

Keep it Clean Partnership

A partnership of communities in the Boulder and St. Vrain watersheds -
working to protect our water quality



2007 Annual Report

Boulder County • City of Boulder • City of Longmont • City of Louisville • Town of Erie • Town of Superior



**KEEP IT CLEAN
PARTNERSHIP**

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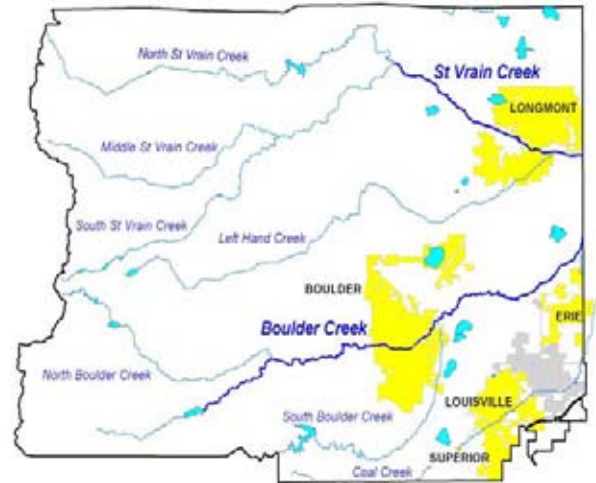
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Executive Summary

Keep it Clean Partnership 2007 Annual Report



The Keep it Clean Partnership (KICP) is a regional stormwater quality management program serving the communities of Boulder, Longmont, Louisville, Erie, Superior, and Boulder County (Partners). This innovative, award-winning program is leading Colorado in addressing water quality issues through watershed management.



The program's primary goal is to comply with the federal and state municipal stormwater regulations and to address broader water quality and watershed issues in the Boulder Creek and Saint Vrain watersheds. KICP uses a collaborative approach in creating cost-effective solutions and implementing regional stormwater management programs that comply with federal Phase II Municipal Stormwater Regulations and address broader water quality and watershed issues.

Cost Sharing = Cost Savings

In 2007, the KICP budget was \$378,697, of which \$55,564 (15%) was proportionately reimbursed to each of the Partners. The majority of the reimbursement represents the unspent contingency funds and cost savings for permit renewal activities completed in-house rather than contracting these services.

The KICP programs emphasize cost-effectiveness by sharing programs and using common strategies and existing programs. These cost-saving strategies have saved Partner communities 30-50% over the cost of individual implementation. In addition, KICP has received over \$175,000 in grant funding since its inception in 2001.

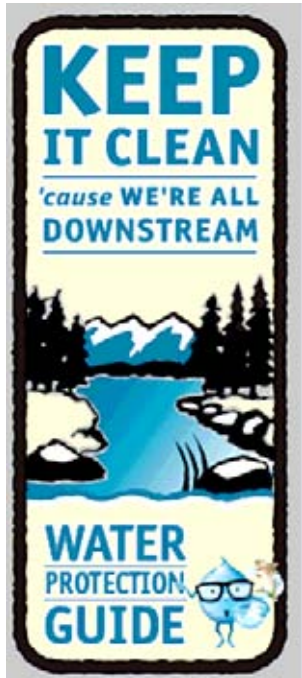
Permit Compliance and Permit Renewal



In 2007, all Partners achieved full regulatory compliance with their municipal stormwater discharge permit through implementation of KICP programs and individual activities.

In September 2007, the Colorado Department of Public Health and Environment (CDPHE) issued a second, five-year municipal stormwater permit. To prepare for the second permit term, the Partners renewed the five-year intergovernmental agreement (IGA), under which they operate. The Partners also reapplied for

coverage under the new permit, and in June 2008, the Partners will submit program descriptions to CDPHE for approval under the permit. To prepare for the permit submittal, KICP conducted an evaluation of their programs and Partner communities participated in an expert panel discussion to identify water quality priorities to include when updating programs. The result was the development of a list of the top water quality concerns. These were incorporated into the 2008-2012 KICP Plan.



Awards and Recognition

- ◆ On April 10, the KICP was awarded the U.S. Environmental Protection Agency (EPA) Region 8's, "Environmental Achievement Award" by the EPA Administrator Robbie Roberts. The award recognizes communities for their significant achievements in protection of public health or the environment.
- ◆ In April's *Stormwater* magazine, an interview with EPA stormwater staff, Nikos Singelis, featured an acknowledgement of the KICP Education Program.
- ◆ A May, a Government Accounting Office (GAO) congressional report featured H₂O Jo and the KICP Education Programs.
- ◆ On October 28, the KICP Education Program received the Colorado Facilitator Leadership Award.

The Future

The KICP Partners have entered into the second five-year IGA and will continue to implement the shared and common programs for the benefit of all of the Partners. The KICP Plan for 2008-2012 will be submitted to the CPDHE Water Quality Division in June 2008.

In addition to common and shared programs, each individual Partner will continue to be responsible for the following tasks in 2008:

- ◆ Implement the individual ordinances adopted in 2004 and related procedures, such as:
 - Review and track erosion control plans and proposed permanent water quality structures.
 - Conduct and track construction and post-construction site inspections.
 - Respond to, enforce, and track all illegal discharges.
- ◆ Maintain storm drainage outfall maps.
- ◆ Ensure municipal operations are in compliance with stormwater regulations.
- ◆ Participate in the ongoing development of the 2008-2012 KICP Plan.
- ◆ Track the development of the state E. coli total maximum daily load (TMDL) process which may require communities to control bacterial pollutant sources.



Summary of 2007 Program Highlights

Community Outreach and School Education Programs

Operation: Water Festival



78,036 brochures distributed.

43,847 *Get to Know Your H₂O* school curriculum take-home materials handed out.

5,916 students and **162** classrooms attended school-based education programs.

828 storm drains were labeled with the message, "Dispose no Waste, Drains to Creek".

1,975 door hangers were distributed as part of the storm drain marking program.

1,814 residents visited the stormwater booths at several community events.

32,000 visits to www.KeepitCleanPartnership.org.

416,006 cars travel past the 'KICP' tributary signs each day.

800 posters of H₂O Jo with water quality protection messages were posted in local buses.

Stormwater Pollution Prevention Programs for Private and Public Sectors

208 restaurant and **127** vehicle service facility stormwater pollution prevention evaluations were completed.

320 municipal employees received training at **12** stormwater pollution prevention trainings.

40 municipal facilities were visited.

7 state-permitted municipal facilities were visited.

4 newsletters were mailed to **500** municipal employees.



Erosion Control, Permanent Water Quality Structures, and Illegal Discharge Prevention

53 participants were provided with basic construction erosion control training.

24 individuals participated in two field trips to audit active construction sites.

17 first responders discussed illegal discharge response and tracking.

8 individuals participated in two low-impact development trainings.

324 municipal employees were trained about illegal discharge identification.

328 spills received response.



Regional Participation

- ◆ Participated in the Water Quality Forum's E. coli Workgroup.
- ◆ Coordinated with the Boulder Creek Watershed Initiative to recruit StreamTeam volunteers.
- ◆ Attended monthly meetings of the Colorado Stormwater Council, an organization that will give a voice to municipalities with stormwater permits.
- ◆ Participated in the Colorado Stormwater Council's Permit Compliance Committee and the Education and Outreach Committee.
- ◆ Attended state-sponsored meetings on minimal industrial discharge permits (MINDIs).
- ◆ Participated on the Addressing Water and Natural Resource Education (AWARE) board.
- ◆ Presented background on the KICP to the Consortium of Cities.
- ◆ Presented background on the KICP to Public Service Institute Participants.



The entire annual report can be found at www.KeepitCleanPartnership.org.

Background and Project Overview

The Keep it Clean Partnership (individually referred to as Partners) is a collaboration of communities in the Boulder and St. Vrain watersheds working together to protect water quality through stormwater management. The communities include Boulder County; the cities of Boulder, Longmont, and Louisville; and the towns of Superior and Erie.

The Keep it Clean Partnership (KICP), formerly known as The Watershed Approach to Stream Health (WASH) Project, grew out of regional stormwater roundtable discussion and a watershed management focus group conducted in 1999. Water quality and stormwater professionals representing various communities in the Boulder Creek and St. Vrain watersheds participated in those meetings to help develop the goals, objectives, and project focus that are now incorporated into the Keep it Clean Plan.

The primary goal of the Keep it Clean Partnership (KICP) is to implement a regional stormwater management program, not only to comply with federal Phase II stormwater regulations, but also to address broader water quality issues. The KICP uses a unique, collaborative approach to involve various levels of government in creating cost-effective solutions to stormwater and other water quality problems. The KICP embodies the spirit of the watershed approach envisioned in the federal Clean Water Act and adopted in the Boulder Valley Comprehensive Plan.

The Keep it Clean Plan

The KICP operates under a five-year plan, which outlined programs tasks, schedules, and budget. Emphasis is placed on developing programs that meet federal Phase II Municipal Stormwater Discharge Regulations. The first plan, developed in 2002, used existing, successful programs; addressed community water quality goals; and allowed for flexibility within jurisdictional oversight. The second plan was developed in September 2007 when the Partners applied for the next five-year Phase II Municipal Stormwater Discharge Permit with the Colorado Department of Public Health and Environment (CDPHE).

Implementation of the Keep it Clean Plan is governed by the five-year intergovernmental agreement (IGA) and supporting bylaws. The initial IGA was executed in January 2003, and the second one was done in December 2007. The IGA identifies the Steering Committee as the managing entity; it is made up of one voting representative from each Partner community. The Steering Committee directs the KICP coordinator, who provides administrative and management services to implement the Keep it Clean Plan and budget. The IGA identifies Boulder County Public Health (BCPH) as the contracting/fiscal agent. BCPH is also the employer of the KICP coordinator. The Keep it Clean Partners participate in workgroups, which direct implementation of the Keep it Clean Plan.

Municipal stormwater regulations call for implementation of six minimum control measures (MCMs) to address the impact of stormwater runoff on water quality and stream health. These programs implemented through the KICP Plan are as follows:

1) MCM 1 - Public Education and Outreach

- School education programs (classroom programs, water festival, and teacher training)
- Outreach Program (brochures and other outreach materials, speakers program, website, watershed stewardship, and stream volunteers)
- Business Education Program (see MCM 3)

2) MCM 2 - Public Participation and Involvement

- Storm Drain Stenciling Program
- Annual outreach event booths to solicit input on Keep it Clean programs

3) MCM 3 - Illicit Discharge Detection and Elimination

- Legal prohibition of illicit discharges (ordinances)
- Illicit discharge enforcement (hotline, spill response plan, inspections, enforcement, and data tracking)
- Business Education Program
- Storm drainage system mapping

4) MCM 4 - Construction Site Stormwater Runoff Control

- Training and education for construction site operators and inspectors
- Erosion control ordinance (required erosion control for construction sites)
- Erosion control standard operating procedures (SOP) (outlines application and approval procedures for construction site stormwater management plan submittals)
- Erosion control inspection and enforcement (implementation of erosion control ordinance)
- Public Input

5) MCM 5 - Post-Construction Stormwater Management

- Post-construction ordinance (required treatment of stormwater runoff)
- Design criteria and standards (outlines type of stormwater treatment or best management practice [BMP] required)
- Development review (ensures appropriate design of BMPs)
- BMP operation and maintenance (requires long-term maintenance of BMPs)

6) MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

- Training and certification for municipal employees (site-specific water pollution prevention activities)

Implementation of the Keep it Clean Plan

The Keep it Clean Plan uses a variety of approaches to reduce the discharge of pollutants from the storm drainage system to protect water quality standards, and to satisfy the appropriate water quality requirements of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations.

