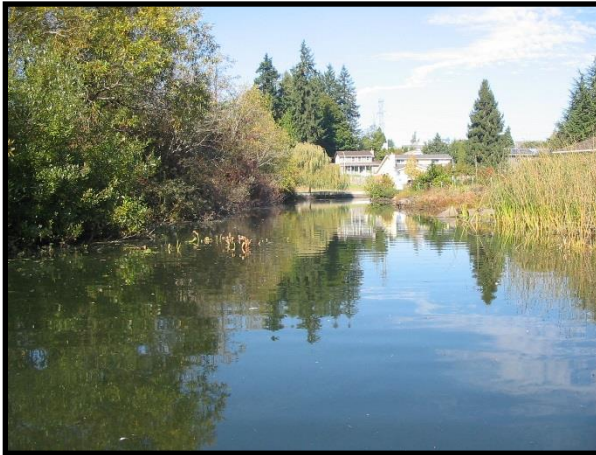




STORMWATER MANAGEMENT PROGRAM



CITY OF SNOHOMISH

2021

1.0 INTRODUCTION

This document has been prepared to satisfy the Western Washington Phase II Municipal Stormwater Permit (Permit) requirement for the continued development and updating of the Stormwater Management Program (SWMP). The purpose of the SWMP is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable and to protect water quality.

The National Pollutant Discharge Elimination System (NPDES) Permit is a federal permit that regulates stormwater and wastewater discharges to waters of the State. While it is a federal permit, the regulatory authority was delegated to the Washington State Department of Ecology (Ecology). In response, Ecology developed and issued the Western Washington Phase II Municipal Stormwater Permit. The Permit was issued by Ecology on January 17, 2007, 2013 and 2019. The current permit was issued August 1, 2019, and will be in effect until July 31, 2024. It is the intent of this SWMP to recognize the current permit requirements and to plan for these requirements where appropriate.

All municipalities affected by the permit must create and implement a SWMP which addresses the following required program elements:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Run-Off from New Development, Redevelopment and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development
- Total Maximum Daily Loads (TMDLs), if applicable to the jurisdiction

The City of Snohomish SWMP will be updated annually and submitted with the City's Annual Report to Ecology. The City of Snohomish is posting this document on the City web site (<http://www.ci.snohomish.wa.us/213/Stormwater>) so it can be reviewed by the public. Comments on the SWMP can be made by submitting comments in writing to City of Snohomish. Comments can be delivered or mailed to City of Snohomish, 116 Union Ave., Snohomish, WA 98290 ATTN: Andrew Sics, P.E., Senior Utilities Engineer. Email comments may be sent to: sics@snohomishwa.gov.

2.0 STORMWATER PLANNING

The following section describes the Permit requirements related to Stormwater Planning and the planned activities the City intends to conduct to meet these requirements.

2.1 Permit Requirements

The 2019 Permit (Section S5.C.1) requires the City to:

- By August 1, 2020, each Permittee shall convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.

- Coordination with long-range plan updates.
 - Each Permittee shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in their jurisdiction. The report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, or taking into account stormwater management needs or limitations.
 - On or before March 31, 2021, the Permittee shall respond to the series of Stormwater Planning Annual Report questions to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the 2013-2019 permit term in updates to the Comprehensive Plan (or equivalent) and in other locally initiated or state-mandated, long-range land use plans that are used to accommodate growth or transportation.
 - On or before January 1, 2023, the Permittee shall submit a report responding to the same questions included above, to describe how water quality is being addressed, if at all, during this permit term in updates to the Comprehensive Plan (or equivalent) and in other locally initiated or state-mandated, long-range land use plans that are used to accommodate growth or transportation.
- Low impact development code-related requirements.
 - Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.
 - Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.
 - Stormwater Management Action Planning (SMAP).
 - Permittees shall conduct a similar process and consider the range of issues outlined in the *Stormwater Management Action Planning Guidance* (Ecology, 2019; Publication 19-10-010). Permittees may rely on another jurisdiction to meet all or part of SMAP requirements at a watershed-scale, provided a SMAP is completed for at least one priority catchment located within the Permittee’s jurisdiction.
 - *Receiving Water Assessment.* Permittees shall document and assess existing information related to their local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management planning.

- Land management/development strategies and/or actions identified for water quality management.
- Targeted, enhanced, or customized implementation of stormwater management actions related to permit sections within S5, including:
 - IDDE field screening,
 - Prioritization of Source Control inspections,
 - O&M inspections or enhanced maintenance, or
 - Public Education and Outreach behavior change programs.

Identified actions shall support other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area in particular.

