

**Poverty Bay Shellfish Protection District (Clean Water District)
2022 Annual Reporting**

August 2022



King County

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II. Ordinance Text

Ordinance 18840¹, Section 6

SECTION 6. Within one year of the effective date of this ordinance, and every year thereafter, the executive shall transmit a report about implementation of this chapter to the council. The report shall be prepared in cooperation with the entities listed in section 5 of this ordinance. It shall include a description of the status and progress of the shellfish protection program, a review of the legal boundaries of the district and, if applicable, a recommended adjustment to the legal boundaries. The report shall be filed in the form of a paper original and an electronic copy with the clerk of the council, who shall retain the original and provide an electronic copy to all councilmembers, the council chief of staff and the lead staff to the planning, rural service and environment committee or its successor. The clerk of the council shall submit the report to the Washington state Department of Health once the council acknowledges receipt of the report.

III. Executive Summary

The [Poverty Bay Shellfish Protection District](#) (SPD) was established in December 2018. The SPD was formed in response to bacteria levels that exceeded the [National Shellfish Sanitation standards](#). Prior to formalizing the district, King County had convened a group of partners to define the boundaries of the district and agree to a strategy for keeping bacteria from reaching Puget Sound.

This annual report has been compiled with input from SPD partners, including the cities of Des Moines, Federal Way, and Kent, along with Public Health Seattle-King County (PHSKC), King County's Stormwater Services Section in the Department of Natural Resources and Parks, the Midway Sewer District, and the Washington State departments of Ecology and Transportation.

The report represents a high-level summation of significant efforts to identify, eliminate, and prevent future sources of fecal bacteria from polluting existing commercial shellfish beds in Poverty Bay. The report is required by [RCW 90.72](#) and highlights work completed over 12 months by King County and other partners within the district. The SPD accomplishments are listed in a format required by the Washington State Department of Health and are attached to this report as Appendix A.

The attached accomplishments generally cover work categorized in a few different buckets. This year, efforts were made to screen and monitor the shoreline and streams; permit, inspect, and maintain Onsite Sewage Systems (OSS); and inspect and maintain both sewer and stormwater infrastructure. In addition, PHSKC administered National Estuary Program funds to support a community engagement specialist and provide opportunities for public engagement and education. The expansion of collective outreach efforts allows the SPD to focus on behavioral changes to improve water quality that will likely impact outcomes in next year's annual report. More details about these accomplishments can be found in Appendix A.

¹ [Ordinance 18840](#)

IV. Background

Department Overview: The King County Department of Natural Resources and Parks (DNRP) works in support of sustainable and livable communities and a clean and healthy natural environment. Its mission is to foster environmental stewardship and strengthen communities by providing regional parks; protecting the region's water, air, land, and natural habitats; and reducing, safely disposing of, and creating resources from wastewater and solid waste.

The Water and Land Resources Division (WLRD) of DNRP [manages stormwater](#) for unincorporated areas, houses three salmon recovery forums, acquires open space, restores habitat, monitors water quality, controls noxious weeds, and provides economic and technical support for forestry and agriculture. As service provider to the Flood Control District, the division reduces flood hazards and restores rivers and floodplains. Additionally, WLRD operates the County's Environmental Lab and Science sections, which provide environmental monitoring, data analysis, and management and modeling services to partners, jurisdictions, and residents throughout the region. The [King County Hazardous Waste Management Program](#) – a collaborative effort with the County and King County municipalities – is also part of WLRD.

Key Historical Context: In 2016, an exceedance in fecal coliform bacteria led to the Washington State Departments of Health (DOH) classification downgrade of the commercial shellfish harvesting area of Poverty Bay from Approved to Conditionally Approved.

After the shellfish growing area classification downgrade in the fall of 2016, King County convened a technical committee consisting of representatives of the cities of Des Moines, Federal Way, Kent, and SeaTac; the Washington State departments of Health (DOH), Ecology, Natural Resources, and Transportation; the Washington State Parks and Recreation Commission, PHSKC, and the Lakehaven and Midway sewer districts; the University of Washington; and the Puyallup Tribe. The technical committee held several meetings in 2016 and 2017 to discuss boundaries of the [Poverty Bay SPD](#), elements of the shellfish protection program, and administration of the district. The SPD was created in 2018. Its purpose is to implement a shellfish protection program to address the causes, or suspected causes, of pollution resulting in water quality degradation.

