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Prepared in fulfillment of NPDES Permit requirements

By

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## **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 EPA designated an NPDES Phase II Permit (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 first Permit was issued by Ecology in 2007. The City of Mukilteo has held a Permit since 2007. The current Permit covers the period from August 1, 2013 to July 31, 2018, with an extension to July 31, 2019. A new Permit is expected to be issued July 1, 2019, and will cover the period August 1, 2019 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 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**

The Permit requires that all Permittees prepare a Stormwater Management Program (SWMP) Plan. The purpose of the SWMP Plan is to outline the City's planned annual activities as they relate to Permit compliance. The City prepares and posts the draft SWMP Plan with the intent of soliciting public feedback related to those planned activities. The most current SWMP Plans are posted on the City's website.

As is required, the City submits an Annual Report on Permit-related requirements to the Washington State Department of Ecology by March 31st of each year. The Annual Report is available online, or you can request a copy by calling (425) 263-8083.

### **2013-2019 NPDES Permit Coverage and Planned Activities**

This SWMP Plan covers the period January 1, 2019 through December 31, 2019. For 2019, the City will be covered by two different permit cycles. The current Permit (2013 Permit) covers activities through July 31, 2019. The anticipated new Permit (2019 Permit) covers activities from

August 1, 2019 through December 31, 2019. Department of Ecology issued the draft 2019 Permit and the City reviewed in 2018. The City is prepared to meet the requirements for 2019 found in the draft 2019 Permit. However, the City will not know the final 2019 Permit requirements until it is released. Ecology anticipates releasing the final 2019 Permit in July.

Because the draft 2019 Permit did not have any new requirements proposed for 2019, the City anticipates that by meeting the requirements under the 2013 Permit, we will be in compliance with the final 2019 Permit. Therefore, this SWMP Plan follows the organization of Section 5.C of the 2013 NPDES Permit.

S.5.C.1 - Public Education and Outreach

S.5.C.2 - Public Involvement and Participation

S.5.C.3 - Illicit Discharge Detection and Elimination

S.5.C.4 - Control Runoff from New Development, Redevelopment and Construction Sites

S.5.C.5 - Municipal Operations and Maintenance

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

## **2019-2024 NPDES Permit Coverage and Planned Activities**

On August 1, 2019, it is expected that the 2019 Permit will become effective. The draft 2019 Permit did not propose any new activities or deadlines for the calendar year 2019. However, the permit structure is proposed to change in 2019; adding three new categories of compliance. The draft 2019 Permit allows for ramp-up time to implement these new areas of compliance. The proposed organization of Section 5.C is as follows:

S5.C.1 - Comprehensive Planning for Stormwater Management

S5.C.2 - Public Education and Outreach

S5.C.3 - Public Involvement and Participation

S5.C.4 - Municipal Separate Storm Sewer System Mapping and Documentation

S5.C.5 - Illicit Discharge Detection and Elimination

S5.C.6 - Controlling Runoff from New Development, Redevelopment, and Construction Sites

S5.C.7 - Municipal Operations and Maintenance

S5.C.8 - Source Control Program for Existing Development

As it relates to any new requirements, in 2019, the City will be assessing capacity to meet the new requirements in coming years, and developing plans to meet the required deadlines.

The City's *Comprehensive Surface Water Management Plan*, updated in 2015, is a more comprehensive plan, providing goals for the surface water utility on a broader range of topics, through 2021. The full plan can be found here: <http://mukilteowa.gov/departments/public-works/surface-water/programs-and-planning>. The City will review this long range plan for consistency with the 2019 Permit requirements and adjust accordingly.

## **Permit Element S5.C.1 - Public Education and Outreach**

### **Overview**

The goal of the education and outreach program is to build general awareness related to the impacts from polluted stormwater; and to effect individual behavior change related to specific practices that contribute pollution to our streams and the Puget Sound.

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. The City is involved in education programs locally and regionally, leveraging other successful outreach campaigns. The City tailors existing programs to fit the needs of our residents and stormwater needs. Examples of continuing partnerships include: Snohomish County Health Department, Snohomish County, Snohomish Conservation District, ECOSS, and neighboring municipalities.

### **Education and Outreach 2019 Planned Activities**

To meet the requirement to build general awareness of the general public and businesses in 2019, the City will provide these educational opportunities:

#### **General Awareness**

##### Stormwater Branding

The City plans to roll out a unique stormwater branding logo and graphic. This will be used as the umbrella for future stormwater messaging. In 2019, The City will be creating vehicle wraps using this branding logo for some of its equipment, such as the vector truck and the sweeper. This campaign will further be used to create educational brochures to convey best practices related to many stormwater pollutants.