- If applicable, identification of changes needed to local long-range plans, to address SMAP priorities.
- A proposed implementation schedule and budget sources for:
 - Short-term actions (*i.e.*, actions to be accomplished within six years), and
 - Long-term actions (*i.e.*, actions to be accomplished within seven to 20 years).
- A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

2.2 Planned Activities

Future activities planned to meet the Stormwater Planning requirement of the permit are listed in Table 2-1.

Table 2-1

Planned Activities for Stormwater Planning

Task ID	Task Description	Schedule
Coordination with long-range plan updates		
SP-C-2	List relevant land use planning efforts (Land use plans, stormwater management, transportation)	By Mar. 31, 2021; Jan. 1, 2023
SP-C-3	List of stormwater capital projects (current or future) that resulted from planning	By March 31, 2021; Jan. 1, 2023
SP-C-4	Description of watershed protection measures resulting from planning efforts	By March 31, 2021; Jan. 1, 2023
SP-C-5	ID corrective actions to control or treat stormwater discharges (i.e. limits to impervious coverage, regional facility planning, minimization of vegetation loss)	By March 31, 2021; Jan. 1, 2023
SP-C-6	Update/Description of goals and policies related to investment in stormwater facilities/BMPs	By March 31, 2021; Jan. 1, 2023
SP-C-7	<p>Prepare report answering these Annual Report Questions:</p> <ul style="list-style-type: none"> • Does the long range plan ID location and existing capacity of public stormwater facilities and show which of these have unused capacity? • Do these facility locations impact where housing/development are projected to be located or influence acquisition of land (how?)? • Does the long-range plan ID a lack of facilities and the potential impacts of existing or new development to those areas and receiving waters? • Any new proposed locations and capacity of stormwater facilities needed for the timeframe of the Plan? • Based on projected growth over the planning period, describe how stormwater runoff impacts are forecasted. Does SW management info direct where growth is directed? 	By March 31, 2021; Jan. 1, 2023
LID Code-Related Requirements		
SP-LID-1	Continue to require LID principles/BMPs when updating codes	Ongoing
SP-LID-2	In a report, assess/document newly identified administrative or regulatory barriers to	Annually - By March 31 st

Task ID	Task Description	Schedule
	implementing LID (since 2013); List measures developed to address the barriers; Describe mechanisms adopted to encourage LID (if applicable)	
Stormwater Management Action Planning (SMAP)		
SP-SMAP-1	Receiving Water Assessment: Submit a watershed inventory (table w/ watershed area and % within the City as well as receiving waterbody name) and map of delineated basins w/ brief description of relative conditions of receiving water. Indicate which receiving waters will be included in the prioritization process. ID which basins have a low influence.	Mar. 31, 2022
SP-SMAP-2	Receiving Water Prioritization: Document prioritized/ranked list of receiving waters and process used for prioritization.	June 30, 2022
SP-SMAP-3	Stormwater Management Action Plan (SMAP): Develop a SMAP for at least one high priority catchment area. Include: <ul style="list-style-type: none"> • possible retrofit locations • land management strategies • targeted stormwater management actions (IDDE field screening, prioritized source control inspections, O&M inspections/enhanced maintenance, education) • If needed, ID changes needed to local long-range plans to address SMAP priorities • Implementation schedule and budget for 6-years and 20-years • Process/schedule to provide future assessment/feedback to improve planning process and implementation of procedures or projects. 	Mar. 31, 2023

3.0 PUBLIC EDUCATION AND OUTREACH PROGRAM

The following section describes the Permit requirements related to Public Education and Outreach and the planned activities the City intends to conduct to meet these requirements.

3.1 Permit Requirements

The 2019 Permit (Section S5.C.2) requires the City to:

- Each Permittee shall implement an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience.
- **General awareness.** To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area from what is listed below:
 - *Target audiences:* General public (including overburdened communities, or school age children) or businesses (including home-based, or mobile businesses). Subject areas:
 - General impacts of stormwater on surface waters, including impacts from impervious surfaces.
 - Low impact development (LID) principles and LID BMPs.
 - *Target audiences:* Engineers, contractors, developers, or land use planners. Subject areas:
 - Technical standards for stormwater site and erosion control plans.
 - LID principles and LID BMPs.
 - Stormwater treatment and flow control BMPs/facilities
 - Permittees shall provide subject area information to the target audience on an ongoing or strategic schedule.
- **Behavior change.** To affect behavior change, Permittees shall select, at a minimum, one target audience and one BMP.
 - *Target Audiences:* Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses).
 - *BMPs:*
 - Use and storage of: pesticides, fertilizers, and/or other household chemicals.
 - Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
 - Prevention of illicit discharges.
 - Yard care techniques protective of water quality.
 - Carpet cleaning.
 - Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings.
 - Pet waste management and disposal.
 - LID Principles and LID BMPs.
 - Stormwater facility maintenance, including LID facilities.
 - Dumpster and trash compactor maintenance.

