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1 INTRODUCTION

1.1 PURPOSE

This document was prepared to meet the City of Everett’s (City) requirement for development of a Stormwater Management Program, or SWMP as required under condition S5 of the Western Washington Phase II Municipal Stormwater Permit (Permit). This SWMP outlines all requirements of the Permit and a summary of the City’s work program between January 1, 2019 and December 31, 2019 to maintain compliance with conditions in the Permit.

The year 2019, is split between two Permits. The modified August 1, 2013 to July 21, 2019 Permit and the newly issued Permit which became effective August 1, 2019 to July 31, 2024.

Since the SWMP Plan is written to inform the public of planned SWMP activities for each program component for the upcoming year, this SWMP Plan and format is based on the 2019-2024 Permit, reporting year 2019.

1.2 OVERVIEW AND BACKGROUND

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect water quality and restore waters for “fishable, swimmable” uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology). The NPDES permit also implements relevant provisions of Washington State’s Water Pollution Control Law.

Municipalities with a population of more than 100,000 (based on the 1990 census) have been designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit as operators of large municipal separate storm sewer systems (MS4s). Municipalities with populations of less than 100,000 (based on the 1990 census) have been designated as Phase II communities and must comply with Ecology’s Western Washington Phase II NPDES Municipal Stormwater Permit as operators of small and medium MS4s. More than 80 small and medium cities, including the City of Everett and urban portions of 5 counties in western Washington, must comply with the Phase II Permit.

The Permit authorizes the discharge of stormwater runoff from municipal drainage systems into the state’s surface waters (e.g., streams, rivers, lakes, wetlands) and groundwater as long as municipalities
implement Permit-specified components intended to meet state AKART (all known, available, and reasonable methods of prevention, control, and treatment) and protect water quality.

The SWMP is based on 2019-2024 Permit requirements. This SWMP Plan describes the Permit requirements, continuing and current programs and activities; and Planned activities to maintain compliance and implement new activities in 2020. The content of this SWMP is based on the following mandatory components and provided in the following SWMP report sections:

Section 2. S5.C.1. Stormwater Planning
Section 3. S5.C.2. Public Education and Outreach
Section 4. S5.C.3. Public Involvement and Participation
Section 5. S5.C.4. MS4 Mapping Documentation
Section 6. S5.C.5. Illicit Discharge Detection and Elimination
Section 8. S5.C.7. Operations and Maintenance
Section 9. S5.C.8. Source Control Program for Existing Development
Section 10. S7. Compliance with Total Maximum Daily Load Requirements (TMDL)
Section 11. S8. Monitoring and Assessment
Section 12. S9. Reporting Requirements

1.3 PERMIT HISTORY

Ecology issued Washington’s first Phase II Municipal Stormwater Permit to Western Washington municipalities in 2007 (January 17, 2007 to February 15, 2012 permit term). Ecology issued it as one general permit with the general permit conditions applicable to all Phase II municipalities in Western Washington, including Everett. The Phase II Permit was appealed by several parties and the permit was modified June 17, 2009, in response to the state Pollution Control Hearings Board appeal rulings.

In August 2012, Ecology extended the first Permit to July 31, 2013, issued a new 5-year Permit (2013–2018) effective August 1, 2013, and also issued a new 2012 Ecology Stormwater Management Manual for Western Washington (SWMMWW), which contained stormwater requirements for new development, redevelopment, and construction sites. The 2013–2018 Permit retains the first Permit’s SWMP structure and phased implementation approach. It continues and builds upon the first Permit’s Program requirements by increasing certain Permit requirements and adding new ones. The Phase II Permit was appealed by several parties, and Ecology modified the Permit and 2012 SWMMWW in response to the state Pollution Control Hearing Board appeal rulings. Ecology issued the modified Permit and an amended version of the 2012 Stormwater Management Manual for Western Washington (2014

A new Western Washington Phase II Municipal Stormwater 5 year Permit was issued in 2019 and became effective August 1, 2019 through July 31, 2024. A new Ecology Stormwater Management Manual for Western Washington was also made available in August 2019. Both are available at Ecology’s Web site at: https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater

Ecology coordinated the requirements of the Phase II Permits with requirements of the Phase I Permit as appropriate in the new 2019-2024 Permit. In addition, Ecology established expectations for regional coordination in monitoring efforts and in requirements for watershed-based stormwater planning. In addition, the New Permit separates the mapping section from the IDDE section, creating a new section. The Source Control Program requirement was added to the New Permit as well. Also, the private stormwater treatment and flow control BMP/facilities annual inspection program elements was moved from the New Development, Re-development and Construction Section to the Operations and Maintenance Section.

1.4 2019-2024 PERMIT IMPLEMENTATION TIMELINE
The new Permit requirements are phased in over the course of the 5-year Permit-term. The Permit requirements along with key compliance dates are described in Table 1-1 below.

1.5 PERMIT REPORTING
The Permit requires submittal to Ecology of an Annual Report by March 31 of each year of the Permit term. The NPDES Annual Report consists of the following documents.

**SWMP Plan**, which is developed by the City and summarizes the continuing and planned City-wide Permit implementation activities to assure continued permit compliance for the coming year.

**Annual Compliance Report**, which is a specific “fill in the blanks” document provided by Ecology and provides the City’s Permit compliance activities for the preceding calendar year. The Annual Compliance Report is prescriptive and is completed administratively by staff.

Specific reporting requirements as contained in the Permit are summarized in the following sections. Each department is responsible for carrying out the required permit conditions and developing and maintaining documentation.
1.6 DEPARTMENTAL RESPONSIBILITIES AND COORDINATION

The Permit broadly applies to many city activities, including maintenance and operations of City facilities, permitting and inspections of new development and redevelopment, and other activities conducted in different City departments. Affected City departments include:

- Public Works
- Planning
- Parks
- Facilities
- Everett Transit
- Everett Fire and Police

Compliance with the Permit requires coordination and documentation activities in several City departments. Public Works coordinates with City departments to verify that all Permit requirements are being implemented and Annual Compliance Reports are submitted on schedule. Further refinement of these tasks will be conducted during each budget year in accordance with the specific Permit conditions.
Table 1-1. WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER NPDES PERMIT OVERVIEW 2019-2024

<table>
<thead>
<tr>
<th>SS Permit Components</th>
<th>Ongoing Program Implementation</th>
<th>2019</th>
<th>2020</th>
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<tr>
<td><strong>A. Stormwater Management Plan</strong></td>
<td><strong>Annually</strong></td>
<td><strong>update &amp; submit the SWMP with Annual Report (S9)</strong></td>
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<td>- A.3.a. $ tracking: track the cost (or estimate) of development and implementation of each component of the SWMP</td>
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<td>- A.3.b. activity tracking: track # of inspections, follow up actions, official enforcement, public ed activities</td>
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<td><strong>A.5. Coordination</strong></td>
<td><strong>Ongoing</strong></td>
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<td>C.1 Stormwater Planning</td>
<td><strong>Annually</strong></td>
<td><strong>assess and report LID code-related requirements.</strong></td>
<td><strong>By Aug. 1:</strong> Convene Interdisciplinary team to lead SW Planning program.</td>
<td><strong>By March 31:</strong> Submit description of internal coordination mechanisms</td>
<td><strong>By March 31:</strong> Submit watershed inventory.</td>
<td><strong>By June 30:</strong> Document the prioritized and ranked list of receiving water basins.</td>
<td><strong>By Jan. 1:</strong> Submit report of responses to SW Planning AR questions for coordination of long range plans during this permit term</td>
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<td>By March 31: Respond to series of Annual Report (AR) questions describing SW Planning during 13-19 permit</td>
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<td>By March 31: Develop Stormwater Management Action Plan (SMAP) for at least 1 high priority area.</td>
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<td><strong>C.2. Public Education and Outreach</strong></td>
<td><strong>Ongoing</strong></td>
<td><strong>implementation of ed &amp; outreach</strong></td>
<td><strong>By July 1:</strong> Conduct new evaluation of</td>
<td><strong>By Feb 1:</strong> Follow community-based social marketing</td>
<td><strong>By March 31:</strong> Evaluate &amp; report on</td>
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<td>S5 Permit Components</td>
<td>Ongoing Program Implementation</td>
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<td>Implement Strategy developed</td>
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<td>C.3 Public Involvement and Participation</td>
<td>Ongoing</td>
<td>Create opportunities for public, including overburdened communities, to participate in SWMP and SMAP - Post to website SWMP and Annual Report by May 31 each year</td>
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<td>C.4 MS4 Mapping and Documentation</td>
<td>Ongoing</td>
<td>Maintain mapping data</td>
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<td>By Jan 1: Begin to collect size and material for all known MS4 outfalls</td>
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<td>By Aug 1: mapping data in electronic format with fully described mapping standards</td>
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<td>By Aug 1: Complete mapping all known MS4 connections to privately-owned stormwater systems</td>
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<td>C.5 Illicit Discharge Detection and Elimination</td>
<td>Ongoing</td>
<td>Implement program to prohibit, address, and eliminate illicit discharges.</td>
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<td>By Aug 1: Begin tracking total % of MS4 screened</td>
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<td>By Mar 31: MAY Begin using WQwebIDDE form for annual reporting.</td>
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<td>By Mar 31: Required to use WQwebIDDE form for annual reporting.</td>
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<td>By Mar 31: If using own tracking system for recordkeeping, submit a .xml that follows the data schema.</td>
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<td>S5 Permit Components</td>
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<td><strong>C.6 Controlling Runoff</strong></td>
<td>-Implement &amp; enforce program to reduce pollutants in runoff. -Train staff.</td>
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<td>By June 30: Adopt and make effective program that meets requirements of App. 1 or equivalent PH I program (See permit for other dates).</td>
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<td><strong>C.7 Operations and Maintenance</strong></td>
<td>-Inspect &amp; maintain stormwater facilities and catch basins controlled by &amp; regulated by the Permittee. -Implement practices, policies, and procedures to reduce SW impacts from all permittee lands. -Train staff.</td>
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<td>By June 30: Update maintenance standards By Dec 31: Document practices, policies, and procedures to reduce SW impacts from all permittee lands. By Dec 31: Update SWPPPs for heavy equipment maintenance or storage yards/facilities.</td>
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<td><strong>C.8 Source Control</strong></td>
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<td>By Aug 1: -Adopt &amp; make effective ordinances requiring source control BMPs. -Establish inventory of properties with potential to generate pollutants to Permittee’s MS4.</td>
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<td>By Jan 1: -Implement inspection program -Implement progressive enforcement policy -Train Staff</td>
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<td>S8 Permit Components</td>
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| **S8.A Regional status and trends monitoring** | **By Dec 1:** submit payment to collective fund if payed into during 2013 permit.  
  - Submit written notification of option selected | **By Aug. 15:** If option chosen, make annual payments to collective fund |       |       |       |       |
| **S8.B SWMP Effectiveness and Source ID** | **By Dec 1:** submit payment to collective fund if payed into during 2013 permit.  
  - Submit written notification of option selected | **By Aug. 15:** If option chosen, make annual payments to collective fund |       |       |       |       |
| **S8.C Stormwater discharge monitoring** | **By Feb 1:** If option chosen, submit draft QAPP for review and approval  
  **By Aug 15:** submit final QAPP for approval within 60 days of receiving approval of draft  
  **By Oct 1:** Begin flow monitoring | **By Oct 1:** Fully implement discharge monitoring | **By Mar 31:** Annual report data and analysis in accordance with QAPP. Enter water & solids concentrations data into EIM |       |       |       |
2 STORMWATER PLANNING

