

Keep It Clean Partnership

2012 Annual Report



Stormwater Protection

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KeepItCleanPartnership.org

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Executive Summary

Keep It Clean Partnership 2012 Annual Report

To address the impact of stormwater on water quality, the federal Clean Water Act was expanded to include requirements that municipalities control pollutants from municipal separate storm sewage systems (MS4s). The Keep It Clean Partnership (KICP) grew out of the need for local communities to respond to these stormwater regulations that are implemented by the Colorado Department of Public Health and Environment (CDPHE). The Partnership is a collaboration of communities in the Boulder and St. Vrain watersheds, and includes Boulder County; the cities of Boulder, Lafayette, Longmont, and Louisville; and the towns of Superior and Erie (individually referred to as “Partners”), working together to protect water quality through stormwater management.

The KICP uses a 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 that was envisioned in the federal Clean Water Act and adopted in the Boulder Valley Comprehensive Plan.

Into the Future

As the KICP enters its eleventh year of implementation, the Partners continue to refine programs to meet the continuing challenges of stormwater management.

MS4 Permit Compliance and Renewal

In 2011, CDPHE indicated that conducting full permit compliance audits of individual MS4 programs was not sustainable, and the MS4s would be required to answer a permit assessment questionnaire in early 2012. After clarification from CDPHE, most Partners revised their ordinances and submitted their answered questionnaires to CDPHE by October 2012.

The current permit expires in March 2013 but has been administratively extended. The renewal process will require KICP attention in 2013.



Regulation 85

Nitrogen and phosphorous are currently some of the nation’s biggest water quality challenges. Referred to collectively as nutrients, they can encourage algae growth, which can rob the water body of oxygen and raise the pH. The Colorado Water Quality Control Commission adopted the Nutrients Management Control Regulation in June 2012, which and it became effective in September 2012.

The KICP will be required, through the general MS4 permit, to identify sources of nitrogen and phosphorus and provide education to reduce those sources. In addition, MS4s will be required to evaluate municipal operations to identify sources of nutrients that can be controlled through implementation of structural and nonstructural pollutant control practices. Regulation 85 also requires MS4s to analyze existing nitrogen and phosphorus data and identify data gaps. There is a statewide effort under way to perform this analysis. The analysis is due to CDPHE in October 2014.

Total Maximum Daily Load for *E. coli*

In 2011, a Total Maximum Daily Load (TMDL) was developed by the City of Boulder in accordance with Section 303(d) of the federal Clean Water Act. The TMDL established the estimated pollutant load

reductions of *E. coli* necessary to meet water quality standards. The TMDL covers Boulder Creek Stream segment known as 2b from 13th Street to the confluence with South Boulder Creek. The TMDL will be added to the City of Boulder's MS4 stormwater discharge permit in 2013 and will require the development of an implementation plan to address controlling sources of *E. coli*.

In 2010, Boulder, Boulder County, Lafayette, Louisville, Erie, and Superior all received letters from CDPHE indicating that their communities' listed stream segments would soon be evaluated for an *E. coli* TMDL.

CDPHE is asking all permitted communities to prepare for the TMDL by:

- ◆ Conducting dry weather surveys to identify illicit connections and discharges.
- ◆ Removing or controlling illicit connections/discharges.
- ◆ Providing public education and enforcement of pet waste ordinances and leash laws.
- ◆ Providing pet waste disposal cans in open space areas.
- ◆ Preserving natural riparian buffers.
- ◆ Working with local wildlife managers to assess the need for population controls or active management of urban wildlife.
- ◆ Considering use of such practices where contributing drainage area, depth to groundwater, and soil conditions are appropriate for infiltration-oriented best management practices (BMPs).

KICP will continue to monitor the *E. coli* TMDL development.

2012 Highlights

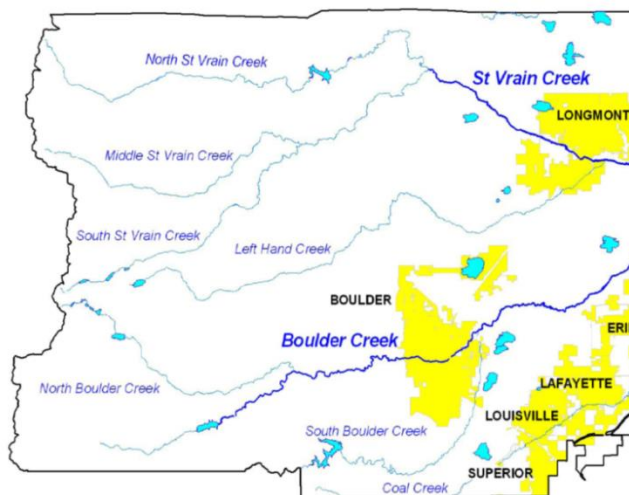
In 2012, the KICP Partners continued to implement and maintain the shared programs of their municipal stormwater discharge permits for a second five-year term (2008-2013).

IGA

The fourth intergovernmental agreement (IGA) was revised and submitted to the Partners for signature and will be finalized in March 2013.

Costs

The staff currently includes 1.00 FTE to support the business and municipal outreach, 1.75 FTE to support the residential outreach program, and 0.75 FTE for the KICP coordinator position. In 2012, the KICP budget was \$462,802, of which \$100,461 (22%) was proportionately reimbursed to each of the Partners at the end of 2012.



Evaluation

In 2011, a third party evaluated the KICP shared programs and made suggestions for improvement. The evaluation investigated how the current KICP approach compared and contrasted with other similar Phase II MS4 partnerships that share stormwater programs. Based upon the research findings and the review of almost 12 years of historical documentation for KICP, specific actions were recommended. The Partners considered the recommendations and revised the KICP Plan in 2012.

School and Community Outreach Programs

KICP contracted with the City of Boulder's Watershed Education Program to implement community outreach and school education programs.



419 residents participated on 1 of **36** stream teams and collected **171** bags of trash
4,682 students and **151** classrooms/events participated in school-based education programs
1,830 students from **27** schools attended the Children's Water Festivals
331 storm drains were labeled with the message, "Dispose no Waste, Drains to Creek."
4,047 door hangers were distributed as part of the storm drain marking program
3,661 residents visited hosted stormwater booths at **30** community events
2,662 residents visited traveling stormwater booths at **8** community locations
26,328 brochures and campaign materials were distributed
423 residents attended 1 of **17** speaker events
144 families and individuals took the water protection pledge
3,000 visits to www.KeepitCleanPartnership.org
454,512 cars are traveling past KICP tributary signs each day

Stormwater Pollution Prevention Programs

KICP contracted with the Business Environmental Sustainability Team (BEST) Program to implement business and municipal outreach.



51 restaurants were visited
26 vehicle service facilities were visited
26 retail establishments were visited
9 restaurant hood cleaners, **17** landscapers, and
13 property managers were visited
287 municipal employees were trained at **13** trainings
69 municipal facilities were visited
2 newsletters were mailed to **250** municipal employees

Erosion Control and Illegal Discharge Prevention Trainings

KICP worked within their individual communities to implement operating procedures and regulations to manage illegal discharges, active construction, and post-construction management.



57 participants were provided with construction erosion control training
16 participants were provided with waterway erosion control training
287 municipal employees were trained about illegal discharge identification

Background

To address the impact of stormwater on water quality, the federal Clean Water Act was expanded to include requirements that municipalities control pollutants from municipal storm drainage systems. In 1990, the U.S. Environmental Protection Agency (EPA) issued the Phase I Stormwater Rules. These rules require National Pollutant Discharge Elimination System (NPDES) permits for operators of municipal separate storm sewer systems (MS4s) serving populations over 100,000 and for runoff associated with industry, including construction sites 5 acres and larger. In 1999, EPA issued the Phase II Stormwater Rule to expand the requirements to small MS4s and construction sites between one and five acres in size.

The Keep It Clean Partnership, formerly known as the Watershed Approach to Stream Health (WASH) Project, grew out of the need for local communities to respond to these new stormwater regulations. In 1999, water quality and stormwater professionals representing various communities in the Boulder Creek and St. Vrain watersheds participated in meetings to help develop the goals, objectives, and project focus that are now incorporated into the Keep It Clean Plan. To further focus efforts, a 2006 Water Quality Roundtable was conducted where experts from local, state, and federal agencies identified six areas of concern typical of urban runoff. These include: pathogens (e.g. *E. coli*), sediment, nutrients, flow modification, metals, and pesticides. These impacts are considered when implementing programs.

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, Lafayette, Longmont, and Louisville; and the towns of Superior and Erie.

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.

Partnership Overview

The KICP operates under a five-year plan that outlines program 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 finalized in October 2008 when the Partners applied for the 2008-2013 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 an intergovernmental agreement (IGA) and supporting bylaws. The initial IGA was executed in January 2003, and subsequent ones were signed in December 2007 and 2011. In 2012, the IGA was again drafted and signed by all seven Partners by March 9, 2013. The IGA identifies a steering committee as the managing entity; it consists 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.

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:

MCM 1 - Public Education and Outreach

- School-based education programs (classroom programs, water festival, and teacher training)
- Community outreach programs (outreach booth, speakers program, website, watershed stewardship, and stream volunteers supported with brochures and other outreach materials)
- Tributary signage and storm drain marking
- Business education program (see MCM 3)

MCM 2 - Public Participation and Involvement

- Website
- Annual outreach event booths to solicit input on Keep It Clean programs

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

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

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 practices [BMP] required)
- Development review (ensures appropriate design of BMPs)
- BMP operation and maintenance (requires long-term maintenance of BMPs)

MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

- Training and certification for municipal facilities, activities, and employees

Implementation of the Keep It Clean Plan

Over the years the Keep It Clean Plan has used a variety of approaches to reduce the discharge of pollutants from the storm drainage system to protect water quality, 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 Business Environmental and Sustainability (BEST) Program provides outreach materials and conducts site visits, addressing commercial and municipal operations.

2012 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 2012 follows.

IGA

The fourth intergovernmental agreement (IGA) was reviewed, revised and submitted to the Partners for attorney review and community signature and will be finalized in March 2013.

Costs

The Partner communities fund the common and shared program costs. Cost allocation is based on each Partner's urbanized population, defined in the most current census. Costs to implement the individual community programs are the responsibility of each individual community. The KICP programs emphasize cost-effectiveness by sharing programs and using common strategies and leveraging existing programs. The common and shared programs are implemented by 3.50 full-time employees (FTE). The staff currently includes 1.00 FTE to support the business and municipal outreach, 1.75 FTE to support the residential outreach program, and 0.75 FTE KICP coordinator position.

In 2012, the KICP budget was \$462,802, of which \$100,461 (22%) was proportionately reimbursed to each of the Partners. The majority of the reimbursement represents the unspent contingency funds and residential outreach personal labor.

MS4 Permit

The Phase II stormwater discharge permit for the Partners' first permit term expired at the end of 2007. The Partners submitted their program descriptions in June 2008 for coverage under the state's general discharge permit for the second permit term, which ranges from March 2008 to March 2013. In late August 2008, CDPHE asked for more program specifics to be submitted addressing individual Partner programs surrounding construction and post-construction plan review and enforcement. The final plan was submitted in October 2008; however, the state issued an additional request for details on individual Partner programs but did not require a written response.

In the summer of 2013, CDPHE is scheduled to release a draft of the 2014–2019 MS4 Phase II permit. It is anticipated that all future Partner program descriptions will be submitted individually.

CDPHE Audits

In June 2010, CDPHE conducted a full program audit of Erie's stormwater program. Erie submitted a revised program description document and adopted a revised ordinance, both of which addressed CDPHE comments.

In August 2010, CDPHE conducted a construction site screening inspection within the boundaries of Longmont. Longmont submitted a response to CDPHE's correspondence.

In 2012, none of the KICP Partners were audited. In 2011, CDPHE decided that full audits were not sustainable, and after performing 10 full MS4 audits across Colorado, CDPHE drafted a permit assessment questionnaire to be completed by all MS4s. The KICP Partners met with CDPHE to gain further clarification of the questions and reviewed, revised, and readopted their communities' ordinances, as well as modified the supporting standard operating procedures. Erie, which had a full audit in 2010, was not required to respond to the questionnaire.

Shared KICP Program Evaluation

In 2011, KICP requested that a third party evaluate the current shared programs and make suggestions for improvement. This activity is conducted the fourth year of every permit term so programs can be modified for improved effectiveness before the Partners submit their program descriptions to CDPHE for the subsequent permit term.

The evaluation investigated how the current KICP approach compares and contrasts with other similar Phase II MS4 partnerships that share stormwater programs. Based upon the research findings and the review of almost 12 years of historical documentation for KICP, specific actions were recommended in order for KICP to deliver the most cost-effective, long-term stormwater program activities that truly improve water quality.

The evaluation posed several recommendations for KICP to consider including:

- Update goals and objectives.
- Identify individual and shared responsibilities more clearly.
- Build on performance measures by estimating behaviors and, where possible, characterize associated load estimates.
- Renew and reestablish the KICP Plan.
- Consider the possibility of a 5-year plan.
- Individually and collectively track the full cost of MS4 compliance.
- Take steps to adjust staffing, contracting, and organization to improve long-term effectiveness.
- Perform routine program evaluation.

Program Strategy Documents and revised KICP Plan

In 2012, in preparation for the third MS4 permit term and to meet the MS4 permit requirement that “programs target specific pollutant sources determined by the permittee to be impacting, or to have the potential to impact, the beneficial uses of receiving waters,” the Partners conducted a pollutant-driven strategy evaluation. The stormwater pollutants of concern determined in 2006 by the pollutant roundtable were assigned:

- sources
- desired behaviors
- control strategies
- audiences
- methods of measurement

The Partners then ranked the programs they believed had the highest priority and could be shared by the Partners. The government service providers, the KICP coordinator, the City of Boulder-sponsored KICP Public Education and Outreach Program, and the Boulder County Public Health Business Environmental Sustainability Team (BEST) were then asked to review the pollutant-driven strategies and respond with programs that emphasized methods of measurement and include budgets for a five-year period. The goals and objectives of the overall partnership were also revised. The end products comprise the updated KICP Plan referred to by the IGA.

Grants

The City of Boulder received a 319 grant on behalf of KICP to develop a watershed plan, incorporating broad stakeholder input. As part of the effort, a strong baseline data inventory and long-term, coordinated monitoring plan for the overall St. Vrain Creek watershed would be completed. The grant allocates \$49,996 in funding, and KICP will match \$33,375, for a total project cost of \$83,371.

Water 2012

KICP participated in the statewide Colorado Year of Water 2012 celebration, which started as a small celebration to commemorate the major anniversaries of some of Colorado's most important water organizations and legislation, but quickly grew into a statewide water awareness campaign. The state-funded Water 2012/KICP hybrid logo took center stage in all KICP promotional materials and presentations. The following promotional materials were developed and used at school and community programs and events throughout the year:

- Stickers for outreach booth and school events
- Water festival t-shirts and festival promotional materials (both school districts)
- Postcards promoting speakers program, school-based education programs, community programs, and the annual teacher workshop
- KICP Colorado Water 2012 traveling exhibit

School and Community Outreach Programs

The Keep It Clean Partners contracted with the City of Boulder's Watershed Education Program to implement the community outreach and school education programs. The program continued to reach out to schools and the residential community through school programs, stream teams, speakers programs, pledge programs, promotional material distribution, and storm drain markings.