- **Common Elements:** Program elements that have common themes and common implementation procedures. An example was the development of ordinance language.
- **Individual Programs:** Program elements that are exclusively the responsibility of individual Partners to implement. An example is the enforcement of erosion control and illicit discharge ordinances.
- **Shared Programs:** Program elements that are shared by all Partners. The following two contracts are examples:
 - The City of Boulder Water Quality Education Program provides community outreach materials and school programs in each of the Partner jurisdictions.
 - Boulder County's Partners for a Clean Environment (PACE) Program provides outreach materials and conducts site visits, addressing commercial and municipal operations.

The Partner communities fund the common and shared program costs. Cost allocation is based on each Partner's urbanized population, as outlined in the Keep it Clean IGA. Costs to implement the individual community programs are the responsibility of each individual community. The average total annual cost to implement the shared and common elements of the Keep it Clean Plan is approximately \$380,000. This includes 3.25 full-time employees (FTEs) at a cost of \$220,000. The staff currently includes 1.50 FTE education positions, 0.75 FTE Keep it Clean coordinator position, and 1.00 FTE to support the PACE Program.

2007 Highlights

Through implementation of the Keep it Clean Plan, all Partners achieved compliance with their stormwater discharge permits. A summary of major tasks completed in 2007 follows:

Program Changes

In 2006, the Partners hired Wes Ganter, with PG Environmental, to independently evaluate the KICP programs. The majority of the report was highly complimentary of the KICP Partnership. The evaluation found that the partnership was comprehensive, cost-effective, efficient, and well-organized. Several of recommendations made in the report were addressed in 2007 and include the following program changes:

- ◆ The project's name was changed from the Watershed Approach to Stream Health (WASH) to Keep it Clean Partnership to better communicate the project's objectives.
- ◆ Incentives and self audits were added to the Pollution Prevention and Good Housekeeping for Municipal Operations programs coordinated by PACE to increase ownership and involvement among municipal employees.
- ◆ Programs were expanded to focus on specific pollutants. These pollutants of concern were identified during a September 2006 pollutant roundtable.

The State has intentionally not defined the term maximum extent practicable (MEP), in order to allow maximum flexibility permitting and optimize reductions in stormwater pollutants.

Each permittee must determine appropriate programs to satisfy each of the six program areas.

In addition, a logo depicting the graphic used in the tributary signs was added to provide "brand identity" to the group.

Permit Planning for 2008-2012

The Phase II stormwater discharge permit for the Partners expired at the end of 2007. The Partners reapplied in September 2007 to be covered under the state's general discharge permit for the second permit term, which covers five years, from January 2008 to December 2012. In preparation for the next permit term, KICP completed the following activities:

- ◆ The KICP coordinator worked with several other members of the Colorado Stormwater Council to review and comment on the proposed 2008-2012 municipal stormwater discharge permit and prepare a template for program descriptions, which is due to the state in June 2008.
- ◆ The Partners met to discuss changes to programs based on the 2006 evaluation recommendations, pollutants identified as priorities, and the Partners' current priorities.
- ◆ Each Partner evaluated their individual community's goals and identified potential compliance program deficiencies and support need from the KICP shared programs. The Partners reaffirmed the benefits of KICP participation and developed individually tailored programs to meet specific community objectives

Community Outreach and School Education Programs

The Keep it Clean Partners contracted with the City of Boulder's Education Program to implement the community outreach and school education programs. The following is a summary of 2007 activities:

- ◆ Distributed 78,036 Keep it Clean brochures and inserts: 11,686 Spanish and English language brochures, 350 'Keep it Clean' flyers through the Boulder Energy Brigade, a two-thirds page version of the Keep it Clean brochure to 30,000 Boulder residents, and one-page report on stormwater quality to 36,000 Longmont residents through the annual Water Quality Report.
- ◆ Distributed 43,847 campaign materials as take-home components to the *Get to Know Your H₂O* School and Community Education programs; 375 sticky note pads; 5,925 magnets; 8,040 tattoos; 10,165 stickers; 2,631 *Adventures of H₂O Jo and Flo* activity books, and 11,536 place mats. In addition, a combination of 5,175 stickers and tattoos were distributed through school education programs.
- ◆ Conducted 162 stormwater education programs reaching a total of 5,175 Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) students.
- ◆ 17 teachers checked our water monitoring equipment to provided programs for 741 students in 23 BVSD and SVVSD classrooms.
- ◆ Marked 828 storm drains with the message, "Dispose no Waste, Drains to Creek".
- ◆ Distributed 1,975 fish door hangers as part of the storm drain marking program.
- ◆ 416,006 cars travel past the 'Keep it Clean' tributary signs each day.
- ◆ Attended several special events and reached 1,814 citizens.
- ◆ Revamped the Keep it Clean website, www.KeepitCleanPartnership.org, which had 32,000 visits.
- ◆ H₂O Jo mascot appeared at 13 community events in the Keep it Clean communities and an additional 30 events throughout the state of Colorado.
- ◆ Coordinated the development and posting of 800 water quality protection posters in buses.

Stormwater Pollution Prevention Programs for Private and Public Sectors

The KICP contracted with Boulder County Public Health's Partners for a Clean Environment (PACE) Program to implement the following work items:

- ◆ Conducted sites visits to 208 restaurants and 127 commercial vehicle service facilities.
- ◆ Provided stormwater pollution prevention training to 320 municipal employees during 12 stormwater pollution prevention trainings.
- ◆ Certified 40 of 43 Tier 1 municipal facilities.
- ◆ Visited 7 state-permitted municipal facilities.
- ◆ E-mailed 4 newsletters to 500 municipal employees.

Erosion Control, Permanent Water Quality Structures, and Illegal Discharge Prevention

The Keep it Clean Partners spent a significant amount of time working within their individual communities to begin implementation of the regulatory mechanisms needed to manage illegal discharges and construction and post-construction stormwater runoff. This included the following tasks:

- ◆ Certified over 53 participants in construction erosion control training.
- ◆ Trained 24 individuals in auditing active construction sites.
- ◆ Trained 8 individuals during two low impact development trainings.
- ◆ Trained 324 municipal employees in illegal discharge identification.
- ◆ Responded to 328 illegal discharges.

Regional Participation

Regional activities of the KICP included:

- ◆ Participated in the Colorado Water Quality Control Commission's Water Quality Forum's E.coli Workgroup.
- ◆ Coordinated with the Boulder Creek Watershed Initiative to solicit StreamTeam volunteers.
- ◆ Attended monthly meetings of the Colorado Stormwater Council, an organization that will give a voice to municipalities with stormwater permits.
- ◆ Participated in the Colorado Stormwater Council's Permit Compliance Committee and the Education and Outreach Committee.
- ◆ Attended state-sponsored meetings on minimal industrial discharge permits (MINDIs).
- ◆ Participated on the AWARE board.
- ◆ Presented background on the KICP to the Consortium of Cities.
- ◆ Presented background on the KICP to Public Service Institute Participants.

Budget

In 2007, the Keep it Clean budget was \$378,697, of which \$55,564 (15%) was proportionately reimbursed to each of the Partners. The majority of the reimbursement represents unspent contingency funds and monies earmarked for permit renewal assistance. The Keep it Clean IGA requires that 10% of the annual program budget be kept in contingency.

Awards

On Tuesday, April 10, 2007, the KICP was awarded the U.S. Environmental Protection Agency (EPA) Region 8's "Environmental Achievement Award" by EPA Administrator Robbie Roberts. The award recognizes communities for their significant achievements in protection of public health or the environment.

Grants

The City of Boulder, with support from the KICP, applied for a grant from the Environmental Protection Agency (EPA) to evaluate the relative contribution of the municipal storm drainage discharges to the E. coli contamination of Boulder Creek, and to evaluate sources of contamination due to human and non-human sources.

Total Maximum Daily Load

On a semi-annual basis, the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division develops a list of impaired waters in the state as mandated under Section 303(d) of the federal Clean Water Act. "Impaired waters" are those water bodies that currently fail to meet water quality standards established by the state, even after point sources have implemented the minimum required levels of pollution control technology. Subsequent to listing, CDPHE is required to develop a total maximum daily load (TMDL) to reduce pollutant levels in impaired waters. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards. Pollutants are generally controlled through numeric limits on permitted discharges, which could include wastewater treatment and/or stormwater discharges.

Three creek segments in the KICP communities have been listed as impaired for **Escherichia coli**, or E. coli. The following table outlines the stream segments as well as the communities discharging to these segments:

303d Listed: Impaired Stream Segment	KICP Community Discharging to Segment*
Boulder Creek from 13 th Street to the confluence with South Boulder Creek	Boulder
Coal Creek from Highway 36 to Boulder Creek	Louisville
Boulder Creek from Coal Creek to St. Vrain Creek.	Erie, Superior
* Any National Pollutant Discharge Elimination System (NPDES) permittee discharging to these stream segments may be included in a TMDL process	

The current municipal stormwater and other NPDES discharge permits include language that provides for the implementation of a total maximum daily load requirements. Affected communities, therefore, may have to meet numeric discharge standards through a TMDL process associated with their discharge permit(s).

The implication of an E. coli TMDL for any of these communities is uncertain at this time; however, if numeric standard of 126 cfu/100ml is established, it may be difficult, if not cost-prohibitive, to meet such a standard.

In addition, currently there is a lot of controversy surrounding an E. coli numeric standard. It was once thought that E. coli, while not a pathogen itself, could serve as a good indicator of sewage waste contamination, and thus pathogens in waterways. However, recently it has been determined that unlike other pathogens, E. coli can live and reproduce readily in the environment. Additional studies have shown that the presence of E. coli had a poor correlation to the presence of other pathogens, such as viruses and other bacteria.

Since 2003, the City of Boulder has been looking at possible human waste contamination sources of E. coli found in Boulder Creek. These studies included a DNA microbial source tracking analysis in 2003-2004 to try to identify the species (i.e. human, wildlife, domestic animals) sources of E. coli. This study, conducted by the Colorado School of Mines, proved inconclusive.

In 2006, additional monitoring of Boulder Creek and storm sewer discharges to the creek looked at the presence of optical brighteners (OBs). OBs, also called fluorescent whitening agents, are commonly used in cleaning compounds and other household produces. Ubiquitous in human wastewater streams, the presence of OBs is indicative of possible cross connections with sanitary sewers. Only one location, which was downstream of a small mobile home park, screened positive for OBs, which was expected; no other sources were discovered.

Further, in 2007, Boulder, Erie, and Louisville began analyzing the discharge from their storm drainage systems for E. coli and comparing the results to the proposed limit of 126 cfu/100mls. The results indicated that E. coli concentrations are sporadic in occurrence and distribution; however, there may be a seasonal trend in areas where E. coli is found. More data is needed to evaluate potential sources of E. coli, and most importantly, the relative threat to public health posed by the presence of this organism.

Future

In 2008, the Keep it Clean Plan programs will be implemented to fulfill regulatory compliance with each Partners' stormwater discharge permit for 2008 and to meet community water quality goals. In 2008, each Partner will be individually responsible for the following activities:

- ◆ Implement the individual ordinances adopted in 2004 and related procedures, such as: (1) Review and track erosion control plans and proposed permanent water quality structures; (2) Conduct and track construction and post-construction site inspections; and (3) Respond, enforce, and track all illegal discharges.
- ◆ Maintain storm drainage outfall maps.
- ◆ Ensure municipal operations are in compliance with stormwater regulations.
- ◆ Participate in the ongoing development of the 2008-2012 KICP Plan.
- ◆ Track the development of the state-issued E. coli total maximum daily load (TMDL).

2007 Activities

MINIMUM CONTROL MEASURES

The following is a summary
of
Priority One and Priority Two Activities
implemented under the Keep it Clean Plan for each of the
Six Minimum Control Measures (MCMs)

MCM 1 - Public Education and Outreach

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure (MCM), the following is required:

(A) *Public education and outreach on stormwater impacts. The permittee must implement a public education program to include the following:*

- (I) *Distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff; and*
- (II) *Inform businesses and the general public of impacts associated with illegal discharges and improper disposal of waste.*

Program Objective

Getting the Word Out - Public Education - Individuals play a key role in reducing stormwater impacts in their day-to-day activities. To successfully achieve water quality goals, a public education program must first educate the public on the extent and nature of the problems associated with urban runoff. Next, the public must be instructed on what they can do to help solve the problem, and finally, a successful program must provide opportunities for hands-on activities.