2.1 OVERVIEW

The stormwater planning component is new under the 2019-2024 Permit. The City is required to implement a Stormwater Planning Program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

2.2 PERMIT REQUIREMENTS

The Permit (Section S5.C.1) requires the City to provide a stormwater planning program that will:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program by August 1, 2020.

- Include coordination with long-range plan updates. The City is required to 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.

(a) On or before March 31, 2021, the City will 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.

(b) On or before January 1, 2023, the City will submit a report responding to the same questions included in (a), 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.

(c) The City 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. The intent shall be to make LID the preferred and commonly-used approach to site development. The local development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible. Annually, the City 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.

(d) The City 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).

*Receiving Water Assessment.* The City will 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.

By March 31, 2022, The City shall submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas. The watershed inventory shall be submitted as a table with each receiving water name, its total watershed area, the percent of the total watershed area that is in the Permittee’s jurisdiction, and the findings of the stormwater management influence assessment for each basin. Indicate which receiving water will be included in the SS.C.1.d.ii prioritization process. Include a map of the delineated basins with references to the watershed inventory table.

*Receiving Water Prioritization.* Informed by the assessment of receiving water conditions, and other local and regional information, the City shall develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions (different than the existing new and redevelopment requirements). The retrofits and actions shall be designed to: 1) conserve, protect, or restore receiving waters through stormwater and land management strategies that act as water quality management tools, 2) reduce pollutant loading, and 3) address hydrologic impacts from existing development as well as planned for and expected future buildout conditions. No later than June 30, 2022, document the prioritized and ranked list of receiving waters.

No later than March 31, 2023, the City shall develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area.

### 2.3 CURRENT ACTIVITIES

The stormwater planning component is new under the 2019-2024 Permit.

- Annually the City assesses 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.
• The City reviewed and updated the Design and Construction Standards and Specifications (DCSS) which resulted in addressing LID principles.

2.4 PLANNED ACTIVITIES

• By August 2020, the City will convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program.

• The City will begin planning and coordinating responses in 2020 for the future Annual Compliance Report questions describing stormwater planning during the past 2013-2019 Permit.

• City will continue to annually assess whether any administrative or regulatory barriers to implementation of LID principles or LID BMPS were identified.

• The City will continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, as feasible.
3 PUBLIC EDUCATION AND OUTREACH

3.1 OVERVIEW
This section describes Permit requirements related to Public Education and Outreach (E&O), lists the continuing and/or current programs and activities that meet Permit requirements, and identifies the planned activities recommended for continued compliance with the 2019-2024 Permit. The goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The City’s education program is developed locally and regionally with other jurisdictions.

3.2 PERMIT REQUIREMENTS
The Permit (Section S5.C.2) requires the City to implement an E&O 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.

• To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area the Permit.

• Behavior change. To affect behavior change, Permittees shall select, at a minimum, one target audience and one BMP from the Permit.

• 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 select option S5.C.2.a.ii.(c)3, below, may forgo this evaluation if it will not add value to the overall behavior change program.

• Based on the recommendation from S5.C.2.a.ii.(b), 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.

• No later than April 1, 2021, begin to implement the strategy developed in S5.C.2.a.ii.(c).

• No later than March 31, 2024, evaluate and report on 1) The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy; and 2) 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.

- Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations 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.

### 3.3 CURRENT ACTIVITIES

For the City of Everett, general awareness efforts have focused on pet waste, natural yard care, low impact development and informing the public about better choices to reduce their impact on stormwater runoff. The targeted audiences have included school-age children and their families, residents, businesses and homeowners.

Efforts to encourage low impact development as a viable option for Everett homeowners included offering a rain garden rebate program, public rain garden tours, alternatives to lawn natural yard care workshops, and distributing informational utility bill inserts and offering a Green Garden, Green Home e-newsletter.

Mutt Mitt stations are maintained in all city parks and other public places as a consistent reminder to pet owners to pick up after their dog. These stations are maintained by volunteers. Additional pet waste outreach includes targeted educational letters and making pet waste kits available for local vet clinics to distribute to their clients.

Our robust school-age program continues to reach thousands of students in over fifteen Everett schools, educating them about stormwater runoff, watersheds, pollutants and how one’s actions can impact water health.

The City of Everett continues to partner with the Everett AquaSox for stormwater billboard messaging, PA announcements, and radio spots at every home game. Each AquaSox game averages about 3,069 fans. Some of our other regional partners include Washington State University (WSU) Master Gardeners, Snohomish County Beachwatchers, STORM (Stormwater Outreach for Regional Municipalities), Puget Sound Starts Here (PSSH) and Snohomish Conservation District. Having partners working in the local community helps to create a consistent message about stormwater health across the region.

City staff are equipped with education material when issues arise during inspections and general outreach. Annually, commercial businesses in Everett receive a postcard about relevant stormwater codes and reminding them of the requirements when hosting car wash related events on their premises.
The city supplies car wash kits to any business or community group to help ensure that local car wash events are in compliance.

Table 3.1 below lists the target audiences and behaviors currently being addressed by education and outreach programs in the City. The outreach activity, funding source, and implementation schedule are planned annually for the future’s year implementation.

