

Stormwater

Rain flows across hard surfaces.
It picks up our pollution.
The pollution flows to the Sound.



Prepared in fulfillment of NPDES Permit requirements

By

The City of Mukilteo
11930 Cyrus Way
Mukilteo, WA 98275

This page intentionally left blank

Table of Contents

Executive Summary	1
Permit Condition S5.C.1 – Stormwater Planning	3
Permit Condition S5.C.2 – Public Education and Outreach	3
Permit Condition S5.C.3 – Public Involvement and Participation.....	6
Permit Condition S5.C.4 – MS4 Mapping and Documentation	6
Permit Condition S5.C.5 – Illicit Discharge Detection and Elimination.....	7
Permit Condition S5.C.6 – Control Runoff from New Development, Redevelopment and Construction Sites	7
Permit Condition S5.C.7 – Operations and Maintenance	8
Permit Condition S5.C.8 – Source Control for Existing Development	9
Permit Condition S7 – Total Maximum Daily Load (TMDL).....	9
Permit Condition S8 – Monitoring and Assessment.....	9
Appendix A – Internal Coordination	A-1

Executive Summary

The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act, with authority over the program given to Washington State Department of Ecology (Ecology). The intent of the NPDES Program is to protect and restore water quality in waters of the State so that they can support beneficial uses, such as fishing and swimming. Governmental and private entities must obtain an NPDES Permit, and comply with conditions set forth in the Permit, before discharging stormwater or wastewater to waters regulated by Federal and State governments.

The Western Washington Phase II Municipal Stormwater Permit

In 1999, the United States Environmental Protection Agency (EPA) created an NPDES Phase II Permit. This Permit requires operators of small Municipal Separate Storm Sewer Systems (MS4s) to obtain coverage, as defined in U.S. Census Bureau urbanized areas. The City of Mukilteo operates an MS4 under this definition.

The City of Mukilteo has been operating under a Phase II Permit since 2007. On August 1, 2019, Ecology issued a new Phase II Permit. The City is operating under this Permit (Permit) through July 31, 2024. The Permit allows municipalities to discharge stormwater from municipal systems into waters of the state, as long as they implement programs to reduce pollutants in stormwater to the maximum extent practicable (MEP), apply all known and reasonable technologies (AKART) to address stormwater pollutants, and protect receiving waters from degradation.

The full text of the 2019 Permit can be viewed at Department of Ecology's website:
<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits>

Purpose of the Annual Stormwater Management Program Plan

Condition S5. of the Permit requires that all Permittees have a Stormwater Management Program (SWMP). "A SWMP is a set of actions comprising the components listed in S5 and any additional actions necessary, to meet the requirements of applicable TMDLs..." (S5.A. of the Permit). The City's SWMP must be implemented City-wide, must include an ongoing program for gathering, tracking, maintaining, and using information to inform the SWMP. The SWMP also requires internal and external coordination.

The City must prepare a written SWMP Plan that outlines the City's planned activities for the upcoming year for programs in S5.C. of the Permit, and. The City prepares and posts the draft SWMP Plan and solicits public feedback related to those planned activities. The most current SWMP Plans are posted on the City's website. The City submits an Annual Report on Permit-related requirements to the Washington State Department of Ecology by March 31st of each year as required by the Permit. The Annual Report is available online, or interested parties can request a copy by calling (425) 263-8000.

2021 NPDES Permit Coverage and Planned Activities

This SWMP Plan covers planned activities for the period January 1, 2021, through December 31, 2021, and follows the organization of 2019 Permit Section 5.C as follows:

- S.5.C.1 – Stormwater Planning
- S.5.C.2 – Public Education and Outreach
- S.5.C.3 – Public Involvement and Participation
- S.5.C.4 – MS4 Mapping and Documentation
- S.5.C.5 – Illicit Discharge Detection and Elimination
- S.5.C.6 – Control Runoff from New Development, Redevelopment and Construction Sites
- S.5.C.7 – Operations and Maintenance
- S.5.C.8 – Source Control Program for Existing Development

Information on Section 7, Compliance with Total Maximum Daily Load Requirements, and Section 8, Monitoring, are also included in this document.

