



**City of Edmonds
2019
Stormwater Management Program (SWMP) Plan**

Permittee Coverage Number: WAR04-5513

**City of Edmonds
121 5th Avenue North
Edmonds, WA 98020**

March 2019

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1 INTRODUCTION

This document has been prepared in accordance with the *Western Washington Phase II Municipal Stormwater Permit* (the Permit). The Permit was issued by the Department of Ecology (Ecology) to municipalities with populations of less than 100,000 as operators of small and medium municipal separate storm sewer systems (MS4s). The City of Edmonds is one of the municipalities who must comply with this permit.

The Permit authorizes the discharge of stormwater runoff from MS4s into the state's surface waters (i.e., streams, rivers, lakes, sounds, wetlands, etc.) and groundwater as long as municipalities implement Permit-specified actions and activities, known as Best Management Practices (BMPs), to protect these receiving waters. Permit requirements are phased in over the permit term per a specified schedule. Some of the required BMPs are carry-overs from the previous Permit while other requirements are new. Table 1 presents the overall implementation schedule of the current Permit. Additional schedule detail can be found in the full text of the Permit found on Ecology's website¹.

This five-year permit was issued by Ecology and became effective on August 1, 2013. The permit was originally scheduled to expire and require renewal by July 31, 2018. However, Ecology has extended the permit through July 31, 2019 so that the requirements of the current permit carry until that date. A new permit is anticipated to be issued by Ecology in July of 2019. No new permit requirements were added for the period of the extension. Additionally, final language of the next permit has not been issued and, therefore, the City cannot commit to meeting permit requirements beyond the current permit cycle. Accordingly, this year's SWMP is somewhat limited in scope.

The City previously complied with Section G18 and filed a notice of intent for continued permit coverage on 10/2/2017.

¹ <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>



City street sweeper cleans a City road adjacent to Puget Sound.

1.1 The Stormwater Management Program Plan

Section S5.A of the Permit requires each Permittee to develop and implement a Stormwater Management Program (SWMP). Each Permittee must also annually prepare written documentation of the SWMP, called the SWMP Plan (Plan). This Plan is intended to be a forward-looking document describing the set of actions and activities (BMPs) the Permittee intends to complete in the upcoming calendar year to comply with the Permit.

Section S9 of the Permit requires the City to submit an Annual Report by March 31 of each year. This Annual report describes the status of the Permit requirements during the preceding reporting year (in this case, calendar year 2018). This report can be found on the City's website².

Per Permit section S5.A.5.b, this Plan includes a written description of the coordination mechanisms among departments within the City of Edmonds to ensure compliance. This written description is found in section 1.2 of this Plan.

This SWMP Plan does not include *all* of the activities and programs implemented by the City to address stormwater runoff issues; the plan only focuses on those that are required by the Permit. The Plan does not include information about the capital improvement plan (CIP) which outlines improvement projects to address flooding, water quality, and aquatic habitat issues. The City also plans to begin the process of updating the stormwater comprehensive plan in 2019. This effort has been delayed from the initially planned start in 2018; the delay will allow the plan to consider impacts of the new permit requirements (when they are formalized later this year) and will serve as a planning document for stormwater funding, projects, and decision making. More

² <http://www.edmondswa.gov/stormwater-utility-system/phase-ii-municipal-stormwater-permit-compliance-npdes.html>

information on the stormwater CIP and previous Stormwater Comprehensive Plan can be found on the City's website³. Additional information will be posted on the City's website as the process begins.

This Plan is organized per S5.C of the Permit and is updated annually for submittal with the City's annual reports to Ecology. The BMPs are grouped under the following Program components:

- 2.1. Public Education and Outreach
- 2.2. Public Involvement and Participation
- 2.3. Illicit Discharge Detection and Elimination (IDDE)
- 2.4. Controlling Runoff from New Development, Redevelopment, and Construction Sites
- 2.5. Municipal Operations and Maintenance (O&M)

In some cases, the Permit requires reporting and implementation of water-body-specific cleanup plans developed by Ecology. However, Ecology has not developed such plans for Edmonds' water bodies to date.