**Table 3-1. 2019 EDUCATION AND OUTREACH PROGRAMS AND ACTIVITIES**

<table>
<thead>
<tr>
<th>Program</th>
<th>Target Audience</th>
<th>Goal/Behavior/Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pet Waste</td>
<td>General Public; Residents</td>
<td>Activity: Mutt Mitt stations, targeted mailers, and outreach to local vet clinics and at dog-centric events. Goal: Multi-pronged approach to promote correct pet waste behavior and demonstrate the importance of picking up pet waste.</td>
</tr>
<tr>
<td>School Outreach (Grade 2 – 8)</td>
<td>General Public (school-age children &amp; their families)</td>
<td>Activity: The City contracts to offer free, classroom education workshops on water conservation, wastewater, and stormwater related curriculum.</td>
</tr>
<tr>
<td>Natural Yard Care</td>
<td>General Public (Homeowners)</td>
<td>Activity: Educational workshops, outdoor demonstrations, garden e-newsletter focused on pesticide free, natural yard care, and water conservation. Behavior: The 2019 program included an evaluation component to access behavior change with an enhanced program format.</td>
</tr>
<tr>
<td>Rain Garden Rebate &amp; Public Tours</td>
<td>General Public (Homeowners)</td>
<td>Goal: For green stormwater infrastructure (GSI) techniques to become commonplace for residents to combat stormwater management issues.</td>
</tr>
<tr>
<td>Car Wash Kits</td>
<td>General Public (fundraising groups and businesses)</td>
<td>Goal: Proper discharge of car wash water into the sanitary sewer system.</td>
</tr>
<tr>
<td>Spill Response hotline and On-line Drainage and Water Quality Complaint Reporting</td>
<td>General Public</td>
<td>Activity: Water quality complaint and spill reporting awareness and illicit discharge reporting.</td>
</tr>
<tr>
<td>Adopt-a Street Program</td>
<td>General Public (Businesses, Residents)</td>
<td>Activity: A city-wide stewardship opportunity to engage local community members and businesses. Goal: Address local impacts to water quality by encouraging community members to clean-up litter.</td>
</tr>
<tr>
<td>Private Storm Inspections</td>
<td>Property Managers, HOA’s and Businesses</td>
<td>Activity: Inspect private stormwater infrastructure and deliver maintenance requirements and fact sheets. Goal: Increase awareness on the stormwater system and reduce the discharge of sediment and pollutants.</td>
</tr>
</tbody>
</table>
### Program: Stormwater Outreach for Regional Municipalities (STORM)
**Target Audience:** General Public  
**Activity:** Coalition of jurisdictions, including Everett, address non-point pollution in the Puget Sound, through the creation of a regional stormwater awareness campaign.

### Program: Public Outreach
**Target Audience:** General Public  
**Activity:** Promote stormwater-related actions, opportunities, and the PSSH brand & principles. Some events include Bark in the Park, Mutt Strut, National Night Out, Everett Home and Garden Show, and local Farmers Markets.

### Program: Storm Drain Markers
**Target Audience:** General Public  
**Goal:** City encourages the public to install storm drain markers in neighborhoods.

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**Measurement**

Annual work programs for public education and outreach activities are developed based on experience and feedback from previous programs. Measurement tools utilized for various programs include: pre and post surveys of program and event participants, total number of inspections, quantification of best management practices made, quantification of activities and volunteers, number and type of materials distributed, and anecdotal information from program participants.

### 3.4 PLANNED ACTIVITIES

City of Everett conducted a Residential Surface Water Quality survey of Everett residents to develop a picture of their understanding of surface water issues, including what contributes to water pollution and their awareness of ways to improve water quality by reducing residential run-off. The key survey findings were that most respondents understood that stormwater runoff travels untreated to local waterways but felt, incorrectly, that the health of Puget Sound and the waters around Everett were excellent or good. Respondents could identify many of the sources of water pollution but the disconnect was that many did not see themselves as contributors to the problem, though they admitted to doing many of the behaviors associated with stormwater runoff.

The opportunity identified by the survey was that most residents expressed a predisposition to act. Based on these findings, the challenge for Everett is to demonstrate that there are water quality issues in our local waterways and tie them to specific actions people can take to reduce pollution in stormwater runoff. Everett will begin to incorporate this message in 2020 programming and outreach that will include pet waste, car washing, low impact development and natural yard care principles.
The fecal coliform bacteria monitoring results in the North and Swamp Creek basins (See Section 10 of this report) show that we still need to tackle issues of pet waste reduction, litter, and improper disposal of waste. The City will shift messaging and outreach to increase awareness about local water quality issues and tie it to specific actions residents can take to effect change in stormwater runoff. This refined focus will inform the creation of a new target audience and behavior change program, required by February 1, 2021.

In 2019, the City of Everett partnered with Snohomish County, Edmonds, Marysville, Monroe, Mukilteo and WSU Extension to offer a natural yard care workshop series with enhanced elements recommended in the North and South Sound Natural Yard Care Education Evaluation Report (2014). To comply with the July 1, 2020 deadline, the completed report on the 2019 enhanced natural yard care workshops will be completed by March 2020. The report findings will also inform the behavior change program model that will be developed to address local water quality issue in the targeted basins as required by the permit.
Table 3-2. PLANNED ACTIVITIES TO MEET PERMIT REQUIREMENTS FOR JULY 1, 2020 AND FEBRUARY 1, 2021

### Behavior Change NPDES requirements

**July 20, 2020**

- **Conduct new evaluation of ongoing behavior change campaign**
  - Implement Enhanced Natural Yard Care series with behavior change evaluation component (Jan - Dec 2019)
  - Evaluate enhanced natural yard care enhanced program (Jan - Dec 2019)
  - Edit Snohomish County Evaluation Report (Dec 2019)
  - Receive completed evaluation report on ongoing behavior change program offered with partnering municipalities in 2019 (March 2020)
  - Meet with county and partnering municipalities to discuss future collaboration (Feb 2020)
  - Make recommended adjustments to future natural yard care programming based on 2019 evaluation, whenever feasible. (Fall 2020)

**February 1, 2021**

- **Develop a strategy/schedule for a new target audience & BMP behavior change program**
  - Use TMDL data to pinpoint areas of need and specific local water quality concerns (March 2020)
  - Use DOH, EPA data maps and other resources to identify overburdened communities & correlate with TDML results (May 2020)
  - Develop a campaign plan using social marketing strategies to reach target audience and chosen BMP (August 2020)
  - Leverage partnerships to create robust behavior change/social marketing program with evaluation component (August 2020)
  - Begin to develop materials and outreach style to fit the need of developed strategies (October 2020)
  - Run small research study on developed materials before finalizing them (Dec 2020)
4 PUBLIC INVOLVEMENT AND PARTICIPATION

4.1 OVERVIEW
The goal of public involvement and participation is to provide ongoing opportunities for public to participate in the decision-making process through advisory councils, watershed committees, participation in developing rate-structures, stewardship programs, environmental activities or other similar activities. The City will comply with applicable State and local public notice requirements when developing the SWMP.

4.2 PERMIT REQUIREMENTS
The Permit (Section S5.C.3) requires the City to:

- Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and updates of the City’s SWMP and Stormwater Management Action Planning. Post to the City website the SWMP and Annual Report no later than May 31st of each year.

4.3 CURRENT ACTIVITIES
The City currently implements activities and programs that meet the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the Permit are implemented. The current compliance activities associated with the above Permit requirements include:

- To meet the Permit requirements for public involvement in development of the SWMP Plan, the City publishes a notice in the local newspaper, on the website, and to the Council of Neighborhoods about the availability of the SWMP Plan for review and comment. The SWMP Plan is made available online or by contacting the City. Additionally, the Surface Water Manager contact information is provided for questions and comments on the program elements. There is no deadline for questions and comments on the program elements.

- The City’s SWMP Plan and Annual Compliance Report are made available on the City Web site.

4.4 PLANNED ACTIVITIES
- The City plans to continue to make its SWMP and other aspects of the Stormwater Program available for comment in 2020.

- Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and updates of the City’s SWMP.
5 MS4 MAPPING

5.1 OVERVIEW
MS4 mapping is a new section in the SWMP. Previously MS4 mapping requirements were located in the Illicit Discharge Detection and Elimination Section of the Permit. MS4 mapping became a new section in the August 2019 to July 2024 Permit. This section describes the Permit requirements related to mapping and documenting the MS4, lists the current permit requirements, and identifies the current and planned activities recommended for continued compliance with the Permit.

5.2 PERMIT REQUIREMENTS
- The SWMP shall include an ongoing mapping program and documenting the MS4 with ongoing minimum performance measures listed in the Permit.
- New mapping includes that 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.

5.3 CURRENT ACTIVITIES
The City mapping process is retained in a Geographical Information System (GIS) that is continually updated, using information from internal workgroups of the Public Works Department (Engineering, Public Services (permitting and inspection), Engineering, Construction Management, Maintenance, etc.) as part of routine work product. The City continues to utilize mapping resources as a means to improve efficiency in the maintenance of stormwater infrastructure via coordination of field inventory, inspection, and maintenance checklists in our computer maintenance management system, which is interconnected with the City’s GIS system.

In 2019:
- The City continues to maintain on-going mapping data related to the MS4. Everett has an online map viewer Map Everett online map viewer | Everett, WA - Official Website also available for use by the public.
• The City continued to collect size and materials for known MS4 outfalls, and will continue to collect this information during the normal course of inspections and maintenance and update records in GIS.

• Continued to update connections between the MS4 owned and operated by the City and other municipalities and public entities.

• Updated mapping in North Everett to create two new drainage basins flowing to MS4 or receiving water relative to the City’s Combined Sewer System Area.

5.4 PLANNED ACTIVITIES

• The City will continue to collect size and material for known MS4 outfalls, and will continue to collect this information during the normal course of inspections and maintenance and update records.

• In 2020 the City plans to select a new asset management system.