In the summer of 2012, KICP again teamed with the Boulder County Youth Corps to work in the creeks and surrounding community areas. The team worked hard to build trails near waterways to reduce erosion, remove muck out of a storm drain detention basin so water would flow, pick up trash so it would no longer harm our environment, and hang door hangers so the word would be spread to "Keep It Clean, 'cause we're all downstream."

Stormwater Pollution Prevention Outreach: Business and Municipal Sectors

The KICP contracted with the Business and Environmental Sustainability Team (BEST), formerly the Partners for a Clean Environment (PACE) Program, to implement the business and municipal outreach.

Business Outreach

Significant effort was spent in 2012 by BEST to develop a cascading business outreach strategy that included evaluating business sector specific best management practices (BMPs) protective of stormwater quality, meeting one-on-one with business to advise them on these practices and instruct them on how to implement them, sharing the experiences of similar businesses, and developing and distributing educational materials. The strategies outlined below are built on following key practices and demonstrate an evolution of services based on this experience and the relationships built over years:

- One-on-One Advising Services
- Leveraging Success
- Communication
- Evaluating the Five Behavior Areas

BEST proposed including the property owner sector in the revised strategy. Property owners will now be receiving an evaluation of the stormwater practices of their tenant business and the contractors that they hire to maintain or clean the property. The feedback will allow property owners to better understand and take greater responsibility for the activities underway in their tenant-occupied properties, as well as the properties that they occupy.

In 2012, BEST continued to offer free advising services to various business sectors, including:

- Restaurants and vehicle service
- Gas stations
- Pet stores
- Allies program
- Property management
- Beyond BEST

For over 17 years, BEST has delivered educational outreach to businesses on a range of topics, including energy efficiency, water conservation, and resource management. For the past 11 years, BEST has included stormwater protection messages in its outreach to restaurants, auto repair facilities, and retail businesses. While the majority of the businesses in these sectors have been contacted by BEST, repeated visits are typically necessary to counteract factors like employee turnover and simple apathy.

Municipal Outreach

BEST continued to provide compliance advice and support to KICP municipal staff in 2012 by providing municipal site visits and training. Significant effort was spent to define and categorize desired behaviors so that site visits can be evaluated and trainings can be tailored based on those evaluations. The desired behaviors are:

- Clean up and prevent leaks and spills.
- Cover and contain materials stored outside that may leak or run off.
- Implement good housekeeping of shops, yards, parks, trails, and facilities.
- Do not allow wastewater from vehicle, facility, or surface washing to reach storm drains or creeks.
- Apply chemicals properly (pesticides, fertilizer, paints, stains, or salt/deicer products) so as not to over-apply and create stormwater pollutants.
- Report illegal discharges to the proper local authorities.

Erosion Control and Illegal Discharge Prevention Training

The Keep It Clean Partners spent a significant amount of effort working within their individual communities implementing operating procedures and regulatory mechanisms needed to manage illegal discharges, active construction, and post-construction management.

Erosion Control Training

The KICP offered two Colorado Department of Transportation erosion control certification classes, which were attended by 57 individuals and Construction in Waterway class, which was attended by 16 individuals.

Illicit Discharge Prevention Training

In total, 287 employees were trained at 13 *Stormwater 101* or *Stormwater 102* training sessions.

KICP's Approach to 2013

As the KICP Partners enter the eleventh year of implementing the shared and common programs for the benefit of all of the Partners, they continue to fine-tune the outreach their shared programs offer and continue to identify programs that will ensure compliance with the stormwater discharge permit and protect local water quality.

The Partners are implementing the KICP plan, which continues to be dominated by KICP contract personnel conducting outreach. The KICP continues to educate:

- School children
- Adults
- Businesses
- Construction operators
- Municipal employees

In addition to common and shared programs, each individual Partner will continue to be responsible for the following tasks in 2013:

- Implement their individual ordinances 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 implementation and refinement of the 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.
- Focus on the implementation of Regulation 85, which focuses on nitrogen and phosphorous controls.
- Focus on reviewing and providing comments to CDPHE on the revised MS4 permit.
- Play an active role in continuing the momentum created by the statewide Water 2012 campaign by contributing to the Value of Water campaign.
- Await the recommendations to the Consortium of Cities from the Water Strategy Workgroup.

Future Watershed Considerations

Regulation 85 and 31

Colorado nutrient criteria development and reduction strategies have been in process for a significant period of time. CDPHE initiated studies as early as 1981 to ascertain appropriate nutrient standards for particular lakes and reservoirs in Colorado. By 1984, Colorado had adopted site-specific numeric total phosphorus and chlorophyll *a* standards for Cherry Creek, Chatfield, and Dillon Reservoirs. A narrative standard for Bear Creek Reservoir followed in 1992.

In early 2001, the EPA published a notice in the Federal Register recommending that states and authorized tribes develop a nutrient criteria plan by the end of 2001 to outline a process for how and when they intend to adopt nutrient criteria into their water quality standards. In addition, the EPA recommended that states adopt nutrient criteria by 2004. EPA later softened these deadlines, and in late 2001 indicated states should begin discussing a plan with the EPA, and that the EPA would evaluate the progress of each state at the end of 2004 to determine how it compared with the schedule in the plan.

In late summer 2010, in response to a recommendation brought forth by stakeholders, CDPHE began to work on an entirely new and flexible nutrient reduction approach that does not rely on initial widespread promulgation of segment-specific standards, but rather combines development of interim numerical nutrient values with limited near-term adoption of site-specific numerical standards, a technology-based treatment requirement for wastewater dischargers, additional focus on nutrient control efforts for stormwater dischargers and nonpoint sources, and broad monitoring requirements.

In January 2011, the Water Quality Control Commission decided to delay the nutrient rulemaking an additional nine months, from June 2011 until March 2012, to accommodate a study of the costs and benefits associated with the Division's approach, financed by the Colorado Water Resources and Power

Development Authority. The study was designed to evaluate both the costs of the proposed nutrient regulations, as well as the public health and environmental benefits.

The Nutrients Management Control Regulation, 5 CCR 1002-85, was adopted on June 11, 2012, and contains three requirements for Municipal Separate Storm Sewer System (MS4) permittees.

The three requirements are:

1. Determine nitrogen and phosphorus contributions to state waters in stormwater discharges from MS4s. Based on the review of the information that is provided, as well as information from potential future monitoring requirements, the Commission intends to revisit the substantive requirements for MS4s in future triennial reviews.
2. Provide outreach and education to the public on stormwater impacts associated with nutrients.
3. Provide outreach and education to the municipal employees on stormwater impacts associated with nutrients.

The entire regulation is available on the Division's webpage:

<http://www.colorado.gov/cs/Satellite/CDPHE-Main/CBON/1251595703337>.

Stormwater Rule Survey

In 2008, a report was released from the National Research Council on *Urban Stormwater Management in the United States*. The report addressed not only the challenges in managing stormwater in an urbanized environment, it also recommended future management of all water-related permits on a watershed basis. The content of the report will continue to guide the future work of the KICP. The report cited the support for a National Stormwater Rule survey, which was to be finalized by the EPA the end of 2012 but had yet to be issued.

In 2009, the EPA began the process of asking for stakeholder input to strengthen stormwater regulations and to establish a comprehensive program to reduce stormwater from newly developed and redeveloped sites. In 2010, the EPA sent out a survey to the state, local, and development communities to solicit input on the following areas, including detailed information about stormwater management and control practices, local regulations, and baseline financial information:

- Expansion of the area subject to federal stormwater regulations.
- Establishment of specific requirements to control stormwater discharges from new development and redevelopment.
- Development of a single set of consistent stormwater requirements for all MS4s.
- Requirement of MS4s to address stormwater discharges in areas of existing development through retrofitting the sewer system or drainage area with improved stormwater control measures.
- Exploring of specific stormwater provisions to protect sensitive areas.

EPA had proposed releasing the draft rule in September 2011 and taking action in 2012, based on the results; however, as of January 2013, the draft rule had not yet been released.

Effluent Limitation Guidelines for Construction Sites

All construction sites over an acre are currently required to obtain permit coverage and must implement a range of erosion and sediment controls and pollution prevention measures.

The 2012 federal construction general permit (CGP) is required under the Clean Water Act and replaces the existing 2008 CGP, which expired on February 15, 2012. The new permit includes a number of enhanced protections for surface waters, including provisions to protect impaired and sensitive waters.

In early 2012, the final CGP permit was released and includes steps intended to limit erosion, minimize pollution sources, provide natural buffers or their equivalent around surface waters, and further restrict discharges to areas impaired by previous pollution discharge. The turbidity limit has yet to be determined and currently is not included in the permit.

It is unclear how the federal CGP will affect the state CDPHE general construction permit, which has been administratively extended.

Total Maximum Daily Load

On a semi-annual basis, the CDPHE Water Quality Control Division (WQCD) develops a list of impaired waters in the state, as mandated under Section 303(d) of the federal Clean Water Act. Pollutants entering the impaired water 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:

303(d) Listed: Impaired Stream Segment	KICP Community
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, Lafayette
Rock Creek in Segment 8	Superior

The municipal stormwater discharge permits include language that provides for the implementation of 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. KICP may be able to assist in the regional effort of TMDL tasks. In 2010, the City of Boulder began working with CDPHE to develop the TMDL for Boulder Creek. In 2011, the City of Boulder finalized the *E. coli* TMDL and began work to define and implementation plan.

Selenium and copper also appear on the 303(d) list for several segments.

Temperature Standard

In 2006, the WQCD proposed changes to statewide water temperature standards. A more restrictive and complex set of temperature standards were adopted in the Colorado Basic Standards and Methodologies for Surface Water. The WQCD will evaluate receiving water temperature data and determine whether discharges, such as treated effluent from wastewater treatment facilities, should have a lower effluent temperature to protect aquatic life (recognizing that temperature variations result from natural conditions and irreversible human impacts).

Aquatic Life Standards

The WQCD initiated the Aquatic Life Work Group in 2000 as part of their process of developing aquatic life water quality standards, which are expressed as biocriteria. The primary function of biocriteria is to describe the biological condition that is necessary to support the designated use of the water body, including lakes, reservoirs, rivers, and streams. Bioassessment tools are being developed to quantify the

biological condition of an aquatic community. The primary intent of biocriteria is not to set a regulatory standard, but rather to be used to detect impairment in aquatic life and identify probable causes of the impairment. To date, the approach to developing biocriteria has focused on using macro invertebrate population data, habitat assessments (physical features), and fish population data. One of the main challenges in developing biocriteria is determining “expected conditions.” The expected condition will reflect a range of biological characteristics that are considered “normal” or “healthy” for a water body. Impairment of a water body will be based on the comparison of the expected condition to the actual condition, based on collected data. The Basic Standards Rulemaking Hearing was held in 2010.

Airborne Contaminants

The U.S. Geological Survey’s National Water Quality Assessment Program included the first comprehensive evaluation of waterways in the U.S. The study identified airborne contaminants as a source of hydrocarbon pollutants in surface water, stormwater, and groundwater. The burning of fossil fuels likely formed these contaminants. The EPA has indicated that these contaminants will be regulated in the future.

Sediment

CDPHE has adopted guidance concerning sediment deposition impacts to aquatic life in streams and rivers. The guidance document, “Provisional Implementation Guidance for Determining Sediment Deposition Impacts to Aquatic Life in Streams and Rivers,” focuses on the application of “expected conditions” with respect to aquatic life classification, nutrient criteria, and narrative sediment standard issues. The WQCC is currently developing sediment regulations, which were expected to be completed by 2011 but had not been released by the end of 2012.

Presence of Invasive Species in Colorado

In 2008, Quagga and Zebra Mussels were detected in Colorado reservoirs, including Carter Lake, upstream of Boulder Reservoir. The State of Colorado initiated an extensive monitoring and education program related to the invasive species.

Climate Change

One of the biggest factors impacting water quality is the modification of stream flows and groundwater levels. These modifications are due in a large part to increased runoff from urban areas and to diversions and return flows from agricultural and municipal water demands. This hydrologic modification of the natural stream system leaves little water in the creek to provide dilution of pollutants, or to maintain habitat and the natural stream channel. These hydrologic conditions may be further affected by climate change.

In a recent study completed by the University of Colorado for the City of Boulder’s Water Resources Workgroup, researchers predict dryer winters and wetter springs with an earlier mountain snow runoff period. These conditions could lead to depleted stream flows in the winter, threatening aquatic life and resulting in more frequent and severe flooding in the spring, which could lead to accelerated stream bank erosion and degradation of aquatic and riparian habitat. Both conditions could lead to degraded water quality.

Minimum Control Measures 2012 Activities

The following is a summary of activities implemented under the Keep It Clean Plan for each of the Six Minimum Control Measures (MCMs).

MCM 1 - Public Education and Outreach

2008 - 2013 Permit Requirement

The permittee must implement a public education program in an effort to promote behavior change by the public to reduce water quality impacts associated with pollutants in stormwater runoff and illicit discharges that includes:

- 1) Targeting specific pollutants and pollutant sources determined by the permittee to be impacting, or to have the potential to impact, the beneficial uses of receiving waters.*
- 2) Conducting 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.*
- 3) Informing businesses and the general public of the municipality's prohibitions against and/or the water quality 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.

Program Implementation

The Keep It Clean Partnership (KICP) contracts with the City of Boulder to provide the Keep It Clean Education Program, which include activities required under MCM 1 and MCM 2 for all KICP communities. The Keep It Clean Education Program staff, with direction from the Keep It Clean Steering Committee and input from Business Environmental Sustainability Team (BEST) staff, implemented programs outlined in the Keep It Clean Plan. Individual Partners are responsible for certain program elements, including the continued distribution of brochures and directing their citizens to the KICP website. The KICP Education Program conducts school-based education and community-based outreach programs to educate teachers, students, and families (adults) on ways to change their behavior to reduce water pollutants.

School-Based Education Programs

Annually, a minimum of 60 classroom and/or field-based programs will be offered to Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) teachers and students.

Annually, two day-long events with hands-on water quality activities will be conducted. The festival is provided for Boulder Valley School District (BVSD) and St. Vrain Valley School District (SVVSD) students.

Operation Water Festival

H2O Jo and Flo reappeared in 2012 as hosts for the BVSD and SVVSD water festivals with their message, "Keep It Clean, 'cause we're all downstream!"

A total of 1,096 BVSD 4th and 5th grade students and their teachers from 44 classrooms in 16 BVSD schools attended the 20th annual Children's Water Festival held at the University of Colorado (CU) campus on May 16, 2012. Sponsors included the Northern Colorado Conservancy District, CU's Office of Community Relations, and the U.S. Bureau of Reclamation.