DNRP is the lead agency for implementation of the Shellfish Protection District Closure Response Plan, and coordinates with the state agencies and affected cities, tribes, and utility districts that have regulatory authority for any of the sources of pollution covered by the Plan.

Key Current Context: Funding to carry out actions related to finding and fixing sources of fecal pollution, as described in the Closure Response Plan, has been made available through a number of different sources. Programmatic activities related to [National Pollutant Discharge Elimination System \(NPDES\)](#) permit actions are paid for by stormwater fees assessed by the individual jurisdictions involved in the SPD. In the case of Poverty Bay, that includes the cities of Des Moines, Federal Way, Kent, and SeaTac, and the Washington State Department of Transportation. The Lakehaven and Midway Sewer Districts use funds raised through customer billing for SPD-related activities, such as capital improvement projects, system maintenance, newsletters, and staff trainings. PHSKC uses National Estuary Program (NEP) funds to pay for the collection of water quality samples, lab analysis and community engagement efforts. WLRD and DNRP provide staff for lab analysis of water quality samples collected during source

tracing activities completed under the Pollution Identification and Correction (PIC) program. WLRD and DNRP provide funding to administer the SPD and provide staff for the purpose of managing the district.

In addition, DOH contributed staff time to refining the SPD's understanding of the bacteria contribution from freshwater systems discharging to Poverty Bay.

Partners reported an increase in homeless encampments within the SPD during this reporting cycle. In 2021 SPD partners identified 50 homeless encampments, but for this reporting period that number has increased to 159 encampments with inadequate access to sanitary services.

At the end of this reporting period SPD staff were made aware of existing deficiencies at Lakehaven's Redondo sewage treatment plant. The plant has been periodically discharging under treated, and non-disinfected sewage to Poverty Bay, for an undetermined duration of time. This situation has catalyzed a conversation with DOH that will likely lead to an expansive downgrade in classification within the district.

In addition, the Washington Department of Fish and Wildlife, in partnership with the Washington State Department of Natural Resources have determined the geoduck growing areas are needing to be "rested" for a period of 20-40 years. This means that no geoduck shall be harvested in Poverty Bay for several decades.

Specific programmatic highlights from this reporting period include:

- NEP funds allowed PHSKC to attend six events, distribute more than 12,000 flyers, create two public service announcement campaigns, and develop five different types of outreach materials. The COVID pandemic and the absence of funding prevented this work from happening last year.
- The City of Des Moines loaned out catch basin marking kits to five new interested groups and labeled 185 more catch basins this year than last year.
- Midway Sewer District was also able to achieve a significant amount of work, installing 2,800 feet of sewer main during this reporting period – 800 feet more than last year.

In March 2020, PHSKC was awarded \$488,000 in a National Estuary Program grant to continue PIC efforts in the SPD. This award was amended in 2021 to include additional funding to focus on widespread behavioral change by providing resources to hire a community engagement specialist, administering financial incentives for OSS owners, and supporting efforts to find and fix sources of fecal pollution by conducting source-tracing activities in Redondo and Cold creeks. These actions were carried out and captured in Appendix A.

Report Methodology: Appendix A of this report captures 12 months' worth of actions to reduce fecal pollution in Poverty Bay. To compile this annual report for the DOH, program staff in WLRD solicited input from all partners on four different occasions and followed up individually with all partners on several occasions. All partners in the SPD also had the opportunity to provide comments on the draft report. Staff from the following agencies contributed information:

- The City of Des Moines
- The City of Kent
- Public Health Seattle-King County

- The Stormwater Services Section of DNRP
- Midway Sewer District
- Washington State Department of Transportation

V. Report Requirements

[Ordinance 18840](#), Section 6, requires the King County Executive to transmit a report to the Council within one year of the effective date of the ordinance, and every year thereafter.

Specifically, the ordinance requires the report to:

1. Include a description of the status and progress of the shellfish protection program,
2. Review the legal boundaries of the district, and
3. If applicable, recommend adjustment to the legal boundaries.

The attached report (Appendix A) is formatted using the template provided by the DOH. Detailed within are descriptions of the status and progress of programs relevant to the SPD. Appendix A describes the current funding status, any substantial program changes to the 2021 annual report, success stories related to finding and fixing sources of fecal pollution and known barriers to improving water quality within the SPD. The outcomes associated with actions required by the DOH can be found on page 4 of Appendix A.