• The City will continue towards mapping all known connections from the MS4 to a privately owned stormwater system.
6 ILLEGIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

6.1 OVERVIEW
The Illicit Discharge Detection and Elimination (IDDE) program (Section S5.C.5) refers to the process of detection and removal of illicit connections, discharges as defined in 40 CFR 122.26(b)(2), including any spills not under the purview of another responding authority, into the municipal separate storm sewers owned or operated by the City. The SWMP includes an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

6.2 PERMIT REQUIREMENTS
- Implement a program including procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program includes procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee’s MS4 to the maximum extent allowable under state and federal law.

- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee’s MS4.

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

- Publicly list and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.

- Implement 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.

- Track and maintain records of the activities conducted to meet the requirements of this Section. In the Annual Report, 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.

6.3 CURRENT ACTIVITIES

City Stormwater Ordinance
The City of Everett Code Chapter 14.56 Surface Water System has been in place since 1990. This code provides for pollutant discharge prohibition, correction of conditions, liability determination, maintenance and operation of private systems, and enforcement and penalties, and has a structure for appeals.

IDDE Response and Reporting
The 24-hour reporting hotline (425) 257-8821 or on-line form allows citizens to report spills, water quality concerns, and utility issues. Each reported spill and call is entered and tracked as a Service Request in the computer maintenance management system. Assignment of response is routed by an established list and spill response protocol. First responders are trained and respond 24 hours a day (by call out, if after hours) to investigate each reported event that may affect surface waters. Trained monitoring technicians are also called in as needed to take samples. City response includes investigating and verifying that a spill or discharge occurred, spill or discharge clean-up (if within public right-of-way), notifying private parties, remedying the cause, notifying the affected public, providing education, door hangers, and taking a compliance action, and scheduling additional maintenance or other actions if needed for City-responsible spills. Spills are reported as required to Ecology (through the ERTS process) and other regulatory agencies as applicable. In 2019, the City began utilizing the IDDE reporting data and format provided in Appendix 12 of the Permit to report for each IDDE incident found, reported to, or investigated by the City.

Field Screening Stormwater System
Our current screening program consists of observation during inspections of stormwater facilities on private properties, and inspection of public structures such as catch basins, ditches, and ponds. The City continues to have qualified staff screen for IDDE during inspection of both public and private catch basin and stormwater facilities.

Training
In 2019, the City utilized a variety of methods to train staff on IDDE. An IDDE video, containing information about the Permit, stormwater, and how to recognize and report spills and illicit discharges. The video was provided to all staff and departments that may either take a call from the public or
encounter an issue during their work in the field. In addition, the video was viewed by new hires through the City orientation process.

Staff that provide IDDE services are trained on-the-job, in the classroom, and through follow-up with qualified employees. Safety is the City’s primary concern and safety training is frequent. When new procedures or materials becomes available, it is provided to appropriate personnel (including temporary workers) during crew training, and integrated into the inspection program as a tool.

Table 6-1 below provides a summary of IDDE related activities that occurred in 2019 within the City.

Table 6-1. CURRENT IDDE ACTIVITIES IN 2019

<table>
<thead>
<tr>
<th>Item</th>
<th>Involvement (Department/Public)</th>
<th>Status and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>The City has established procedures for responding to spills. Staff respond to reports from the public and other staff when notified. Investigation of the source and follow-up, including code enforcement is documented.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>The spill reporting hotline number (425) 257-8821 is available on the City website at Surface &amp; Stormwater</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>Everett, WA - Official Website</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tracking of illicit discharge investigations and spill response actions completed in 2019. Inspection dates, follow-up visits, water quality complaints and concerns, and related activities are documented within the City’s Service Requests (SR) system and utilizing a new spreadsheet per Appendix 12 and WQWebIDDE Format.</td>
<td>Public Works</td>
<td>55 spills and water quality complaints responded to in 2019</td>
</tr>
<tr>
<td>Field screening annually the City’s MS4 and 40% of the MS4 per the Permit Cycle.</td>
<td>Public Works</td>
<td>34% screened in 2019</td>
</tr>
<tr>
<td>An IDDE awareness training video was provided using a City on-line training tool in 2019 to all staff. The IDDE video contains information about the permit, and how to recognize and report spills and illicit discharges. The video is also shown as part of the City orientation program to all new staff.</td>
<td>Public Works Everett Fire Police</td>
<td>1,922 Staff (including seasonal and temporary)</td>
</tr>
<tr>
<td>Facilities Parks Everett Transit New Staff</td>
<td></td>
<td>2019</td>
</tr>
<tr>
<td>City staff who come into contact with IDDE as part of their normal job responsibilities received training on identification, responding, and reporting.</td>
<td>Public Works Everett Fire Police</td>
<td>On-going</td>
</tr>
<tr>
<td>The City informs public employees, property owners, and general public of hazards associated with illicit discharges and improper disposal of waste through public education information, private stormwater inspections, municipal stormwater inspections, and staff training.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
</tbody>
</table>
6.4 PLANNED ACTIVITIES

Everett currently conducts many activities to detect and eliminate illicit discharges. The major work items for continued compliance include the following:

- In 2020, staff will begin updating the City’s Stormwater Ordinance to effectively prohibit non-stormwater discharges, update compliance, and address future source control program.
- Continue to track the number of illicit discharges, illicit connections, including spills reported in 2020.
- Continue to review and refine education programs on the hazards of illicit discharges, and on reducing pollutants in permitted non-stormwater discharges.
- Continue to verify that staff involved in illicit discharge detection and elimination program have adequate training.
- Continue to implement training program for field staff to recognize and report IDDE.
- Continue to field screen for an average of 12% of the MS4 each year and annually track total percentage of the MS4 screened beginning with the new Permit.
7 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

7.1 OVERVIEW
This section describes the Permit requirements for Controlling Runoff from New Development, Redevelopment, and Construction sites to reduce pollutants in stormwater runoff to a regulated MS4.

7.2 PERMIT REQUIREMENTS
The Permit requires that Everett develop, implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. This program (Section S5.C.6) must include:

- 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 Permit requirements of S5.C.6.b(i) through (iii), and shall apply to all applications submitted.

- The program is to include a permitting process with site plan review, inspection and enforcement capability for both private and public projects, using qualified personnel. At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted.

- The program is to review all stormwater site plans for proposed development activities.

- Inspect, prior to clearing, during construction, and upon construction the proper installation, maintenance, and best management practices.

- 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.

- 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.

7.3 CURRENT ACTIVITIES

The City implements a program to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction site activities. The City enforces this program through the City code. The City will continue to perform the items listed in Table 7-1. In 2019 the City began the process to update City code to reflect the most current version of the 2019 Stormwater Management Manual for Western Washington (SWMMWW). This Manual became effective January 1, 2020. In addition, the City’s Design and Construction Standards were updated in 2019. Also in 2019 a Small Project Stormwater Site Plan and report was created to provide a simplified template to assist small projects in meeting the City of Everett’s stormwater requirements in accordance with the 2019 SWMMWW. Other activities in 2019 included the creation of a more formal process of requiring all development projects which construct stormwater facilities to record a Declaration of Covenant for inspection and maintenance.

Table 7-1. CURRENT ACTIVITIES IN 2019 FOR CONTROLLING RUNOFF FROM NEW DEVELOPMENT, RE-DEVELOPMENT, AND CONSTRUCTION SITES

<table>
<thead>
<tr>
<th>Item</th>
<th>Involvement (Department/Public)</th>
<th>Status and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>City adopts and makes effective a local program, no later than June 30, 2022 that meets Permit requirements. The most current version of the Washington State Department of Ecology Stormwater Management Manual for Western Washington (SWMMWW) is the 2019 Stormwater Management Manual for Western Washington. Additional stormwater requirements established by the City Engineer are generally found in Chapter 4 of the Design and Construction Standards and Specifications (DCSS).</td>
<td>Public Works</td>
<td>January 1, 2020 effective date of the 2019 Ecology SWMMWW (EMC 14.28)</td>
</tr>
<tr>
<td>Implement stormwater plan review, inspection, and escalating enforcement processes and procedures necessary to implement the program in accordance with Permit conditions.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>Record keeping is done through the City permit software (TrakIT) for site plan review and inspections.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>The City inspects before clearing (initial inspection), and during construction (TESC inspection) all known new development, re-development and construction sites.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>The City continues to identify changes in the permit service process to implement new stormwater development requirements. In 2019 this included updating inspection tracking tools, creating a Small Project Stormwater Site Plan,</td>
<td>Public Works</td>
<td>Stormwater Resources updated in 2019</td>
</tr>
<tr>
<td>Item</td>
<td>Involvement (Department/Public)</td>
<td>Status and Timeline</td>
</tr>
<tr>
<td>------</td>
<td>--------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>and Declaration of Covenant.  Stormwater Technical Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resources</td>
<td>Everett, WA - Official Website</td>
<td></td>
</tr>
<tr>
<td>The City inspected all permitted development sites upon completion of construction prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify a maintenance plan is completed and responsibility for maintenance is assigned.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>The City provides a link on its website to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and, a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity. Staff also informs applicants if they need to apply for an Ecology Construction Stormwater General Permit or an Industrial Permit.</td>
<td>Public Works</td>
<td>On-going</td>
</tr>
<tr>
<td>City staff attended training including permitting, plan review, construction site inspections and enforcement. These training opportunities are made available through a variety of venues. All training records are maintained on-site.</td>
<td>Public Works</td>
<td>On-going New Ecology Manual Training for City Staff in 2019</td>
</tr>
</tbody>
</table>

7.4 PLANNED ACTIVITIES

- The City plans to continue the items listed in Table 7-1 in 2020.
- Continue to implement the stormwater code addressing construction, site plan review, permitting, maintenance, inspections, and training.
- Continue to re-fine the Permit tracking system and efficiencies in recordkeeping and program management.
- Provide on-going inspectors training on inspection practices, recordkeeping, and erosion control training.
# 8 OPERATIONS AND MAINTENANCE

## 8.1 OVERVIEW
An operations and maintenance (O&M) program for municipal operations has been developed and implemented that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program primarily affects Public Works (Operations and Maintenance), Facilities, and Parks.