A total of 734 SVVSD 5th grade students and their teachers from 32 classrooms in 11 SVVSD schools attended the Longmont Children's Water Festival, held at the Raddison Events Center in Longmont on May 10, 2012.

Additional sponsors included the City of Longmont, the U.S. Bureau of Reclamation, and the Northern Colorado Water Conservancy District.

This year marked the seventh year of the pre-festival Operation Water Festival Program. The materials focus on fundamental water awareness, conservation, pollution, and flooding designed for 4th and 5th graders. The program, Operation Water Festival, includes a complete teacher's packet featuring teacher's guides, student worksheets, and flashcards on each water topic.

A key benefit of the Operation Water Festival materials is the take-home water agent book. Students are encouraged to work with family members to complete the assignments. As a result, parents and siblings also learn about water protection and conservation.

All BVSD and SVVSD classes attending the Children's Water Festival participated in the Water Ambassador Program.

Operation Water Festival Receives State and National Attention

The 2012 Colorado Alliance for Environmental Education's Award for Excellence in the government category was awarded to the Operational Water Festival. In addition, the City of Boulder was accepted to present the Operation Water Festival model to conference attendees at the Green Schools National conference held in West Palm Beach, Florida, in February 2013.

Classroom Programs

A *Celebrate Water: Colorado Water 2012* postcard, featuring a hybrid graphic of H₂O Jo and the Colorado Year of Water logo, brief description, and link to the website with classroom programs, was distributed to all K-5 teachers and 6-12 science teachers in BVSD and SVVSD, as well as to local private schools. The postcard was also sent to teachers via an email attachment. Keep It Clean Partnership Education staff facilitated 151 stormwater education programs and reached a total of 4,682 BVSD and SVVSD students in 2012.

Classroom Programs

Partner	Number of Classrooms	Number of Students
Boulder	43	1,237
Longmont	42	1,801
Lafayette	11	215
Boulder County	7	158
Louisville	35	750
Erie	9	351
Superior	4	170
Total	151	4,682

Teacher-Led Programs

In addition to providing classroom and field-based programs, KICP staff provided training and loan equipment/resources to teachers wishing to teach programs in their own classrooms. In 2012, 4 teachers provided programs for 364 students in 2 BVSD and 2 SVVSD classrooms.

Community Partnership

This year marked the third year that the KICP partnered with Thorne Ecological's Sombrero Marsh program. The district-supported marsh program engages BVSD 4th grade students in a full-day educational program at Sombrero Marsh. The KICP Enviroscope stormwater model program entitled *Rain, Rain Go Away* is a station on this field trip. KICP has trained Thorne staff and interns to deliver the program, and as a result, 1,631 4th grade students from 22 BVSD schools participated in 124 stormwater programs in 2012.

Science is Everywhere Program

This year marked another successful year partnering with local environmental organizations to host the *Science is Everywhere* Program. The program included hosting a water education table at Loma Linda, Lyons, and Centennial Elementary Schools in Longmont, where 31 students participated in a stormwater pollution prevention program. The following week, many of these same students, along with their families (siblings and grandparents included), attended the *Science is Everywhere* night at the National Center for Atmospheric Research (NCAR) in Boulder. A total of 40 people attended the event, where students taught families lessons learned at the water quality station and other stations they had visited the prior week.

Latin American Center for Arts, Science, and Education (CLACE): Water Green Lab

BVSD's Columbine Elementary students spent the spring and fall of 2012 learning about global climate change and fostering a sense of environmental stewardship in an afterschool program funded by NASA and provided by CLACE. Students were able to choose a topic of interest to them—from air to energy, from soil to water. The KICP staff provided a water workshop for CLACE facilitators, so these educators could, in turn, teach the nearly 100 students participating in the CLACE program. Equipped with new knowledge about local water resources, the trained facilitators engaged students in NASA water activities with a localized message.

Throughout the semester, students learned about the water cycle, how water moves through the Boulder Creek Watershed, and how both climate and humans affect local waterways. Students were able to see the connection between the waste humans produce and how improper disposal of trash can litter our waterways. Additionally, students learned how stormwater washes down streets and parking lots, driveways and sidewalks, roofs and yards, carrying water and everything it picks up into storm drains. These storm drains lead directly to nearby lakes, creeks, streams, rivers, and wetlands. This combined pollution can affect our local fish habitat, swimming areas, and drinking water.

During the spring and fall of 2012, this program reached a targeted audience of 100+ K-5 Green Lab students at Columbine, as well as a much larger population of students, teachers, staff, and families. The program has helped to raise the local and regional Latino population's awareness of environmental issues.

Teacher Workshop

Annually, one training will be offered to BVSD and SVVSD K-12 teachers on the use of KICP-sponsored and other water quality curriculum.

H₂O Go! My Water Units (grades 6-8) contains background information and activities related to the Boulder Creek and St. Vrain Creek watersheds. These materials and the *Project WET* (Water Education for Teachers) materials are used as the basis for the annual *Get to Know Your H₂O Teacher Training*. All BVSD and SVVSD K-5 grade teachers and 6th-12th grade science teachers received an email advertising the free two-day training. A total of 17 educators participated in this workshop in August 2012. Together, those educators will reach over 802 students in the 2010-2011 school year.

In addition, KICP hosted a Growing Up WILD workshop for Boulder County educators who provide environmental science programming to Boulder County youth and families. KICP staff trained 7 educators in 2012. Collectively, these educators will reach an estimated 119 students.

Community-Based Outreach Programs

Outreach Booth

Annually, a staffed booth travels to at least one special event in each of the Partner communities to provide stormwater pollution prevention materials to the public.

Utilizing graphics and messages created for the “Keep It Clean” water quality campaign, a special events outreach booth was present in each community. The booth includes hands-on, portable, engaging activities that serve as tools for community members to learn about stormwater pollution and recognize how their behaviors can affect water quality. KICP staff provides citizens with an opportunity to discuss, provide input on, and learn about stormwater issues. The booth reached 3,661 individuals at 30 outreach booth events in 2012.

Outreach Events

Partner	Date of Event	Event	Visitors
Boulder	March 13, 2012	CU Internship Fair	36
	April 20, 2012	Earth Day Fair	111
	April 21, 2012	Boulder County Nature Symposium	95
	May 19, 2012	Community Cleanup Day	10
	May 19, 2012	Kids and Parks Day	17
	June 21, 2012	Ocean Frontiers Film Screening	62
	June 26, 2012	Discover Water	105
	July 11, 2012	Boulder Farmers’ Market	112
	July 21, 2013	Water Conservation Fair	150
	August 15, 2012	CU RA Resource Fair	200
	September 7, 2012	City/KICP Water 2012 Table	39
	September 15, 2012	Pharmaceutical Drop-off	375
	September 16, 2012	Green Streets	219
	September 19, 2012	Boulder Farmer’s Market	70
	October 23, 2012	CU Internship Fair	8
	December 1, 2012	CLACE Family Night	35
Longmont	April 21, 2012	Arbor Day	160
	April 28, 2012	Science is Everywhere Family Night	40
	July 14, 2012	Rhythm On the River	514
	August 27, 2012	Prospect Eats	26
Lafayette	May 5, 2012	Waneka Lake Day & Fishing Derby	112
Boulder County	April 22, 2012	Wild Bear’s Wild Sunday	95
	April 26, 2012	IBM Earth Day Fair	110
	October 21, 2012	Making Waves Colorado	63
Louisville	June 2, 2012	Taste of Louisville	404
Erie	April 28, 2012	Arbor Day Celebration	90
	June 9, 2012	Erie Bark in the Park	75
	September 8, 2012	Great Erie Outdoor Adventure	110
Superior	June 28, 2012	Parks and Recreation Swim Lessons	41
	September 11, 2012	Chili Cook-off	177
Total	30 events		3,661

The H₂O Jo mascot attended 8 school and community events in the Keep It Clean communities, as well as the BVSD and SVVSD water festivals.

Speakers Program

Staff and expert speakers attend events in each of the KICP communities to present water quality information to various community groups.

KICP staff provided 17 presentations and reached 423 people. KICP education staff offers stormwater protection fact sheets and “tips for water protection” information for homeowners’ association (HOA) leaders

for inclusion in newsletters. This information, in turn, is often included, and therefore leverages the message reach to community members beyond those attending the speakers program. This year, many speakers programs were coupled with youth education programs and the KIC partnership traveling display. Partner communities, including Erie and Nederland, both reported much appreciation for these combined programs.

Speakers Programs

Partner	Date of Event	Group	Audience
Boulder	February 24, 2012	Water in the West Class	50
	March 12, 2012	Neighbor Sustainability Meeting	5
	March 15, 2012	Water Agent Meeting	76
	October 18, 2012	CLACE Educator Training	8
	November 13, 2012	KICP/Water Career	50
Longmont	January 19, 2012	Green Apple Learners	12
	March 22, 2012	Water Agent Meeting	80
	September 24, 2012	Get to Know Your H ₂ O	14
Lafayette	April 18, 2012	Get to Know Your H ₂ O	39
Boulder County	February 23, 2012	Life-Long Learning Class	10
	March 5, 2012	Water in the West Class	50
	August 11, 2012	Get to Know Your H ₂ O	4
	November 7, 2012	Eco-Cycle Appreciation Seminar	16
Louisville	October 22, 2012	Get to Know Your H ₂ O	2
Erie	November 20, 2012	Get to Know Your H ₂ O	2
	December 8, 2011	Water Quality and Bugs	4
Superior	November 21, 2012	Get to Know Your H ₂ O	1
Total	17 events		423

Watershed Stewardship Program

Staff will offer programs in each KICP community to train volunteers to be neighborhood water quality advocates.

The Watershed Stewardship Program is a neighborhood-based behavior change and outreach program. The goal is to engage residents in water protection activities so they reduce stormwater pollution in their communities.

The program was offered via the website and printed recruitment materials. In 2012, the Boulder County Youth Corps team received the program.

Stream Teams

Staff will support teams in each KICP community to provide community volunteers the opportunity to be involved in water protection activities by providing resources and training for creek cleanups, water quality monitoring, and more.

The Stream Team Program was promoted to the general public via press releases and direct mail/email to target groups. In 2012, 36 groups were enrolled as active stream teams. Keep It Clean Partnership staff provided training on how to perform safe creek cleanup activities and, where appropriate, how to use sampling equipment, which is loaned free of charge to all interested parties.

Stream Teams

Partner	Groups	Participants	Bags of Trash Collected
Boulder	12	186	87
Longmont	11	61	29
Lafayette	3	32	7
Boulder County	3	41	22
Louisville	4	71	8
Erie	1	1	8
Superior	2	27	10
Total	36	419	171

Informational and Promotional Materials

Brochures, fact sheets, and product give-aways are produced, as needed, for distribution at school and community events. At a minimum, distribution will take place annually at special events in each partner community. Distribution also takes place through the school-based education programs and within public municipal areas.

Distribution of the Keep It Clean general residential brochure continued. A total of 10,317 Spanish and English language brochures were distributed throughout KICP communities at school, community, business outreach, and residential direct mail programs. In addition to the KICP efforts, several of the Partner communities distributed the KICP general brochure to their residents which are not captured in this report.

Keep It Clean Partnership staff continues to distribute campaign promotional materials as take-home components to the Get to Know school and community programs. This extensive materials distribution brings the campaign message into Keep It Clean Partnership community homes, businesses, and schools.

Campaign promotional materials are distributed to bring the campaign message into Keep It Clean Partnership community homes, businesses, and schools. KICP distributed 1,954 temporary tattoos; 8,370 stickers; 5,475 *Adventures of H₂O Jo and Flo* activity books; and 212 coloring placemats.

Informational and Promotional Materials

Partner	Households	Brochures and Materials Distributed in 2012
Boulder	39,596	11,039
Longmont	26,667	6,806
Lafayette	10,392	1,005
Boulder County	8,900	1,458
Louisville	7,216	2,283
Erie	3,750	1,490
Superior	4,500	2,247
Total	101,021	26,328

Pledge Program

The year 2012 marked the third year for implementation of a full-scale pledge program. Both the community-based and school-based Keep It Clean pledge programs are tools to increase the number of Keep It Clean Partnership community residents who take action to reduce the amount of stormwater pollution that washes off of their homes and business properties.

The community pledge, offered at each outreach booth event, invited community members to pledge to mark a local storm drain and hang door hangers in the same area. In 2012, a total of 52 people pledged to mark 91 storm drains and hang 32 door hangers. Through email and phone communication, staff confirmed that pledge program participants marked 13 storm drains and distributed 10 door hangers.

The school pledge program, offered through the school education program and including water festival participants, invited students and their families to select and pledge to specific water protection actions at home. Participating families selected from a list of 7 actions. In 2012, a total of 339 families pledged to take a total of 1,888 water protection actions.

KICP staff solicited feedback on the pledge program from teachers and families, as well as discussed areas of improvement for internal purposes. As a result, the pledge documents were edited for use in 2013. In addition, an interactive family pledge is posted on the KICP website.

Year of Water 2012

KICP participated in the statewide Colorado Year of Water 2012 celebration, which started as a small celebration to commemorate the major anniversaries of some of Colorado's most important water organizations and legislation but quickly grew into a statewide water awareness campaign. The state-funded Water 2012/KICP hybrid logo took center stage in all KICP promotional materials and presentations. The following promotional materials were developed and used at school and community programs and events throughout the year:

- Stickers for outreach booth and school events
- Water festival t-shirts and festival promotional materials (both BVSD and SVVSD)
- Post cards promoting speakers program, school based education programs, community programs, and the annual teacher workshop
- KICP Colorado Water 2012 traveling exhibit

Colorado Water 2012 Traveling Exhibit

KICP developed a Colorado Water 2012/KICP traveling exhibit for display at key locations in KICP communities throughout the year.

Traveling Exhibit

Partner	Date of Event	Event	Estimated Viewers
Boulder	June 21, 2012	Dairy Arts Center	62
	September 14 – October 2, 2012	Natural History Museum	100
Longmont	June 22 – July 9, 2012	Civic Center Mall	500
Lafayette	July 16 – July 30, 2012	Lafayette Library	500
Boulder County	October 2 – October 17, 2012	Boulder County Courthouse	100
Louisville	August 21 – August 29, 2012	Recreation/Senior Center	250
Erie	November 5 – November 20, 2012	High Plains Library	150
Superior	May 25 – June 8, 2012	South Pool	1000
Total	8 Events		2,662

News Coverage

Education and outreach programs were featured in the following publications in 2012:

- Longmont promoted the September speakers program in [Longmont Life](#).
- A video of the teacher's workshop was up on the *Daily Camera* website the week of August 2.
- A full-story article about the teacher workshop was in the August 2, 2012, edition of the *Daily Camera*.
- A full-story article on Boulder's Water Festival Water Agent Program was in the May 13, 2012 edition of the *Daily Camera*.
- The Camera also featured a Water Festival event photo and caption on May 17, 2012.
- The *Colorado Hometown Paper* featured an article on Boulder's Water Festival in the May 16, 2012, edition.
- Boulder's Municipal Channel 8 filmed and covered the following stories:
 - [Creek Critters Puppet Show](#)
 - [Boulder Water Festival](#)

Presentations and Awards

- Steve Noud and Kristin Libberton led water education program for statewide educators at the Project WILD facilitator training, July 2012.
- Kristin Libberton and Steve Noud presented "Water Festival in a Flash" to 15 K-12 teachers at the Colorado Science Conference for Professional Development.
- Curry Rosato was accepted as a presenter for Operation Water Festival at the National Green Schools Conference to be held in West Palm Beach, Florida, in February 2013.
- The KICP Operation Water Festival program received the Colorado Association of Environmental Educators (CAEE) Award for Environmental Excellent in the Government category. The award will be presented to staff on March 2, 2013.