The City's *Comprehensive Surface Water Management Plan*, last updated in 2015, contains policies and goals for the surface water utility on a broad range of topics, through the end of the planning period in 2021. The full plan can be found on the City's website at: <http://mukilteowa.gov/departments/public-works/surface-water/programs-and-planning>.

Permit Condition S5.C.1 – Stormwater Planning

Overview

The goal of the Stormwater Planning effort is to build on past City efforts to protect receiving water quality and beneficial uses under anticipated future developed conditions. The continuation of this effort will require a multi-disciplinary team and coordination with many of the City's long-range land use plans that are used to accommodate growth or transportation.

Stormwater Planning 2021 Planned Activities

The City will continue to work with its interdisciplinary team (convened in 2019) to continue to work on items related to Stormwater Planning. Specific activities include:

1. Responding to the series of Stormwater Planning Annual Report questions, on or before March 31, 2021.
2. Assessing, identifying, and addressing any barriers to implementation of LID Principles or LID BMPs.
3. Acquire funding and engage in consultant services to implement recommendations from the 2020 Stormwater Management Action Plan Gap Analysis.

Permit Condition S5.C.2 – Public Education and Outreach

Overview

There are two goals of the education and outreach program. The first is to build general awareness related to the impacts from polluted stormwater. The second is to affect individual behavior change related to specific practices that contribute pollution to our streams and the Puget Sound. Many of these programs may experience unanticipated impacts due COVID-19 social distancing and other state mandated requirements.

Education and Outreach 2021 Planned Activities

The City of Mukilteo's education and outreach program has several elements to help residents and business owners understand stormwater pollution as a significant water quality concern.

Regional Collaboration

The City is involved in education programs locally and regionally. The City tailors existing programs to fit our residents' and stormwater needs. Examples of continuing partnerships include: Snohomish County Health District, Snohomish County Surface Water Management, Snohomish Conservation District, ECOSS, and neighboring municipalities through the Stormwater Outreach for Municipalities (STORM) group.

The City's Dumpster Outreach Behavior Change Program, Youth Stormwater and Water Quality Awareness classes and Business Outreach Spill Kit program are specific programs that are the direct result of regional collaboration (see below for program details).

Stormwater Outreach for Municipalities (STORM) Long-Term Funding Committee

STORM is a regional work group comprised of municipal Permittees from jurisdictions of all sizes. The STORM work group is led by a steering committee and has several work groups for separate stormwater related outreach topics. STORM meets quarterly, where information is shared across jurisdictions. Mukilteo leverages the expertise that STORM provides through use of educational materials and partnership opportunities in regional campaigns.

STORM has a Coordinator who oversees meeting agendas, trainings, and spearheading regional outreach campaigns. Over many years, the STORM Coordinator position has been temporarily funded with grant monies or other non-stable funding sources. In 2021, STORM will continue working to secure long-term funding sources, through the Long-Term Funding Committee. Mukilteo is a member of the Long-Term Funding Committee (LTF Committee). The City does not have the capacity to replace the value the STORM Coordinator, so support of a long term funding mechanism is a benefit to the City's stormwater utility.

General Awareness

The Permit provides lists of target audiences and subject areas from which Permittees can choose for their General Awareness programs. The components of the City's General Awareness program are below, with the target audiences and subject areas from the lists:

Stormwater Branding

Target Audience: General Public

Subject Area: General impacts of stormwater on surface waters, including impacts from impervious surfaces.

In 2021, the City will be installing temporary banners at various locations across the City with key best practice messaging, including car wash practices, pet waste disposal practices, stewardship opportunities, and leaf clearing practices. Some of the 2020 goals such as vehicle wraps and website updates were not completed and will be re-evaluated in 2021.

Youth Stormwater and Water Quality Awareness

Target Audience: Elementary School-Aged Children

Subject Area: General impacts of polluted rain water on surface waters, including impacts from impervious surfaces.

The City will continue its partnership with the Snohomish Conservation District (SCD), through the SCDs Sound Education programs, to provide education at the elementary school level. Topics include lessons titled "Four Drops of Rain", "It's not Fido's Fault!", "Macro Mayhem", "Salmon of Puget Sound", "Water Quality Monitoring with Test Kits", and "Water Quality Monitoring with Live Benthic Macros". The City anticipates execution of a new

Interlocal Agreement for these services. We expect these classes will be held in an online format.