The Keep it Clean Education Program uses a variety of methods to “get the word out.” The program is an expansion of the City of Boulder’s award-winning water quality outreach program.

Program Implementation

The Keep it Clean Partners contracted with the City of Boulder to provide the Keep it Clean Education programs, which includes activities required under MCM 1 and MCM 2 for all Keep it Clean Partner communities. The Keep it Clean education staff, with direction from the Keep it Clean Education Workgroup and input from PACE staff, implemented programs outlined in the Keep it Clean Plan. Individual Partners were responsible for certain program elements, including the continued distribution of brochures and directing their citizens to the Keep it Clean website. The entire City of Boulder’s Stormwater Education Program’s annual report is available at www.KeepitCleanPartnership.org. The following is a summary of that report.

2007 Accomplishments

PRIORITY ONE ACTIVITIES

Brochures or Fact Sheets

2007 Measurable Goal outlined in the Keep it Clean Plan states - Brochures and fact sheets will be developed for targeted activities, as necessary.

The *After the Storm* brochure was created in 2003 and included information on the impacts of illegal discharges and other water quality issues. In 2004, the brochure was translated into Spanish. In 2005, the brochure was revised to include Keep it Clean campaign images, and the amount of text was reduced. In 2007, the brochure was revised again to include the Keep it Clean logo, information on the connection between transportation and water quality, the SepticSmart Program and a pledge reference. The Spanish version will be updated and reprinted when current supplies run out.

Distribution of the *Keep it Clean* general residential brochure continued in 2007. A total of 11,686 Spanish and English language brochures were distributed in 2007 throughout KICP communities at school, community, business outreach, and residential direct mail programs. In addition, the KICP partnered with Boulder County Eco-cycle; the Boulder Energy Brigade; and the cities of Boulder, Erie, and Louisville to produce and distribute a one-page flyer for distribution to the public. Through this project, the KICP distributed 350 *Keep it Clean* flyers to the public. The City of Boulder produced a 2/3-page version of the *Keep it Clean* brochure for inclusion in utility bill inserts. This brochure featured information in both Spanish and English and was mailed to 30,000 Boulder residents. The City of Longmont included a page on stormwater quality and KICP references in their Water Quality Report, which was sent to 36,000 residents. In total, the KICP distributed 78,036 brochures and flyers in 2007.

The permit requires that each *Keep it Clean* Partner is responsible for distributing brochures equal to approximately the number of households in their community over the five-year permit term. A summary of distribution methods follows:

Partner	Distribution means	Number of households	2003	2004	2005	2006	2007	% of total households
Boulder County	Community and school events, and Ecocycle insert	8,900	0	7,700	38,906	4,873	849	587
Boulder	Utility bill insert, community and school events	39,596	37,000	27,833	31,513*	50,076	38,767	468
Longmont	Independent mailings, Ecocycle Insert, community and school events	26,667	21,500	850	8,162	2,101	37,619	263
Louisville	Utility bill insert, community and school events	7,216	8,100	14	916	6,450	414	220
Superior	Newsletter insert, community and school events	4,500	4,800	0	532	459	0	129
Erie	Utility bill insert, community and school events	3,750	3,750	250	5,900	7,591	387	477
TOTAL		90,629	75,150	36,647	85,929	71,550**	78,036	383

* The City of Boulder produced the 'H2oooh!' stormwater brochure as part of the continued "Keep it clean, 'cause we're all downstream!" campaign in 2004. This brochure was distributed again in 2005, along with the new 'Keep it Clean' brochure, which was used in the city's 2005 utility bill insert.

** 69,449 was reported in 2006. The number was uncorrected and has been corrected in the 2007 report.

In addition to brochures, stormwater and water protection information is also distributed via e-mail list serves. For example, in partnership with the PACE Program, stormwater and water pollution prevention information was sent via e-mail to all Boulder County and City of Boulder employees in September 2007.

Water Quality Curriculum

2007 Measurable Goal outlined in the Keep it Clean Plan states – Water quality curriculum will continue to be distributed to Boulder Valley School District and St. Vrain Valley School District.

In 2005, the Watershed Resource Guide was updated to include the most current and useful information for both the Boulder Creek and St. Vrain Creek Watersheds.

In 2007, the curriculum was again distributed through the annual Watershed teacher training sessions. All Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) K-5th grade teachers and 6th-12th grade science teachers were invited to attend a free two-day training. In August, 19 educators attended the training.

It is estimated that the educators who attended the 2007 training will reach over 1,065 students in the 2007-2008 school year.

Other Keep it Clean education and outreach activities included:

- ◆ Promoting the Get to Know your H₂O Education Program.
- ◆ Conducting 162 stormwater education programs, reaching a total of 5,175 students.
- ◆ 17 teachers checking out equipment to conduct classroom programs, reaching 741 students.
- ◆ Appearing as the H₂O Jo mascot at 13 community events in the Keep it Clean communities and an additional 30 events throughout the state of Colorado.
- ◆ Distributing campaign materials, including: 375 sticky note pads; 5,925 magnets; 8,040 tattoos; 10,165 stickers; 2,631 *Adventures of H₂O Jo and Flo* activity books and 11,536 place mats.

Website

2007 Measurable Goal outlined in the Keep it Clean Plan states – Stormwater materials will continue to be developed for the website.

In 2005, the Keep it Clean website, hosted by the Boulder Area Sustainability Information Network (BASIN) was updated to include ‘Keep it Clean’ campaign graphics and general information on the KICP.

In December 2006, the website address was changed from www.BASIN.org/WASH to www.KeepitCleanPartnership.org to better reflect its relationship to the Keep it Clean campaign. The website is updated frequently to include the most current KICP information.

Year	Average Monthly Requests	Average Monthly Distinct Hosts Served
2004	1,587	703
2005	3,363	859
2006	3,029	1,543
2007	2,653	1,380

All Keep it Clean Partners list the Keep it Clean website on their own communities' websites, which include:

- ◆ **Boulder County:** <http://www.bouldercountywater.org/>
- ◆ **Boulder:** www.boulderwater.net
- ◆ **Longmont:** <http://www.ci.longmont.co.us>
- ◆ **Louisville:** <http://www.ci.louisville.co.us>
- ◆ **Superior:** www.townofsuperior.com
- ◆ **Erie:** <http://www.ci.erie.co.us/>

PRIORITY TWO ACTIVITIES

Children's Water Festival

2007 Measurable Goal outlined in the Keep it Clean Plan states – Continue hosting Children's Water Festival for Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) students.

H₂O Jo and Flo reappeared in 2007 as hosts for the BVSD and SVVSD water festivals. Their message, "Keep it clean, 'cause we're all downstream!" was the theme.

Approximately 1,239 BVSD 4th and 5th grade students and their teachers from 50 classrooms in 20 BVSD schools attended the 15th annual Children's Water Festival held at the University of Colorado (CU) campus on May 16, 2007. Sponsors included the Northern Colorado Conservancy District, CU's Office of Community Relations, the U.S. Bureau of Reclamation, and Wild Oats Markets.

Approximately 823 SVVSD 5th grade students and their teachers from 37 classrooms in 11 SVVSD schools attended the Longmont's Children's Water Festival held at the Raintree Conference Center in Longmont on May 24, 2007.

This year marked the second year of a new and improved Level II/Ambassador Program. The materials focus on fundamental water awareness, conservation, pollution, and flooding. The program, Operation Water Festival, includes a complete teacher's packet featuring teacher's guides, student worksheets, and flash cards on each water topic. Colorful stickers and certificates were given as study and performance measures. All of these elements were presented in a contemporary, undercover secret agent theme.

A key benefit of the Operation Water Festival materials is the take-home water agent book. This book features homework assignments for each activity. Students are encouraged to work with family members to complete the assignments. As a result, parents and siblings learn about water protection and conservation. To measure family learning, KICP provided a parent feedback form to parents. From storm drains to water conservation tips, all 54 families who returned the survey reported they learned something new from the Operation Water Festival materials.

Over 58% of BVSD classes and 100% of SVVSD classes attending the Children's Water Festival participated in the Water Ambassador Program.

Tributary Signage

2004 Measurable Goal outlined in the Keep it Clean Plan states – Tributary signage will be designed, produced, and installed along major intersections in the county and in municipalities marking significant waterways.

The tributary signs are intended to increase public awareness of local water resources. The sign caption reads, “Keep it clean, ‘cause we’re all downstream!” and includes the local creek name. The tributary signs were designed in 2003. In 2004, 60 tributary signs were produced and installed along major intersections in Boulder County and in Keep it Clean communities marking significant waterways.

In total, over 416,006 cars travel past these signs each day.

Number of daily vehicles traveled (DVT) for streets where tributary signs are installed.	Boulder	Boulder County	Erie	Louisville	Longmont	Superior
	228,015	30,860	4,700	21,431	94,600	36,400

Alternative Information

2007 Measurable Goal outlined in the Keep it Clean Plan states – Specific campaigns to target various pollutant sources will be developed.

The website was updated to reflect the Keep it Clean campaign materials.

Program Element Changes

None

Budget

Proposed: \$110,383

Actual: \$106,638

Unexpended funds: \$3,745

Savings are due primarily to not expending all funds allocated for permit application support.

Members of Workgroup

Wendi Palmer, Town of Erie

Donna Scott, City of Boulder

MCM 2 - Public Involvement and Participation

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(B) Public involvement/participation. The permittee must, at a minimum, comply with State and local public notice requirements when implementing the stormwater management programs required under this permit. Notice of all public hearings should be published in a community publication or newspaper of general circulation, to provide opportunities for public involvement that reach a majority of citizens through the notification process.

Program Objective

Promoting Public Participation: To ensure buy-in and support from the public, participation is critical. This includes providing information and seeking public input on stormwater management issues.

The Keep it Clean programs include participatory programs, such as neighborhood storm drain stenciling, illegal discharge reporting, and annual public meetings.

2007 Accomplishments

Keep it Clean Education Program

The KICP contracted with the City of Boulder to develop programs for MCM 2, which included the annual public meeting presentation and the storm drain stenciling program.

Individual Keep it Clean Partners are responsible for scheduling and hosting an annual public meeting in each of their communities. In 2004, after notifying the State, the annual meetings took place during special events in each of the Partner communities. The City of Boulder supplied an event booth and staff for each event. In addition, staff from each of the Keep it Clean Partners attended to answer questions and hand out materials.

Each year, Keep it Clean Partners are responsible for ensuring that a minimum of 5% of the storm drains are stenciled or marked in their communities. The City of Boulder supplies the materials for this activity.

PRIORITY ONE ACTIVITIES

Annual Public Meetings

2007 Measurable Goal outlined in the Keep it Clean Plan states – Annual public meetings will continue.

In 2003, each Keep it Clean Partner hosted a public meeting to solicit input on Keep it Clean programs, but only a handful of citizens attended these meetings. To increase participation, Keep it Clean Partners requested and received approval to change this measurable goal to include an alternative annual meeting that included participation at a local community festival or special event for each Keep it Clean Partner.

Utilizing graphics and messages created for the ‘Keep it Clean’ water quality campaign, a special events outreach booth was developed. The booth includes hands-on, portable, engaging activities that serve as tools for community members to learn about non-point source pollution and recognize how their behaviors can affect water quality. The booth reached 1,814 individuals at a minimum of one large-scale community event in each Keep it Clean community in 2007.

In addition to the outreach booth, the KICP had a presence at several other events.