## 8.2 PERMIT REQUIREMENTS
The Permit (Section S5.C.7) requires the City to:

- Implement a municipal operations and maintenance program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards that are as protective as those noted in Volume V of the *Stormwater Management Manual for Western Washington*, no later than June 30, 2022.
- Perform annual inspection of municipally owned and operated stormwater treatment and flow control BMPs/facilities.
- Inspect catch basins owned and operated by the City every two years or use an alternative frequency.
- Conduct annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the City since 2007.
- Conduct spot checks and inspections, as necessary of stormwater facilities after major storms as per S5.C.7.cii.
- Establish and implement practices, policies, and procedures to reduce pollutants in runoff from all lands owned or maintained by the City. No later than December 31, 2022, document the practices, policies, and procedures for all activities addressed in the Permit.
- Provide training to assist staff in implementing practices and policies to reduce pollutants in runoff from maintenance operations.
- Implement and maintain a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage yards, and material storage facilities owned or operated by the City. As, necessary update SWPPPs no later than December 31, 2022.

## 8.3 CURRENT ACTIVITIES
The City currently implements activities and programs that meet the Permit requirements. The City will continue to implement these programs and activities as new and/or increased requirements in the
Permit are implemented. The current compliance activities associated with the above Permit requirements are in Table 8-1 below.

**Table 8-1. 2019 OPERATIONS AND MAINTENANCE ACTIVITIES**

<table>
<thead>
<tr>
<th>Item</th>
<th>Involvement (Department/Public)</th>
<th>Status and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>The City has had a longstanding program to maintain public stormwater facilities. The Standard Operating Procedures (SOPs) for stormwater facility maintenance are required to be as protective as Chapter 4 of Volume V of the <em>Stormwater Management Manual for Western Washington</em>.</td>
<td>Public Works Parks Facilities</td>
<td>On-going</td>
</tr>
<tr>
<td>To meet the Permit requirements, the inspection program annually inspected and maintained municipally owned or operated stormwater treatment and flow control BMP/facilities in 2019.</td>
<td>Public Works Parks</td>
<td>440 in 2019 On-going</td>
</tr>
<tr>
<td>Annual inspections of all private stormwater treatment and flow control BMPs/facilities that discharge to the MS4 that were permitted by the City since 2007 (Private Stormwater Inspection Program).</td>
<td>Public Works</td>
<td>376 Sites inspected in 2019 On-going</td>
</tr>
<tr>
<td>City stormwater maintenance program includes catch basin inspections and maintenance. Documentation of maintenance activities is done through the work order management system.</td>
<td>Public Works Parks Facilities</td>
<td>2,936 inspected in 2019 On-going</td>
</tr>
<tr>
<td>Implemented practices, policies, and procedures (Standard Operating Procedures) for material management and maintenance activities. The SOPs are intended to be living documents that can be updated easily as needed.</td>
<td>Public Works Parks Facilities</td>
<td>On-going, updated annually as needed</td>
</tr>
<tr>
<td>The Parks Maintenance Yards have SWPPPs and the Water Filtration Plant has a SWPPP for its maintenance facility.</td>
<td>Public Works Parks</td>
<td>On-going</td>
</tr>
<tr>
<td>City Conducts spot checks and inspections after majors storms</td>
<td>Public Works Parks</td>
<td>Occurred 9/9/2019 and On-going as storms occur</td>
</tr>
<tr>
<td>City departments conduct regular training for staff in accordance with established SOPs and other requirements of their job descriptions. Training of the field crews and maintenance staff for applicable Public Works and Parks staff using the Regional Road Maintenance track 2, 3, 3F, and 3B to address the importance of protecting water quality, operation and maintenance, selecting BMPs, and ways to perform their job activities to prevent or minimize impacts to water quality have been completed for the field crews.</td>
<td>Public Works Parks Facilities</td>
<td>On-going</td>
</tr>
</tbody>
</table>
8.4 PLANNED ACTIVITIES

- The City plans to continue the items listed in Table 8-1 in 2020.
- Continue to review and revise practices to reduce runoff from maintenance practices associated with municipally owned or operated streets, parking lots, and roads.
- Continue to implement training programs for staff whose work could impact stormwater.
- Continue to update tracking and documentation efficiency methods and procedures associated with inspection and maintenance activities. A new asset management system is being reviewed by the City in 2020, with implementation planned in 2021.
- Continue to annually inspect and maintain municipally owned or operated stormwater treatment and flow control BMPs/facilities according to permit conditions.
- Inspect all catch basins owned and operated by the City every two years.
- Continue to annually inspect private permitted stormwater flow control and treatment BMPs/facilities.
- Review and update SWPPPs as needed during the reporting year.
9 SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

9.1 OVERVIEW
The Source Control Program is a new Permit requirement. The goal of this program is to prevent and reduce pollutants in runoff from areas that discharge to the MS4.

9.2 PERMIT REQUIREMENTS
- The City is required to 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 no later than August 1, 2022.

- 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.

- Annually complete the number of inspections equal to 20% of the businesses and/or sites listed in the City’s source control inventory to assess BMP effectiveness and compliance with source control requirements. Follow-up compliance inspections count toward the 20% inspection rate. The City is required to inspect all sites identified through credible complaints.

- No later than January 1, 2023, the City will implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period per the Permit specifications.

- 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.

- Maintain records of the training provided and the staff trained.

9.3 CURRENT ACTIVITIES
- City has obtained a list of businesses, based on business license and SIC codes specified in the Permit for inspection. A preliminary business list has been generated to determine future staffing needs and approach to creating a source control program.

- Everett participates in the Business Inspection Group (BIG).
9.4 PLANNED ACTIVITIES

- In 2020, staff will begin updating the City’s Stormwater Ordinance to effectively prohibit non-stormwater discharges, update compliance, and address future source control program (not required until January 2023).
10 S7 COMPLIANCE WITH TMDL REQUIREMENTS

10.1 OVERVIEW
This section describes the new Permit requirements related to Total Maximum Daily Load (TMDL) requirements, lists the continuing and/or current programs and activities that meet Permit and TMDL requirements, and identifies the planned activities for continued compliance with the Permit.

10.2 PERMIT REQUIREMENTS
The Permit (Section S7) requires the City to:

- For North Creek, Swamp Creek and Snohomish River Tributaries (Wood Creek) the City shall comply with the Total Maximum Daily Load (TMDL) requirements specified in Appendix 2 and the associated TMDL plans. Records shall be kept of all actions required by the Permit that are relevant to applicable TMDLs within Everett. The status of the implementation shall be included as part of the annual report submitted to Ecology. Each annual report shall include a summary of relevant SWMP and required TMDL activities conducted in the TMDL area to address the applicable TMDL parameter(s).

- For applicable TMDLs not listed in Appendix 2, compliance with the Permit shall constitute compliance with those TMDLs.

- For TMDLs that are approved by EPA after the Permit is issued, Ecology may establish TMDL-related permit requirements through future permit modification if Ecology determines implementation of actions, monitoring or reporting necessary to demonstrate reasonable further progress toward achieving TMDL waste load allocations, and other targets, are not occurring and shall be implemented during the term of this Permit or when this Permit is reissued. The City is encouraged to participate in development of TMDLs and to begin implementation.

- **Business Inspections:** Inspect commercial animal handling areas and commercial composting facilities to ensure implementation of source control BMPs for bacteria. *Commercial animal handling areas* are associated with Standard Industrial Code (SIC) 074 and 075 and include veterinary and pet care/boarding services, animal slaughtering, and support activities for animal production. Facilities where the degradation and transformation of organic solid waste takes place under controlled conditions designed to promote aerobic decomposition are considered *composting facilities* (definition in accordance with Chapter 173-350 WAC). An ongoing inspection program to re-inspect facilities with bacteria source control problems a minimum of every three years.