During the 12-month period from June 2021-May 2022, there were no substantial district-wide program changes.

In response to the second and third requirements, during the reporting period there were no requests made by SPD partners to re-evaluate or examine the existing boundaries, so the district is not recommending any adjustments to the legal boundaries at this time.

VI. Conclusion/Next Steps

This annual report identifies areas where the SPD made progress compared to last year's annual report. Most noteworthy is the awarding of National Estuary Program funds to support a community engagement specialist. Over the last 12 months, the expansion of collective outreach and community engagement efforts allowed the SPD to focus on behavioral changes to improve water quality.

As the public's concern for the COVID-19 pandemic wanes, the district hopes to continue the trajectory of organizing more in-person meetings and continue establishing relationships with community members in the SPD.

Most troublesome in this reporting cycle was the profound uptick in homelessness identified by SPD partners when compared to last year. In the 2021 report, SPD partners identified 50 homeless encampments in the district, but in this report, partners identified 159 homeless encampments. This trend is worrisome as almost all encampments lack basic sanitary services and can contribute fecal bacteria to Poverty Bay.

Recent information about the future of the district has come to light in the period of time between the end of the reporting period and the development of this report. Lakehaven's Redondo treatment plant continues to suffer from issues of inadequate treatment, resulting in the periodic discharge of under-treated and non-disinfected sewage. This has catalyzed a conversation about downgrading nearly three quarters of the conditionally approved growing areas in Poverty Bay.

In addition, the Washington Department of Fish and Wildlife, in partnership with the Washington Department of Natural Resources, have determined the existing growing areas need to be rested for a period between 20 and 40 years. This means that no geoduck clams will be harvested in the area for several decades. Negotiations about how this information will affect the administration of the district are in the early stages, and the outcomes of these conversations are largely unknown.

Regardless of the future of the district, the King County PIC program will continue working to find and fix sources of fecal pollution in Poverty Bay. While geoduck harvesting may be on hiatus, there are many people who continue to recreate along the shoreline, so preventing exposure to harmful bacteria is still a priority.

Appendix A to this report will be transmitted by the Clerk of the Council to the Washington State Department of Health.

VII. Appendices

Appendix A: Poverty Bay Shellfish Protection District (Clean Water District) 2022 Annual Report

Shellfish Protection District (Clean Water District) 2022 Annual Reporting

Reporting Period: June 1, 2021 – May 31, 2022

Date: June 30, 2022

Name of Shellfish Protection District: Poverty Bay

Name of County: King County

Primary Point of Contact: Todd Hunsdorfer, King County

1. Summary

Please provide a summary of the following:

- **Shellfish Protection District (SPD) Program funding source:**

Funding to carry out actions within the SPD boundary continues to be made available through a number of different sources. Programmatic activities related to National Pollutant Discharge Elimination System (NPDES) permit actions are paid for by stormwater fees assessed by the individual jurisdictions involved in the SPD. In the case of Poverty Bay, that includes the cities of Des Moines, Federal Way, Kent, and SeaTac, along with the Washington State Department of Transportation. Activities related to permitting and enforcement of on-site sewage systems (OSS) are funded by Public Health Seattle-King County (PHSKC). The City of Kent, Lakehaven, and Midway Sewer districts use funds raised through customer billing for SPD-related activities, such as sewer capital improvement projects, sewer system maintenance, newsletters, and staff trainings. The Water and Land Resources Division of the King County Department of Natural Resources and Parks provided funding to administer the SPD and provided staff for the purpose of managing the district and compiling required annual reporting documentation.

In early 2021, PHSKC and the Washington State Department of Health (DOH) amended an existing National Estuary Program (NEP) agreement to expand the Pollution Identification and Correction (PIC) work in the SPD to include source tracing in the Cold Creek and Redondo Creek basins. Over the reporting period, work to build awareness around sources of fecal pollution and foster commitment to taking action to improve water quality increased. Specific messaging and methods of community engagement continue to be developed.