This SWMP Plan covers the City of Edmonds' activities planned in 2019 to comply with the Permit. Edmonds continues to track costs associated with the program's action and activities as required by the Permit.

1.2 Stormwater Management in Edmonds

Logger George Brackett founded Edmonds in 1890 making it the oldest incorporated city in Snohomish County with a growing population of approximately 42,000 and covering approximately 9 square miles of land area. Edmonds is approximately 94 percent built-out with the vast majority of the land-use as single-family or multi-family residential (City of Edmonds 2017). The City is broken into 26 local sub-basins, with 24 of those basins eventually draining into Puget Sound. The remaining two basins enter the greater Lake Ballinger watershed that discharges into Lake Washington.

Edmonds first adopted a stormwater code in 1977, and has been actively mitigating runoff from new impervious surfaces since this date. Responsible management of stormwater is something the City has been committed to well in advance of the current Permit.

³ <http://www.edmondswa.gov/government/departments/public-works-home/capital-improvement-program.html> and http://www.edmondswa.gov/images/COE/Government/Departments/Development_Services/Planning_Division/Plans/Final_2010_SWM_Comp_Plan_Text.pdf



Daylighting of Willow Creek and restoration of the Edmonds Marsh will be a major Capital Improvement effort, involving multiple City departments, in the coming years

1.2.1 Organization

There are four City departments that work together regularly on complying with the applicable provisions of the Permit: Public Works, Finance, Development Services, and Parks & Recreation. The Public Works and Utilities Director holds the Permit Section G19 certification and signature authority. Figure 1 shows an organizational chart of the City Departments, highlighting in green those that are involved in Permit compliance. Figure 2 provides a visual description of each department's responsibilities for the various Permit components.

The Public Works Engineering Division heads up the Permit compliance efforts. The Stormwater Engineer in the Engineering Division is primarily responsible for ensuring Permit compliance. The stormwater engineering coordinates the annual report and update of the SWMP each year and is the lead for Controlling Runoff from New Development, and Public Involvement and Participation. The Stormwater Engineer conducts reviews for compliance with stormwater codes directly and coordinates field activities and inspections with the Engineering Program Manager who oversees the engineering permit reviewers and field inspection staff. The position also leads stormwater related code, utility rate, comprehensive plan, and CIP updates which are the major processes for public involvement in stormwater decision making.

The Stormwater Technician is the lead for compliance with the Public Education and Outreach and Illicit Discharge Detection and Elimination sections, and is also tasked with performing post-construction inspections on private facilities.

The Public Works Operations Division handles all other operations and maintenance-related components of the City's MS4 including spill response and clean-up, catch basin inspections, IDDE screening, inspection of public storm drain facilities, mapping, and adherence with the

SWPPP for the Public Works Department storage and maintenance yard. The Parks & Recreation Department is responsible for stormwater management and municipal operations on park properties and for adhering with the SWPPP on the Parks & Recreation Department storage and maintenance yard.

The Finance Department manages the payments required to comply with the Monitoring and Assessments portion of the permit.

The Code Enforcement Officer (Development Services Department) and the City Attorney get involved in a variety of issues as needed.

1.2.2 Internal Coordination

The Stormwater Engineer and the Stormwater Technician in the Engineering Division regularly meet with other staff members involved in Permit compliance activities. Regular meetings are held with the Street/Stormwater Manager and the Stormwater Division Lead to coordinate on issues related to Municipal Operations and Maintenance and system mapping.

After major illicit discharge events the Stormwater Technician discusses and reviews the response and documentation with the Street/Stormwater Manager, Stormwater Division Lead, and Stormwater Engineer. Our new Stormwater Technician joins us after multiple years serving on the City's public works crews and has greatly improved communication between the Engineering and Operations Divisions of the Public Works Department.