- **Public Education and Outreach (Swamp Creek):** Conduct public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management behavior.
• **Operations and Maintenance (Swamp Creek only):** Install and maintain animal waste collection and/or education stations at municipal parks and other Permittee owned and operated lands reasonably expected to have substantial domestic animal (dog and horse) use and the potential for pollution of stormwater.

• **Illicit Discharge Detection and Elimination (IDDE) (Swamp Creek only):** When conducting IDDE-related field screening, screen for bacteria sources in any screened MS4 subbasins which discharge to surface waters in the TMDL area.

• **Targeted Source Identification and Elimination:** By January 1, 2021 review the fecal coliform data collected per the approved Quality Assurance Project Plans (QAPPs) under the 2013 Permit. The purpose of this review is to identify a minimum of one high priority area (such as a tributary or a stream segment) that will be the focus of source identification and elimination efforts during calendar years 2021 and 2023. Prepare written documentation of this review and the identified high priority area; documentation shall be submitted with the Annual Report for 2020. Begin to implement source identification and elimination efforts in the MS4 subbasins discharging to the identified high priority area no later than May 1, 2021. Address potential bacteria pollution sources not associated with the MS4. Stormwater quality sampling for bacteria sources is required as part of this focused source identification and elimination effort. Implement the schedules and activities identified in the IDDE section of the Permit in response to any illicit discharge found. Each annual report’s TMDL summary shall include qualitative and quantitative information about the source identification and elimination activities, including procedures followed and sampling results, implemented in the selected high priority area(s).

• **Surface Water Monitoring:** Conduct surface water monitoring for characterization and long term trends evaluation of fecal coliform in accordance with the QAPP approved under the 2013 Permit. If changes to surface water monitoring locations or other updates are needed, the City is to submit a draft revised QAPP to Ecology for review and approval.
   - Collect 12 samples in at least one location per calendar year.
   - Submit available data to the Environmental Information Management (EIM) database by May 31 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.

### 10.3 CURRENT ACTIVITIES

**Business inspections**
The City inspected commercial animal handling areas and commercial composting facilities in 2019 to ensure implementation of source control BMPs for bacteria in Marshland, North Creek and Swamp Creek drainage basins. The City Clerk’s office provided the current list of business licenses within the City of Everett for the year 2019. City staff screened the business license list
for animal production SIC codes 074, 075 (NAICS code 112) and Veterinary services (NAICS code 541940); pet care and boarding services (NAICS code 812910). City staff additionally filtered the business list to businesses meeting the criteria listed above, as well as located in TMDL drainages only (North, Swamp, and Marshland).

There were only 2 businesses in 2019 located in TMDL drainage basins within City of Everett required to be visited (North Creek and Marshland Basin). Both businesses inspected were found to be utilizing source controls BMPS for bacteria.

Public Education and Outreach
Public education and outreach action is required in the Swamp Creek TMDL basin. In 2019, surface water pollution education was provided to Explorer Middle School located within Swamp Creek basin, as part of the Water Connections day program. Additionally, the City has Mutt Mitt stations that directly pinpoint areas through the TMDL program. Signage is also posted at parks and open space to pick up pet waste. In addition to pet waste, the City has an Adopt-a-Street Program which provides cleanup by volunteers. The City also conducts private stormwater inspections and provides education and outreach as needed on source control related items related to bacterial contamination sources.

Operations and Maintenance
The City of Everett Parks and Recreation Department maintains animal waste collection and educational signs at municipal parks and along trails where pet waste is expected. Some of the outreach efforts include volunteer staffing of Mutt Mitt stations around Everett. Staff continues to look for ways to incorporate additional Mutt Mitt stations. There are fifty-four Mutt Mitt stations in Everett city-limits, located in public parks and open space, as well as along the Interurban Trail. Mutt Mitt stations include dog waste bags for the public to use and educational signs encouraging waste pick-up and disposal.

IDDE
See Section 6 in the previous section of the SWMP for a full description of the City IDDE program. The City screens for bacteria sources when conducting catch basin inspections within the MS4 and as part of the private stormwater inspections program.

Targeted Source Identification and Elimination (TSIE)
The Permit requires TSIE evaluations to be performed in the TMDL watersheds. The City implements source identification and elimination efforts in a high priority area in each watershed, such as a tributary or stream segment.

The City employs a tiered approach to bacteria source tracking to investigate fecal bacteria sources. The strategy uses multiple lines of evidence to identify sources utilizing a phased approach which includes developing a work plan and schedule, analyzing data, mapping of potential sources of fecal coliform bacteria, refining protocols, planning and implementing field surveys and outfall screenings, and monitoring. The City has reviewed previously collected fecal coliform data to identify a minimum of one high priority area for source identification and elimination during the last Permit cycle for each TMDL water body. Sites with higher frequencies of exceedances were prioritized for source tracing.
High priority basins within North Creek, Swamp Creek and Wood Creek were a focus of field investigation in 2019 to investigate potential sources of fecal coliform bacteria, illicit discharges, and or areas where additional outreach and education may be needed. In addition, bracket sampling data occurred to determine focused efforts in future TSIE in North and Swamp Creek. In addition to bracketed monitoring approach, the City has been active in screening for bacteria during normal catch basin inspection screening, stormwater facility inspections, and private stormwater inspections.

**Surface Water Monitoring**
The City has sampled fecal coliform since 2007 in North Creek, Swamp Creek, and Wood Creek a tributary to the Snohomish River.

The City conducts surface water monitoring for characterization and long-term trends evaluation of fecal coliform bacteria in accordance with a Quality Assurance Project Plan (QAPP) approved by the Washington State Department of Ecology as part of the Permit. The QAPP describes the objectives of the surface water monitoring and procedures to be followed to achieve those objectives.

In 2019 the QAPP’s for all 3 of the City’s TMDL basins: Snohomish River Tributaries (Wood Creek), North Creek, and Swamp Creek were updated to better follow the format *Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies*, July 2004, Ecology Publication No. 04-03-030). In addition, the goals of the QAPPs were updated to clearly describe surface water monitoring requirements for the TMDL per Special Condition S7 and Appendix 2 of the Permit, and to reflect the revised water quality standards for fecal coliform bacteria and E. coli.

*New Primary Contact Recreation Bacteria Criteria*
On January 23, 2019, Ecology adopted amendments to Chapter 173-201A WAC, Water Quality Standards for Surface Waters of the State of Washington. This rulemaking adopted updated fresh and marine water quality standards for the protection of water contact recreational uses in state waters. Table 10-1 below lists the bacteria criteria to protect water contact recreation in freshwaters. These criteria are based on *Escherichia coli* (*E. coli*) and fecal coliform organism levels, and expressed as colony forming units (CFU) or most probable number (MPN). The use of fecal coliform organism levels will expire in December 31, 2020.

Ecology has communicated to the City that although the bacteria standards have changed, the TMDL monitoring requirement is for fecal coliform, not *E. coli*. The City will continue to collect fecal coliform bacteria data to evaluate long-term trends. The City of Everett will also sample *E. coli* and compare data to the Primary Contact Recreation criteria.
Table 10-1. PRIMARY CONTACT RECREATION IN FRESHWATER

<table>
<thead>
<tr>
<th>Bacterial Indicator</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>E. coli</em></td>
<td><em>E. coli</em> organism levels within an averaging period must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained within the averaging period exceeding 320 CFU or MPN per 100 mL.</td>
</tr>
<tr>
<td>Fecal coliform (expires 12/31/2020)</td>
<td>Fecal coliform organism levels within an averaging period must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained within the averaging period exceeding 200 CFU or MPN per 100 mL.</td>
</tr>
</tbody>
</table>

The States’ Water Quality Standard for bacteria has two criteria: a geometric mean and an upper limit value for no more than 10% of the samples. In Washington State, Fecal Coliform TMDL studies, the upper limit statistic (i.e., not more than 10% of samples shall exceed) has been interpreted as a 90th percentile value of the log normalized values. If less than 10 samples are being evaluated, no samples may exceed the upper limit.

**North Creek TMDL**

The North Creek drainage in the City of Everett is comprised of the uppermost portion of the basin. The upper North Creek stream network is a seasonal headwater system. The headwaters originate in the Everett Mall Way area of South Everett and flow southerly for 12.6 miles before discharging to the Sammamish River, within the City of Bothell. The Sammamish River drains into Lake Washington. Approximately 10 percent of the watershed lies in the City of Everett. The City has sampled North Creek since 2007 as part of the required Permit Special Condition S7 TMDL compliance monitoring.

Surface water sampling is designed to collect unbiased storm and baseflow events during the calendar year. Samples are collected for fecal coliform bacteria bi-monthly when flow is present at 4 sampling stations (see Figure 10-1).