The Keep it Clean communities' festivals or special events included the following:

Partner	Date of Event	Event	Number of Visitors
Boulder County	September 15, 2007	Boulder County Fair	182
Boulder	May 19, 2007	Community Clean-up Day	200
	June 3, 2007	Boulder Greenways	100
	June 23, 2007	Dog Gone Crazy Event	50
	June –October, 2006	Boulder's Farmer's Market	1,000
	July 4, 2007	Folsom Field	10,000
	August 7, 2007	CU RA Resource Fair	170
	October 7, 2007	Fall Festival	216
	December 1, 2007	Lights of December Parade	500
Longmont	July 14, 2007	Rhythm on the River	440
Louisville	June 9, 2007	Taste of Louisville	250
Superior	September 8, 2007	Chili Cook-off	350
Erie	May 19, 2007	Erie Town Fair	379
Total			13,837

Storm Drain Stenciling Program

2007 Measurable Goal outlined in the Keep it Clean Plan states – Storm drain stenciling program will continue to be initiated. A minimum of 5% of the storm drains will be stenciled per year.

In 2007, Keep it Clean education staff provided stormwater education programs and facilitated storm drain stenciling activities with over 243 youth and citizens in Keep it Clean communities. Keep it Clean education staff continued to use curb markers and spray-painted stencils marking 828 storm drains. The Storm Drain Marking Program volunteers distributed 1,975 fish door hangers as part of the marking program in neighborhoods in 2007. The brightly colored, fish-shaped door hangers, available in both English and Spanish, were distributed to property owners in the same block that the storm drains were marked. The door hangers included information about the storm drain marking program and provided tips on ways to protect and conserve local waters. The door hanger also lists the www.KeepitCleanPartnership.org website and the Keep it Clean spill hotline (303-441-4444).

The 5% minimum requirement for marking storm drains was met by all of the Partners in 2007. The following table summarizes this activity:

Partner	Total Number of Storm Drains	2003	2004	2005	2006	2007	Percent of Total Marked in 2007	Percent of Total Storm Drains Marked
Boulder County	225	82	40	31	23	50	22 %	100 %
Boulder	4,180	209	439	402	264	402	10 %	41 %
Longmont	1,820	99	95	115	170	193	11 %	37%
Louisville	600	43	137	31	31	83	14 %	54 %
Superior	300	22	20	74	20	30	10 %	55 %
Erie	320	62	17	162	144	70	22 %	142 %
Total	7,445	517	748	815	652	828	11 %	48 %

PRIORITY TWO ACTIVITIES

Speakers Program

2007 Measurable Goal outlined in the Keep it Clean Plan states – Speakers Program will be continued.

The Speakers Program includes a list of speakers available to present water quality information at local events. A program overview, the three presentation options, and a list of speakers are available at www.KeepitCleanPartnership.org. In 2007, KICP staff provided 3 presentations and reached 180 people:

Date	Group	Number of Participants	Location	Program Topic
2/27/07	Earth Education	100	Boulder	Get to Know your H2O
6/20/07	Western Water	30	Boulder	Water Protection
10/3/07	Land Trust Alliance	50	Boulder	Water Protection

StreamTeam

2007 Measurable Goal outlined in the Keep it Clean Plan states – Stream Teams will continue to be initiated.

KICP staff met numerous times over the course of the year with StreamTeam partner organizations, the United States Geological Survey (USGS) and the Boulder Creek Watershed Initiative (BCWI) to discuss program specifics, including roles of each organization, grant opportunities, and details for the water quality monitoring component. Program resources were developed and include the program web site, promotional flyers, enrollment and risk and release forms, safety information, as well as the water quality monitoring kit contents and related forms. The StreamTeam Program was promoted to the general public via a press release in May and in the Boulder Creek Watershed Initiative summer and fall newsletters.

Currently, there are eight groups enrolled as active StreamTeams. Of these groups seven participate in water quality monitoring activities.

StreamTeam Program participants have the following equipment available for loan through the Keep it Clean Education Program:

- ◆ Water quality testing equipment
- ◆ Creek cleanup kits
- ◆ Storm drain marking and stenciling kits
- ◆ Colorado Lake Monitoring Program training and related supplies

Program Element Changes

None

Budget

Proposed: \$21,383

Actual: \$17,889

Unexpended funds: \$3,494

Savings are due primarily to not expending all funds allocated for permit application support.

Members of Workgroup

Wendi Palmer, Town of Erie

Donna Scott, City of Boulder

MCM 3 - Illegal Discharge Detection and Elimination

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(C) *The permittee must develop, implement and enforce a program to detect and eliminate illegal discharges (as defined at 61.2) into the permittee's MS4. The permittee must:*

- (a) *Develop, if not already completed, a storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and location of all state waters that receive discharges from those outfalls;*
- (b) *To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the storm sewer system, and implement appropriate enforcement procedures and actions; and*
- (c) *Develop and implement a plan to detect and address non-stormwater discharges, including illegal discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illegal discharges; procedures for tracing the source of an illegal discharge; and procedures for removing the source of the discharge.*

Program Objective

Detecting and Eliminating Improper or Illegal Connections and Discharges: A cost-effective way to reduce some of the worst stormwater pollutants is to identify and eliminate illegal connections and discharges.

The Keep it Clean Plan includes public and municipal employee education training, spill response, and regulatory language to control illegal discharges. In addition, public information material will discuss the impacts of spills on water quality and a hotline for reporting illegal discharges will be advertised.

2007 Accomplishments

PRIORITY ONE ACTIVITIES

All Keep it Clean Partners have illegal discharge ordinances and enforcement response plans in place. The following table includes web links to the Partners' ordinances.

Partner	Ordinance Adopted	Web Link
Boulder County	September 13, 2005	http://www.co.boulder.co.us/bocc/Ordinances/illicit%20stormwater%20discharge.htm Ordinance no. 2005-1, Ordinance Concerning Illicit Stormwater Discharge
Boulder	December 6, 2004	http://www.colocode.com/boulder2/chapter11-5.htm#section11_5_5 Boulder Revised Code 1981, Title 11, Chapter 5, Section 5 (b) (BRC 11-5-5b)
Longmont	January 12, 2005	http://www.ci.longmont.co.us/city_clerk/municipal_code.htm Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, Water/Sewer, Chapter 13.36
Superior	December 13, 2004	http://www.colocode.com/superior.html Chapter 11, Article IV
Erie	November 9, 2004	http://66.113.195.234/CO/Erie/index.htm Title 12, Chapter 2-1, Illicit Discharges and Storm Water Quality Permit Requirements

Municipal Separate Storm Sewer System (MS4) Mapping

2007 Measurable Goal outlined in the Keep it Clean Plan states - MS4 system mapping updated.

Each Keep it Clean Partner community has completed a storm sewer map as required. The maps show the locations of municipal storm sewer outfalls and the names and locations of state waters that receive discharges from these outfalls. These maps are routinely updated.

Illicit Discharge Hotline

2007 Measurable Goal outlined in the Keep it Clean Plan states - Illicit Discharge hotline and database implemented.

In 2003, Boulder County's Emergency Communications Division agreed to the use and publication of a "Spill Hotline" (303-441-4444) to be shared by all Keep it Clean Partners. Calls to the Spill Hotline are received by the Boulder County Communications Center and are dispatched to the appropriate response agency and/or jurisdiction.

In addition to the Spill Hotline, the Keep it Clean Partners share an illegal discharge incident database, hosted on the BASIN website. The Boulder County Environmental Emergency Response Team (EERT), which responds to hazardous material and other spills, contributes its data to the BASIN database as well.

Partner	Number of Responses*	Enforcement Actions
Boulder County	12+0+0	4 verbal, 5 written
Boulder	28+161+19	7 verbal, 23 written
Longmont	5+67+2	29 verbal, 36 written warnings, 2 NOV
Louisville	6+21+3	3 verbal, 2 NOV
Erie	0+4+0	4 verbal
Superior	0+0+0	

* The first number is from the BASIN database; the second number is either fire department responses or individual tracking; and the third number is regarding public reporting on construction sites typically under an acre. NOV = Notice of violation.

Business Education Program

2007 Measurable Goal outlined in the Keep it Clean Plan states - Business Education Program component development completed and implementation continued.

The Keep it Clean Partners contracted with the Boulder County Partners for a Clean Environment (PACE) Program to provide stormwater pollution prevention education and materials to businesses operating in the Keep it Clean communities. Major work elements performed by PACE in 2007 for the KICP are outlined below. For more details, the complete PACE Annual Report is available online at www.pacepartners.com.

About PACE

PACE offers a pollution prevention certification program to various business sectors. PACE services are free-of-charge to interested businesses. For the KICP, PACE used a two-pronged approach to provide additional services to the Keep it Clean Partners. For Program A, PACE targets business sectors already included in the PACE certification program. For these businesses, PACE expanded its existing certification program to include stormwater pollution

prevention information. PACE's Program B provides outreach materials to those targeted businesses not already included in the PACE certification program.

Program A: PACE Certification

PACE expanded its existing program to include commercial sectors identified as potentially significant contributors of pollutants to the storm drain system. Program A sectors include vehicle repair, auto body, restaurant, and retail businesses.

In 2007, PACE completed the following activities for PACE Program A businesses:

- ◆ Conducted site visits, which provided one-on-one technical assistance to educate businesses, identify stormwater impacts, and identify low-cost solutions.

2007 PACE activity in each of the Keep it Clean Partner communities

Jurisdiction	Contacts per Contract	Vehicle Contacts	Restaurant Contacts	Total Actual Contacts
Boulder County	7	7	3	10
Boulder	170	77	98	175
Longmont	58	35	75	110
Louisville	32	6	27	33
Erie	4	2	4	6
Superior	1	0	1	1
Total Area	272	127	208	335

Total to date PACE activities in each Keep it Clean Partner community

Jurisdiction	Vehicle Repair		Restaurants	
	Total Businesses	Site Visits to date	Total Businesses	Site Visits to date
Boulder County	9	9	18	35
Boulder	131	221	268	348
Longmont	91	135	188	284
Louisville	7	15	67	68
Erie	4	5	10	14
Superior	1	6	13	18
Total Area	243	391	564	767

During the 2005 year-end status review of the PACE contract, the KICP Steering Committee set a goal that all restaurant and vehicle repair businesses in the KICP jurisdictions would receive a PACE site visit by the end 2007. It was recognized that this goal would not be completely

achievable due to businesses closing and new businesses opening during 2007; however, PACE would ensure that each KICP municipality receives at least the same number of site visits as businesses currently open in the restaurant and vehicle repair sectors. PACE achieved this goal in 2007, with most businesses receiving at least two site visits during the five-year permit cycle.

Program B: PACE Business Outreach

PACE developed Program B to provide stormwater outreach to businesses that are not currently included in PACE's existing certification program. These business sectors included commercial building maintenance, facility managers, pressure washers, private golf courses, do-it-yourself auto parts stores, and equipment rental stores.

Outreach to these Program B businesses sectors in 2007 included:

- ◆ Outlining PACE Allies program, which will be used to outreach to firms providing service to PACE businesses.
- ◆ Conducting 3 facility manager trainings.
- ◆ Distributing outreach materials to 7 do-it-yourself automobile maintenance shops and rental shops. Additionally, PACE returned to 5 of the shops to restock brochures.

2008 PACE Goals

In 2008, PACE plans to continue site visits to provide *Program A: PACE Business Certification* to vehicle repair, auto body, restaurant, and retail businesses in the KICP area.

The following activities are planned for 2007:

- ◆ **Existing PACE Sector Outreach:** PACE will continue to provide outreach to the existing priority sectors – auto repair facilities and restaurants.
- ◆ **New Sector Outreach Develop:** PACE will develop criteria, BMPs, and outreach material for new sectors, including gas stations and car washes.
- ◆ **One-on-One Training:** PACE will conduct one-on-one trainings with facility maintenance organizations.
- ◆ **PACE Allies:** Develop a web-based training and certification for PACE Allies to provide in-depth guidance to businesses in need of specific stormwater compliance assistance.
- ◆ **Outreach Beyond PACE Sectors:** Activities that negatively impact stormwater quality are frequently observed in non-PACE sectors. PACE will respond to these incidents to provide educational outreach on regulations and BMPs. This outreach will be conducted either at the request of a KICP Partner or when observed by PACE in the field. At the KICP Partner's discretion, this outreach may serve as a "first warning" in the Notice of Violation (NOV) process.
- ◆ Work with Keep it Clean education specialist to "co-brand" outreach materials.
- ◆ Participate in the development of the 2008-2012 Keep it Clean Plan.