- **Substantial program changes (i.e., staff, revised closure response plan, new PIC projects or programs, created MRA, regulation changes):**

During this 12-month period (June 2021-May 2022), the City of Kent reported working on a regional behavioral campaign called “Shut It.” The program focuses on getting business staff to keep dumpster lids closed and prevent the discharge of pollutants into drainage systems. Kent completed the research phase and developed education and outreach materials to reinforce behavioral changes. Kent completed the pilot program phase with five businesses and monitored them to see if the education and outreach resulted in staff keeping their dumpster lids closed. Once the observation period is over, Kent will implement the program citywide, including the

portion of the city within the SPD boundary.

During the reporting period there were no requests made by SPD stakeholders to re-evaluate or examine the existing boundaries. The district is not requesting any adjustments.

- **SPD successes (i.e., collaboration; upgrades to shellfish growing areas; improved marine or fresh-water quality- political support; sustainable funding source; met any outreach, inspection, or compliance goals; experimental methods identifying sources):**

The SPD met twice during the current reporting period, in September 2021 and March 2022. During those meetings, members discussed the status of the marine monitoring stations, challenges that were faced during 2020 and 2021, and updates to the NEP funded work being managed by PHSKC.

The additional money from the NEP fund for community engagement and source tracing in the SPD has been incredibly beneficial to the District. Building awareness among community members has been a goal since the SPD was created, and this additional funding has added the resources necessary to produce the ancillary materials to promote public awareness and behavioral change.

A Poverty Bay Shellfish Protection District Community Engagement and Outreach subcommittee was created to support coordinated outreach goals in the SPD. Participants from the cities of Des Moines, Federal Way, and Kent, as well as the Lakehaven Sewer District, the Washington State Department of Transportation, King Conservation District, King County Stormwater Services, and Public Health – Seattle & King County, have committed to collaborating on District-wide outreach about sources of fecal pollution over the 12-month period. Staff from local organizations focused on environmental protection and education have also participated.

In addition, over the past year, King County has been successfully executing the Quality Assurance Project Plan (QAPP) describing source-tracing work to be completed in Cold Creek, Redondo Creek, and monitoring at the mouths of all five creeks within the district.

The City of Kent reported working with an outside vendor to develop educational materials about best management practices (BMPs) to prevent pollution at businesses and for the general public. During this reporting period, Kent completed a poster for automotive-related businesses, a Low Impact Development protection brochure for construction sites, a children's stormwater activity booklet, and a restaurant BMP brochure to accompany the poster for automotive related businesses and Low Impact Development (LID) protection brochure for construction sites developed last year.

The City of Kent also recently made updates to its website to include more information about environmental education and the use of BMPs. The city will be adding an interactive BMP page soon.

Furthermore, Kent updated its Storm and Surface Water Utility Code, 7.05 to support new NPDES programs, including the new Source Control Program requirement and the use of BMPs to prevent pollutant discharges. This new language will help promote activities in the SPD that are supportive

of clean water.

- **SPD Challenges/Barrier (i.e., staffing levels, funding gaps; lack of political support, property access issues, database, enforcement/compliance):**

All partners have been challenged to accomplish in-person work due to the COVID-19 pandemic, but this is gradually changing. In this reporting cycle, there were far more in-person events compared to the year before, and the district anticipates that this trend will continue into the next round of reporting.

SPD Information	Number	Partner Outcomes	Comments
Miles of shoreline evaluated	n/a		
Discharges/streams monitored	5	PHSKC -5-	PHSKC - 30 samples have been collected during six sampling events from five stream outfalls during the closed period
Sites with elevated bacteria or "hot spots"	9	PHSKC -9-	PHSKC - 101 sites in the stormwater conveyance system and along the shoreline have been surveyed and/or monitored in the Redondo and Cold Creek basins. 490 samples have been collected and analyzed for E. coli or fecal coliforms. Nine sites have been sampled for lab analyses of E. coli and fecal coliforms to confirm high results obtained from Coliscans. Two sites have had source-tracking initiated, but no sources have been isolated or identified.
OSS Parcel/property evaluations	9	PHSKC -9-	PHSKC - No failures or pollution sources identified. OSS inspections completed as follow-up to some of these visits.
OSS operation and maintenance inspections	243	PHSKC -243-	PHSKC – These inspections are from 190 different sites over a three-year period to approximate state-required inspection intervals
OSS in the Shellfish Protection District	1,335	PHSKC -1,335-	PHSKC – Out of a total of 12,207 parcels in the Protection District (11%). This number is less than previously reported (1,352) due to redevelopment to sewers mainly
OSS failures reported	14	PHSKC -14-	PHSKC – Eight corrected - Closed by as-built repair (5) and Closed by follow-up inspection (3)
OSS repairs	3	PHSKC -3-	PHSKC – (1) permit disapproved, (2) limited repairs completed
OSS install permits	11	PHSKC -11-	PHSKC – (1) Issued; (1) Installed; (3) Installed and approved; (6) Installed as-built approved
OSS site applications	14	PHSKC -14-	PHSKC - All 14 appear are for repairs to current systems, no new system applications during reporting period.
	1	PHSKC -1-	