In 2019, North Creek consistently measured higher fecal coliform concentrations during the dry season than during the wet season (See Table 10-2). During the dry season, only North Creek #4 met the geometric mean primary contact recreation for fecal coliforms of 100 cfu/100 mL. Both North Creek stations #2 and #3 had measured fecal coliforms during the dry season higher than what is typical. During the May 2019 sampling North Creek #2 and #3 stations measured fecal coliform bacteria over 1000 cfu/100 mL (Figure 10-2). As a result, City staff re-sampled within 48
hours to determine if additional investigation was needed, which it was not. In September, the 2nd Ave Creek #1 station experienced a spike in fecal coliform bacteria of 16,000 cfu/100 mL in December 2019, which was re-sampled (21 cfu/100 mL) and was below standard. It is unknown what the cause of the discharge was.

During the wet season the fecal coliform bacteria geometric mean values ranged between 12 and 37 cfu/100 mL, which meets the primary contact recreation criteria. North Creek #2 was the only station during the wet season that had 17% of samples exceeding 200 cfu/100 mL. Overall, in 2019, wet season fecal coliform bacteria was low.
Figure 10-1
North Creek Stations

- Sampling Locations
- North Creek
- Drainage Basin
- Everett City Limits

North Creek Stations:
- NORTH CREEK #2
- NORTH CREEK #3
- NORTH CREEK #4 (REMOVE 2020)
- SILVER LAKE CREEK #2
- 2ND AVE CREEK
Table 10-2. 2019 NORTH CREEK FECAL COLIFORM BACTERIA (CFU/100 ML) RESULTS

<table>
<thead>
<tr>
<th>Monitoring Location</th>
<th>Dry Season (May 1st - Sept 30th)</th>
<th>Wet Season (Oct 1st - April 30th)</th>
<th>Full Reporting Year (2019)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of samples</td>
<td>GMV</td>
<td>% &gt;200</td>
</tr>
<tr>
<td>Silver Creek #2</td>
<td>1</td>
<td>125</td>
<td>NA</td>
</tr>
<tr>
<td>2nd Ave. Creek #1</td>
<td>2</td>
<td>158</td>
<td>NA</td>
</tr>
<tr>
<td>North Creek #2</td>
<td>6</td>
<td>476</td>
<td>NA</td>
</tr>
<tr>
<td>North Creek #3</td>
<td>6</td>
<td>557</td>
<td>NA</td>
</tr>
<tr>
<td>North Creek #4</td>
<td>4</td>
<td>81</td>
<td>NA</td>
</tr>
</tbody>
</table>

GMV=Geometric Mean Value fecal coliform bacteria (cfu/100 mL)

Figure 10-2. 2019 NORTH CREEK SAMPLING STATIONS SUMMARY

Status and Trends Comparison
Surface water monitoring data has been assessed utilizing dry and wet season comparability. See Table 10-3 displaying geometric mean value for fecal coliform bacteria between 2007 and 2019 relative to the primary contact recreation bacteria criteria. Fecal coliform bacteria during the dry season has been an ongoing measurable occurrence. High dry season fecal coliform levels may be due, in large measure, to extreme low flows and little dilution. In Everett, North Creek headwaters typically become stagnant or dry during the summer months. Rainfall events that do occur in the summer, result in elevated fecal coliform concentrations “first-flush” events.
Table 10-3. 2007 to 2019 NORTH CREEK FECAL COLIFORM BACTERIA SUMMARY

<table>
<thead>
<tr>
<th>Sample Site</th>
<th>Fecal Coliform (cfu/100 mL) Geomean</th>
<th>Dry Season¹</th>
<th>Wet Season²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fecal Coliform (cfu/100 mL) Geomean</td>
<td>% over 200 (cfu/100 mL) Standard</td>
<td>Number of Samples</td>
</tr>
<tr>
<td>2nd Ave Creek #1</td>
<td>80</td>
<td>191</td>
<td>53%</td>
</tr>
<tr>
<td>North Creek #2</td>
<td>94</td>
<td>170</td>
<td>44%</td>
</tr>
<tr>
<td>North Creek #3</td>
<td>86</td>
<td>229</td>
<td>57%</td>
</tr>
<tr>
<td>North Creek #4³</td>
<td>70</td>
<td>121</td>
<td>21%</td>
</tr>
<tr>
<td>Silver Lake Creek</td>
<td>65</td>
<td>177</td>
<td>44%</td>
</tr>
</tbody>
</table>

¹Dry season between May 1 and September 30th
²Wet season between October 1 and April 30th
³North Creek #4 station added in 2014.

Figure 10-3. NORTH CREEK FECAL COLIFORMS BACTERIA GEOMETRIC MEAN (LAST 10 YEARS)
Swamp Creek TMDL
The City of Everett is located at the northern end of the Swamp Creek Watershed. The headwaters of Swamp Creek begin in Everett at the Walter E. Hall golf course. Everett is the largest of six cities within the Swamp Creek drainage basin, however, only five percent of the City contributes to Swamp Creek basin. The City has sampled Swamp Creek since 2007 as part of the required Permit Special Condition S7 TMDL compliance monitoring. The sampling stations were altered in 2014, due to beaver dams.

Surface water sampling is designed to collect unbiased storm and baseflow events during the calendar year. Samples are collected for fecal coliform bacteria bi-monthly when flow is present at three sampling stations (See Figure 10-6).

Water quality in Swamp Creek varies with the season. Dry season bacteria concentrations are higher, and may be due to extreme low flows and little dilution. In Everett, Swamp Creek normally dries up for three or four months during the summer. The timing and duration of the dry period depends on the precipitation amount and pattern in any given year. Most of Swamp Creek and its tributaries, including all portions of the creek within the City of Everett’s jurisdiction, are shallow and unsuitable for full-immersion swimming activities.

Swamp Creek station #2 has historically had higher concentrations measured than the other two stations, which is consistent in 2019 as well (Table 10-4). Dry season measurements, especially at Swamp Creek #2 were above the primary contact recreation criteria. The priority basin of focus as part of the TSIE program occurred in the Swamp Creek #2 drainage basin and no significant sources were observed.

Table 10-4 2019 SWAMP CREEK FECAL COLIFORM BACTERIA (CFU/100 ML) RESULTS

<table>
<thead>
<tr>
<th>Swamp Creek Monitoring Location</th>
<th>Dry Season (May 1st - Sept 30th)</th>
<th>Wet Season (Oct 1st - April 30th)</th>
<th>Full Reporting Year (2019)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of samples</td>
<td>GMV</td>
<td>% &gt;200</td>
</tr>
<tr>
<td>Swamp Creek #1</td>
<td>3</td>
<td>26</td>
<td>NA</td>
</tr>
<tr>
<td>Swamp Creek #2</td>
<td>7</td>
<td>438</td>
<td>NA</td>
</tr>
<tr>
<td>Swamp Creek #3</td>
<td>5</td>
<td>145</td>
<td>NA</td>
</tr>
</tbody>
</table>

GMV=Geometric Mean Value fecal coliform bacteria (cfu/100 mL)
Status and Trends Comparison

Surface water monitoring data has been assessed utilizing dry and wet season comparability. Swamp creek sampling started at the current sampling sites in 2014. Similar to North Creek, Swamp creek is a headwater system, which responds rapidly to ambient conditions. Fecal coliform bacteria is a dry season issue at Swamp Creek observed at stations #2 and #3, with Swamp Creek #2 being the segment most influenced. Measurements in 2019 are similar to years past data (Table 10-5 and Figure 10-5).

Table 10-5 2014-2019 SWAMP CREEK STATION FECAL COLIFORM BACTERIA SUMMARY

<table>
<thead>
<tr>
<th>Sample Site</th>
<th>Fecal Coliform (cfu/100 mL) Geomean</th>
<th>Dry Season¹</th>
<th>Wet Season²</th>
<th>Number of Samples</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fecal Coliform (cfu/100 mL) Geomean</td>
<td>% over 200 (cfu/100 mL) Standard</td>
<td>Number of Samples</td>
<td>Fecal Coliform (cfu/100 mL) Geomean</td>
</tr>
<tr>
<td>Swamp Creek #1</td>
<td>28</td>
<td>41</td>
<td>10%</td>
<td>20</td>
</tr>
<tr>
<td>Swamp Creek #2</td>
<td>66</td>
<td>200</td>
<td>44%</td>
<td>25</td>
</tr>
<tr>
<td>Swamp Creek #3</td>
<td>35</td>
<td>74</td>
<td>26%</td>
<td>19</td>
</tr>
</tbody>
</table>

¹Dry season between May 1 and September 30th
Figure 10-5. 2014-2019 SWAMP CREEK FECAL COLIFORM BACTERIA GEOMETRIC MEAN

Swamp Creek TMDL Geomeans (2104-2019)

Water Quality Standard

Fecal Coliform, Colonies Geometric Mean Value (10^5 CFU/100 mL)