Pet Waste Station Messaging

Target Audience: General Public

Subject Area: General impacts of polluted rain water on surface waters, including impacts from impervious surfaces.

The Stormwater Utility will continue to provide mutt mitts (dog waste bags) with stormwater messaging at City parks and other City-managed pet waste stations.

Behavior Change

Dumpster Outreach

The City will develop a strategy and schedule for a new target audience and BMP behavior change campaign by February 1, 2021, and will implement the strategy no later than April 1, 2021. The City anticipates that it will target multi-family residential properties as its target audience and dumpster lid closure as its BMP behavior.

Business Awareness and Outreach

The City anticipates continuing its partnership with ECOSS in 2021. ECOSS educates businesses on procedures for preventing spills from entering the stormwater network. They help businesses develop a spill response plan that is specific to their business practices. It is anticipated that ECOSS will use an online platform to educate businesses in the City, and evaluate whether the business shows behavior change related to spill clean up. Each business that participates in the program receives a no-cost spill kit.

Stewardship

Drain Marking Program

The City will continue to offer its Drain Marking program as a stewardship opportunity for interested groups. The City has kits available that include all of the necessary tools and equipment to apply drain markers within the City.

Private Stormwater System and BMP Maintenance

Most of the private stormwater facilities within the City do not fall under the Permit's requirements for the City to inspect for maintenance, due to the age of the infrastructure. As opportunity arises, City staff work with private property homeowners and Homeowner's Associations to educate them on private stormwater BMPs, their maintenance requirements, and the importance of these facilities on the landscape.

Permit Condition S5.C.3 – Public Involvement and Participation

Overview

The City's goal for public involvement and participation is to actively engage its residents, business owners, property owners, and contractors in preservation and protection of clean water. The City achieves this through advisory councils, public hearings, watershed committees, volunteer opportunities, and other avenues for participation as activities arise.

Public Involvement and Participation 2021 Planned Activities

SWMP Plan Update

Public involvement is sought during development of the SWMP Plan. Residents are encouraged to review and comment on the SWMP Plan by visiting the City of Mukilteo's website at <http://mukilteo.gov/departments/public-works/surface-water/stewardship/npdes/>.

The final SWMP Plan and the 2021 Annual Report will be posted on the City's website no later than May 31, 2021.

Annual Utility Update to Council

City staff plans to provide a stormwater utility update to City Council in the first quarter of 2021. The update includes reports on Permit compliance, as well as other goals and performance measures for the Utility. This update is advertised on the Council Agenda.

Stormwater Management Action Plan (Permit Condition S5.C.1)

The Stormwater Management Action Plan Gap Analysis recommends outlining a plan for public involvement, including reaching overburdened communities. This plan development is anticipated to begin in 2021.

Source Control Program Development (Permit Conditions S5.C.8)

The City will begin development of its Source Control Program in 2021. It is currently estimated that there will be opportunity to reach out to businesses to receive preliminary feedback about the program. Additionally, the program requirements will be presented to several City work groups. It is not anticipated that the formal Notice and Hearing process will occur in 2021, but the scheduling and outline for that process will be developed in 2021.

Permit Condition S5.C.4 – MS4 Mapping and Documentation

Overview

The goal of the mapping program is to provide continuous improvements and updates to the City's map of the stormwater network. Accurate mapping helps the utility understand flows in the system, trace illicit connections and spills, and identify discharge locations to natural water bodies.

Mapping and Documentation 2021 Planned Activities

Maintain maps of the City's stormwater drainage system (MS4)

- Continue collecting pipe material and pipe size information for all known outfalls.
- Maintain and update the City's MS4 maps, including points of significance, such as outfalls, waters of the state, stormwater facilities, and all known connections.
- Continue efforts for complete mapping of all known connections from the MS4 to a privately owned stormwater system (scheduled to be complete August 1, 2023).
- Update fully described mapping standards by August 1, 2021.
- Maintain the City's Stormwater Network Viewer.

Permit Condition S5.C.5 – Illicit Discharge Detection and Elimination

Overview

The goal of the illicit discharge detection and elimination (IDDE) program is to prevent, detect, characterize trace and eliminate illicit discharges and connections found in the MS4. This goal is achieved through inspection, education, regulation, and enforcement.