Tributary Signage and Storm Drain Marking

Storm Drain Marking

In the first permit term, 25% of all KICP storm drains were marked. KICP Education staff will maintain equipment and support volunteer groups to mark an additional 3% of the storm drains in each KICP community. Where appropriate, program participants may also post door hangers that explain the stormwater pollution prevention message.

Keep It Clean education staff facilitated storm drain stenciling activities with over 56 youth and citizens in Keep It Clean communities. Keep It Clean Education staff used curb markers to identify 331 storm drains, exceeding the goal of 3% marked drains.

Storm Drain Marking Program volunteers and KICP staff distributed 4,047 door hangers as part of the marking program in neighborhoods.

Staff continued to engage Lafayette community members with a custom door hanger which mirrors the KICP door hanger but does not include reference to the KICP storm drain marker. Lafayette has a stenciling storm drain marking program.

The brightly colored door hangers 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 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).

Door Hanger Distribution

Partner	Door Hangers Distributed
Boulder	677
Longmont	489
Lafayette	100
Boulder County	1,118
Louisville	473
Erie	869
Superior	321
Total	4,047

Storm Drain Marking

Partner	Total Storm Drains	2008	2009	2010	2011	2012	Percent Marked in 2012
Boulder	4,180	228	440	288	200	129	3.1%
Longmont	1,820	83	115	179	281	61	3.4%
Boulder County	225	36	15	58	44	35	15.6%
Louisville	600	26	58	43	40	25	4.2%
Erie	685	42	253	22	92	70	10.2%
Superior	300	36	32	38	89	11	3.67%
Total	7,810	451	913	628	746	331	4.2%

Tributary Signage

A minimum of five tributary signs are posted within each of the KICP Partner communities in prominent locations.

In 2003, tributary signs were designed and installed along major intersection marking significant waterways, with the intent of increasing public awareness of local water resources. The sign caption reads, “Keep It Clean, ‘cause we’re all downstream!” and includes the local creek name. In total, over 454,512 cars travel past these signs each day.

Tributary Signs

Partner	Signs Installed in 2012	Daily Vehicles Traveled (DVT) for Streets with Tributary Signs Installed
Boulder	43	213,618
Longmont	9	140,745
Boulder County	6	26,400
Louisville	8	29,100
Erie	5	6,899
Superior	6	37,750
Total	77	454,512

Reaching Diverse Audiences

Businesses, teachers, students, and residents of diverse backgrounds are reached through the programs mentioned above. In addition, the KICP program has published and distributed two brochures that were translated into Spanish. The Spanish general KICP brochures continue to be distributed.

Boulder County Youth Corps Team

In 2012, the Keep It Clean Partnership sponsored a Youth Corps Team. The Keep It Clean Partnership solicited the help of five Boulder County Youth Corps teens and their team leader in the summer to help improve the condition of our waterways. The team built trails near waterways, removed muck from a detention basin, bagged trash, and hung door hangers.

In just eight short weeks, the team completed the following accomplishments:

- Cleaned and assessed 10 miles of streams
- Marked 100 storm drains
- Distributed 2,863 door hangers
- Planted 38 trees
- Removed 37 Russian Olive trees
- Removed sludge and weeds from detention ponds
- Dug 150 feet of mosquito trenches for better drainage
- Removed $\frac{3}{4}$ mile of erosion control materials
- Identified 2 location of standing water
- Talked to 5 people

The Youth Corps provides opportunities for Boulder County teens to develop a sense of community involvement through personal accomplishment, teamwork, and service to the county. Corps members benefit by learning strong work habits, new skills, and the value of environmental and civic stewardship. While KICP recognizes the value of this partnership, due to staff time commitments and a new scope of work for the upcoming five years, KICP will not host a team in 2013. Staff will, however, partner with Boulder County's Public Health and Sustainability teams by identifying and supporting 2 days of storm drain marking and/or door hanging, and stream cleanups in each Partner community. This new arrangement is an effective way to continue our support for and partnership with Boulder County Youth Corps.

Illicit Discharge Education to Business and the Public

The Business Environmental Sustainability Team (BEST) program reaches restaurants, vehicle service facilities, and other businesses that have the potential to adversely impact water quality. Outreach is performed either by direct personal contact, educational materials, or web resources.

The BEST Program, formerly the PACE Program, conducts advising visits with commercial business. The point of contact is to educate on proper practices so water quality is not adversely affected. For details on the business outreach effort, see the Minimum Control Measure (MCM) 3 section.

Program Changes

None

Budget

Proposed: \$170,134

Actual: \$139,009

Unexpended funds: \$34,125

MCM 2 - Public Involvement and Participation

2008 - 2013 Permit Requirement

The permittee must implement a public involvement program as follows:

- 1) The permittee must comply with the State and local public notice requirements when implementing the CDPS 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.*
- 2) The permittee must provide a mechanism and process to allow the public to review and provide input on the CDPS Stormwater Management Program.*

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.

Program Implementation

The KICP Partners contract 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. Individual Partners are responsible for certain program elements, such as directing their citizens to the KICP website. The Keep It Clean programs include participatory programs, such as storm drain stenciling and stream teams. The KICP Steering Committee agendas and minutes are posted monthly online. The entire KICP Education Program's annual report is available at www.KeepitCleanPartnership.org. The following is a summary of that report, as it relates to public participation.

Public Notices

The KICP Steering Committee agendas and minutes are posted monthly online. All individual KICP Partner meetings are publicly noticed, as required by local ordinance.

Providing a Mechanism for Public Involvement/Feedback

Either the general KICP or the KICP Education Program's phone number is listed on publications. The KICP website lists all the contact information for all Partners. Each Partner's website provides a link to the KICP website. The KICP Stormwater Management Program descriptions document is posted on the KICP website. An outreach booth (see MCM 1) is sponsored annually in each Partner community, where program feedback and suggestions are welcomed from the public.

The public continued to navigate through the Keep It Clean Partnership background information (including the six MCMs, annual reports, and stormwater resources) and Education and Outreach Program information. The www.KeepitCleanPartnership.org website is updated frequently to include the most current project information. In 2012, a printable pet waste sign and an automated pledge form were added. In addition, teachers and staff continue to use this site for program registration.

Website Views

Year	Average Monthly Unique Visitors
2012	244

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

- Boulder County: www.bouldercounty.org
- Boulder: www.boulderwater.net
- Lafayette: www.cityoflafayette.com
- Longmont: www.ci.longmont.co.us
- Louisville: www.ci.louisville.co.us
- Superior: www.townofsuperior.com
- Erie: www.erieco.gov

Program Changes

None

Budget

Funds are identified in MCM 1.

MCM 3 - Illegal Discharge Detection and Elimination

2008 - 2013 Permit Requirement

The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 61.2) into the permittee's MS4. Illicit discharges do not include discharges or flows from firefighting activities, or other activities specifically authorized by a separate CDPS permit. The permittee must:

- 1) Develop and maintain a current 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.
 - a. To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges (except those identified in subparagraph 5 and 6 of this section) into the storm sewer system, and implement appropriate enforcement procedures and actions.**
- 2) Develop, implement, and document a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges, including areas with higher likelihood of illicit connections; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.*
- 3) Develop and implement a program to train municipal staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observation and therefore receive training, and how staff will report observed suspected illicit discharges.*
- 4) Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (4) by no later than December 31, 2009.*
- 5) Address the following categories of non-stormwater discharges or flows (i.e., illicit discharges) only if the permittee identifies them as significant contributors of pollutants to the permittee's MS4: landscape irrigation, lawn watering, diverted stream flows, irrigation return flow, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, springs, flows from riparian habitats and wetlands, water line flushing, discharges from potable water sources, foundation drains, air conditioning condensation, water from crawl space pumps, footing drains, individual residential car washing, dechlorinated swimming pool discharges, and water incidental to street sweeping (including associated sidewalks and medians) and that is not associated with construction.*

The permittee may also develop a list of occasional incidental non-stormwater discharges similar to those in the above paragraph, (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-stormwater discharges must not be reasonably expected (based on information available to the permittee) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the permittee has established for allowing these discharges to the MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs, etc.). The permittee must document in their program any local controls or conditions placed on the discharges. The permittee must include a provision prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to the MS4.

- 6) The following sources are excluded from the prohibition against non-stormwater discharges and the requirements of subsections (2) and (3) above:
 - a. Discharges resulting from emergency firefighting activities. Such discharges are specifically authorized under this permit (see Part I.A.2)*
 - b. Discharges specifically authorized by a separate CDPS permit.**

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.

Program Implementation

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 discusses the impacts of spills on water quality and lists a hotline for reporting illegal discharges. The maintenance of the outfall map, the response to discharges, and enforcement is performed by the individual KICP Partners.

Outfall Map

All KICP Partners have completed their outfall maps, which are updated on an as-needed basis.

The CDPS Stormwater Management Program Description document submitted by KICP in October 2008 details the individual Partners' processes for updating outfall maps.

Regulatory Mechanism

All KICP Partners have illegal discharge ordinances in place.

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

Partner	Ordinance Adopted	URL
Boulder	December 6, 2004	Title 11, Chapter 5, Section 5 (b) (BRC 11-5-5b)
Longmont	January 12, 2005 April 2009 August 2011 2012	Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Lafayette	2005 2011 2012	Chapter 104, Article III
Boulder County	September 13, 2005 2012	Ordinance 2012-4, Ordinance Concerning Illicit Stormwater Discharge
Louisville	December 21, 2004 2012	Title 13, Water/Sewer, Chapter 13.36
Erie	November 9, 2004 2009	Title 8, Chapter 4, Illicit Discharges and Storm Water Quality Permit Requirements
Superior	December 13, 2004 2012	Chapter 11, Article III

Illicit Discharge Detection and Elimination Plan

Each KICP Partner has developed and is implementing a plan that addresses illicit discharges and illegal dumping to their storm drainage systems. The plans include procedures for:

- locating priority areas likely to have illicit discharges
- tracing the source of an illicit discharge
- removing the source of the discharge

In addition, Boulder County's Business Environmental Sustainability Team (BEST) assists in identifying illicit and threatened discharges. They educate the offender and refer the information to the enforcing community. Discharges that are unknown or hazardous in nature are responded to by the local municipal fire department with assistance from the County's Environmental Emergency Response Team.

The CDPS Stormwater Management Program Description document submitted by KICP in October 2008 details the individual Partners' description of plans and procedures in place for locating, tracing, and removing illicit discharges.

The Keep It Clean Partners individually track their illegal discharges.

The Boulder County Environmental Emergency Response Team (EERT), which responds to hazardous material and other spills, contributes to the effort as well.

Each of the KICP Partners submits the number of illicit discharge enforcement actions to CDPHE within their annual reports.

Illicit Discharge Education to Businesses

The Business Environmental Sustainability Team (BEST) Program reaches restaurants, vehicle service facilities, and other businesses that have the potential to adversely impact water quality. Outreach is performed either by direct personal contact, educational materials, or web resources.

The Keep It Clean Partners contracts with the Boulder County Business Environmental Sustainability Team (BEST) Program to provide stormwater pollution prevention education and materials to businesses operating in the KICP communities. Major work elements performed by BEST in 2012 for KICP are outlined below.

About BEST

BEST offers a pollution prevention certification program to various business sectors and has expanded outreach efforts beyond the certification program. BEST services are offered free of charge to businesses.

The six program areas implemented to address business activities with stormwater impacts are:

1. Restaurants, retail and vehicle service
2. Gas stations
3. Pet stores
4. Allies program
5. Property management
6. Beyond BEST

Annually a scope of work is developed and each KICP community is assigned an allocation of the programs is described below. The results of the 2012 scope of work is as follows.

Restaurants and Vehicle Service

For over 17 years, BEST has delivered educational outreach on a range of topics, including energy efficiency, water conservation, and resource management to businesses in Boulder County. For the past nine years, BEST has included stormwater protection messages in its outreach to restaurants, auto repair facilities, and retail businesses in support of the KICP. While the majority of the businesses in these sectors have been contacted by BEST, repeated visits are typically necessary to counteract factors like employee turnover and simple apathy.

BEST conducted site visits, which provided one-on-one technical assistance to educate businesses, identify stormwater impacts, and identify solutions. In 2012, BEST began measuring observed behaviors and barriers to desired behaviors. BEST used 2012 site visits to strategically capture a baseline of the behaviors being implemented that will be used to help measure the effectiveness of the strategic outreach during the next five years. BEST prioritized 50% of site visits with businesses that received a visit in 2011, 25% had a visit 2 or more years ago, and 25% never had a visit. This allowed BEST to not only evaluate the behaviors with measurable data, but will provide insight to effectiveness of outreach messaging and frequency. The results of the behavior and barrier analysis are found later in the report.

Restaurants and Vehicle Service Outreach

Partner	Restaurants Visits (total)	Vehicle Service Visits (total)	Retail Visits (total)
Boulder	27 (203)	10 (73)	10 (378)
Longmont	0 (183)	8 (66)	8 (341)
Lafayette	6 (58)	2 (16)	2 (78)
Boulder County	6 (52)	2 (19)	2 (97)
Louisville	6 (39)	2 (14)	2 (73)
Erie	3 (16)	1 (9)	1 (49)
Superior	3 (20)	1 (7)	1 (37)
Total	51 (571)	26 (204)	26 (1,053)

Gas Stations

In 2012, BEST continued outreach to gas stations that had not previously received a visit. Additionally, BEST followed up with the eight corporate contacts of facilities that had received a site visit in 2011, as well as the corporate contacts of facilities that received a visit in 2012. During the visits with new facilities, BEST measured behaviors being implemented and barriers to behaviors that were not being implemented.

Gas Station Outreach

Partner	Gas Stations Visits (total)
Boulder	2 (26)
Longmont	2 (27)
Lafayette	2 (10)
Boulder County	0 (3)
Louisville	0 (4)
Erie	0 (2)
Superior	1 (3)
Total	7 (75) 9% visited

BEST has visited 72% of the gas stations in Boulder County and portions of Weld County since 2010.