##### Youth stormwater and water quality awareness

The City will continue its partnership with the Snohomish Conservation District, through the District's 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".

##### Storm Drain Marking and Adopt-a-Drain Program

In 2017, the City launched an outreach/public participation program with community residents to encourage "Only Rain Down the Drain". This program provides "at home" solutions to prevent water quality degradation and provides the opportunity for volunteers to place "Dump No Waste" markers around storm drains in the City. The City will continue providing drain marking kits and opportunities for interested volunteers.

### Bluff and vegetation management

The City of Mukilteo has many steep slope areas, where uncontrolled stormwater runoff has the potential to exacerbate slide potential. Education on bluff management is a unique focus for the City. In 2019, the City will continue to:

- Participate in the Landslide Working Group to help educate homeowners on bluff and vegetation management.
- Continue partnership with BNSF, WSDOT, Sound Transit and the City of Everett, through the Landslide Hazard Working Group, to explore alternatives to managing stormwater on steep bluffs.
- Host an open house at City Hall to bluff side property owners, in partnership with the Landslide Hazard Working Group.

### Ongoing messaging for pet waste management and disposal

The City will continue with messaging about pet waste management through informational brochures at the City's dog park and other key locations. The Stormwater Utility will be providing mutt mitts with stormwater messaging at City parks and other mutt mitt locations.

### Ongoing messaging to eliminate car wash wastewater from entering the MS4

Provide outreach and education for car washing through the City's website.

## **Behavior Change**

### Natural Yard Care

The City and Snohomish County have been working together since 2013 to provide a Natural Yard Care training to Mukilteo residents. It is anticipated that a final training will be offered to Mukilteo residents in 2019. While the training is open to all residents, the City plans to directly mail invitations to approximately half of its Single Family Residential homes in the City. Targeted invitations have proven to increase turnout. This program is a continuation of Permit requirement to S5.C.1.c to evaluate one targeted behavior for one target audience in at least one subject. The results from that evaluation are being used to adjust the program and direct resources most effectively. The County intends to evaluate the new project components, either late 2019 or early 2020.

### Business Awareness and Outreach

The City anticipates continuing its partnership with ECOSS, a non-profit organization, who provides outreach to businesses and helps them develop a spill response plan. It is anticipated that ECOSS will reach out to an additional 20 businesses in 2019. Each business participating in the program will receive a no-cost spill kit.

### Private stormwater system and BMP maintenance

Continue working with private property homeowners and Homeowner's Associations to educate them on private stormwater BMPs on an individual basis, as requests arise.

## **Other General Activities**

- Update the City's Stormwater webpage, to reflect current programs and actions.
- Support future activities in regional campaigns.
- Use regional messaging on stormwater related outreach materials and participate in programs, as appropriate, and as it resonates with Mukilteo's residents.
- Build general awareness of engineers, contractors, developers, and land use planners. The City will continue to:
  - Promote trainings for Low Impact Development offered by Department of Ecology and other resources.
  - Provide information to contractors, developers, and engineers on the technical standards for stormwater site and erosion control plans.
  - Provide ongoing resources to developers on new Low Impact Development requirements.

## **Permit Element S5.C.2 - Public Involvement and Participation**

### **Overview**

The City's goal for public involvement and participation is to actively engage all willing residents, business owners, property owners, and contractors, through advisory councils, public hearings, watershed committees, participation in developing rate structures, and other similar activities.

### **Public Involvement and Participation 2019 Planned Activities**

#### **SWMP Update**

Public involvement is actively sought in the development of the SWMP Plan. Citizens may review and comment on the SWMP by visiting the City of Mukilteo's website at <http://mukilteowa.gov/departments/public-works/surface-water/stewardship/npdes/>.

#### **Stormwater Branding**

The City will continue its development of a stormwater brand (see General Awareness Section of Education and Outreach), by gathering input on branding concepts through online surveys and implementing the branding through City documents and stormwater outreach materials.

#### **Annual Utility Update to Council**

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



### 2019 NPDES Permit Issuance

The City will be evaluating the capacity and budgetary impacts of the 2019 NPDES Permit requirements, when it is issued in July 2019. The City does not anticipate there will be any impacts that will affect the utility in 2019. However, if future needs are identified through the evaluation, the City will outline a process for public involvement to determine best steps to meet those needs.

## **Permit Element S5.C.3 - 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 municipal stormwater system. This goal is achieved through inspections, education, regulations, and enforcement.

One of the largest threats to the City's freshwater is illicit discharge from both small and large sources. IDDE is an essential program to protect the water quality of our streams, and Puget Sound.