The Stormwater Engineer meets regularly with the Engineering Program Manager and Engineering Technicians to discuss issues related to Controlling Runoff from New Development, Redevelopment and Construction sites. The Engineering Program Manager and Engineering Technicians regularly meet with the Planners on this Permit component as well.

The Senior Utility Engineer, the Stormwater Engineer and the Stormwater Technician also meet every other week to coordinate utility projects and discuss field concerns, including stormwater permit compliance issues.

The Stormwater Engineer, coordinates with all parties involved in permit compliance at the beginning of every year to collect the data needed for the annual report and Stormwater Management Program Plan update, and to review potential impacts to workload and staffing needs.



Through a multi-jurisdictional partnership, the City participated in development of an aquatic vegetation management plan for Lake Ballinger which will be implemented in 2019.

1.2.3 External Coordination

The City's Stormwater Engineer and Stormwater Technician coordinate with colleagues in the adjacent communities of Mountlake Terrace, Lynnwood, Lake Forest Park, Shoreline, and Snohomish County on SWMP-related issues.

The City continues to commit a Council Member, a staff person (Stormwater Technician or Stormwater Engineer as available), and annual funding to the Lake Ballinger/McAleer Creek Forum. This is a multi-agency group, consisting of the City of Edmonds, City of Mountlake Terrace, and City of Lake Forest Park, which works with residents on the lake to address water quality and flooding concerns on Lake Ballinger and along the downstream McAleer Creek. This year's work included development of an aquatic vegetation management plan, with input from lakeside residents, which will be implemented in summer of 2019 to address milfoil and white lily infestations in the lake.

City staff also regularly attend STORM meetings and regional NPDES Coordinators meetings with other agencies to share and collaborate on ways to meet permit requirements and improve stormwater programs.

Additional coordination directly with residents and/or non-profit organizations, such as Sound Salmon Solutions (who operate the Willow Creek fish hatchery in Edmonds) and Students Saving Salmon, is also a regular part of staff work. The City is currently seeking a resident champion to assist in developing a new cluster of private rain gardens as part of the residential rain garden program in partnership with Snohomish Conservation District.

1.3 Document Organization

The remaining sections of this document have been organized to follow the sequence of the Permit requirements S5.C.1 through S5.C.5, as well as for S8, monitoring and assessment. Permit requirements, current/ongoing activities, and planned activities for each of the required elements are presented.

TABLE 1
Western Washington Phase II Municipal Stormwater Permit Schedule Overview – 2013 to 2018