- Litter and debris prevention.
 - Sediment and erosion control.
 - (Audience specific) Source control BMPs (refer to S5.C.8).
 - (Audience specific) Locally-important, municipal stormwater-related subject area.
- No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign (required under S5.C.1.a.ii and S5.C.1.c of the 2013 Permit). Permittees shall document lessons learned and recommendations for which option to select from S5.C.2.a.ii.(c). Permittees that develop a strategy for a new audience and different BMP may forgo this evaluation if it will not add value to the overall behavior change program.
- Based on the recommendation from the evaluation listed above, by February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall:
 - Develop a strategy and schedule to more effectively implement the existing campaign; or
 - Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
 - Develop a strategy and schedule for a new target audience and BMP behavior change campaign.
- No later than April 1, 2021, begin to implement the strategy above.
- No later than March 31, 2024, evaluate and report on:
 - The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy; and
 - Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.
- Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.
- Stewardship. Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations (including nonpermittees) to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.

3.2 Planned Activities

Future activities planned to meet the Public Education and Outreach requirement of the permit are listed in Table 3-1.

Table 3-1

Planned Activities for Public Education and Outreach Program

Task ID	Task Description	Schedule
EDUC-1	Provide stewardship opportunities on City's website (Conservation District Events, Sound Salmon Solutions Events, other storm related community events); Document opportunities advertised.	Ongoing
EDUC-2	Provide general stormwater education on City's website (document)	Ongoing
EDUC-3	Promote proper pet waste management behavior with pet waste stations at parks (document)	Ongoing
EDUC-4	Continue stormwater education at Farmer's Market (document)	Annually (Summer to Fall)
EDUC-5	Select one target audience and one subject area to focus education on for general awareness.	Annually
EDUC-6	Work with Snohomish Health District on educating businesses on general stormwater BMPs	By April 2021
EDUC-9	Develop education campaign that 1) develops existing campaign, 2) expands existing campaign to new audience or BMP or 3) creates new campaign for new audience/BMP	By Feb. 1, 2021
EDUC-10	Implement education campaign	By April 1, 2021
EDUC-11	Report on changes in understanding/adoption of targeted behavior and recommended changes to campaign to be more effective	By March 31, 2024

4.0 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

The following section describes the Permit requirements related to Public Involvement and Participation and the planned activities the City intends to conduct to meet these requirements.

4.1 Permit Requirements

The 2019 Permit (Section S5.C.3) requires the City to:

- Permittees shall create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the Permittee’s SMAP and SWMP.
- Each Permittee shall post on their website their SWMP Plan and the annual report, required under S9.A, no later than May 31 each year. All other submittals shall be available to the public upon request.

4.2 Planned Activities

Future activities planned to meet the Public Involvement and Participation requirement of the permit are listed in Table 4-1.

Table 4-1

Planned Activities for Public Involvement and Participation

Task ID	Task Description	Schedule
PI-1	Hold public meeting on the Annual SWMP via the City Council	By May (each year)
PI-2	Post final SWMP and Annual Report to City Website	By April 30th (each year)
PI-3	Post final SWMP in City Hall foyer.	By April 30 th (each year)
PI-4	Post public opportunities to get involved on City website (i.e. links to Sound Salmon Solutions, Snohomish Conservation District, Snohomish County, Dept. of Ecology, etc.); Document opportunities advertised and provide with Annual Report.	Ongoing
PI-5	Hold public meeting on the Annual SWMP and the new SMAP via the City Council	March 31, 2023

5.0 MS4 MAPPING AND DOCUMENTATION

The following section describes the Permit requirements related to MS4 Mapping and Documentation and the planned activities the City intends to conduct to meet these requirements.

5.1 Permit Requirements

The 2019 Permit (Section S5.C.4) requires the City to:

- *Ongoing Mapping*: Each Permittee shall maintain mapping data for the features listed below:
 - Known MS4 outfalls and known MS4 discharge points.
 - Receiving waters, other than groundwater.
 - Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
 - Geographic areas served by the Permittee MS4 that do not discharge stormwater to surface waters.
 - Tributary conveyances to all known outfalls and discharge points with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:
 - Tributary conveyance type, material, and size where known.
 - Associated drainage areas.
 - Land use.
 - Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- *New Mapping*: Each Permittee shall:
 - No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business (e.g. during field screening, inspection, or maintenance) and update records.
 - No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately owned stormwater system.
- No later than August 1, 2021, the required format for mapping is electronic (e.g. Geographic Information System, CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes), with fully described mapping standards.

- To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps depicting the information required above.
- Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. This Permit does not preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

5.2 Planned Activities

Future activities planned to meet the MS4 Mapping and Documentation requirement of the permit are listed in Table 5-1.