Illicit Discharge Detection Plan

2007 Measurable Goal outlined in the Keep it Clean Plan states – Illicit Discharge Detection Plan implementation continued.

All Partners have completed and are implementing the Illicit Discharge Detection and Elimination (IDDE) Plans. IDDE training is a component of the municipal training offer by the PACE Program.

In addition, the KICP has developed door hangers. The door hanger was developed to notify potential illegal discharge violators. The door hanger outlined the possible violations and solutions and serves as a warning of potential fines.

PRIORITY TWO ACTIVITIES

Household Hazardous Waste (HHW) Disposal Program

2007 Measurable Goal outlined in the Keep it Clean Plan states – Support of countywide HHW Disposal Program will continue.

All of the Keep it Clean Partners signed a five-year intergovernmental agreement to participate in the county-wide Household Hazardous Waste Program. The shared cost for the HHW are separate from the KICP Program, and therefore are not included in the MCM's budget.

Program Element Changes

None

Budget

Proposed: \$55,899

Actual: \$50,271

Unexpended funds: \$5,628

Savings are due primarily to not expending all funds allocated for permit application support and PACE operating budget.

Members of Workgroup

Ken Mason, City of Louisville

Cal Youngberg, City of Longmont

Donna Scott, City of Boulder

MCM 4 - Construction Site Stormwater Runoff Control

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(D) *Construction site stormwater runoff control.*

- (I) *The permittee must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B), the permittee is not required to develop, implement, and/or enforce its program to reduce pollutant discharges from such a site.*
- (II) *The program must be developed and implemented to assure adequate design, implementation, and maintenance of BMPs at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include the development and implementation of, at a minimum:*
- (a) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law;*
 - (b) *Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;*
 - (c) *Requirements for construction site operators to control waste, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste, at the construction site that may cause adverse impacts to water quality;*
 - (d) *Procedures for site plan review which incorporate consideration of potential water quality impacts;*
 - (e) *Procedures for receipt and consideration of information submitted by the public, and*
 - (f) *Procedures for site inspection and enforcement of control measures.*

Program Objective

Controlling Construction Site Runoff - Effective construction site pollution prevention can dramatically reduce sediment loading to stream ecosystems. An effective erosion control program must include adequate ordinance language, effective inspection and enforcement, and appropriate development and construction standards.

The Keep it Clean Plan includes all of these components. In addition, the Keep it Clean Plan includes contractor training and a certification program. These program elements will ensure consistent countywide education and minimum standards.

2007 Accomplishments

PRIORITY ONE ACTIVITIES

The following table includes web links to the Partners' ordinances.

Partner	Ordinance Adopted	Web Link
Boulder County	August 11, 2005	http://www.co.boulder.co.us/lu/lucode/amendments/DC0504final.pdf Article 7, Development Standards
Boulder	December 6, 2004	http://www.colocode.com/boulder2/chapter11-5.htm#section11_5_6 Boulder Revised Code 1981, Title 11, Chapter 5, Section 5 (b) (BRC 11-5-5b)
Longmont	January 12, 2005	http://www.ci.longmont.co.us/city_clerk/municipal_code.htm Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, Water/Sewer, Chapter 13.36
Superior	December 13, 2004	http://www.colocode.com/superior.html Chapter 11, Article IV
Erie	November 9, 2004	http://66.113.195.234/CO/Erie/index.htm Title 12, Chapter 2-1, Illicit Discharges and Storm Water Quality Permit Requirements

Erosion Control Standard Operating Procedures

2007 Measurable Goal outlined in the Keep it Clean Plan states - Individual communities implement enforcement procedures.

The Keep it Clean Partners are implementing enforcement procedures.

Partner	Number of Active Construction Sites Over an Acre	Number of Inspections	Enforcement Actions
Boulder County	7	Full -27 Reconnaissance- 15	3 verbal
Boulder	19	Continuous	Multiple verbal warnings, no enforcement required.
Longmont	22	Full -177	1 verbal, 1 written
Louisville	15	Full - 100	14 written
Erie	25	Continuous	Multiple verbal warnings, no enforcement required
Superior	3	Full -34	0

Training and Education for Construction Site Operators and Inspectors

2007 Measurable Goal outlined in the Keep it Clean Plan states – Implement Keep it Clean contractor training program.

The KICP has been implementing a training program for construction site operators and inspectors since 2003. Most of the Keep it Clean Partners require, by ordinance, that the individuals inspecting erosion control and sediment removal practices be certified by an acceptable program.

In 2007, 53 individuals from the private and public construction sector participated in the Keep it Clean Erosion Control Training Program.

Public Input

2007 Measurable Goal outlined in the Keep it Clean Plan states - Individual communities implement public response tracking system.

The Keep it Clean Partners have developed individual tracking systems for public concerns.

Erosion Control Plans Review

2007 Measurable Goal outlined in the Keep it Clean Plan states – Individual communities review 100% of all erosion control plans.

The Keep it Clean Partners have their erosion control programs fully implemented.

Program Element Changes

None

Budget

Proposed: \$27,533

Actual: \$27,188

Unexpended funds: \$345

Savings are due primarily to not expending all funds allocated for permit application support.

Members of Workgroup

Brian Campbell, City of Boulder

Betty Solek, City of Boulder

Ela Nelson, City of Longmont

Justin Gindlesperger, Boulder County

MCM 5 - Post-Construction Stormwater Management

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(E) *Post-construction stormwater management in new development and redevelopment.*

(I) *The permittee must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the small MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.*

(II) *The permittee must:*

- (a) *Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community;*
- (b) *Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and*
- (c) *Ensure adequate long-term operation and maintenance of BMPs.*

Program Objective

Addressing Stormwater in New Development and Redevelopment. It is estimated that when a tributary drainage basin reaches 10–20 percent impervious, there are significant ecological stresses on the aquatic ecosystem. Therefore, the most important strategy for addressing stormwater is to focus on land use and development. One of the best strategies is to address the aggregate amount of new impervious surfaces and disconnecting impervious areas. Other strategies include implementing effective best management practices (BMPs) for the control and treatment of site runoff, such as stormwater detention or grass swales.

The Keep it Clean Plan for post-construction includes the development of programs and ordinances that address runoff from new development and redevelopment. The KICP will use a successful, existing program by adopting Urban Drainage and Flood Control District’s Best Management Practices Manual.

2007 Accomplishments

PRIORITY ONE ACTIVITIES

The following table includes web links to the Partners’ ordinances.

Partner	Ordinance Adopted	Web Link
Boulder County	August 11, 2005	http://www.co.boulder.co.us/lu/lucode/amendments/DC0504final.pdf
Boulder	December 6, 2004	http://www.colocode.com/boulder2/chapter11-5.htm#section11_5_6
Longmont	January 12, 2005	http://www.ci.longmont.co.us/city_clerk/municipal_code.htm Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Louisville	December 21, 2004	http://www.ci.louisville.co.us/cityclerk/municode.htm Title 13, Water/Sewer, Chapter 13.36
Superior	December 13, 2004	http://www.colocode.com/superior.html Chapter11, Article IV
Erie	November 9, 2004	http://66.113.195/CO/Erie/index.htm

Design Criteria and Standards

2005 Measurable Goal outlined in the Keep it Clean Plan states - Post-Construction ordinance references Urban Drainage and Flood Control District (UDFCD) Manual, Vol. 3. Individual communities implement monitoring and inspection procedures of construction of best management practices (BMPs) and post-construction maintenance.

All Partner ordinances have been adopted and reference UDFCD Manual, Vol 3.

Development Review

2006 Measurable Goal outlined in the Keep it Clean Plan states - Individual communities implement standard operating procedures (SOP)s for site plan review and inspection.

All Partners have approved SOPs for site plan review and inspection and are implementing them.

BMP Operation and Maintenance

2007 Measurable Goal outlined in the Keep it Clean Plan states - Individual communities implement enforcement procedures.

All Partner ordinances have been adopted and monitoring and inspection procedures of permanent BMPs has begun.

Partner	Number of Approved Post-Construction BMPs since Adoption of Ordinance	Number of Inspections of Post-Construction BMPs	Enforcement Actions	Comments
Boulder County	2	2	0	
Boulder	11	11	0	Tracking 739 existing
Longmont	29	0	0	
Louisville	1	0	0	
Erie	17	15	4 written	Minor corrections required on a few.
Superior	1	12	0	

Program Element Changes

None

Budget

Proposed: \$10,883

Actual: \$3,297

Unexpended funds: \$7,586

Savings are due primarily to not expending all funds allocated for permit application support.

Members of Workgroup

Brian Campbell, City of Boulder

Betty Solek, City of Boulder

Ela Nelson, City of Longmont

Justin Gindlesperger, Boulder County

MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

Regulatory Requirement

To satisfy the regulatory requirements for this minimum control measure, the following is required:

(F) *Pollution prevention/good housekeeping for municipal operations.*

(I) *The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable.*

Program Objective

Implementing Pollution Prevention for Municipal Operations. A surprising number of municipal operations can affect water quality and quantity. These activities range from the storage and handling of harmful chemicals to the maintenance of municipal properties, vehicles, roads, and storm sewer systems. Activities such as integrated pest management, water conservation, recycling, and education programs can prove to be very effective in addressing these pollutant sources.

The KICP provides an education and certification program through the Boulder County Partners for a Clean Environment (PACE) Program for municipal operations.

2007 Accomplishments

PRIORITY ONE ACTIVITIES

Partners for a Clean Environment (PACE) Municipal Program

2007 Measurable Goal outlined in the Keep it Clean Plan states – The PACE Program will certify 100% of the Tier 1 facilities (storm drain maintenance, streets, fleets, parks and golf courses, streets). Conduct training and outreach to all Tier 2 operations (facility maintenance, fire departments, and waste transfer centers). Implement recommended changes by December 31, 2007.

The Keep it Clean Partners contracted with the Partners for a Clean Environment (PACE) Program to develop a certification program for municipal operations. The following outlines a summary of activities completed in 2007. The complete PACE Annual Report is available online at www.pacepartners.com.

Tier 1 Municipal Facility Certification

Tier 1 facilities are those facilities identified by PACE to have the highest impact on stormwater, including **fleet, street, and storm drainage maintenance, and parks/golf courses**.

In 2003 and 2004, PACE visited all Tier 1 facilities in each of the Keep it Clean Partner communities. These site visits provided one-on-one assistance to identify appropriate pollution prevention practices and identify areas for improvement. A “certification” program was

developed to recognize the operations implementing pollution prevention or stormwater practices. In 2005, the Tier 1 Facility Certification Program continued, and facilities that had not yet fully implemented pollution prevention measures were asked to submit a certification plan. At the end of 2005, 55% of the Tier 1 facilities were certified. At the end of 2006, 72% (32 out of 42) of Tier 1 facilities were certified. The majority of those still needing certification are facilities requiring significant funding for improvements.

In 2007, 93% (40 out of 43) of Tier 1 facilities were certified. The three facilities that have not been fully certified have submitted requests for funding and have been approved for capitol improvement projects for 2008. These sites do not have “active” discharges, but they have not implemented all the self-imposed PACE BMPs for certification.

The City of Longmont Fleets Maintenance facility will install a wash bay in 2008, but they are currently is not washing vehicles, so an active discharge is not taking place.