### **Illicit Discharge Detection and Elimination 2019 Planned Activities**

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

- 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.
- Field staff will continue to verify the mapped drainage system, including known discharge points.
- Continue to update mapping of the stormwater infrastructure, (especially stormwater flow control and water quality facilities) including field verifications of infrastructure. This will be an ongoing effort, but the City expects to have all known private facilities mapped by the end of 2019.
- The City's drainage inventory is available online. <https://mukilteowa.gov/maps/>

#### Continue to implement ongoing program to detect and identify non-stormwater discharges.

The City will continue to follow the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*.

Other program elements include:

- Maintain City's Spill Hotline: (425)263-8088
- Continue to implement the City's internal training program
- Continue to screen its MS4 as part of the annual catch basin and facility inspections.

## **Permit Element S5.C.4 - Control Runoff from New Development, Redevelopment and Construction Sites**

### **Overview**

Section 5C.4 of the Permit requires that Mukilteo develop, implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. Among other items addressed below, the Permit intends to make low impact development (LID) the preferred and commonly-used approach to site development.

Controlling runoff from developed properties is necessary to reduce peak flow flooding, pollutant loading, and other negative freshwater impacts. By implementing Best Management Practices (BMPs), developed properties can reduce their impact on water quality, and help protect the City's watersheds, including Puget Sound. Ongoing maintenance of permanent stormwater facilities is critical in meeting this goal. To this end, stormwater facilities permitted since July 29, 2009 require proof of ongoing maintenance.

### **Control Runoff from New Development 2019 Planned Activities**

- Continue to apply MMC 13.12.160 that addresses runoff from new development, redevelopment, and construction site projects. The City requires development projects to meet the Minimum Requirements, thresholds, and definitions of the Permit. This is met by administering the *2014 Stormwater Management Manual for Western Washington* for all permitted new development and redevelopment projects.
- MMC 13.12.160 will be applied as the legal authority to inspect and enforce maintenance standards.
- 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. This training may take many forms, one of which may be Certified Sediment and Erosion Control Lead training.
- The City will continue to apply Department of Ecology's maintenance standards in Chapter 4 of Volume V of the *Stormwater Management Manual for Western Washington*.
- Continue annual facility and BMP inspections for stormwater treatment and flow control BMPs/facilities permitted prior to July 29, 2009 (the date the City began permitting projects in accordance with the 2007-2012 Ecology Permit).

## **Permit Element S5.C.5 - Municipal Operations and Maintenance**

### **Overview**

The City's goal is to ensure that all of the municipally owned stormwater flow control and water quality facilities are functioning properly, and to prevent or reduce pollutant runoff to the maximum extent practicable during the course of City activities.

Pollution prevention and good housekeeping are the simplest and least costly methods to help protect stormwater quality from municipal facilities and City staff practices.

## **Municipal Operations and Maintenance 2019 Planned Activities**

### Facility Inspections

- The City follows the maintenance standards of Chapter 4.6 of Volume V of the *2014 Stormwater Management Manual for Western Washington*, and the *Western Washington Low Impact Development Operation and Maintenance Guidance Document*.
- The City Public Works facility operates according Surface Water Pollution Prevention Plan (SWPPP) to minimize impacts to surface water from the facility. Operations staff inspect the facility quarterly, in accordance with the SWPPP.
- Inspect all municipally owned or operated stormwater facilities. The City has approximately 145 stormwater treatment and flow-control facilities. The City operations staff will inspect each of these in 2019 to identify maintenance needs. In 2019, the inspection process will be paperless.
- Stormwater public works staff routinely perform spot checks of potentially damaged permanent treatment and flow-control facilities, other than catch basins, after major storm events.
- Staff will follow their practices, policies and procedures to reduce stormwater impacts associated with runoff from all municipal lands and associated with municipal operations.
- City staff training will be updated as needed, according to the City's Training Program.

## **Permit Element 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 Element S8.A - Monitoring and Assessment**

### **Overview**

The goals of monitoring and assessment under the Permit are to: 1) study recommended BMPs to determine their effectiveness after implementation and through time; 2) monitor freshwaters to determine whether the region is achieving its goal of clean water; and 3) to track and record efforts in stopping pollution sources.

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 conduct its own qualifying Status and Trends Monitoring and/or Effectiveness Studies OR 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 (renamed Stormwater Action Monitoring) 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/About-us/Our-role-in-the-community/Partnerships-committees/Stormwater-Work-Group>

### **Opt In Decisions**

For this Permit term, The City of Mukilteo opted to contribute to the Regional fund for the Status and Trends Monitoring and Effectiveness Studies for the Permit term. The City will also contribute to the SIDM for the Permit term. No additional stormwater monitoring is expected in 2019.

This draft SWMP Plan is available for comment through March 15, 2019. The final document is required by March 31, 2019.