Table 5-1

Planned Activities for MS4 Mapping and Documentation

Task ID	Task Description	Schedule
MAP-1	Maintain stormwater basemap in electronic format	Ongoing <i>(Electronic format required by Aug. 1, 2021)</i>
MAP-3	Complete mapping of all known connections from the MS4 to a privately owned storm system.	By Aug. 1, 2023

6.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The following section describes the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE) and the planned activities the City intends to conduct to meet these requirements.

6.1 Permit Requirements

The 2019 Permit (Section S5.C.5) requires the City to:

- The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

Illicit connections and illicit discharges must be identified through, but not limited to: field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.

- Permittees shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the PermitteeMS4 to the maximum extent allowable under state and federal law.
 - Allowable Discharges: The regulatory mechanism does **not** need to prohibit the following categories of non-stormwater discharges:
 - Diverted stream flows
 - Rising groundwaters
 - Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(b)(20))
 - Uncontaminated pumped groundwater
 - Foundation drains
 - Air conditioning condensation
 - Irrigation water from agricultural sources that is commingled with urban stormwater
 - Springs
 - Uncontaminated water from crawl space pumps
 - Footing drains
 - Flows from riparian habitats and wetlands
 - Non-stormwater discharges authorized by another NPDES or state waste discharge permit
 - Discharges from emergency firefighting activities in accordance with S2 Authorized Discharges
 - Conditionally Allowable Discharges: The regulatory mechanism may allow the following categories of non-stormwater discharges only if the stated conditions are met:
 - Discharges from potable water sources, including but not limited to water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH-adjusted, if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.
 - Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through, at a minimum, public education activities and water conservation efforts.

- Dechlorinated swimming pool, spa and hot tub discharges. The discharges shall be dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH-adjusted and reoxygenized if necessary, volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4. Discharges shall be thermally controlled to prevent an increase in temperature of the receiving water. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4.
- Street and sidewalk wash water, water used to control dust, and routine external building washdown that does not use detergents. The Permittee shall reduce these discharges through, at a minimum, public education activities and/or water conservation efforts. To avoid washing pollutants into the MS4, Permittees shall minimize the amount of street wash and dust control water used.
- Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a pollution prevention plan reviewed by the Permittee, which addresses control of such discharges.
- The Permittee shall further address any category of discharges above if the discharges are identified as significant sources of pollutants to waters of the State.
- The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.
- Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the PermitteeMS4. The program shall include the following components:
 - Procedures for conducting investigations of the PermitteeMS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections.

The Permittee shall implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Screening for illicit connections may be conducted using *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual* (Herrera Environmental Consultants, Inc.; May 2013), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report.

- All Permittees shall complete field screening for an average of 12% of the MS4 each year. Permittees shall annually track total percentage of the MS4 screened beginning August 1, 2019.

- A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
- An ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.
- Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the PermitteeMS4. The program shall include:
 - Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.
 - Procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures.
 - Procedures for eliminating the discharge, including notification of appropriate authorities (including owners or operators of interconnected MS4s); notification of the property owner; technical assistance; follow-up inspections; and use of the compliance strategy developed pursuant to S5.C.5.c.iv, including escalating enforcement and legal actions if the discharge is not eliminated.
 - Compliance with the provisions in (i), (ii), and (iii), above, shall be achieved by meeting the following timelines:
 - Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.
 - Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports, or monitoring information that indicates a potential illicit discharge.

- Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.
 - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.
- Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.
 - Recordkeeping: Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this Section. In the Annual Report, each Permittee shall submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the Permittee during the previous calendar year. The data shall include the information specified in Appendix 12 and WQWebIDDE. Each Permittee may either use their own system or WQWebIDDE for recording this data. Final submittals shall follow the instructions, timelines, and format as described in Appendix 12.

6.2 Planned Activities

Future activities planned to meet the Illicit Discharge and Detection and Elimination requirement of the permit are listed in Table 6-1.

Table 6-1

Planned Activities for Illicit Discharge Detection and Elimination

Task ID	Task Description	Schedule
IDDE-1	Maintain IDDE program for reporting, correcting and/or removing illicit connections or spills. Document issues identified through field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections and/or monitoring. Maintain documented procedures for addressing illicit discharges/connections.	Ongoing
IDDE-2	<p>For spills:</p> <ul style="list-style-type: none"> • Per Section G3, provide notice to Ecology and other spill response authorities within 24 hours of knowledge of a discharge/spill that is <u>a threat to human health, welfare or the environment</u>. • Per Section S4.F.1., within 30 days, write a letter to Ecology of the incident, identifying the water quality violation. • Document <u>any</u> spill/discharge or illicit connection to Ecology’s online WQWebIDDE. 	As needed
IDDE-3	Provide general public with information related to IDDE including hotline on City website. List actions in Annual Report.	Ongoing
IDDE-4	Implement/Review ordinance to prohibit illicit discharges including escalating enforcement actions.	Ongoing
IDDE-5	Continue to use the <i>Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual</i> for field screening. Cite this source in Annual Report.	Ongoing
IDDE-6	Field Screen average of 12% of system for IDDE each year (Maintain records of which areas have been field screened and date inspected). This is typically done through cb inspections.	12% of total system (annually); Begin tracking starting Aug. 1, 2019
IDDE-7	Maintain hotline for reporting spills/illicit discharges; Document all calls and within the Annual Report, note how the hotline was advertised.	Ongoing
IDDE-8	Renew IDDE training for field staff and public employees (Track each training session with names of employees, their positions and date)	November 2022
IDDE-9	Include WQWebIDDE report with Annual Report	March 31 st , annually