Allies Program

The Allies Program was developed as a mechanism for working with service providers that do not fit the traditional BEST model of businesses – of being in a fixed location. Service providers like mobile cleaners and landscape maintenance companies can affect a business's ability to comply with stormwater ordinances. Certifying these service providers would allow BEST to present businesses with a list of service providers that understand and are able to follow stormwater BMPs.

Hood Cleaners

- 9 businesses were followed up with, but only 2 had a successful contact.
- 2 were interested and emailed the test and application.

Mobile Cleaners (Pressure Washers)

- 1 business completed the application, test, and site visit process. They were certified.

Landscape Maintenance

- Directed outreach to landscape design firms that were already engaged in other programs to work with their partners that do the construction and installation. They were contacted by email and followed up with a phone call.
 - 17 received the email
 - 17 received a follow-up call, of which 9 had a successful contact
 - 2 completed the Allies' application

Barriers and Recommendations for the Allies' Programs:

The inconsistent performance due to assumed/observed to be staff turnover providing the services and lack of management oversight on the specific job by the service providers has made recommending businesses as an incentive difficult. It is recommended to:

- continue to provide education to these businesses through referrals by property managers and based on observed behaviors in the field.
- use the behaviors and barriers evaluation method to measure the effectiveness of the outreach.
- include a classroom training opportunity to all businesses contacted in the field.

Property Managers

Property managers can often have a greater impact on stormwater quality than the individual tenants or property owners. Property managers are typically responsible for the cleaning of parking areas and building exteriors, providing and maintaining dumpsters, and servicing HVAC equipment and maintaining permanent water quality structures. In 2012, BEST measured behaviors being implemented and barriers to behaviors that were not being implemented.

Property Manager Outreach

Partner	Training Visits
Boulder	4
Longmont	4
Lafayette	1
Boulder County	1
Louisville	1
Erie	1
Superior	1
Total	13

BEST advisors met with the environmental managers for St. Vrain Valley School District and Boulder Valley School District. All school district facilities are not covered under an individual permit. Only schools with a daytime population of 1,000 are covered. The remaining schools and maintenance facilities do not have oversight under individual permits, unless defined otherwise. During the visit, BMPs were reviewed; facilities not covered under the permit were discussed. Also discussed was how KICP could support their programs – especially focusing on outreach and education.

Beyond BEST Outreach

Activities that negatively impact stormwater quality are frequently observed but not addressed in site visits discussed above. The hours provided by the KICP Partners allow BEST to respond to these incidents and provide educational outreach on regulations and BMPs. The outreach was conducted at the request of a KICP community or when observed by BEST staff when working in the field.

BEST staff documented the incidents and forwarded the information to the appropriate KICP community personnel. At the end of the 3rd quarter, BEST notifies the Keep It Clean Partners with remaining hours and asks that they identify specific geographic business areas to be targeted by BEST for outreach.

Beyond BEST Outreach

Partner	Actual Hours
Boulder	14
Longmont	13
Lafayette	5
Boulder County	4
Louisville	2
Erie	2
Superior	2
Total	42

Behavior and Barrier Evaluation

In 2012, BEST developed a “Behavior Rating System” for evaluating performance, behaviors, and tracking implementation of BMPs from year to year in the customer management system database. BEST defined and evaluated the top five stormwater behaviors (per type of operation) while conducting site visits and rated each facility on whether they met, exceeded or needed improvement in each of the five behavior areas. Ratings for compliance with the desirable behaviors were tracked, as were barriers to compliance for each behavior area.

Behavior Areas

1. Spills or leaks (vehicles, equipment, gas, oil, hydraulic fluid, or other chemicals).
2. Outdoor materials storage and handling (cover and containment of hazardous liquids, containers, drums, batteries or other dry materials, storage of containers, dirt piles, debris, trash, mag chloride, salt/sand, chemicals, oil, diesel, gasoline, or other products)
3. Good housekeeping (trash, dumpsters not covered, areas not swept, debris, and/or issues with BMP maintenance)
4. Outdoor washing or cleaning (washing of vehicles, sidewalks, buildings, pressure washing, etc.).
5. Additional criteria:
 - a. Application of chemicals (pesticides, fertilizers, salt, liquid deicer, paint, or chemical products)
 - b. Proper discharge of wastewater
 - c. Proper scheduling of maintenance activities
 - d. Proper recordkeeping

Ratings

- “Exceed” is when the facility shows ownership of protecting water quality and measures above and beyond what is required (e.g. making signs to remind employees and haulers to keep the lids closed).
- “Meets: is when the facility is in compliance (implementing appropriate BMP’s) with all the specific behaviors in the behavior areas. If they are not meeting one specific behavior, the entire area will be considered as “Needs Improvement.”
- “Needs Improvement” is when one or more specific criteria within the behavior areas is not in compliance (e.g. not implementing appropriate BMP’s or not having a spill kit).

Barriers to Compliance

- Lack of staff
- Lack of equipment
- Lack of money
- Lack of time
- Lack of training
- Lack of space
- Low priority

In 2013 and beyond, BEST will continue to use the behavior and barrier evaluation with a strategic approach to gauge the effectiveness of the advising services visits with the business sector.

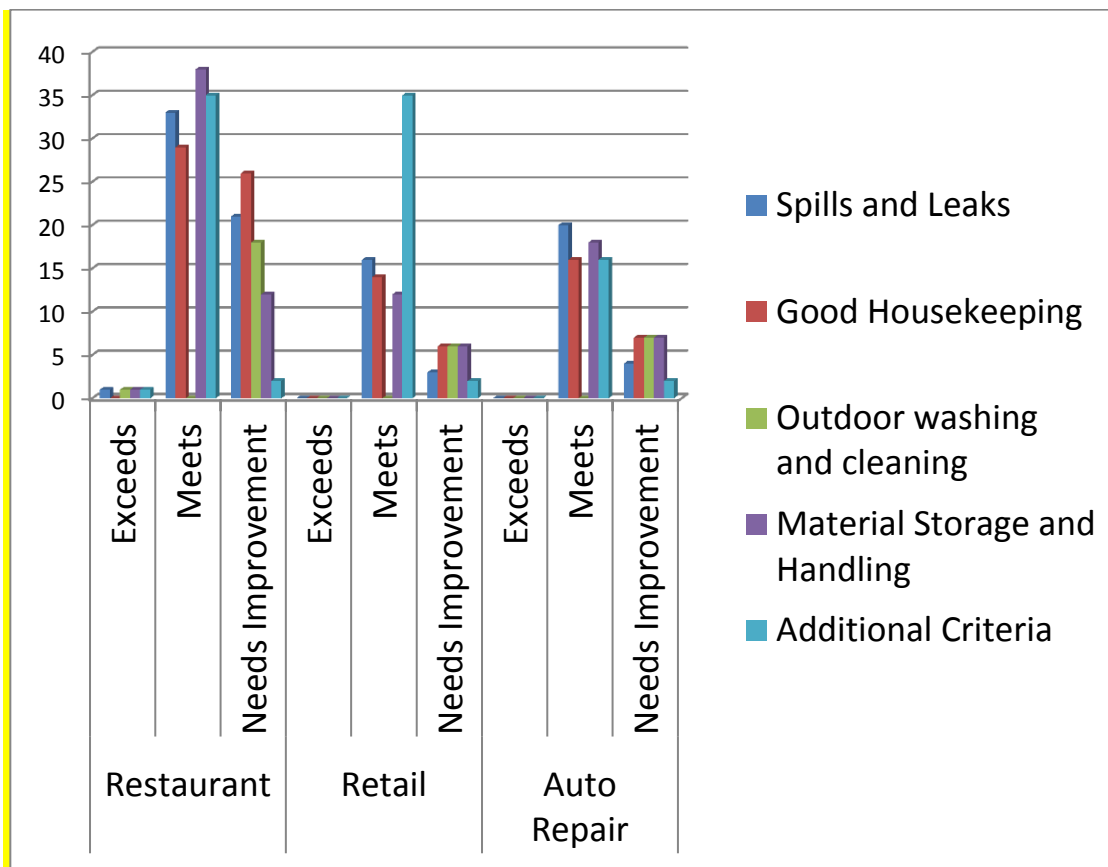
2012 Site Visit Data Analysis - Behavior Rating and Barriers to Compliance

Restaurants, Auto Repair and Retail – Behaviors Analysis

- Restaurant facilities: 64% “Exceed/Meet” behavior criteria, 36% “Need Improvement”
- Retail facilities: 77% “Exceed/Meet” behavior criteria, 23% “Need Improvement”
- Auto repair facilities: 72% “Exceeds/Meets” behavior criteria, 28% “Need Improvement”

The top three overall behaviors that need improvement (in order) are:

1. Good housekeeping
2. Outdoor washing
3. Material storage and handling

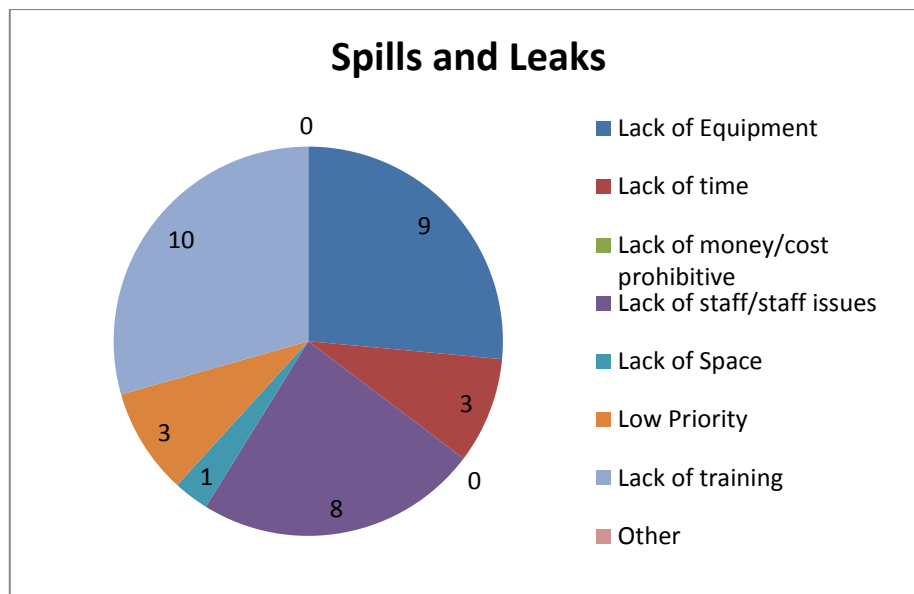


It was also noted with restaurants that “spills and leaks” was an area that showed “needs improvement” frequently.

Barriers to Spills and Leaks

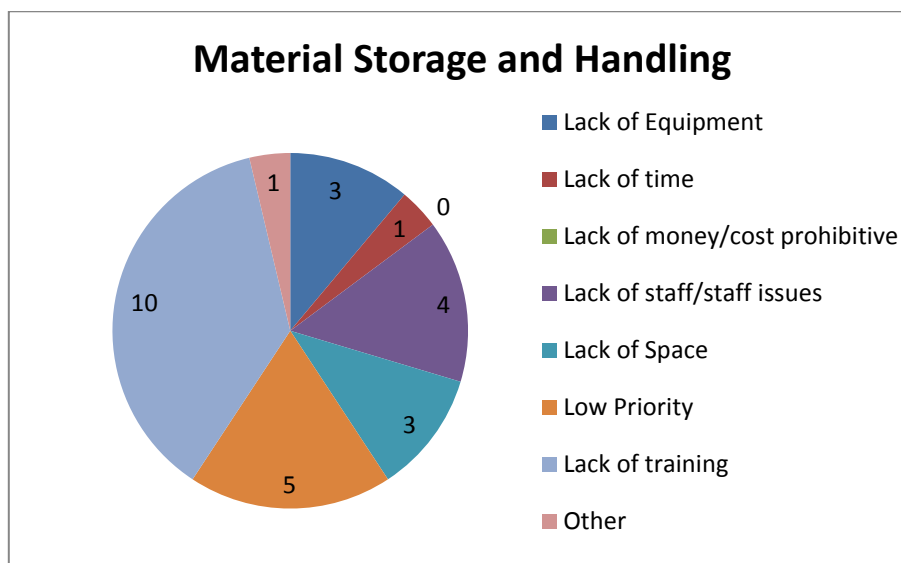
The most common barriers to achieving compliance with spills and leaks were:

- Lack of staff
- Lack of equipment
- Lack of training



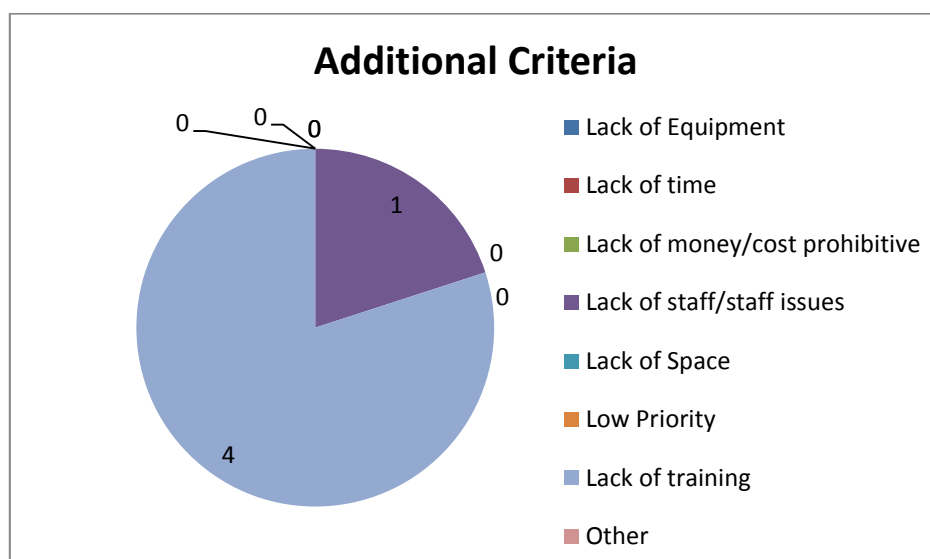
Barriers to Material Storage and Handling

- The most common barriers reported was lack of training
- The next highest barrier reported was low priority



Barriers to Additional Criteria (application of chemicals, proper discharge of wastewater, recordkeeping, and scheduling of maintenance)

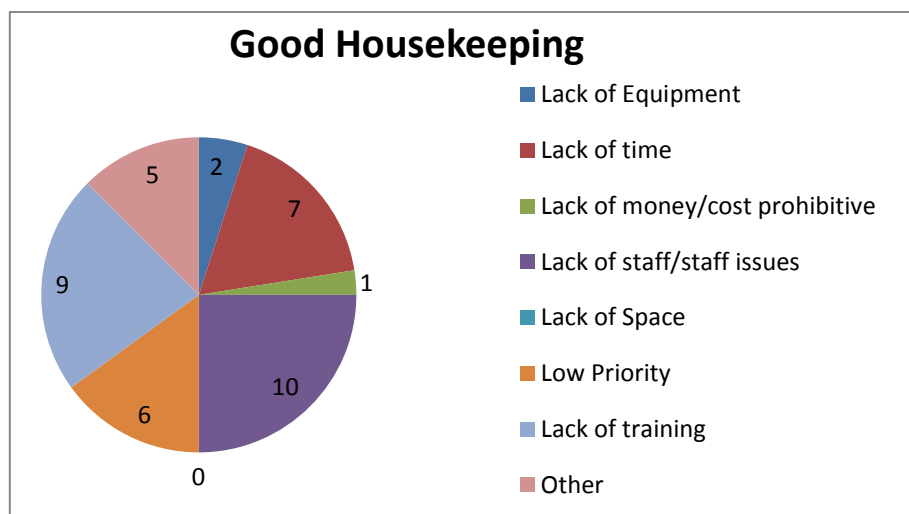
The main barrier reported was lack of training.