Boulder County still has two facilities to fully certify. One of the Boulder County facilities (Road Maintenance facility in Nederland) has started design and construction of a self-contained, recycling wash station. The other Boulder County facility (Fleets Maintenance or OSTC in Longmont) has proposed a design for containment of a fueling area and will implement non-structural BMPs until the capitol improvement project (CIP) is completed by the end of 2008.

The following table outlines the status of certified Tier 1 Facilities in each of the Keep it Clean Partner communities.

PACE Certification: Tier 1 Municipal Facilities

Partner	Percent of Tier 1 Facilities Certified
Boulder County	80%*
Boulder	100%
Longmont	88%*
Louisville	100%
Superior	100%
Erie	100%

* These “un-certified” sites do not have “active” discharges but they also have not implemented all of the self-imposed PACE BMPs for certification. The three facilities have approved Capitol Improvement Projects for 2008.

PACE in 2007

- ◆ Conducted 40 site visits to assist facilities with certification.
- ◆ Provided guidance to Boulder County on new Household Hazardous Waste facility.
- ◆ Reviewed 11 certification plans and certified 11 operations.
- ◆ Developed certified/non-certified lists for each Keep it Clean Partner.
- ◆ Provided stormwater pollution prevention training to 320 employees at 12 stormwater training sessions.
- ◆ Provided Illicit Discharge Reporting Contact list to the Boulder County Multi-Agency Coordination (MACs) group, Boulder County Local Emergency Planning Committee (LEPC), and Boulder County Public Health Environmental Emergency Response Team (EERT).

Number of Site Visits per Partner

Type of Facility	Boulder	Boulder County	Longmont	Louisville	Superior	Erie	Total
Tier 1	9	6	7	4	2	3	31
Tier 2	3	1	2	3	0	0	9
Total	12	7	9	7	2	3	40

Tier 2 Municipal Operation Outreach

Tier 2 sources were identified by PACE as the operations with the next highest potential to pollute stormwater that were not designated as Tier 1 operations. These facilities include **fire departments, building and facilities maintenance, recreation centers, swimming pools, and solid waste transfer/recycling centers.**

In 2005, PACE developed stormwater pollution prevention practices for these operations. These practices were developed using information from over 60 employees and managers in six focus group meetings.

Municipal operations in PACE’s Tier 2 approach often include a large number of buildings and facilities, making it impractical to conduct individual site visits. In addition, one manager generally oversees numerous Tier 2 operations. Therefore, PACE determined that the most effective and efficient approach for the Tier 2 operation would be to provide pollution prevention training to the managers. Rather than a PACE “certification program” for Tier 2 operations, managers will be asked to meet industry specific criteria for the operations they manage.

2007 Training

Two different stormwater training presentations have been developed for the different municipal sectors: *Stormwater 101* for Tier 1 Operations (fleet, parks, golf course, street and storm drain maintenance), and *Stormwater 102* for Tier 2 Operations (municipal fire departments, building & facilities maintenance departments).

PACE offered tailored on-site customized, trainings to the KICP municipalities in 2007. PACE found this to be the most effective method for municipal employee trainings and plans to further develop this training method in 2008.

The trainings gave the employees basic information on stormwater compliance, illicit discharge identification and reporting, local contact information, and best management practices to prevent stormwater pollution. The “*Storm Watch*” video that was created for KICP/PACE is included in all the classes. The PowerPoint presentations were placed on the PACE website (www.pacepartners.com) for easy access by all employees.

The customized, on-site trainings involved PACE staff going to the facility the day before the training session to take photos of stormwater issues/concerns and/or implemented BMPs and then incorporating these photos into a PowerPoint presentation. This tool allowed employees to recognize and take ownership of issues at their own site. It also provided PACE staff with a chance to conduct a site visit for stormwater compliance. Employees were recognized for

implementing stormwater BMPs or for reporting illicit discharges. PACE staff then returned to the facility to ensure these issues were addressed, or they requested that the manager contact them when the matter was resolved.

PACE also provided stormwater training to three municipal contractors.

- ◆ MTEC Heating and Air Conditioning: Provided training on proper permitting and BMPs for discharges from cleaning heat transfer equipment and/or air conditioning units.
- ◆ Cocal Landscaping: Conducted a *Stormwater 101* class to 4 managers, who then relayed the information to their employees.
- ◆ Eco-cycle: Trained 3 employees from Eco-cycle who work at the Boulder County Recycling Center in *Stormwater 101* and general good housekeeping practices. This was in response to numerous violations found during a Colorado Discharge Permit System (CDPS) inspection by a state-contracted inspector.

In total, 324 employees were trained at 14 different training sessions.

Number of Employees Trained per Department and Municipality

	Fleets/ Transportation	Public Works	Parks/ Landscaping	Facilities Maintenance	Contractors	Total
Boulder	12	4		8	3	27
Boulder County	70			21	3	94
Longmont	51	26	16	44		137
Louisville		19	12	2		33
Erie	1	15	5			21
Superior		6	2		4	12
Total	134	70	35	75	10	324

2007 Additional Accomplishments

- ◆ Distributed 4 stormwater newsletters to approximately 500 employees.
- ◆ Met with police, code enforcement, municipal responders, and stormwater quality personnel on stormwater compliance and illicit discharge reporting.
- ◆ Developed new illicit discharge reporting list and distributed to Boulder County Multi-Agency Coordination group, Boulder County Local Emergency Planning Committee, and Boulder County Public Health Environmental Emergency Response Team.
- ◆ Designed and developed the Municipal ‘Keep it Clean’ Campaign to educate all employees on stormwater pollution prevention.
 - Designed and printed Keep it Clean/Protect Storm Drain stickers for municipal employees and equipment.
 - Printed Stormwater: Keep it Clean, ‘Cause we’re all Downstream static-cling window decals for distribution to municipal operations and vehicles.
- ◆ Developed a recognition/incentive program that rewards employees who report illicit discharges and/or implement BMPs/good housekeeping practices.

- Recognized 15 municipal employees for reporting illicit discharges or implementing a stormwater pollution prevention best management practice
- Distributed 12 \$10 gift certificates and 3 \$100 gift certificates
- Distributed 6 \$10 gift certificates to training attendees
- ◆ Conducted site visits to 7 municipal operations with CDPS permits to provide compliance assistance, review each operation’s Stormwater Management Plan (SWMP) and annual reports.

2007 Goals

Tier 1 Facilities and Tier 2 Operations

- ◆ Continue to Stormwater Certification Program.
- ◆ Conduct site visits for certification every other year with self-certification in the intervening years.
- ◆ Conduct site visits for certification follow-up.
- ◆ Conduct Stormwater 101 training sessions for new employees.
- ◆ Provide on-site training sessions as requested by operations managers.
- ◆ Conduct “on-the-job” or “tailgate” sessions to certified operations.
- ◆ Develop PACE “Street Smart Program”; a more in-depth evaluation of street maintenance operating procedures.
- ◆ Develop PACE “Storm Smart Program”; a more in-depth evaluation of storm drain maintenance operating procedures.
- ◆ Develop PACE “Green Lots Program”; a more in-depth stormwater certification (compliance) program for municipal parking lots.

Other

- ◆ Continue and enhance Municipal Employee Outreach and Recognition Program and work with the KICP Education Program.
- ◆ Recognize employees who protect stormwater with cash awards, posters, stickers, mugs and/or water bottles, photos in newsletters, and/or gift certificates.
- ◆ Utilize community-based social marketing techniques to change employee behavior.
- ◆ Distribute pledge certificates after training events.
- ◆ Continue data management efforts and enhancement.
- ◆ Send quarterly newsletters on key issues; highlight innovations and accomplishments.

Program Element Changes

None

Budget

Proposed: \$76,463

Actual: \$71,905

Unexpended funds: \$4,558

Savings are due primarily to not expending all funds allocated for permit application support.

Members of Workgroup

Ken Mason, City of Louisville
 Cal Youngberg, City of Longmont
 Donna Scott, City of Boulder

2007

**Municipal Stormwater Discharge Permit
Annual Report Table**

The following are the 2007 permit activities
for the Six Minimum Control Measures
submitted
to the State Water Quality Control Division

MCM 1. Public Education and Outreach

GENERAL SUMMARY: The KICP contracts with the City of Boulder to provide programs required for MCM 1 and MCM 2, which included producing brochures, the water quality education program, and the Keep it Clean website.

Individual Partners were responsible for distributing brochures and directing their citizens to the Keep it Clean website.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 1 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?																																								
<p>Brochures or fact sheets – will be developed for targeted activities as necessary by 12/31/07.</p>	<p><u>KEEP IT CLEAN ACTIVITIES</u> A total of 11,686 Spanish and English language <i>Keep it Clean</i> brochures were distributed in 2007 throughout Keep it Clean communities at school, community, business outreach, and residential direct-mail programs. In total, Keep it Clean distributed 78,036 brochures and inserts in 2007.</p> <p><u>INDIVIDUAL ACTIVITIES</u> The total number of brochures distributed since 2003 and in 2007 are listed below:</p> <table border="1" data-bbox="444 1079 1208 1514"> <thead> <tr> <th>Partner</th> <th>Number of House-holds</th> <th>Number Distributed by Partners in 2003-2005</th> <th>Number Distributed by Partners in 2007</th> <th>% Distributed to Date of Total House-holds</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>8,900</td> <td>51,479</td> <td>849</td> <td>587</td> </tr> <tr> <td>Boulder</td> <td>39,596</td> <td>146,422</td> <td>38,767</td> <td>468</td> </tr> <tr> <td>Longmont</td> <td>26,667</td> <td>32,613</td> <td>37,619</td> <td>263</td> </tr> <tr> <td>Louisville</td> <td>7,216</td> <td>15,480</td> <td>414</td> <td>220</td> </tr> <tr> <td>Superior</td> <td>4,500</td> <td>5,791</td> <td>0</td> <td>129</td> </tr> <tr> <td>Erie</td> <td>3,750</td> <td>17,491</td> <td>387</td> <td>477</td> </tr> <tr> <td>TOTAL</td> <td>90,629</td> <td>269,276</td> <td>78,036</td> <td>383</td> </tr> </tbody> </table> <p>General Community Outreach in 2007:</p> <ul style="list-style-type: none"> ◆ Appeared as the H₂O Jo mascot at 13 community events in the Keep it Clean communities and an additional 30 events throughout Colorado. ◆ Distributed 43,847 campaign materials, including 375 sticky note pads, 5,925 magnets, 8,040 tattoos, 10,165 stickers, 2,631 <i>Adventures of H₂O Jo and Flo</i> activity books and 11,536 place mats. In addition, a combination of 5,175 stickers and tattoos were distributed through school education programs. 	Partner	Number of House-holds	Number Distributed by Partners in 2003-2005	Number Distributed by Partners in 2007	% Distributed to Date of Total House-holds	Boulder County	8,900	51,479	849	587	Boulder	39,596	146,422	38,767	468	Longmont	26,667	32,613	37,619	263	Louisville	7,216	15,480	414	220	Superior	4,500	5,791	0	129	Erie	3,750	17,491	387	477	TOTAL	90,629	269,276	78,036	383	<p>No</p>
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<p>Water Quality Curriculum—continue to be distributed to Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) by 12/31/07.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u></p> <p>In 2007, the curriculum was again distributed through the annual Watershed teacher training sessions.</p> <p><u>Teacher Training</u> All Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) K-5th grade teachers and 6th-12th grade science teachers were invited to attend a free two-day training.</p> <p>In August, 19 educators attended the training. It is estimated that the educators that attended the 2007 training will reach over 1,065 students in the 2007-2008 school year.</p> <p><u>School-Based Programs</u></p> <ul style="list-style-type: none"> ◆ Promoted the “Get to Know your H₂O” Education Program. ◆ Conducted 162 stormwater education programs, reaching a total of 5,175 students. ◆ 17 teachers checked out equipment to conduct classroom programs, reaching 741 students. 	<p>No</p>															
<p>Website - stormwater information will continue to be posted on the Keep it Clean website by 12/31/07.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u></p> <p>Background information on the KICP, including the six MCMs, along with specific information promoting the stormwater education program, storm drain stenciling program, training opportunities, informational brochures, and annual reports are provided on the BASIN website (www.KeepitCleanPartnership.org). This website is updated frequently to include the most current KICP information.</p> <table border="1" data-bbox="459 1478 1208 1724"> <thead> <tr> <th>Year</th> <th>Average Monthly Requests</th> <th>Average Monthly Distinct Hosts Served</th> </tr> </thead> <tbody> <tr> <td>2004</td> <td>1,587</td> <td>703</td> </tr> <tr> <td>2005</td> <td>3,363</td> <td>859</td> </tr> <tr> <td>2006</td> <td>3,029</td> <td>1,543</td> </tr> <tr> <td>2007</td> <td>2,653</td> <td>1,380</td> </tr> </tbody> </table>	Year	Average Monthly Requests	Average Monthly Distinct Hosts Served	2004	1,587	703	2005	3,363	859	2006	3,029	1,543	2007	2,653	1,380	<p>No</p>
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	<p><u>INDIVIDUAL PROGRAMS</u> Each Partner references the Keep it Clean website on their own communities' websites as listed below: Boulder County: www.bouldercountywater.org Boulder: www.boulderutilities.net Longmont: www.ci.longmont.co.us Louisville: www.ci.louisville.co.us Superior: www.townofsuperior.com Erie: www.ci.erie.co.us</p>	

- 2. **RESULTS OF INFORMATION COLLECTED:** No data required.
- 3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM.
- 4. **PROPOSED CHANGES:** None.
- 5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2008 are as listed below.