S5 Program Component	August 1, 2013 Ongoing program implementation	2014	2015	2016	2017	Jan-July 31, 2018
A. Stormwater Management Plan	Continue to track costs, actions and activities. Continue required internal and suggested external coordination and SWMP Plan submittal w/annual report. Update SWMP Plan annually.		By March 31: annual report includes description of internal coordination and update of SWMP Plan.			
C.1 Public Education and Outreach	Continue public education and outreach program. Measure changes in behavior for 1 audience & 1 topic.	Create or partner w/others to create stewardship.		By February 2: use measures of behavior changes to improve program.		
C.2 Public Involvement	Continue to provide ongoing opportunities for the public to participate in SWMP decision-making. Post online annual reports and SWMP Plan for previous calendar year by 5/31 of each year.					
C.3 Illicit Discharge Detection and Elimination (IDDE)	Continue implementing the enforceable mechanism to prohibit illicit discharges, compliance strategy, IDDE and municipal staff training, citizen hotline and IDDE response, and maintain map of MS4.				By Dec 31: Field screen at least 40% of MS4 & on average 12% each year thereafter.	By Feb 2: Update ordinance if needed.
C.4.a-f Control Runoff from New Development, Redevelopment Construction Sites	Continue to implement ordinance addressing construction/post-construction runoff controls; make NOIs for construction, industrial stormwater permits available; site plan review & permitting, requiring long-term maintenance; inspections; training; and enforcement.			By Dec 31: Update City code to revised Appendix 1 standards; review, revise, make effective development codes to make LID preferred approach.	By March 31: Submit summary of review & revision of codes to reduce impervious surface, protect vegetation, minimize runoff.	Achieve at least 80% of scheduled inspections.
C.4.g Watershed scale stormwater planning (selected permittees)	(By Oct. 31, 2013 Phase I permittee notifies Ecology of selected basin and affected Phase II permittees; convenes planning process.)	(By April 1: Scope of work submitted to Ecology by Phase I watershed plan lead.)	Participate in planning process, if located within selected basin.	By Oct 1: Phase I lead submits final watershed scale stormwater plan to Ecology.		
C.5 Municipal Pollution Prevention, Operation and Maintenance	Continue implementation of MS4 maintenance; annually inspect stormwater treatment & flow control BMPs/facilities; spot checks; O&M & SWPPPs for municipal lands & facilities; staff training			By Dec 31: Update maintenance standards to revised manual/ code standards	By August 1: Inspect all catch basins or document alternatives if used. Plan to complete inspections every 2 years thereafter.	Achieve 95% of inspections for municipal stormwater treatment/flow control BMPs/facilities and catch basins.

Table 1 (continued)