7.0 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

The following section describes the Permit requirements related to controlling runoff from new development, redevelopment and construction sites. It also describes the planned activities the City intends to conduct to meet these requirements.

7.1 Permit Requirements

The 2019 Permit (Section S5.C.6) requires the City to:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.
- Each Permittee shall adopt and make effective a local program, no later than June 30, 2022, that meets the requirements of S5.C.6.b(i) through (iii), below, and shall apply to all applications submitted:
 - On or after July 1, 2022.
 - Prior to January 1, 2017, that have not started construction by January 1, 2022.
 - Prior to July 1, 2022, that have not started construction by July 1, 2027.
- The ordinance or other enforceable mechanism shall include, at a minimum:
 - The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2013 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and variance criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.
 - The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the 2019 Phase I Permit) will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge:
 - Site planning requirements

- BMP selection criteria
- BMP design criteria
- BMP infeasibility criteria
- LID competing needs criteria
- BMP limitations

Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

Permittees who choose to use the requirements, limitations, and criteria, above, in the *Stormwater Management Manual for Western Washington*, or a Phase I program approved by Ecology, may cite this choice as their sole documentation to meet this requirement.

- The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this Section that discharge to the PermitteeMS4.
- The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the standards listed in (i) through (iv) below, for both private and public projects, using qualified personnel (as defined in *Definitions and Acronyms*). At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to what is listed above.
 - Review of all stormwater site plans for proposed development activities.
 - Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – *Determining Construction Site Sediment Damage Potential*. As an alternative to evaluating each site according to Appendix 7, Permittees may choose to inspect all construction sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i, above.
 - Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection.
 - Each Permittee shall manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.
 - Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is

completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce as necessary based on the inspection.

- Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term shall be determined by achieving at least 80% of required inspections. The inspections may be combined with other inspections provided they are performed using qualified personnel.
 - The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
 - An enforcement strategy shall be implemented to respond to issues of non-compliance.
- The program shall make available, as applicable, the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic *Industrial Stormwater General Permit* NOI form for industrial activity to representatives of proposed new development and redevelopment. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
 - Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

7.2 Planned Activities

Future activities planned to meet the Control Runoff from New Development, Redevelopment and Construction Sites requirement of the permit are listed in Table 7-1.

Table 7-1

Planned Activities for Controlling Runoff from New Development, Redevelopment and Construction Sites

Task ID	Task Description	Schedule
CTRL-1	Maintain ordinance that addresses runoff from new development, redevelopment and construction site projects including the adoption of Appendix 1 of the Permit (which includes adoption of the Stormwater Management Manual for Western Washington); Cite code reference in Annual Report	Ongoing, Update code by June 30, 2022
CTRL-2	Maintain ordinance allowing inspection and enforcement of maintenance standards for private stormwater facilities	Ongoing
CTRL-3	Review site plans for compliance with City Code (Keep track of number of site plans reviewed)	Ongoing
CTRL-4	Inspect constructions sites prior to and during construction for erosion control (Maintain inspection records; see CTRL-6).	Ongoing
CTRL-5	Provide post construction inspections prior to approval for compliance with City Code and to verify a maintenance plan is in place. (Maintain inspection records; see CTRL-6).	Ongoing
CTRL-6	Maintain records of inspections (Include name of inspector, date, findings, warning letters, notices of violations, enforcement actions).	Ongoing <i>(Need to complete 80% of scheduled inspections)</i>
CTRL-7	Make available (via website and developer checklist) the electronic links to Ecology’s Construction Stormwater General Permit Notice of Intent and the Industrial Stormwater General Permit Notice of Intent to developers.	Ongoing
CTRL-8	Train staff in the site plan review process, inspections, and enforcement. Maintain records of this training and names of staff trained.	Ongoing/New Hires

8.0 OPERATIONS AND MAINTENANCE

The following section describes the Permit requirements related to the City's stormwater operation and maintenance practices. It also describes the planned activities the City intends to conduct to meet these requirements.