Illicit Discharge Detection and Elimination 2021 Planned Activities

The City will continue to implement its ongoing program to detect and identify non-stormwater discharges and will begin to implement and follow the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual* (Herrera, May 2020 Revision).

Other program elements include:

- Maintain City's Spill Hotline: (425) 263-8088
- Continue to implement the City's internal training program
- Continue to screen the City's MS4 as part of the annual catch basin and facility inspections
- Follow up on any potential illicit connections discovered as part of the newly implemented pipe inspection program

Permit Condition S5.C.6 – Control Runoff from New Development, Redevelopment and Construction Sites

Overview

Permit Section 5.C.6 requires that Mukilteo develop, implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. Controlling runoff from developed properties reduces peak flow flooding, pollutant loading, and other negative freshwater impacts.

Control Runoff from New Development 2021 Planned Activities

- Continue to apply Mukilteo Municipal Code (MMC) Section 13.12.160 to address runoff from new development, redevelopment, and construction site projects. The City requires development projects to meet the Minimum Requirements, thresholds, and definitions of the Appendix 1 of the Permit. This is met by administering the *2014 Stormwater Management Manual for Western Washington* (Ecology Manual) and the City of Mukilteo's *2019 Amendment of the 2017 Development Standards* (DS) for all permitted new development and redevelopment projects.
- Continue to implement a permitting process that requires site plan review, inspections and enforcement mechanisms for noncompliance.
- Update training for staff involved in controlling stormwater runoff in development.
- The City will continue to apply Ecology's maintenance standards in Chapter 4 of Volume V of the Ecology Manual.
- Prepare schedule for adoption of the *2019 Stormwater Management Manual for Western Washington* in 2022.

Permit Condition S5.C.7 – Operations and Maintenance

Overview

The City's goal is to implement and document a program that ensures maintenance activities to prevent or reduce pollutant runoff to the maximum extent practicable, including stormwater facility maintenance and other non-stormwater related maintenance activities.

Municipal Operations and Maintenance 2021 Planned Activities

- The City will follow the maintenance standards of Chapter 4.6 of Volume V of the Ecology Manual, and the *Green Stormwater Operations and Maintenance Manual* (Seattle Public Utilities, 2009) using the timeframes for maintenance found in the Permit.

Maintenance of Stormwater Facilities:

- MMC 13.12.160 will be applied to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control facilities.
- Continue annual facility and BMP inspections for private stormwater treatment and flow control BMPs/facilities permitted after July 29, 2009 (the date the City began permitting projects in accordance with the 2007 Permit).
- Inspect all municipally owned or operated stormwater facilities. The City has approximately 145 stormwater treatment and flow-control facilities. The City Public Works operations staff will inspect each of these in 2021 to identify maintenance needs.
- Public Works operations staff routinely perform spot checks of potentially damaged permanent treatment and flow-control facilities, other than catch basins, after major storm events.
- Public Works operations staff will inspect 50% of the City's owned or operated catch basins and address any maintenance deficiencies.

- Staff will continue to follow their practices, policies and procedures to reduce stormwater impacts associated with runoff from all municipal lands and associated with municipal operations. Draft documentation of these practices will be developed in 2021 to meet the June 30, 2022 deadline.
- City staff training will be updated as needed, according to the City's Training Program.
- The City Public Works facility will continue to operate according to the Surface Water Pollution Prevention Plan (SWPPP). Operations staff inspect the facility quarterly, in accordance with the SWPPP.

Permit Condition S5.C.8 – Source Control for Existing Development

Overview

Source Control for Existing Development is a new Permit requirement. The goal of the source control program for existing development is to provide technical assistance to business that have the potential to pollute. This assistance will be aimed at implementing operational BMPs or treatment facilities, where warranted.

Municipal Operations and Maintenance 2021 Planned Activities

This program does not yet exist in Mukilteo. In 2021, the City will engage a consultant to estimate program costs, secure funding in the 2022 budget, and begin development of the required Ordinance.

Permit Condition S7 – Total Maximum Daily Load (TMDL)

There are no water bodies in the City of Mukilteo with a TMDL designation. Therefore, no activities are planned under this element.

Permit Condition S8 – Monitoring and Assessment

Overview

The goals of monitoring and assessment under the Permit are to: 1) study small streams and marine nearshore areas to track long term trends in water quality and 2) study the effectiveness of the elements required under the SWMP.