Barriers to Good Housekeeping

The main barriers reported were:

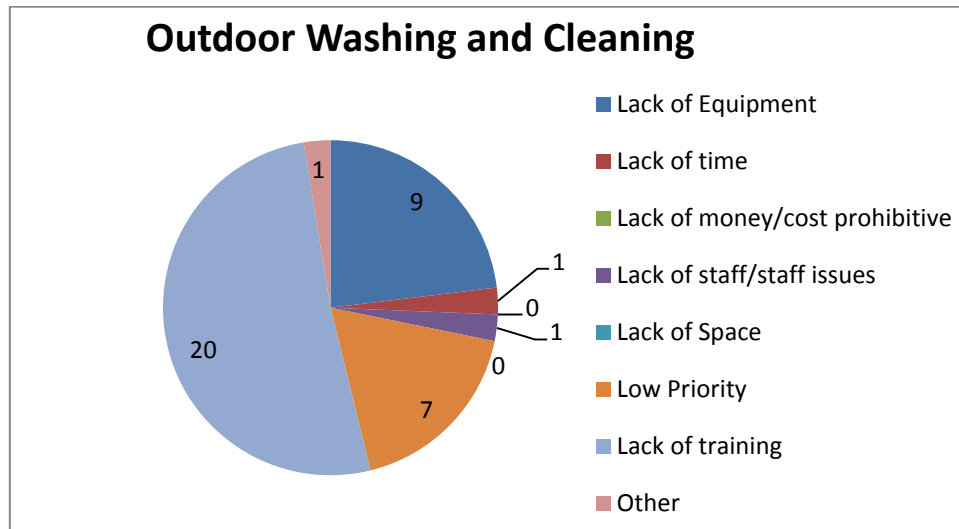
- Lack of training
- Lack of staff
- Lack of time
- Low priority



Barriers to Outdoor Washing and Cleaning

The main barriers reported were:

- Lack of training
- Lack of equipment
- Low priority



Municipal Staff Education

BEST provides yearly and as-requested training to KICP Partners' municipal staff on observing and reporting illicit discharges. This training is provided to field personnel during classroom and/or tailgate sessions.

Employees Trained per Municipality

Municipality	Employees
Boulder	98
Longmont	18
Lafayette	35
Boulder County	72
Louisville	27
Erie	29
Superior	8
Total	287

Hazardous Material Management Facility Waste Disposal Program

All of the Keep It Clean Partners sign an intergovernmental agreement to participate in the countywide Hazardous Material Management Facility (HMMF) Program. The shared cost for implementing the HMMF Program is separate from the KICP Program, and therefore is not included in the MCM's budget.

Program Changes

Partners for a Clean Environment (PACE) changed its name to Business Environmental Sustainability Team (BEST).

Budget

Proposed: \$77,588

Actual: \$74,508

Unexpended funds: \$3,080

MCM 4 - Construction Site Stormwater Runoff Control

2008 – 2013 Permit Requirements

The permittee must:

- 1) *Develop, implement, and enforce a program to reduce pollutants in any stormwater runoff, and to reduce pollutants in, or prevent when required in accordance with I.B.3, non-stormwater discharges that have the potential to result in water quality impacts (e.g., construction dewatering, wash water, etc.), to the MS4 from construction activities that result in a land disturbance of one or more acres. Reduction of pollutants in 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 or more acres. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B) (the “R-Factor” waiver), the permittee is not required to develop, implement, and/ or enforce its program to reduce pollutant discharges from such a site.*
- 2) *Develop and implement the program to assure adequate design, implementation, and maintenance of BMP's at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include, at a minimum, the development, implementation, and documentation of:*
 - i) *Program Requirements, including:*
 - A) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions and procedures adequate 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 BMP's.*
 - C) *Requirements for construction site operators to implement BMP's to control waste such as discarded building materials, concrete truck washout, chemicals, litter, sanitary waste, and other non-stormwater discharges including construction dewatering and wash water, at the construction site that may cause adverse impacts to water quality.*
 - ii) *Compliance Assessment, including:*
 - A) *Procedures for site plan review which incorporate consideration of potential water quality impacts.*
 - B) *Procedures for construction site compliance assessment, including*
 - 1) *Site inspections; and*
 - 2) *Receipt and consideration of information submitted by the public.*
 - iii) *Compliance Assurance, including:*
 - A) *Procedures for enforcement of control measures that includes documented procedures for response to violations of the permittee's program requirements. Procedures must include specific processes and sanctions adequate to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.*
- 3) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph*
 - A) *Develop, document and implement response procedures that specifically address chronic and recalcitrant violators by no later than December 31, 2009.*
 - B) *An education and training program for municipalities, their representatives and/or construction contractors. At a minimum, the program must include an information program for construction site operators unfamiliar with the reviewing authority's regulatory requirements.*

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.

Program Implementation

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

Regulatory Mechanism

All KICP Partners have construction ordinances in place.

The following table includes hyperlinks to the Partners' ordinances.

Partner	Ordinance Adopted	Web Link
Boulder	December 6, 2004	Title 11, Chapter 5, Section 5 (b) (BRC 11-5-5b)
Longmont	January 12, 2005 June 2009 August 2010 2012	Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Lafayette	2005 2011 2012	Chapter 104, Article III
Boulder County	August 11, 2005 2012	Article 7, Development Standards
Louisville	December 21, 2004 2012	Title 13, Water/Sewer, Chapter 13.36
Erie	November 9, 2004 2009	Title 8, Chapter 4, Illicit Discharges and Storm Water Quality Permit Requirements
Superior	December 13, 2004 2012	Chapter 11, Article III

Requirements to Implement Appropriate Erosion Control BMPs

All KICP Partners' ordinances require that stormwater management plans meet the requirements of the CDPS General Permit for Stormwater Discharges Associated with Construction Activities (Stormwater Construction Permit). All KICP Partners ordinances require that BMPs are designed to meet the technical standards of:

- Urban Drainage and Flood Control District's Urban Storm Drainage Criteria Manual Volume 3-BMP or its successor.
- Any other alternative methodology approved by the jurisdiction, which is demonstrated to be effective.

In 2010, Urban Drainage and Flood Control finalized the updating of Volume 3.

Requirements to Control Waste

All KICP Partners' ordinances require that stormwater management plans meet the requirements of the CDPS General Permit for Stormwater Discharges Associated with Construction Activities (stormwater construction permit). The stormwater construction permit requires that stormwater management plans (SWMPs) include practices for stormwater pollution prevention, which includes controlling waste, such as:

- discarded building materials
- concrete truck washout
- chemicals
- litter
- sanitary waste
- other non-stormwater discharges, including construction dewatering and wash water

Site Plan Review

All KICP Partners' ordinances require that stormwater management plans meet the requirements of the CDPS General Permit for Stormwater Discharges Associated with Construction Activities (stormwater construction permit).

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' processes for construction site plan submittal, review, and preliminary approval process; the system used to track status of stormwater control site plans; procedures for ongoing review of site plans during active construction; and how consideration of potential water quality impacts are achieved.

Receipt and Consideration of Information Submitted by the Public

Each KICP Partner has community-specific procedures in place for receiving and recording public complaints.

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' processes for processing inquiries or tracking and documenting complaints received from the public.

Site Inspection and Enforcement of Control Measures.

Each KICP Partner has community-specific procedures in place for conducting construction site inspections and enforcement. The procedures may include how inspections are conducted, documented, and how enforcement is carried out. The KICP Partners utilize verbal warnings through stop work orders. Enforcement options are described in each Partner's ordinance.

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' procedures used for inspections; it includes inspection documentation, frequency, and prioritization, and how sites and inspections are tracked. Procedures for regularly scheduled compliance inspections, complaint response inspections, and reconnaissance inspections (as applicable) are described. In addition, procedures used for enforcement, to include any documentation used that dictates responses to non-compliance; tracking of enforcement actions; enforcement tools; and escalation procedures for chronic and recalcitrant violators are described.

Training and Education for Construction

Each KICP Partner informs construction site operators of the regulatory requirements during the pre-construction meeting. The KICP website has a page specific to construction and lists links to each Partner's ordinance. The KICP Partners offer construction site stormwater management trainings, which are open to both municipal and private entities.

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.

The KICP offered two Colorado Department of Transportation erosion control certification classes, which were attended by 57 individuals and 1 Construction in Waterway class which was attended by 16 individuals.

Program Changes

KICP is now offering Colorado Department of Transportation erosion control certification.

Budget

Proposed: \$29,545

Actual: \$20,373

Unexpended funds: \$9,172

MCM 5 - Post-Construction Stormwater Management

2008 – 2013 Permit Requirements

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 MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. The permittee must:

- 1) Develop, implement, and document strategies which include the use of structural and/or non-structural BMPs appropriate for the community that address the discharge of pollutants from new development and redevelopment projects, and/or that maintain or restore hydrologic conditions at sites to minimize the discharge of pollutants and prevent in-channel impacts associated with increased imperviousness;*
- 2) 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;*
- 3) Develop, implement, and document procedures to determine if the BMPs required under Item (1), above, are being installed according to specifications. (This may be developed in conjunction with the Construction program area, as described in Part I.B.4);*
- 4) Develop, Implement, and document procedures to ensure adequate long-term operation and maintenance of BMPs, including procedures to enforce the requirements for other parties to maintain BMPs when necessary;*
- 5) Develop, implement, and document an enforcement program, which addresses appropriate responses to common noncompliance issues, including those associated with both installation (subparagraph (3), above) and long term operation and maintenance (subparagraph (4), above) of the required control measures;*
- 6) Develop and implement procedures and mechanisms to track the location of and adequacy of operation of long-term BMPs implemented in accordance with the program.*

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. An effective post-construction program must include adequate ordinance language, effective inspection, and enforcement.

Program Implementation

The Keep It Clean Plan includes all of the aforementioned components. In addition, the Keep It Clean Partners continue to educate municipal staff and the private sector in the advantages of infiltration BMPs. The 2008-2013 permit language includes added language to strengthen the goal of implementing BMPs that would benefit water quality over time and attempt to reduce the impact of land development.

Regulatory Mechanism

All Keep it Clean Partners have post-construction ordinances in place.

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

Partner	Ordinance Adopted	Web Link
Boulder	December 6, 2004	Title 11, Chapter 5, Section 5 (b) (BRC 11-5-5b)
Longmont	January 12, 2005 June 2009 August 2010 2012	Chapter 14.26, Stormwater Illicit Discharges and Permit Requirements
Lafayette	2005 2011 2012	Chapter 104, Article III
Boulder County	August 11, 2005 2012	Article 7, Development Standards
Louisville	December 21, 2004 2012	Title 13, Water/Sewer, Chapter 13.36
Erie	November 9, 2004	Title 8, Chapter 4, Illicit Discharges and Storm Water Quality Permit Requirements
Superior	December 13, 2004 2012	Chapter 11, Article III

Design Criteria and Standards

All KICP Partners, by ordinance, have required BMPs designed to meet the technical standards of:

- Urban Drainage and Flood Control District's Urban Storm Drainage Criteria Manual-Volume 3 BMP or its successor.
- Any other alternative methodology approved by the jurisdiction that is demonstrated to be effective.

Review and Approval Procedures

Each KICP Partner has community-specific procedures and requirements in place that address how plans for both public and private BMPs are tracked, reviewed, and confirmed as built.

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' procedures for plan review process; the systems implemented to track status of plans; how correct installation of BMPs is confirmed; and the enforcement procedures used when BMPs have not been built as approved.

Tracking

Each KICP Partner has a system to track permanent BMP locations and requirements for maintenance of BMPs installed since the adoption of their ordinance.

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' procedures for tracking permanent BMP locations and maintenance history.

Ensuring Operation and Maintenance

Each KICP Partner has community-specific procedures in place for conducting BMP inspections and enforcement. Each KICP Partner has community-specific procedures for enforcement. Enforcement options are described in each Partner's ordinance.

The CDPS Stormwater Management Program description document submitted by KICP in October 2008 details the individual Partners' inspection programs, including routine and complaint response inspections.

Program Changes

None

Budget

Proposed: \$9,136

Actual: \$3,718

Unexpended funds: \$5,418

MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations

2008 – 2013 Permit Requirements

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 pollutants in 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. The permittee must:

- 1) Develop and maintain written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations. The program must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of industrial facilities the permittee owns or operates that are subject to separate coverage under the State's general stormwater permits for discharges of stormwater associated with industrial activity;
 - i. Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (1) by no later than December 31, 2009.**
- 2) Develop and implement procedures to provide training to municipal employees as necessary to implement the program under Item 1, above.*

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 like integrated pest management, water conservation, recycling, and education programs can prove to be very effective in addressing these pollutant sources.

Program Implementation

The KICP provides municipal education and compliance evaluation through the Business Environmental Sustainability Team (BEST) formerly referred to as the Partners for a Clean Environment (PACE) Program.

Pollution Prevention and Good Housekeeping Program

The BEST provides a stormwater pollution prevention program to KICP Partners' municipal facilities through an inspection and certification program. Certification is based on criteria developed specifically for the facility through industry standards and municipal staff recommendations. Facilities are targeted based on potential to impact water quality. BEST conducts yearly or biannual audits of municipal operations to ensure that procedures are being implemented that meet the self-imposed certification program. BEST notifies the facility or operations manager, as well as the KICP Partner's stormwater manager, if any deficiencies are noted during sites visits.

The following outlines a summary of activities completed in 2012.

Compliance Assistance (Site Visits)

In 2012, 69 site visits were conducted at municipal facilities in the KICP communities. Site visits included walking around the facility and performing an audit of stormwater BMPs; documenting non-compliance

issues; taking photographs (that were later used for training staff); sending follow-up letters with photos and information on areas for improvement, proper BMPs; and overall compliance with stormwater regulations.

Site Visits per Municipality

KICP Partner	Completed Site Visits Tier 1	Completed Site Visits Tier 2
Boulder	15	4
Longmont	8	1
Lafayette	4	3
Boulder County	11	3
Louisville	6	2
Erie	4	2
Superior	3	3
Total	51	18

2012 Site Visit Data Analysis

In 2012, BEST developed a “Behavior Rating System” for evaluating performance, behaviors, and tracking implementation of BMPs from year to year in the customer management system database. BEST looked at the top five stormwater behaviors (per type of operation) while conducting site visits and rated each facility on whether they met, exceeded, or needed improvement in each of the five behavior areas. Ratings for compliance with the desirable behaviors were tracked, as were barriers to compliance for each behavior area.