8.1 Permit Requirements

The 2019 Permit (Section S5.C.7) requires the City to:

- Each Permittee shall implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* or a Phase I program approved by Ecology. For facilities which do not have maintenance standards, the Permittee shall develop a maintenance standard. No later than June 30, 2022, Permittees shall update their maintenance standards as necessary to meet the requirements of this Section.
 - The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a measure of the facility's required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance is not a permit violation.
 - Unless there are circumstances beyond the Permittee's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000.

Circumstances beyond the Permittee's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.

- Maintenance of stormwater facilities regulated by the Permittee
 - The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.7.a.

The provisions shall include:

- Implementation of an ordinance or other enforceable mechanism that:

- Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.7.a.
 - Requires inspection of facilities in accordance with the requirements in (b), below.
 - Establishes enforcement procedures.
- Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6.c, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

- Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections.
- The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
- Maintenance of stormwater facilities owned or operated by the Permittee.
 - Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities, and taking appropriate maintenance actions in accordance with the adopted maintenance standards.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

- Each Permittee shall spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24 hour storm event with a 10 year or greater recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.
- Each Permittee shall inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *Stormwater Management Manual for Western Washington*. Decant water shall be disposed of in accordance with Appendix 6 –*Street Waste Disposal*.

The following alternatives to the standard approach of inspecting all catch basins every two years may be applied to all or portions of the system:

- The catch basin inspection schedule of every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records for catch basins, the Permittee may substitute written statements to document a specific, less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experiences and shall be certified in accordance with G19 –*Certification and Signature*.
- Inspections every two years may be conducted on a basis whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include an inspection of the catch basin immediately upstream of any MS4 outfall, discharge point, or connections to public or private storm systems, if applicable. Clean all catch basins within a given circuit for which the inspection indicates cleaning is needed to comply with maintenance standards established under S5.C.7.a, above.
- The Permittee may clean all pipes, ditches, and catch basins and inlets within a circuit once during the permit term. Circuits selected for this alternative must drain to a single point.
- Compliance with the inspection requirements in S5.C.7.c.i-iii, above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.

- Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. No later than December 31, 2022, document the practices, policies, and procedures. Lands owned or maintained by the Permittee include, but are not limited to: streets, parking lots, roads, highways, buildings, parks, open space, road right-of-ways, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

The following activities shall be addressed:

- Pipe cleaning
 - Cleaning of culverts that convey stormwater in ditch systems
 - Ditch maintenance
 - Street cleaning
 - Road repair and resurfacing, including pavement grinding
 - Snow and ice control
 - Utility installation
 - Pavement striping maintenance
 - Maintaining roadside areas, including vegetation management
 - Dust control
 - Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts
 - Sediment and erosion control
 - Landscape maintenance and vegetation disposal
 - Trash and pet waste management
 - Building exterior cleaning and maintenance
- Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.
 - Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes stormwater discharges associated with the activity.

As necessary, update SWPPPs no later than December 31, 2022, to include the following information. At a minimum, the SWPPP shall include:

- A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed. BMPs selected must be consistent with the *Stormwater Management Manual for Western Washington*, or a Phase I program approved by Ecology. The SWPPP must be updated as needed to maintain relevancy with the facility.
 - At minimum, annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections must be documented in an inspection report or check list.
 - An inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to precipitation or runoff and could result in stormwater pollution.
 - A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.
 - A plan for preventing and responding to spills at the facility which could result in an illicit discharge.
- Maintain records of the activities conducted to meet the requirements of this Section.

8.2 Planned Activities

Future activities planned to meet the Municipal Operations and Maintenance requirement of the permit are listed in Table 8-1.

Table 8-1

Planned Activities for Municipal Operations and Maintenance

Task ID	Task Description	Schedule
O&M-1	Maintain records of inspections and maintenance activities. List number of stormwater treatment and flow control facilities that were 1) located in the City, 2) were inspected and 3) were maintained in Annual Report.	Ongoing
O&M-2	Provide annual inspections of all public stormwater treatment and flow control BMPs/facilities. <ul style="list-style-type: none"> ▪ Maintain inspection records; see O&M-1. ▪ Document if a reduced inspection frequency is used. ▪ If inspection reveals that a maintenance standard is not being maintained, need to perform maintenance: <ul style="list-style-type: none"> ○ within 1 year (all facilities except public catch basins) ○ within 6 months (public catch basins) or ○ within 2 years (maintenance that requires capital construction of less than \$25,000). ▪ Document when/if maintenance standard could not be met on time and attach to Annual Report. 	Ongoing
O&M-3	Provide annual inspections of all private stormwater treatment and flow control BMPs/facilities. Document results/enforcements and provide follow-up inspections as needed. Any maintenance activity shall be recorded.	Ongoing
O&M-4 / CTRL-2	Maintain ordinance identifying responsible party for maintaining private flow control and water quality facilities and that allows inspection and enforcement of maintenance standards of these facilities	Ongoing
O&M-5	Spot check treatment and flow control facilities/BMPs and repair if necessary.	After 24-hour/10-year storms (Ongoing)