SPD Information	Number	Partner Outcomes	Comments
Mailers/flyers	12,035	PHSKC -12,035-	<p>PHSKC - Postcard to inform about the Poverty Bay Shellfish Protection District 11,617</p> <p>Septic rebate flyer (factsheet, advertisement graphic) shared at Korean Women's Association (1), H-mart and vendors inside (6), Saltwater State Park bulletin board (1), King County Library System (100+60 multilingual), City Current Des Moines Newsletter (29,000 households subscription)</p> <p>Septic rebate Halloween-theme flyer distributed to community members at Des Moines Halloween event (250)</p> <p>Septic rebate Halloween-theme Social media posting on Public Health-Seattle and King County, Puget Sound Starts Here, Environmental Coalition of South Seattle (ECOSS, King Conservation District, Sealife Response, Rehabilitation, and Research, King County Library Services, King County Wastewater Treatment District, Friends of Saltwater, Federal Way Senior Center, Destination Des Moines, Multi-service Center sites.</p> <p>Social media posting on septic rebate through ECOSS, King Conservation District, Sealife Response, Rehabilitation, and Research, King County Library Services, King County Wastewater Treatment District.</p>

SPD Information	Number	Partner Outcomes	Comments
PSA Campaigns	2	PHSKC -2-	<p>First campaign was Poverty Bay SPD awareness campaign about the district among local residents, highlighting the need to protect water quality. This campaign included a call to action for septic owners to apply for an inspection rebate. Postcards were sent to all properties in the district, letters were mailed to owners for tenant-occupied properties, and social media posts directed people to more information. Ten local partners shared information via their networks and social media pages. Information was shared with OSS service providers that work in the SPD area.</p> <p>The second campaign was a "sewage is scary" Halloween-themed campaign that emphasized sewer and septic inspections. Information and calls to action were shared via targeted social media posts and local partners' networks and listservs. Flyers were also distributed at the Des Moines Halloween walk, where an OSS inspector was available for follow-up questions.</p> <p>300 unique visits to the OSS rebate site after the initial campaign; 600 additional visits after the Halloween campaign; and approximately 300 direct interactions with residents, providing technical assistance and information about wastewater management.</p>
Education and Outreach materials developed	7	PHSKC -5- Des Moines -1- Kent -1-	<p>PHSKC - Education and Outreach materials developed include: postcards about SPD, OSS financial assistance brochures, pet-waste pledges, Halloween "sewage is scary" social media posts and flyers, Septic for Water workshop flyers and social media posts.</p> <p>Des Moines - Poverty Bay Article for City Currents through the Poverty Bay Community Outreach and Education Committee.</p> <p>Kent – Restaurant pollution prevention BMPs poster.</p>

SPD Information	Number	Partner Outcomes	Comments
Classroom presentations	3	PHSKC -2- King County -1-	<p>PHSKC - Public Health partnered with Seattle Humane to teach grade-school classes about pet-waste management in schools within the SPD. Students were very engaged and worked with parents to submit a pledge to be a Super Poop Scooper – 24 pledges received.</p> <p>King County – Presented information about the Shellfish Protection District to 20 high-school students at Maritime High School in Des Moines.</p>
Storm Drains marked	235	Des Moines -235-	<p>Des Moines – Five new groups checked out the stencil kits.</p>
Homeless camps Identified	191	WSDOT -159- Des Moines -23- Kent -9-	<p>WSDOT – <u>Total identified overtime - not within reporting date range.</u></p> <p>Des Moines – 23 known homelessness hotspots located in Des Moines.</p>
Newsletters produced	6	Des Moines -6-	<p>Des Moines - Citywide newsletter articles: Poverty Bay (Fall, Winter), Pet Waste (Fall, Spring), Stop Pollution from your Household (Winter), Yard Care BMPs (Spring)</p> <p>Kent - Using social media to post about pollution preventions practices.</p>
		Des Moines -3-	<p>Des Moines - Citywide newsletter articles: Pet Waste (Winter), Stop Pollution from your Household (Winter), Stormwater Quality and Social Distancing (Summer)</p>