Will be submitted June 2008

- 6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** Per the original applications, the KICP is performing the Shared and Common Programs for public education and outreach.

MCM 2. Public Participation and Involvement

GENERAL SUMMARY: The KICP contracted with the City of Boulder’s Stormwater Education Program to develop programs for MCM 2, which included the annual public meeting presentation and the storm drain stenciling program.

Individual Partners were responsible for scheduling and hosting an annual public meeting in each of their communities. In addition, communities were responsible for ensuring that a minimum of 5% of their storm drains were stenciled.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 2 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?																																																		
<p>Annual Public Meetings - will be conducted in all Partner communities by 12/31/07. An alternative annual meeting format will be developed. This may include special events, presentation of Keep it Clean Program updates to councils, commissioners, citizen advisory boards, and/or public forums; distribution of feedback forms; or other means to solicit public input into the KICP and individual Partner community stormwater programs.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u> Utilizing graphics and messages created for the ‘Keep it Clean’ water quality campaign; the ‘Keep it Clean’ outreach booth was developed. It includes hands-on, portable, engaging activities that serve as tools for community members to learn about non-point source pollution and recognize how their behaviors can affect our water quality.</p> <p>A total of 1,814 people visited the Keep it Clean event booth in 2007 and had one-on-one interaction; many others had an introduction.</p> <p><u>INDIVIDUAL PROGRAMS</u> The Keep it Clean communities’ festivals or special events included:</p> <table border="1" data-bbox="467 1291 1211 1801"> <thead> <tr> <th>Partner</th> <th>Date of Meeting</th> <th>Meeting Description</th> <th>Number of Visitors</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>9/15/07</td> <td>Boulder County Fair</td> <td>182</td> </tr> <tr> <td rowspan="7">Boulder</td> <td>5/19/07</td> <td>Community Clean-up Day</td> <td>200</td> </tr> <tr> <td>6/3/07</td> <td>Boulder Greenways</td> <td>100</td> </tr> <tr> <td>6/23/07</td> <td>Dog Gone Crazy Event</td> <td>50</td> </tr> <tr> <td>6-10/07</td> <td>Boulder’s Farmer’s Market</td> <td>1,000</td> </tr> <tr> <td>07/04/07</td> <td>Folsom Field</td> <td>10,000</td> </tr> <tr> <td>8/7/07</td> <td>CU RA Resource Fair</td> <td>170</td> </tr> <tr> <td>10/7/07</td> <td>Fall Festival</td> <td>216</td> </tr> <tr> <td></td> <td>12/1/07</td> <td>Lights of December Parade</td> <td>500</td> </tr> <tr> <td>Longmont</td> <td>7/14/07</td> <td>Rhythm on the River</td> <td>440</td> </tr> <tr> <td>Louisville</td> <td>6/09/07</td> <td>Taste of Louisville</td> <td>250</td> </tr> <tr> <td>Superior</td> <td>9/0807</td> <td>Chili Cook-off</td> <td>350</td> </tr> <tr> <td>Erie</td> <td>5/19/07</td> <td>Erie Town Fair</td> <td>379</td> </tr> </tbody> </table>	Partner	Date of Meeting	Meeting Description	Number of Visitors	Boulder County	9/15/07	Boulder County Fair	182	Boulder	5/19/07	Community Clean-up Day	200	6/3/07	Boulder Greenways	100	6/23/07	Dog Gone Crazy Event	50	6-10/07	Boulder’s Farmer’s Market	1,000	07/04/07	Folsom Field	10,000	8/7/07	CU RA Resource Fair	170	10/7/07	Fall Festival	216		12/1/07	Lights of December Parade	500	Longmont	7/14/07	Rhythm on the River	440	Louisville	6/09/07	Taste of Louisville	250	Superior	9/0807	Chili Cook-off	350	Erie	5/19/07	Erie Town Fair	379	
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<p>Storm Drain Stenciling Program will continue with target of 5% of storm drains by 12/31/07.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u></p> <p>Storm Drain Stenciling Program: Keep it Clean education staff provided stormwater education programs and facilitated storm drain stenciling activities with over 243 youth and citizens in Keep it Clean communities.</p> <p>In 2007, Keep it Clean education staff continued to use curb markers and spray paint and stencils marking 828 storm drains.</p> <p>The Storm Drain Marking Program volunteers distributed 1,975 fish door hangers as part of the storm drain marking program in neighborhoods in 2007. The brightly colored, fish-shaped door hangers, available in both English and Spanish, inform residents about the storm drain marking program and provide tips on ways to protect and conserve local waters. The door hanger also lists the KeepitCleanPartnership.org website and the spill report line, 303-441-4444.</p> <p><u>INDIVIDUAL PROGRAMS</u></p> <p>All of the Partners exceeded the goal of stenciling 5% of their storm drains in 2007.</p> <table border="1" data-bbox="467 1062 1211 1421"> <thead> <tr> <th>Partner</th> <th>Total Storm Drains</th> <th>2003</th> <th>2004</th> <th>2005</th> <th>2006</th> <th>2007</th> <th>% of Total in 2007</th> <th>% of Total</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>225</td> <td>82</td> <td>40</td> <td>31</td> <td>23</td> <td>50</td> <td>22</td> <td>100</td> </tr> <tr> <td>Boulder</td> <td>4,180</td> <td>209</td> <td>439</td> <td>402</td> <td>264</td> <td>402</td> <td>10</td> <td>41</td> </tr> <tr> <td>Longmont</td> <td>1,820</td> <td>99</td> <td>95</td> <td>115</td> <td>170</td> <td>193</td> <td>11</td> <td>37</td> </tr> <tr> <td>Louisville</td> <td>600</td> <td>43</td> <td>137</td> <td>31</td> <td>31</td> <td>83</td> <td>14</td> <td>54</td> </tr> <tr> <td>Superior</td> <td>300</td> <td>22</td> <td>20</td> <td>74</td> <td>20</td> <td>30</td> <td>10</td> <td>55</td> </tr> <tr> <td>Erie</td> <td>320</td> <td>62</td> <td>17</td> <td>162</td> <td>144</td> <td>70</td> <td>22</td> <td>142</td> </tr> <tr> <td>Total</td> <td>7,445</td> <td>517</td> <td>748</td> <td>815</td> <td>652</td> <td>828</td> <td>11</td> <td>48</td> </tr> </tbody> </table>	Partner	Total Storm Drains	2003	2004	2005	2006	2007	% of Total in 2007	% of Total	Boulder County	225	82	40	31	23	50	22	100	Boulder	4,180	209	439	402	264	402	10	41	Longmont	1,820	99	95	115	170	193	11	37	Louisville	600	43	137	31	31	83	14	54	Superior	300	22	20	74	20	30	10	55	Erie	320	62	17	162	144	70	22	142	Total	7,445	517	748	815	652	828	11	48	<p>No</p>
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3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM.
4. **PROPOSED CHANGES:** None.
5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2007 are as listed below.

Will be submitted June 2008

6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** Per the original applications, the KICP is performing the shared and common programs for public participation and involvement.

MCM 3. Illicit Discharge Detection and Elimination

GENERAL SUMMARY: The Keep it Clean Partners have all adopted their illicit discharge ordinances and have written illicit discharge detection and elimination plans.

The KICP contracts with the Boulder County Partners for a Clean Environment (PACE) Program to provide stormwater pollution prevention outreach and materials to commercial businesses identified as potential significant contributors of pollutants to the MS4 (this is done in conjunction with MCM 1). These businesses include restaurants and vehicle service facilities.

Individual Partners were responsible for the mapping of their MS4s' outfalls.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 3 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?
MS4 Mapping - MS4 system mapping updated by 12/31/07.	<p><u>INDIVIDUAL PROGRAMS</u> Mapping of MS4 outfalls is the responsibility of the individual Partners. The status of this mapping is as follows: Boulder County: updating outfall mapping in Transportation. Boulder: updating outfall mapping in Public Works. Longmont: updating outfall mapping in Public Works. Louisville: updating outfall mapping in Public Works. Superior: updating outfall mapping in Public Works. Erie: updating outfall mapping in Public Works.</p>	No
Legal Prohibition and Enforcement- Continue implementation of Illicit Discharge Hotline, Ordinance and Response Plan by 12/31/07.	<p><u>KEEP IT CLEAN PROGRAMS</u> The Boulder County Communications number 303-441-4444 was identified as the KICP hotline.</p> <p>The website www.BASIN.org hosts the Keep it Clean spill response and tracking system.</p> <p><u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their illicit discharge regulatory mechanisms: Boulder County: Ordinance approved September 13, 2005. Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p>	No

2007 MCM 3 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?
<p>Business Education Program- Implementation continued by 12/31/07.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u> PACE evaluated stormwater pollution prevention criteria and provided information during site visits to 208 restaurant facilities and 127 vehicle service facilities.</p> <p>PACE visited and distributed outreach materials for both the owners and customers of 6 do-it-yourself auto part and rental stores.</p> <p><u>INDIVIDUAL PROGRAMS</u> The following facilities visited in each of the Partner's communities: Boulder County: 3 restaurants, 7 vehicle service facilities. Boulder: 98 restaurants, 77 vehicle service facilities. Longmont: 75 restaurants, 35 vehicle service facilities. Louisville: 27 restaurants, 6 vehicle service facilities. Superior: 1 restaurants, 0 vehicle service facilities. Erie: 4 restaurants, 2 vehicle service facilities.</p>	<p>No</p>
<p>Illicit Discharge Detection Plan: Continue implementation of Illicit Discharge Detection Plan by 12/31/07.</p>	<p><u>KEEP IT CLEAN PROGRAMS</u> The KICP model for the Illicit Discharge Detection and Elimination Plan was drafted and distributed to the Partners in November 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> Each Partner has modified the Illicit Discharge Detection and Elimination Plan model for their communities and is implementing the plan.</p> <p>Illicit discharge detection was incorporated into the general PACE municipal employee trainings.</p>	

2. RESULTS OF INFORMATION COLLECTED: No data required.

3. INSPECTION AND ENFORCEMENT:

Partner	Number of Responses*	Enforcement Actions
Boulder County	12+0+0	4 verbal, 5 written
Boulder	28+161+19	7 verbal, 23 written
Longmont	5+21+2	29 verbal, 36 written warnings, 2 NOV
Louisville	6+21+3	3 verbal, 2 NOV
Erie	0+4+0	4 verbal
Superior	0+0+0	

* The first number is from the BASIN database; the second number is either fire department responses or individual tracking; the third number is regarding public reporting on construction sites typically under an acre.