Task ID	Task Description	Schedule
O&M-6	Train staff in O&M operations, inspection procedures, reporting water quality concerns, SWPPPs, and on efforts to reduce pollutants to runoff. Maintain records of this training, names/positions of staff trained and dates training was held.	Ongoing/New Hires
O&M-7	Inspect catch basins and inlets; Document total number of cbs, how many inspected and how many cleaned with the Annual Report.	Inspect 50% annually (<i>all cbs to be inspected every 2 years beginning Aug. 1, 2019</i>). All to be inspected by Aug 1, 2021.
O&M-8	Review/Update Maintenance standards (specified in Ecology's <i>Stormwater Management Manual for Western Washington</i>)	By June 30, 2022
O&M-9	Implement/document procedures to reduce stormwater impacts from all lands owned/maintained by the City and road maintenance activities. Cite documentation in Annual Report.	By Dec. 31, 2022
O&M-10	Update SWPPP for Public Works' Yard and any heavy equipment maintenance/storage yards, if needed	By Dec. 31, 2022

9.0 SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

The following section describes the Permit requirements related to the Source Control Program for Existing Development and the planned activities the City intends to conduct to meet these requirements.

9.1 Permit Requirements

The 2019 Permit (Section S5.C.8) requires the City to:

- The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include:
 - Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.

- Inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
- Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by a separate NPDES permit.
- Permittees that are in compliance with the terms of this Permit will not be held liable by Ecology for water quality standard violations or receiving water impacts caused by industries and other Permittees covered, or which should be covered under an NPDES permit issued by Ecology.
- Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.
- **Minimum performance measures:**
 - No later than August 1, 2022, Permittees shall adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities (see Appendix 8 to identify pollutant generating sources).

The requirements of this subsection are met by using the source control BMPs in the SWMMWW, or a Phase I Program approved by Ecology. In cases where the manual(s) lack guidance for a specific source of pollutants, the Permittee shall work with the owner/operator to implement or adapt BMPs based on the best professional judgement of the Permittee.

Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs, provided that formal enforcement authority is available to the Permittee and is used as determined necessary by the Permittee, in accordance with S5.C.8.b.iv, below.

- No later than August 1, 2022, the Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory shall include:

- Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8).
 - Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.
- No later than January 1, 2023, Permittees shall implement an inspection program for sites identified pursuant to S5.C.8.b.ii, above.
 - All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the permit term to allow for tailoring and distribution of the information during site inspections.
 - The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.
 - Each Permittee shall inspect 100% of sites identified through credible complaints.
 - Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.
- No later than January 1, 2023, each Permittee shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:
 - If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.
 - When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s), the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.
 - Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of

violations, and other enforcement records, demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.

- A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.
- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

9.1 Planned Activities

Future activities planned to meet the Source Control Program requirement of the permit are listed in Table 9-1.

Table 9-1

Planned Activities for Business Source Control Inspection

Task ID	Task Description	Schedule
BUS-1	Implement ordinance requiring source control BMPs (i.e. from the Ecology Stormwater Manual) for pollutant generating sources for existing land uses. Cite ordinance in Annual Report.	Aug. 1, 2022
BUS-2	Create inventory of public/private institutional, commercial and industrial sites that have the potential to generate pollutants and any complaint-based sources (home-based businesses, multi-family sites). Document number of sites in Annual Report.	Aug. 1, 2022
BUS-3	Implement business source control inspection program including education (via mail/phone/in-person) about source control BMPs. Document all inspections (including follow-ups) with business category, number of times inspected and if enforcement actions were taken in a single list. Include this list with the Annual Report. Also document records of sites where the owner denies entry.	Begin by Jan. 1, 2023; annually inspect 20% of inventory (<i>follow-up inspections can count toward the 20%</i>)
BUS-4	Inspect all complaint-based businesses for pollution generating sources and installed BMPs	Ongoing
BUS-5	Implement progressive enforcement policy requiring business sites to comply with stormwater requirements within a reasonable time period	Jan. 1, 2023
BUS-6	Train staff on conducting business source control inspections including inspection protocols, lessons learned, and enforcement procedures.	By Jan. 1, 2023 (Ongoing every year/New Hires)

10.0 COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS

The following section describes the Permit requirements related to the City’s participation associated with the Snohomish River Tributaries’ Total Maximum Daily

Load (TMDL). It also describes the planned activities the City intends to conduct to meet these requirements.