Behavior Areas

1. Spills or leaks (vehicles, equipment, gas, oil, hydraulic fluid, or other chemicals).
2. Outdoor materials storage and handling (cover and containment of hazardous liquids, containers, drums, batteries or other dry materials, storage of containers, dirt piles, debris, trash, mag chloride, salt/sand, chemicals, oil, diesel, gasoline, or other products).
3. Good housekeeping (trash, dumpsters not covered, areas not swept, debris, and/or issues with BMP maintenance).
4. Outdoor washing or cleaning (washing of vehicles, sidewalks, buildings, pressure washing, etc.).
5. Additional criteria:
 - a. Application of chemicals (pesticides, fertilizers, salt, liquid deicer, paint, or chemical products)
 - b. Proper discharge of wastewater
 - c. Proper scheduling of maintenance activities
 - d. Proper recordkeeping

Ratings

- “Exceed” is when the facility shows ownership of protecting water quality and measures above and beyond what is required (e.g. making signs to remind employees and haulers to keep the lids closed).
- “Meets” is when the facility is in compliance (implementing appropriate BMP’s) with all the specific behaviors in the behavior areas. If they are not meeting one specific behavior, the entire area will be considered as “Needs Improvement”.
- “Needs Improvement” is when one or more specific criteria within the behavior areas is not in compliance (e.g. not implementing appropriate BMP’s or not having a spill kit).

Barriers to Compliance

- Lack of staff

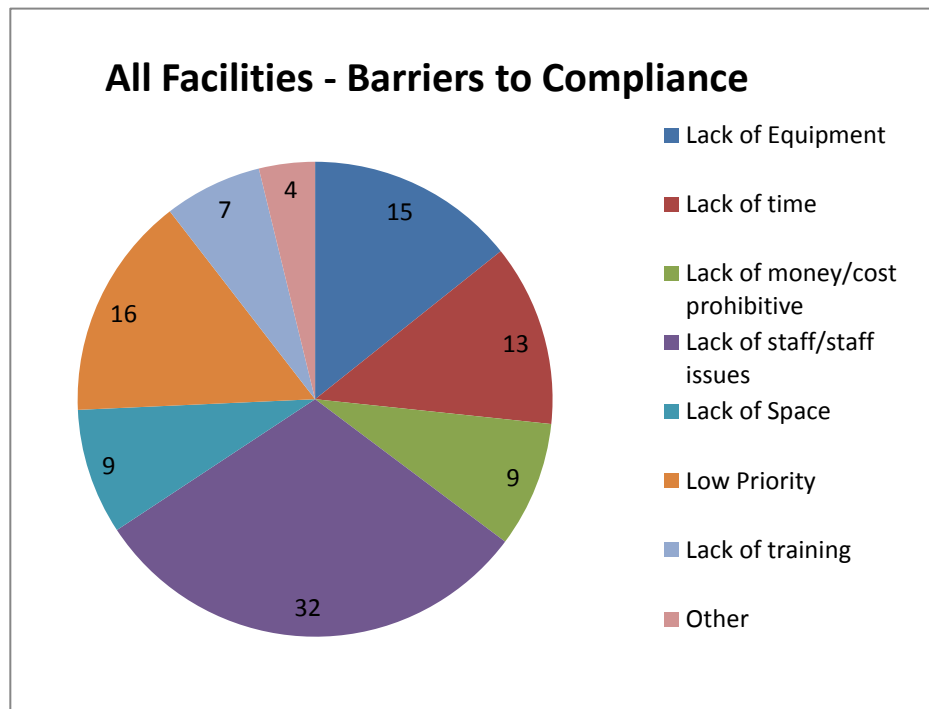
- Lack of equipment
- Lack of money
- Lack of time
- Lack of training
- Lack of space
- Low priority

In 2013 and beyond, BEST will continue to use the behavior and barrier evaluation with a strategic approach to gauge the effectiveness of site visits and training within the municipal sector.

2012 Site Visit Data Analysis

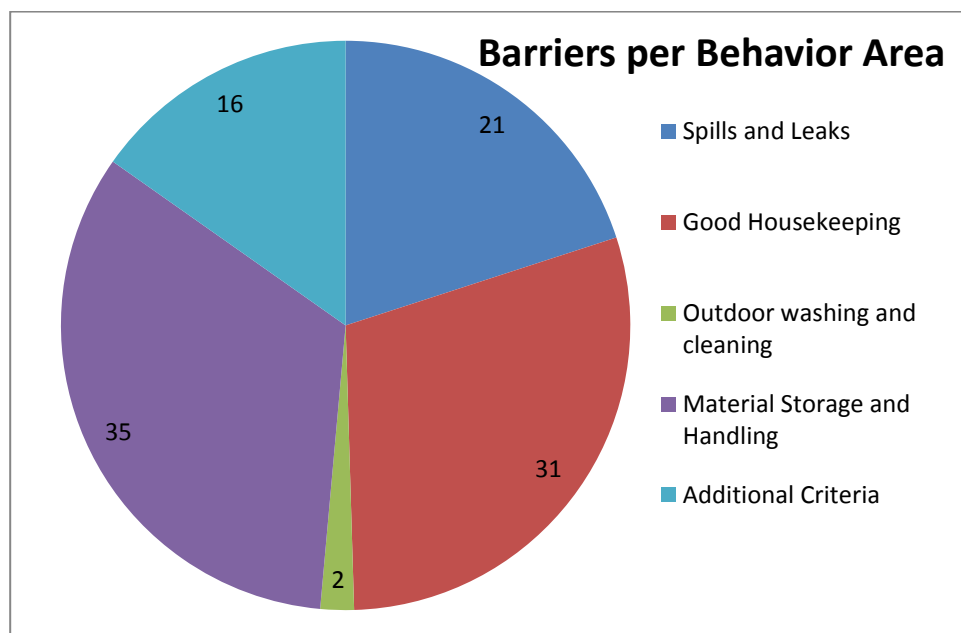
The top 4 overall barriers to compliance (in order) are:

1. Lack of staff
2. Low priority
3. Lack of equipment
4. Lack of time



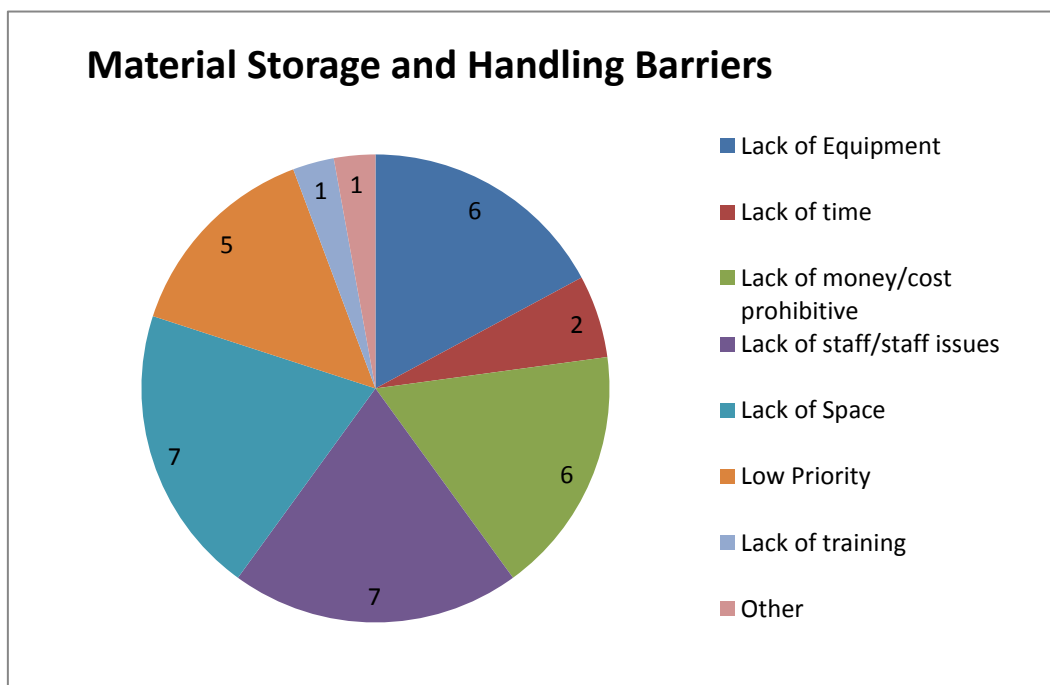
Barriers per Behavior Area

The most barriers to compliance were seen in the materials, storage, and handling (35 out of 105). Good housekeeping was second in the number of barriers (31 out of 105). The least barriers (none) were seen in outdoor washing and cleaning because all facilities were meeting this behavior.



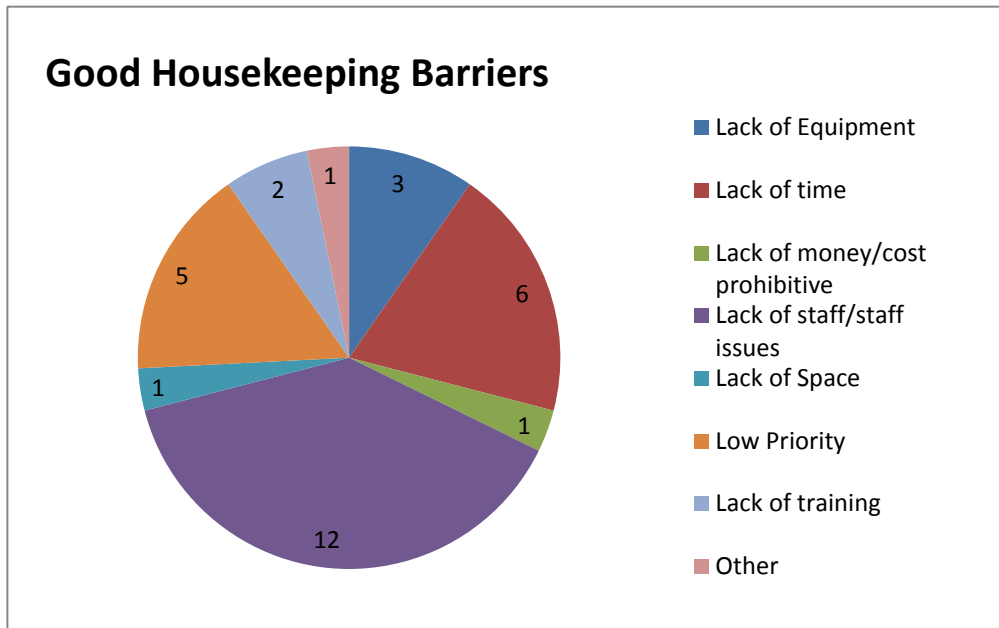
Barriers to Material Storage and Handling

The top two barriers to achieving compliance with materials storage and handling were lack of staff and lack of space (tied at 7 each). Lack of equipment and lack of money were third and fourth (tied at 6 each). Lack of time and other were fifth and sixth (tied at 2 each). Lack of training and low priority were seventh and eighth (tied at 1 each).



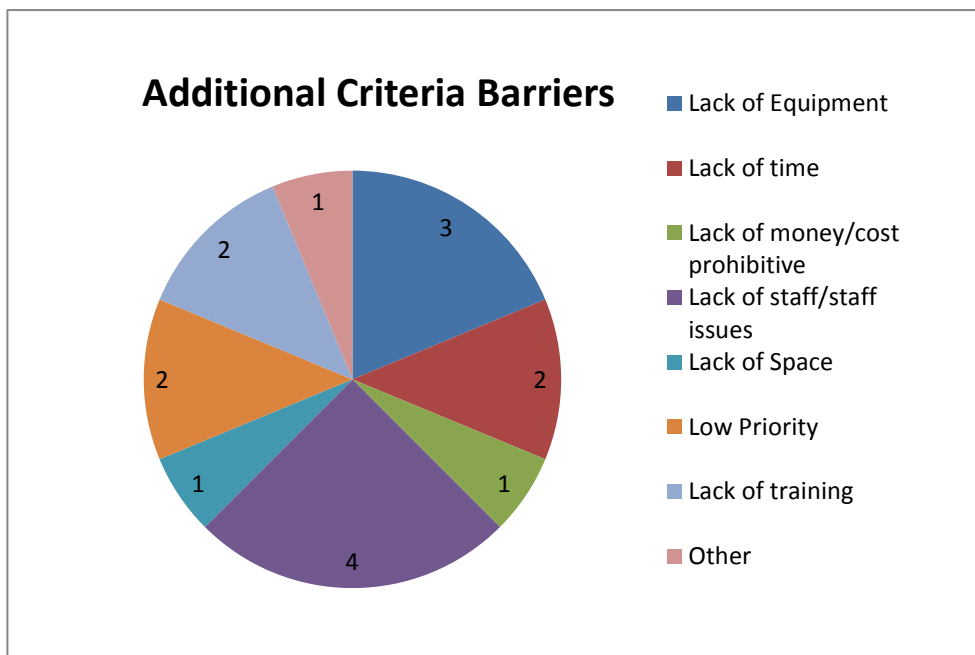
Barriers to Good Housekeeping

- Lack of staff
- Lack of time
- Low priority



Barriers to Additional Criteria (application of chemicals, proper discharge of wastewater, recordkeeping, and scheduling of maintenance)