4. PROPOSED CHANGES: None.

5. ACTIVITIES FOR NEXT REPORTING CYCLE: Per the permit application, the planned stormwater activities for 2007 are as listed below.

Will be submitted June 2008

6. NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY: In accordance with the original applications, the KICP is performing the shared and common programs for illicit discharge detection and elimination.

MCM 4. Construction Site Stormwater Runoff Control

GENERAL SUMMARY: The KICP Partners developed a model construction and post-construction ordinance in 2003. In 2004 and 2005, the ordinance language was adapted by the individual Partners' attorneys and adopted by their councils and boards. Standard operating procedures were developed, and implementation began in 2005.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 3 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?
Erosion Control Ordinance	<p><u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their construction and post-construction regulatory mechanisms: Boulder County: Land Use Code adopted August 11, 2005. Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p>	No
Erosion Control Standard Operating Procedures- Review 100% of all erosion control plans by 12/31/07.	<p><u>KEEP IT CLEAN ACTIVITIES</u> Model SOP language was developed and approved by the KICP Partners for construction and post-construction on May 24, 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> Boulder County: fully implemented. Boulder: fully implemented. Longmont: fully implemented. Louisville: fully implemented. Superior: fully implemented. Erie: fully implemented.</p>	
Public Input- Individual communities implement public response tracking system by 12/31/06.	<p><u>INDIVIDUAL PROGRAMS</u> Boulder County: Tracking system resides in a database on the County network in the Land Use Department. Boulder: Tracking system resides in Landlink, a development database, on the city network. Longmont: Tracking system resides in Customer Request Tracking System (CRTS) on city network. Louisville: Tracking system resides in Public Works. Superior: Tracking system resides in Public Works. Erie: Tracking system resides in Public Works.</p>	

<p>Training and Education for Construction Site Operators and Inspectors- Implement KICP contractor training program by 12/31/06.</p>	<p><u>KEEP IT CLEAN ACTIVITIES</u> The KICP has been implementing a training program for construction site operators and inspectors since 2003. Most of the Keep it Clean Partners require, by ordinance, that the individuals inspecting erosion control and sediment removal practices be certified by an acceptable program.</p> <p>In 2007, 53 individuals from the private and public construction sector received certification in the Keep it Clean Erosion Control Training Program.</p>	
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2. RESULTS OF INFORMATION COLLECTED: No data required.

3. INSPECTION AND ENFORCEMENT:

KICP Partner	Number of Active Construction Sites Over an Acre	Number of Inspections	Enforcement Actions
Boulder County	7	Full –27 Reconnaissance- 15	3 verbal
Boulder	19	Continuous	Multiple verbal warnings, no enforcement required.
Longmont	22	Full- 177	1 verbal, 1 written
Louisville	15	Full -100	14 written
Erie	25	Continuous	Multiple verbal warnings, no enforcement required
Superior	3	Full –34	0

4. PROPOSED CHANGES TO PROGRAM AREA: None.

5. ACTIVITIES FOR NEXT REPORTING CYCLE: In accordance with the permit application, the planned stormwater activities for 2008 are as listed below.

Will be submitted June 2008

6. NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY: In accordance with the original applications, the KICP Project is performing the shared and common programs for construction site stormwater runoff control.

MCM 5. Post-Construction Stormwater Management

GENERAL SUMMARY: The KICP Partners developed a model construction and post-construction ordinance in 2003. In 2004 and 2005, the ordinance language was adapted by the individual Partners' attorneys and adopted by their councils and boards. Standard operating procedures (SOPs) were developed, and implementation began in 2005.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 5 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?
Post-Construction Ordinance	<p><u>INDIVIDUAL PROGRAMS</u> Individual Partners adopted their construction and post-construction regulatory mechanisms: Boulder County: Land Use Code adopted August 11, 2005. Boulder: Ordinance approved December 6, 2004. Longmont: Ordinance approved January 12, 2005. Louisville: Ordinance approved December 21, 2004. Superior: Ordinance approved December 13, 2004. Erie: Ordinance approved November 9, 2004.</p>	No
Development Review: Implement SOP's for site plan review by 12/31/06.	<p><u>KEEP IT CLEAN ACTIVITIES</u> Model SOP language was developed and approved by the KICP Partners for construction and post-construction requirements on May 24, 2004.</p> <p><u>INDIVIDUAL PROGRAMS</u> Boulder County: Site plans reviewed. Boulder: Site plans reviewed. Longmont: Site plans reviewed. Louisville: Site plans reviewed. Superior: Site plans reviewed. Erie: Site plans reviewed.</p>	No
BMP Operation and Maintenance: Individual communities implement enforcement procedures by 12/ 31/07	<p><u>INDIVIDUAL PROGRAMS</u> Boulder County: fully implemented. Boulder: fully implemented. Longmont: fully implemented. Louisville: fully implemented. Superior: fully implemented. Erie: fully implemented.</p>	No

2. RESULTS OF INFORMATION COLLECTED: No data required.

3. INSPECTION AND ENFORCEMENT:

Partner	Number of Approved Post-Construction BMPs since Adoption of Ordinance	Number of Inspections of Post-Construction BMPs	Enforcement Actions	Comments
Boulder County	2	2	0	
Boulder	11	11	0	Tracking 739 existing
Longmont	29	0	0	
Louisville	1	0	0	
Erie	17	15	4 written	Minor corrections required on a few ponds, most functioning properly.
Superior	1	12	0	

4. PROPOSED CHANGES TO PROGRAM AREA: None.

5. ACTIVITIES FOR NEXT REPORTING CYCLE: In accordance with the permit application, the planned stormwater activities for 2008 are as listed below.

Will be submitted June 2008

6. NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY: In accordance with the original applications, the KICP is performing the shared and common programs for post-construction stormwater management.

MCM 6. Pollution Prevention and Good Housekeeping for Municipal Operations

GENERAL SUMMARY: The KICP Project contracts with the Boulder County Partners for a Clean Environment (PACE) Program to develop an outreach program for municipal operations.

1. IMPLEMENTATION STATUS OF PROGRAMS: The following table outlines the status of the measurable goals for this MCM.

2007 MCM 6 MEASURABLE GOALS	2007 STATUS <i>Completion Date: December 31, 2007</i>	Changes Proposed?														
<p>PACE – Municipal Program - The PACE Program will <i>certify</i> 100% of the Tier 1 facilities (storm drain maintenance, streets, fleets, parks and golf courses, streets). Conduct training and outreach to all Tier 2 operations (facility maintenance, fire departments, and waste transfer centers). Implement recommended changes by 12/31/07.</p>	<p><u>KEEP IT CLEAN ACTIVITIES</u> PACE continues to evaluate municipal operations’ stormwater pollution prevention certification criteria, both structural and non-structural. Municipal operations are categorized into two tiers, based on an operation’s potential stormwater pollution threat.</p> <p>Tier 1 Facilities (fleet, street, and storm drainage maintenance, and parks/golf courses) have been provided with a stormwater pollution prevention binder containing the applicable BMPs, KICP/PACE criteria, a model spill response plan, and a training log.</p> <ul style="list-style-type: none"> ◆ 93% (40 out of 43) of Tier 1 facilities were certified. The three facilities that have not been fully certified have submitted requests for funding and have been approved for capitol improvement projects for 2008. These sites do not have “active” discharges but have not implemented all the self-imposed PACE BMPs for certification. ◆ Conducted 31 site visits. ◆ Certified 11 operations. <p>Tier 2 Operations (fire departments, building and facilities maintenance, recreation centers, swimming pools, and solid waste transfer/recycling centers) were identified by PACE as the facilities or operations with the next highest potential to pollute stormwater that were not designated as “Tier 1” facilities.</p> <ul style="list-style-type: none"> ◆ Conducted 9 site visits. <p>Training</p> <table border="1" data-bbox="532 1629 1198 1877"> <thead> <tr> <th>KICP Partner</th> <th>Number of Employees Trained*</th> </tr> </thead> <tbody> <tr> <td>Boulder County</td> <td>94</td> </tr> <tr> <td>Boulder</td> <td>27</td> </tr> <tr> <td>Longmont</td> <td>137 +30</td> </tr> <tr> <td>Louisville</td> <td>33</td> </tr> <tr> <td>Superior</td> <td>12</td> </tr> <tr> <td>Erie</td> <td>21</td> </tr> </tbody> </table> <p>*first number trained by PACE second number trained by individual Partner</p>	KICP Partner	Number of Employees Trained*	Boulder County	94	Boulder	27	Longmont	137 +30	Louisville	33	Superior	12	Erie	21	<p>Yes-see change that was submitted in 2005</p>
KICP Partner	Number of Employees Trained*															
Boulder County	94															
Boulder	27															
Longmont	137 +30															
Louisville	33															
Superior	12															
Erie	21															

INDIVIDUAL PROGRAMS

Tier 1 Individual Partners were responsible for working with PACE staff to ensure the PACE inspection and certification process would be implemented. The following percentage of municipal operations were certified in 2007:

- Boulder County: 8/10 or 80% certified
- Boulder: 14/14 or 100% certified
- Longmont: 7/8 or 88% certified
- Louisville: 6/6 or 100% certified
- Superior: 2/2 or 100% certified
- Erie: 3/3 or 100% certified

Tier 1 Facilities visited by PACE in 2007:

KICP Partner	Number of Tier 1 Facilities visited
Boulder County	6
Boulder	9
Longmont	7
Louisville	4
Superior	2
Erie	3

Tier 2 Individual Partners were responsible for working with PACE staff to ensure the PACE inspection would be implemented.

Tier 2 Operations visited by PACE in 2007:

KICP Partner	Number of Tier 2 Facilities visited
Boulder County	1
Boulder	3
Longmont	2
Louisville	3
Superior	0
Erie	0

- 2. **RESULTS OF INFORMATION COLLECTED:** No data required.
- 3. **INSPECTION AND ENFORCEMENT:** Not applicable for this MCM for 2007.
- 4. **PROPOSED CHANGES TO PROGRAM AREA:** Not applicable for this MCM for 2007.
- 5. **ACTIVITIES FOR NEXT REPORTING CYCLE:** In accordance with the permit application, the planned stormwater activities for 2008 are as listed below.

Will be submitted June 2008

- 6. **NOTICE OF PROGRAM ELEMENT OPERATION BY A SECOND PARTY:** In accordance with the original applications, the KICP is performing the shared and common programs for pollution prevention and good housekeeping for municipal operations.

Partnership Working Agreement

Keep it Clean Partners Are:

- Dedicated to the stated goals and objectives of the project.
- Active participants, attending meetings and voicing opinions equally.
- Willing to share resources and data.
- Clear about their agencies' needs and interest in participating in the project.
- Completing the bulk of KICP work in subgroups.

Keep it Clean Partners Will:

- Be prompt to meetings and participate to the highest level of their ability.
- Maintain focus, prioritize all actions, and encourage involvement of all.
- Understand that not all communities have the resources to attend every meeting.
- Complete assigned tasks that are agreed upon in the group.
- Stay informed about discussions and decisions that take place at Keep it Clean meetings in their absence.

Keep it Clean Partners Are:

- Participating in good faith and working towards the identified common goals and objectives.
- Committed to the protection of water quality within the Boulder Creek and St. Vrain River watersheds.
- Committed to sharing information and resources with other Keep it Clean Partners.
- Committed to developing strategies and solution that benefit the general public and represent the shared goals and objectives of the KICP.

Keep it Clean Partnership Decisions:

- Will be discussed in an organized manner and the process will be open to all.
- Will be made by consensus, an approach to find an inclusive solution that everyone can support.

Keep it Clean Partners:

- Understand compromise may be necessary to reach Keep it Clean common goals.
- Show a commitment to mediate disagreement.

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