10.1 Permit Requirements

The 2019 Permit (Appendix 2) requires the City to:

- **Business Inspections:** Inspect commercial animal handling areas (veterinary and pet care/boarding services, animal slaughtering, and support activities for animal production) and commercial composting facilities to ensure implementation of source control BMPs. Implement an ongoing inspection program to re-inspect facilities with bacteria source control problems a minimum of every three years.
- **Public Education and Outreach:** Conduct public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management behavior.
- **Operations and Maintenance:** Install and maintain animal waste collection and/or education stations at municipal parks and other City owned lands reasonably expected to have dog and horse use and the potential for pollution of stormwater.
- **IDDE:** During IDDE-related field screening, screen for bacteria sources in any screened MS4 subbasins which discharge to surface waters in the TMDL area.
- **Surface Water Monitoring:** Continue conducting surface water monitoring for fecal coliform data collected per the approved QAPPs for continued characterization and long term trends evaluation of fecal coliform. At a minimum, the monitoring program shall:
 - Collect 12 samples in at least one location per calendar year.
 - Submit available data to the Environmental Information Management (EIM) database by May 31st of each year.
 - Provide data summaries and narrative evaluation of the data in each annual report's TMDL summary.
 - Be documented in a QAPP which follows Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies, July 2004, Ecology Publication No. 04-03-030.

10.2 Planned Activities

Future activities planned to meet the TMDL requirement of the permit are listed in Table 10-1.

Table 10-1

Planned Activities for TMDL Requirements

Task ID	Task Description	Schedule
TMDL-1/ IDDE-7	Field screen for bacteria sources during IDDE screenings (i.e. look for fungus, algae, color, rotten egg or musty smell)	Annually <i>(during cb inspections/IDDE screenings)</i>
TMDL-2	Continue stormwater sampling for fecal coliform (per QAPP)	Monthly <i>(or frontload toward summer...min. 12 samples per year)</i>
TMDL-3/ REP-2	Include TMDL Summary with Annual Report regarding source identification and elimination activities (procedures followed, sampling results from TMDL-2, Show figure with results)	March, Annually <i>(Due Mar. 31st)</i>
TMDL-4	Submit data to EIM database	May, Annually <i>(by May 31st)</i>
TMDL-5	Inspect veterinary offices for source control BMPs	April 2021 <i>(re-inspect problem areas);</i> Repeat in April 2024
TMDL-6/ EDUC-3	Promote proper pet waste management behavior with pet waste stations at parks	Ongoing

11.0 MONITORING

The following section describes the Permit requirements related to monitoring. It also describes the planned activities the City intends to conduct to meet these requirements.

11.1 Permit Requirements

The 2019 Permit (Section S8) requires the City to:

- Describe any monitoring related studies conducted throughout the year in the Annual Report.
- Reporting involved with the Regional Stormwater Management Program is not necessary as part of the Annual Report. The regional program includes status and trends monitoring, stormwater management program effectiveness studies, and source identification/diagnostic monitoring.

11.2 Planned Activities

Future activities planned to meet the monitoring requirement of the permit are listed in Table 11-1.

Table 11-1
Planned Activities for Monitoring Requirements

Task ID	Task Description	Schedule
MON-1	Opt into Regional Stormwater Management Program by paying the following fee categories: <ul style="list-style-type: none">• Status and Trends Monitoring• Stormwater Program Effectiveness• Source Identification and Diagnostic Monitoring	Aug. 15 th , each year
MON-2	Describe any stormwater monitoring conducted for the year in the Annual Report	By March 31 st , each year

12.0 REPORTING REQUIREMENTS

The following section describes the Permit requirements related to reporting. It also describes the planned activities the City intends to conduct to meet these requirements.

12.1 Permit Requirements

The 2019 Permit (Section S9) requires the City to:

- Submit an Annual Report by March 31st of each year. The report will include:
 - Copy of the current SWMP
 - Annual Report Form (per Ecology)
 - Attachments (summaries, descriptions, reports, etc.)
 - Certification and signature
 - Notice if the City is relying on another entity to assist with permit requirements
 - Notification of any annexations, incorporations or jurisdictional boundary changes
- Keep all records related to the permit and the SWMP for at least five years.
- All records related to the permit shall be available to the public at reasonable times during business hours.

12.2 Planned Activities

Future activities planned to meet the monitoring requirement of the permit are listed in Table 12-1.

Table 12-1

Planned Activities for Reporting Requirements

Task ID	Task Description	Schedule
REP-1	Submit Annual Report	March 31 st , each year
REP-2 / TMDL-3	Include TMDL Summary with Annual Report regarding source identification and elimination activities (procedures followed, sampling results in TMDL-5, can show figure with results)	March 31 st , each year
REP-3	Attach letters notifying Ecology of relying on another entity to satisfy one or more permit obligations.	March 31 st , each year