking tool in our jurisdiction. In addition, we understand how this study can help inform the development of a business database to support permit required source control inspections, education, and code enforcement.

The outcomes and recommendations from this study could have a significant regional impact on how stormwater is managed, pollution sources are prioritized, and how mobile businesses are given the resources needed to reduce their risk of noncompliance. The City of Enumclaw believes this is an important study to support.

If you have questions or need more information, please contact me at 360-615-5668 or at epalmer@ci.enumclaw.wa.us

Sincerely,

Eric Palmer
Stormwater Engineer
City of Enumclaw
Public Works

Todd Hunsdorfer
King County Department of Natural Resources and Parks
Water & Land Resources
KSC-NR-0600
201 S. Jackson St.
Seattle, WA 98104

Dear Mr. Hunsdorfer

I am writing on behalf of the City of Maple Valley to express support for King County's proposal for a Stormwater Action Monitoring Effectiveness study to address a variety of issues related to tracking, inspecting, and coordinating across jurisdictional boundaries on the source control efforts of mobile businesses.

Previous efforts have been informative but they have fallen short on execution. We are excited about the direction this study is taking, and look forward to testing the proposed tracking tool in our jurisdiction. In addition, we understand how this study can help inform the development of a business database to support permit required source control inspections, education, and code enforcement.

The outcomes and recommendations from this study could have a significant regional impact on how stormwater is managed, pollution sources are prioritized, and how mobile businesses are given the resources needed to reduce their risk of noncompliance. Maple Valley believes this is an important study to support.

Sincerely,

A handwritten signature in black ink, appearing to read "Halley Kimball". The signature is fluid and cursive, written over a light blue horizontal line.

Halley Kimball
SWM/NPDES Program Manager
City of Maple Valley

Todd Hunsdorfer
King County Department of Natural Resources and Parks
Water & Land Resources
KSC-NR-0600
201 S. Jackson St.
Seattle, WA 98104

Dear Mr. Hunsdorfer

I am writing on behalf of the City of Des Moines, WA to express support for King County's proposal for a Stormwater Action Monitoring Effectiveness study to address a variety of issues related to tracking, inspecting, and coordinating across jurisdictional boundaries on the source control efforts of mobile businesses.

Previous efforts have been informative but they have fallen short on execution. We are excited about the direction this study is taking, and look forward to testing the proposed tracking tool in our jurisdiction. In addition, we understand how this study can help inform the development of a business database to support permit required source control inspections, education, and code enforcement.

The outcomes and recommendations from this study could have a significant regional impact on how stormwater is managed, pollution sources are prioritized, and how mobile businesses are given the resources needed to reduce their risk of noncompliance. The City of Des Moines believes this is an important study to support.

Sincerely,

Loren Reinhold
Surface Water Management (SWM) Utility Manager
City of Des Moines
21650 11th Avenue South
Des Moines, WA 98198-6317