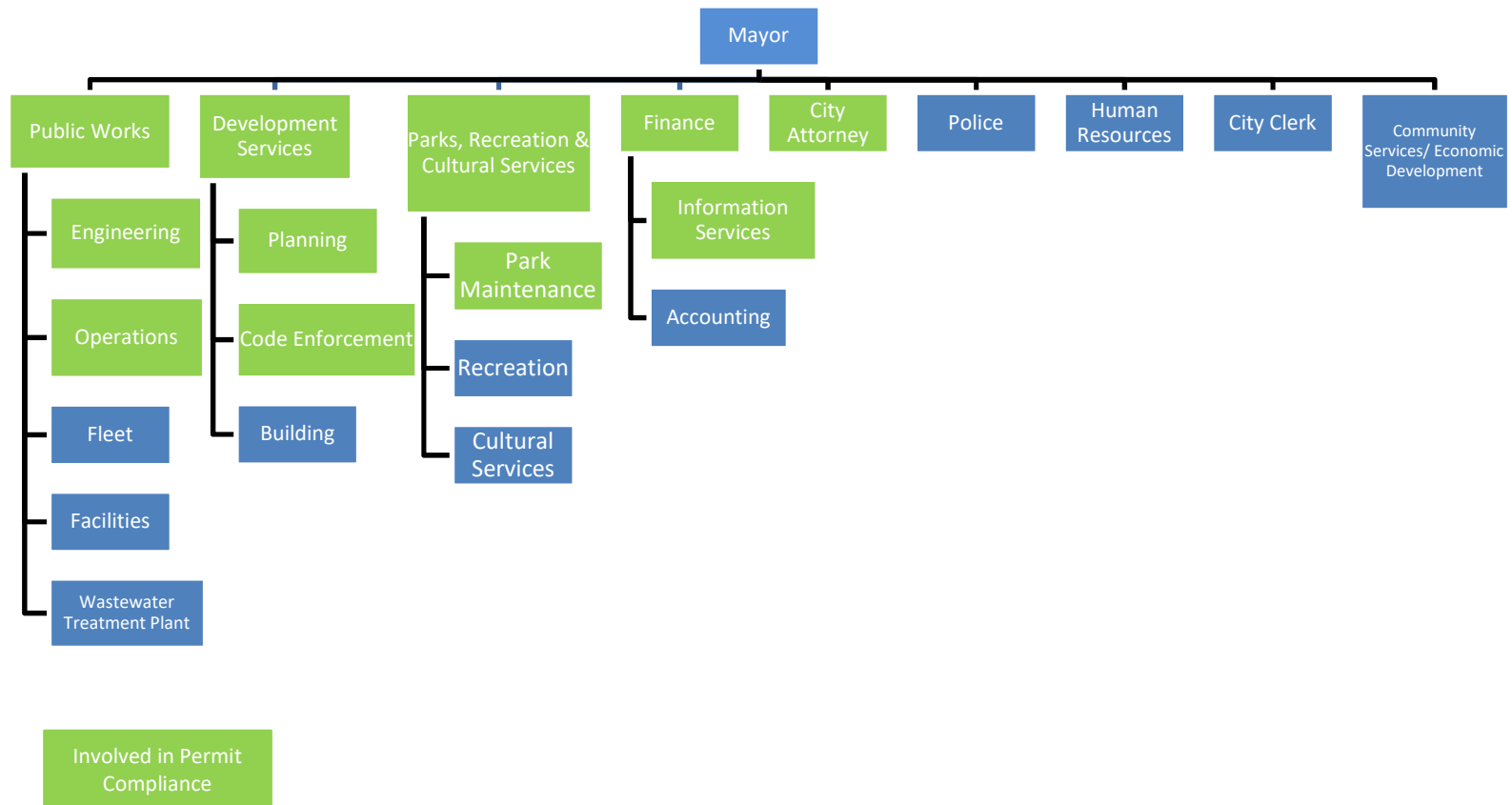
S8 Monitoring & Assessment	August 1, 2013	2014	2015	2016	2017	July 31, 2018
S8.A	Continue to provide description in each annual report of stormwater monitoring or stormwater- related studies conducted by permittee or others (except if related to S8.B or S8.C).					
S8.B Status and Trends Option #1	PS Permittees ONLY: By Dec 31: Notify Ecology which option selected for status and trends monitoring.	PS Permittees ONLY : By Aug 15: First annual payment to RSMP.	Annual reporting as per Ecology-approved QAPP.			
S8.B Status and Trends Option #2		By July 31: Begin monitoring wadeable streams.				
C. Effectiveness Option #1	By Dec 31: Notify Ecology which option selected for effectiveness monitoring.	By Aug 15: Option #1 first annual payment to RSMP.	Annual reporting as per Appendix 9 in the Permit.			
C. Effectiveness Option #2		By Feb 2: Submit QAPP to Ecology. By Oct 1: Begin flow monitoring.				
S8.D Source ID & Diagnostic Monitoring		By Aug 15: First annual payment to RSMP.				