Section 8 of the Permit covers Status and Trends Monitoring, Effectiveness Studies, and Source Identification and Diagnostic Monitoring (SIDM). In the first two categories, the City was given the option to either 1) conduct its own qualifying Status and Trends Monitoring and/or Effectiveness Studies, or 2) opt in to a regional collective fund. This fund is used to complete

studies of regional significance. In the case of the SIDM, the City is required to pay into a collective fund.

The Stormwater Work Group (SWG), a subgroup of the Puget Sound Ecosystem Monitoring Program identifies objectives for stormwater monitoring. Working with regional input from several municipalities and the general public, the SWG develops an approach to provide information about stormwater impacts and the effectiveness of stormwater management actions. The SWG makes recommendations to Ecology for directed studies and shares the results with Permittees. For more information, see the SWG webpage at: <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Stormwater-monitoring/Stormwater-Action-Monitoring>

Opt-In Decisions

The City of Mukilteo will make annual payments into the collective fund for both Regional Status and Trends Monitoring and SWMP Effectiveness and SIDM Studies. No additional stormwater monitoring is expected in 2021.

This draft SWMP Plan will be available for comment through February 1, 2021. The final document is required by March 31, 2021, and will be available on the City's website at <https://mukilteowa.gov/departments/public-works/surface-water/stewardship/npdes/>.


Appendix A – Internal Coordination



Date: July 16, 2020

To: Dave Osaki, Community Development Director
Michelle Meyers, Finance Director
Jeff Price, Recreation & Cultural Services Director
Choel Kang, Police Chief
Chris Alexander, Fire Chief

Cc: Mayor Gregerson
Steve Powers, City Administrator

From: Andrea Swisstack, Director, Public Works 

RE: NPDES Internal Coordination

NPDES Internal Coordination

Internal Coordination Requirement

The City has coverage under the National Permit Discharge Elimination System (NPDES) Phase II Permit ("Permit"). The Permit requires that the City implement many programs, spanning nearly every City department to one degree or another.

Under Section S5.A.5.b of the Permit, the City is required to have a written description of internal coordination mechanisms to eliminate barriers to compliance with the terms of the Permit. The written description is required to be included in the City's Annual Report beginning March 31, 2021, and to be included in the Annual Stormwater Management Program Plan.

Internal Coordination Goals

- Assure that current programs, practices, and policies meet Permit requirements.
- Inform development of the annual Stormwater Management Program Plan, required under Section S4.A of the Permit.
- Assure that processes are in place to capture, compile, and report on required information for the Annual Report.
- Make NPDES requirements known and understood City-wide.
- Share relevant documents related to NPDES Permit requirements across City departments.
- Implement and track required training programs.
- Other tasks that arise in relation Permit compliance.
- Report out to the Executive Office and Council, as appropriate.



Several tasks in the NPDES Permit require cross-departmental coordination to achieve Permit compliance. The City intends to leverage already existing meetings for Internal Coordination opportunities on Permit compliance topics, where more than one department may be affected. These standing meetings are not specific to NPDES Permit requirements, but can have Permit related topics as meeting items. In some cases, program development on specific topics may require a special interdisciplinary team. These teams are convened as necessary, in an ad hoc manner. The coordination meetings can be a place where ad hoc team members are identified.

Standing meetings, attendees, and frequencies for Internal Coordination opportunities are listed below.

Cabinet Meetings - Weekly

Executive Department (Mayor or City Administrator)
Fire Chief
Police Chief
City Department Directors

Planning Engineering Fire (PEF) Meeting - Weekly

Fire Marshal
Assistant City Engineer
Senior Engineering Technician
Surface Water Programs Manager
Surface Water Technician
Planning Manager
Senior Planner
Associate Planners
Assistant Planner
Permit Center staff

Stormwater Meeting - Monthly

Public Works Director
Public Works Superintendent
Surface Water Programs Manager

GIS-Storm-Operations Meeting - Quarterly

Public Works Superintendent
Surface Water Programs Manager
Planning Manager
Storm Maintenance Lead
GIS Coordinator
GIS Technician



Public Works Department Meeting - Quarterly

City Engineer

Superintendent

All Engineering Staff

All Operations Staff