<table>
<thead>
<tr>
<th>Year</th>
<th>Swamp CR1</th>
<th>Swamp CR2</th>
<th>Swamp CR3</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>39</td>
<td>65</td>
<td>78</td>
</tr>
<tr>
<td>2015</td>
<td>34</td>
<td>27</td>
<td>23</td>
</tr>
<tr>
<td>2016</td>
<td>22</td>
<td>44</td>
<td>58</td>
</tr>
<tr>
<td>2017</td>
<td>88</td>
<td>99</td>
<td>191</td>
</tr>
<tr>
<td>2018</td>
<td>54</td>
<td>67</td>
<td>54</td>
</tr>
<tr>
<td>2019</td>
<td>19</td>
<td>19</td>
<td>17</td>
</tr>
</tbody>
</table>
Figure 10-6
Swamp Creek Stations
- Sampling Locations
- Swamp Creek Drainage Basin
- Everett City Limits

City of Everett
Snohomish County

SWAMP CREEK #1
SWAMP CREEK #2
SWAMP CREEK #3
Snohomish River Tributaries-Wood Creek
To address impairments, a TMDL for fecal coliform bacteria was established for various tributaries draining to the lower Snohomish River. The Marshland Watershed Segment XW79FQ, partially located in the City of Everett, is one of the tributaries draining to the Snohomish River that has a TMDL for fecal coliform bacteria. Only a small fraction of the City contributes to the Marshland Watershed segment, which is itself only a portion of the area covered by the Lower Snohomish River Tributaries TMDL. Within the City of Everett, flow from the City to the Marshland Watershed is primarily from Wood Creek (Figure 10-9). Wood Creek is the only tributary within the City that has perennial flow draining to the Marshland segment, as a result Wood Creek is the waterbody that has been sampled since 2007 (Wood Creek #2), prior to entry into the Marshland Segment, as part of the required Permit Special Condition S7 TMDL compliance monitoring.

Data collected at Wood Creek in 2019 continues to meet the primary contact recreation criteria both during dry and wet season conditions (Table 10-6). Fecal Coliform bacteria measurements collected in Wood creek exceeded the standard 1 out of 24 samples collected. The timing of the sample collection during the May 2019 sampling occurred during a rainfall event after a dry period, and was typical of a “first-flush” condition (Figure 10-7). Overall, Wood Creek continues to be a low source of fecal coliform bacteria to the Marshland drainage.

### Table 10-6. 2019 WOOD CREEK FECAL COLIFORMA BACTERIA (CFU/100 ML) RESULTS

<table>
<thead>
<tr>
<th>Monitoring Location</th>
<th>Dry Season (May 1st - Sept 30th)</th>
<th>Wet Season (Oct 1st - April 30th)</th>
<th>Full Reporting Year (2019)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of samples</td>
<td>GMV</td>
<td>% &gt;200</td>
</tr>
<tr>
<td>Wood Creek #2</td>
<td>10</td>
<td>55</td>
<td>10%</td>
</tr>
</tbody>
</table>
Status and Trends Comparison

The City of Everett has sampled fecal coliform bacteria since 2007 at Wood Creek #2 to fulfill Municipal Stormwater Permit Requirements. The Permit requires a minimum of 12 samples be collected annually. Beginning in 2007 Wood Creek had been sampled monthly. This frequency was increased to bi-monthly in 2017 to acquire a larger set of samples. Fecal coliform bacteria sampled as part of the TMDL suggest that Wood Creek meets the primary contact recreation criteria of not to exceed a geometric mean value of 100 colonies forming units (cfu)/100 mL, with not more than 10 percent of all samples exceeding 200 cfu/100 mL for fecal coliform bacteria. Table 10-7 and Figure 10-8 show a summary of fecal coliform bacteria for the TMDL sampling from 2007-2019. Wood Creek has met the primary contact recreation bacteria criteria since 2007. The past 12 years of data have continued to show this stream is not a contributor of fecal coliform bacteria to the Marshland drainage segment listed in the TMDL.

Table 10-7. 2007-2019 SUMMARY OF WOOD CREEK FECAL COLIFORM BACTERIA

<table>
<thead>
<tr>
<th>Watershed</th>
<th>Sample Site</th>
<th>Fecal Coliform Geomean (2007-2019)</th>
<th>Dry Season¹</th>
<th>Wet Season²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Fecal Coliform Geomean</td>
<td>% over 200 (cfu/100 mL)</td>
<td>Fecal Coliform Geomean</td>
</tr>
<tr>
<td>Wood Creek</td>
<td>Wood Creek #2</td>
<td>24</td>
<td>38</td>
<td>6.5%</td>
</tr>
<tr>
<td>Sample Size</td>
<td></td>
<td>263</td>
<td>108</td>
<td>-</td>
</tr>
</tbody>
</table>
10.4 PLANNED ACTIVITIES

- City will continue to re-inspect commercial animal handling areas and commercial composting facilities to ensure implementation of source control BMPs for bacteria in Marshland, North Creek and Swamp Creek drainage basins a minimum of every 3 years (2022).

- The City will review the fecal coliform data collected per the approved QAPPs under the 2013 Permit to identify a minimum of one new high priority area that will be the focus of source identification and elimination efforts during 2021 through 2023.

- The City will begin to implement source identification and elimination efforts on the MS4 subbasins discharging to the identified high priority areas no later than May 1, 2021.

- The City will continue to collect a minimum of 12 samples per calendar year per the QAPPs for Swamp, North, and Wood Creek.

- The City will submit available data into the Environmental Information Management (EIM) System by May 31\textsuperscript{st} of each year.
11 MONITORING AND ASSESSMENT

11.1 OVERVIEW
This section describes the Permit requirements related to water quality Monitoring and Assessment, lists the continuing and/or current programs and activities that meet Permit requirements, and identifies the planned activities recommended for continued compliance with the Permit.

11.2 PERMIT REQUIREMENTS
The Permit (Section S8) requires the City to:

- All Permittees that chose S8.B Status and Trends Monitoring Option #1 in the Phase II Western Washington Municipal Stormwater Permit, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall make a one-time payment into the collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in Puget Sound. This payment is due on or before December 1, 2019.

- All City and County Permittees covered under the Phase II Western Washington Municipal Stormwater Permit, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), except the Cities of Aberdeen and Centralia, shall notify Ecology in writing which of the following two options for regional status and trends monitoring (S8.A.2.a or S8.A.2.b) the Permittee chooses to carry out during this permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2019. The annual payments into the collective fund are due on or before August 15 each year beginning in 2020.

- All Permittees that chose S8.C Effectiveness Studies Option #1 in the Phase II Western Washington Municipal Stormwater Permit, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall make a one-time payment into the collective fund to implement effectiveness studies and source identification studies. The payment is due on or before December 1, 2019.

- All City and County Permittees covered under the Phase II Western Washington Municipal Stormwater Permit, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall notify Ecology in writing which of the following two options (S8.B.2.a or S8.B.2.b) for effectiveness and source identification studies the Permittee chooses to carry out during this permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2019. The annual payments into the collective fund are due on or before August 15 each year beginning in 2020.

- All Permittees shall provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects. These requests will be limited to records of SWMP activities and associated data tracked and/or maintained in accordance with S5 – Stormwater
11.3 CURRENT ACTIVITIES
The City currently implements activities and programs that meet the Permit requirements. The City will continue to implement these programs and activities. The City participated in a variety of regional and state monitoring forums to develop feasible and effective monitoring requirements for the new Permit.

The City notified Ecology prior to December 1, 2019 of its intent to participate in the Regional Stormwater Monitoring Program (RSMP) and began providing program funding in 2019. The City contributes annually in the Stormwater Action Monitoring (SAM), the regional stormwater monitoring program for the Regional Status and Trends Monitoring ($18,162) and the Stormwater Management Program Effectiveness and Source Identification Studies ($33,191).

11.4 PLANNED ACTIVITIES
- City will make annual payments by August 15th to the collective fund for S8 Monitoring and Assessment.
- The City will provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active SAM projects.
12 REPORTING REQUIREMENTS

12.1 OVERVIEW
This section describes the Permit requirements reporting and record keeping requirements and current and planned activities. The Annual Report and SWMP are prepared and reported each year to the Department of Ecology and posted on the City’s website. The SWMP has been developed and updated annually in coordination with affected City departments. As part of the implementation of the SWMP the City gathers, tracks, maintains, and uses information on an on-going basis to evaluate the SWMP development and implementation.

12.2 PERMIT REQUIREMENTS
- The City shall submit an annual report electronically no later than March 31 of each year.
- Submit annual reports electronically using Ecology’s Water Quality Permitting Portal.
- Records related to the Permit and SWMP shall be made available to the public at reasonable times during business hours.
- Records related to the Permit and the SWMP are required to be kept for at least 5 years.

12.3 CURRENT ACTIVITIES
- The SWMP is updated as part of the Annual Report to incorporate progress on implementing the SWMP and changes to projected future work items.
- The SWMP was posted on the City’s website prior to March 31st.

12.4 PLANNED ACTIVITIES
- The SWMP is updated to incorporate progress on implementing the SWMP and changes to projected future work items. The SWMP will be posted by March 31, 2020 on the City’s website and annually report submitted electronically.
- The City will continue to keep all records related to the permit and SWMP and will make records related to these available to the public.