SPD Information	Number	Partner Outcomes	Comments
Business Inspections	50	Des Moines -29- Kent -21-	<p>Des Moines - The City has partnered with ECOSS to help educate, train, and deliver free spill kits to businesses in the City of Des Moines. ECOSS is a nonprofit organization that encourages urban redevelopment and a healthy environment by providing education, resources and technical assistance to diverse businesses and communities in the Puget Sound region” (www.ecoss.org). In the reporting cycle, 29 businesses were identified and served through these approaches. Of those businesses served during this period, 10 received spill kits and 19 post-service surveys were conducted. ECOSS has served a total of 215 businesses in the City of Des Moines since 2013.</p> <p>Kent - Ensured proper best management practices were being used.</p>
Stormwater Ponds Inspected	13	WSDOT -2- Des Moines -9- Kent -2-	<p>WSDOT - 2 ponds inspected Des Moines – 9 ponds inspected</p>
Stormwater Catch Basin Screening	2,731	WSDOT -105- Des Moines -2254- Kent -372-	<p>WSDOT – 13 inlets required additional maintenance Des Moines – Public Works Maintenance Crew was trained in Illicit Discharge – Illicit Connection Field Screening and conducted field screening during regular NPDES catch basin inspections. Kent – 62 catch basins cleaned and 7 repaired</p>
Private systems Inspected	113	Des Moines -80- Kent -33-	<p>Ensure the storm systems meet city standards.</p>

SPD Information	Number	Partner Outcomes	Comments
Are there stormwater activities occurring?	Yes	Federal Way -NPDES Compliance- Des Moines -NPDES Compliance- Kent -NPDES Compliance- WSDOT -NPDES Compliance-	Federal Way, Des Moines, Kent - Required actions under the Permit include catch basin inspections and maintenance, illicit discharge detection and elimination, source control inspections, stormwater infrastructure screening, the application of development and redevelopment regulations, and education and outreach.
Sewer Capital Improvement Projects	3	Midway Sewer District -3-	Midway Sewer District – 70% completed construction for 16 th Avenue pump station project. Expected completion of October 15. 30% design underway for replacing 5,000 LF of existing 14" force main, expected completion by end of 2022 with construction set for 2023. 85% of sewer construction completed for Federal Way Link Extension Project – Sound Transit. Kent - Installed cured in-place pipe in the city's sewer mainline in the McSorley Creek basin.
Sewer Main Pipe Install	2800 LF	Midway Sewer District -2800-	Midway Sewer District – 2,300 LF of 8" sewer main replaced; 500 LF of new 8" sewer main installed. Nine manholes replaced; three new manholes installed.
Side Sewer Pipe Install	20	Midway Sewer District -20-	Midway Sewer District – 20 new side sewers installed.
Side Sewer Capping	5	Midway Sewer District -5-	Midway Sewer District - Five old side sewers were capped.
Side Sewer Repairs	39	Midway Sewer District -39-	Midway Sewer District - 39 side sewers were permitted, repaired, and inspected.
Sewer Main Replacement and lining of existing pipe	5,778 LF	Lakehaven Sewer District -5,778-	Lakehaven Sewer District - 8-inch 1,799 LF, 10-inch 2,590 LF, 12-inch 401 LF, 15-inch 988 LF. Total 5,778 LF. and 34 t-liners.

SPD Information	Number	Partner Outcomes	Comments
Street Sweeping	YES	<p>Des Moines -Yes-</p> <p>Kent -Yes-</p>	<p>Des Moines - The City is divided into four categories: Public Street (12 sweeps total per year), High Priority Street (16 sweeps total per year), High Debris Area (20 sweeps total per year), and Both High Priority and High Debris Area (24 sweeps total per year)</p> <p>Kent – Within the district boundary, the City of Kent sweeps every 1st and 3rd Tuesday each month.</p>
Illicit Discharge Detection and Elimination Responses	30	Des Moines -30-	