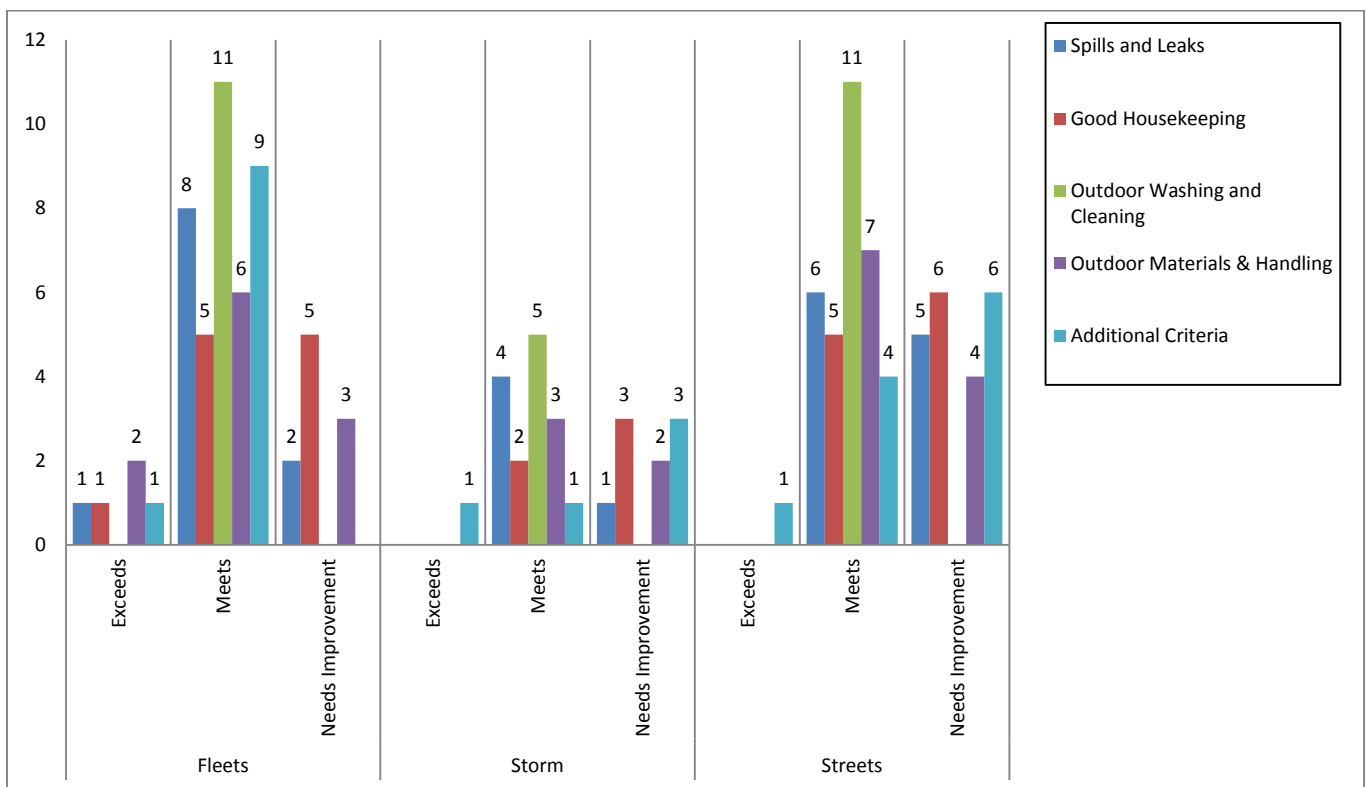
- Lack of staff
- Lack of equipment



2012 Behavior Rating per Type of Facility

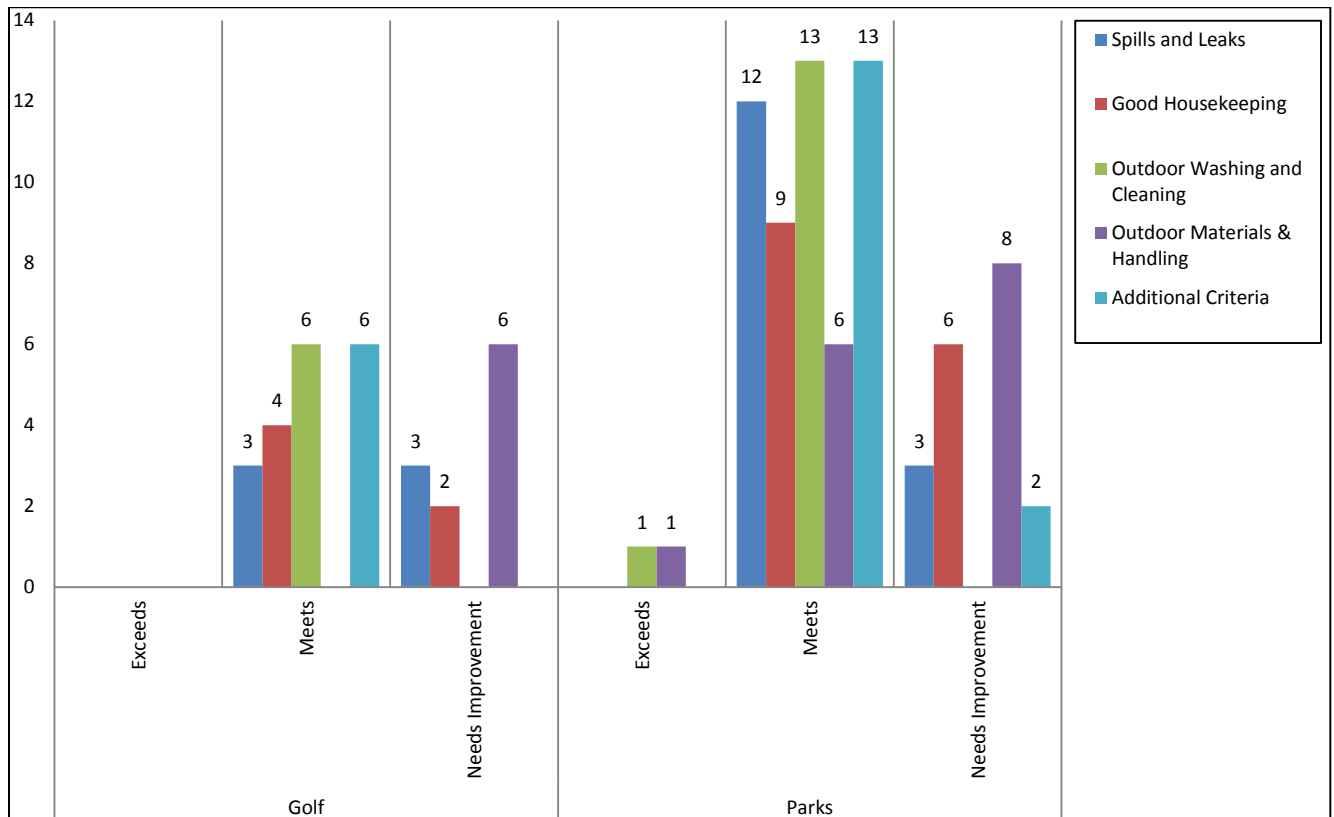
Fleets, Streets, and Storm Drain Maintenance Facilities

- ◆ Fleets facilities: 81% “exceed/meet” behavior criteria, 19% “need improvement.”
- ◆ Fleet maintenance facilities have the most “exceeds” (5 out of 54 or 9%).
- ◆ Streets maintenance facilities: 62% “exceed/meet” behavior criteria; 38% “need improvement.”
- ◆ Streets “need improvement” areas are evenly spread between spills/leaks, good housekeeping, outdoor material storage & handling, and additional criteria.
- ◆ Storm drain maintenance facilities: 64% “exceeds/meets”, 36% “need improvement.”
- ◆ All fleet, street and storm drain maintenance facilities “meet” the outdoor washing and cleaning behavior.
- ◆ All facilities “exceed/meet” spills & leaks behavior criteria 60% of the time.
- ◆ All facilities “need improvement” in good housekeeping; 44% of the visits.



Parks and Golf Course Facilities Maintenance

- Parks facilities: 75% “exceed/meet” behavior criteria; 25% “need improvement.”
 - “Needs improvement” were seen mostly in material storage & handling. Good housekeeping was 2nd for “needs improvement.”
- Golf facilities: 63% “exceed/meet” behavior criteria; 37% “need improvement”
 - Golf facilities “need improvement” mostly in Material Storage and Handling.
- All parks and golf facilities “meet” the outdoor washing and cleaning behavior.



In the future, this data will allow BEST to determine which operations or facilities need improvement and which behavior areas need concentration. The barriers for each operation or facility can be determined, and training can be provided to the facility to overcome those barriers. In turn, the effort on the areas that are meeting or exceeding the criteria can be reduced.

Stormwater Training Program

BEST provides yearly and as-requested training to municipal staff on operational BMPs and on observing and reporting illicit discharges. This training is provided to field personnel during classroom and/or tailgate sessions.

Newsletters and recognition programs may be used to support this effort.

General Stormwater Training

BEST has developed two general stormwater training presentations for municipal sectors:

- *Stormwater 101* for Tier 1 Operations (fleet, parks, golf course, street and storm drain maintenance)
- *Stormwater 102* for Tier 2 Operations (municipal fire departments, building & facilities maintenance departments)

Both trainings provide basic information about stormwater compliance, illicit discharge identification and reporting, local contact information, and best management practices to prevent stormwater pollution. The “*Storm Watch*,” “*Rain Check*,” and/or “*Drop in the Bucket*” videos are viewed during the training classes. The *Stormwater 101* and *Stormwater 102* presentations can be found at www.pacepartners.com. In total, 287 employees were trained at 13 *Stormwater 101* or *Stormwater 102* training sessions.

Employees Trained per Municipality

Municipality	Employees
Boulder	98
Longmont	18
Lafayette	35
Boulder County	72
Louisville	27
Erie	29
Superior	8
Total	287

Tailored, On-Site Training

These customized, on-site trainings required BEST staff to visit the facility before the training to take photos of stormwater issues/concerns, good housekeeping measures, and/or BMPs. The photos were then incorporated into a customized presentation. This approach helps employees to recognize and take ownership of stormwater issues at their job sites. It also provides BEST staff with a chance to conduct a site visit for stormwater compliance. Employees that implemented BMPs or good housekeeping measures were recognized by rewards of gift certificates, and their names were listed in the winter *Stormwater* newsletter (see “Employee Recognition” below). BEST staff then returned to the facility to ensure issues were addressed, or they requested that the manager contact them when the matter was resolved.

Beyond MCM 6 Site Visit Training

BEST staff also conducted “beyond MCM 6 site visits,” which were impromptu, in-the-field, training opportunities where they observed municipal employees or contractors performing maintenance work with/without implementing stormwater protection best management practices. BEST staff would document the

issues with photographs and send them to the KICP Steering Committee representative for appropriate follow-up or enforcement actions.

“Beyond MCM 6” Trainings per Municipality

KICP Partner	Beyond MCM 6 Trainings
Boulder	7
Longmont	2
Lafayette	1
Boulder County	2
Louisville	1
Erie	1
Superior	1
Total	15

Stormwater Heroes Program

The goal of the Stormwater Heroes Program is to increase municipal staff’s knowledge and awareness of stormwater pollution prevention and encourage employees to participate in water protection behaviors. The program is also intended to empower staff to protect local water quality and to recognize that the work they do directly affects water quality. BEST recognized employees who protected storm drains, implemented BMPs to prevent stormwater pollution, or reported illegal discharges with awards (e.g. stickers, water bottles, names in newsletters, and/or gift certificates). Community-based social marketing techniques were utilized to change employee behavior.

Keep It Clean Pledge Program

The Keep It Clean Pledge Program was developed to create ownership and to motivate municipal employees to take actions to protect storm drains. Employees were asked during stormwater training sessions to pledge to “Keep It Clean.” They receive a printed pledge form to remind them of their pledge and a water bottle or travel mug as a prompt. The employees signed their pledge on a tear-off slip at the bottom, which was kept by BEST staff for recordkeeping.

The three Keep It Clean pledge actions are:

1. *Locate and protect* storm drains near work site.
2. *Cover and contain* any materials stored outside and *clean up* spills.
3. *Report* any pollutants that may enter storm drains.

Stormwater Newsletters

Newsletters are written and distributed to municipal employees and managers twice yearly. Newsletters include articles of interest, seasonal messages, recognition of “Stormwater Heroes” (employees or contractors that have prevented stormwater pollution), operations implementing stormwater pollution prevention BMPs and areas or operations that need improvement.

2012 Recognition Program Accomplishments

- Two newsletters were written and distributed via e-mail to approximately 250 employees and posted on www.pacepartners.com website. The newsletter contained articles of interest, recognized operations that had the Best Stormwater BMP, the most improved stormwater BMP, and identified the “Discharge of the Year.”

- 17 “Stormwater Heroes” were recognized in the biannual newsletters.
- Two \$25 gift certificates or prizes were distributed to 2 “Stormwater Heroes” via a raffle.
- Seven \$15 gift certificates were distributed to training attendees via a raffle.
- 214 employees signed the “Keep It Clean” municipal employee pledge, thus pledging to reduce stormwater pollution.
- 38 “Protect Storm Drains” stickers were distributed during trainings and site visits.
- 24 “Keep It Clean” static-cling window decals were distributed during trainings and site visits.
- Water bottles were designed and printed with the “Keep It Clean Pledge” message.
- 58 “Keep It Clean Pledge” water bottles were distributed during training classes.

Opportunity Fund (Target Pollutants)

The Opportunity Fund included special projects for targeted pollutants or programs, as requested by KICP Steering Committee members.

2012 Accomplishments

- Conducted 15 “Beyond MCM 6 Site Visits” educating 25 employees and/or contractors.
- Provided guidance on the EPA’s Pesticide General Permit.
- Provided assistance with and research on Colorado’s Nutrient Management Regulation No. 85.
- Continued research and provided education on the proper discharge of fire suppression system wastewater from new buildings and from annual testing.
- Reviewed and commented on guidance documents from CDPHE and from the Colorado Division of Fire Safety on fire suppression system testing discharges.
- Provided the “CDPHE Draft Guidance Document on Fire Safety Activities” during site visits.
- Updated and revised Stormwater BMPs and SOPs on www.pacepartners.com.
- Created a compliance/behavior rating system based on 5 behavior areas and 7 barriers to compliance in a customer management system (CMS) database.
- Created reports and graphs evaluating “the 5 behavior areas per type of facility and on the barriers to each behavior.
- Planned for the 2013-2017 with the KICP Steering Committee, including development of program strategies and a five-year plan.

Program Changes

Partners for a Clean Environment (PACE) changed its name to Business Environmental Sustainability Team (BEST).

Budget

Proposed: \$80,958

Actual: \$76,547

Unexpended funds: \$4,411

KICP Ground Rules

Keep It Clean Partners are dedicated to:

- ◆ Supporting the stated goals and objectives of the project.
- ◆ Participating in good faith and sharing information and resources with other Partners.
- ◆ Being open, honest, and clear about their agencies' needs and interest in participating in the partnership.

Keep It Clean Partners agree to:

- ◆ Be prompt to meetings and participate to the highest level of their ability, understanding that all communities may not have the resources to attend every meeting.
- ◆ Maintain focus and stick to the topics on the agenda. Be concise and clear, prioritize all actions, and encourage involvement of all.
- ◆ Complete assigned tasks that are agreed upon in the group.
- ◆ Stay informed about discussions and decisions that take place in their absence.
- ◆ Complete the bulk of KICP work in workgroups.
- ◆ Speak one at a time, avoiding sideline discussions.
- ◆ Work as team players and share all relevant information.
- ◆ Focus on solution-based discourse, limiting complaints or criticism.
- ◆ Look for mutually beneficial solutions.

Keep It Clean Partnership decisions:

- ◆ Will be discussed in an organized manner, and the process will be open to all.
- ◆ May require compromise to reach Keep It Clean common goals and benefit.
- ◆ Will be made with a commitment to mediate disagreement.
- ◆ Will be based on consensus that every member can support.

The group will reach consensus when it finally agrees upon a single alternative and each participant can honestly say:

- I believe that other participants understand my point of view.
- I believe I understand other participants' points of view.
- Whether or not I prefer this decision, I support it because it was arrived at openly and fairly, and it is the best solution for us at this time.

Once a decision is made it should not be re-visited unless the group agrees that it is in the benefit of all participants.

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