Source: Modified from: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>

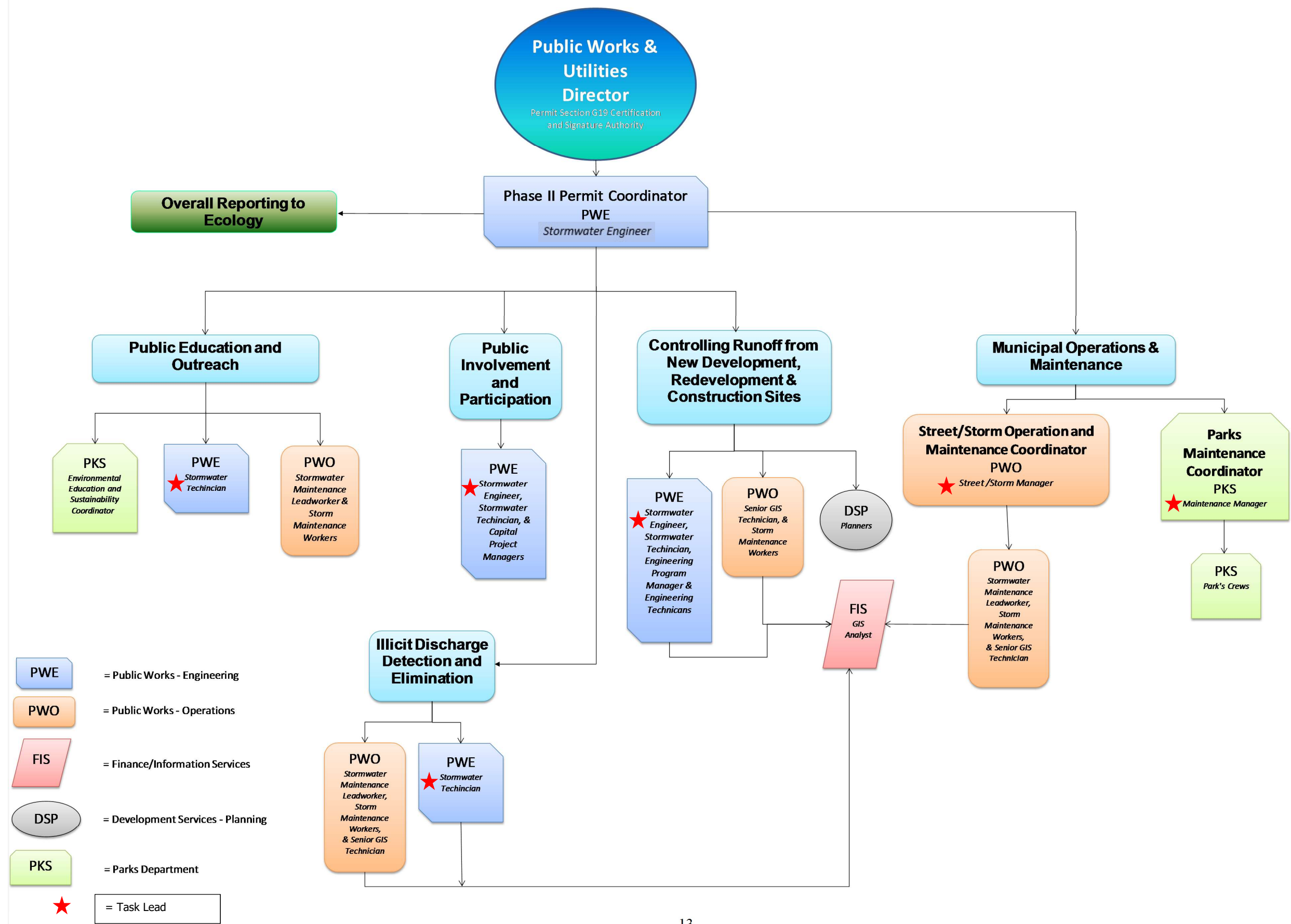
BMP = Best Management Practices
ID = Identification
IDDE = Illicit Discharge Detection & Elimination
LID = Low Impact Development
MS4= Municipal Separate Storm Sewer System
O & M = Operations and Maintenance

PS = Puget Sound
QAPP = Quality Assurance Program Plan
RSMP = Regional Stormwater Monitoring Program
SWMP = Stormwater Management Program
SWPPP = Stormwater Pollution Prevention Plan

FIGURE 1
City of Edmonds Organizational Chart



City of Edmonds Phase II Municipal Stormwater Roles and Responsibilities



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2 STORMWATER MANAGEMENT PLAN ELEMENTS

2.1 Public Education and Outreach



The residential rain garden program produced aesthetically pleasing examples of rain gardens which attract public interest and include educational signage of the benefits of rain gardens.

2.1.1 Permit Requirements

Permit Section S5.C.1 states that the SWMP shall include an education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The education program may be developed and implemented locally or regionally. The Permit lists the following minimum performance measures for compliance with this element. Each Permittee shall:

- Provide an education and outreach program for the area served by the MS4. The program shall be designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. No later than February 2, 2016, Permittees shall use the resulting measurements to direct education and outreach resources most effectively,

as well as to evaluate changes in adoption of the targeted behaviors. Permittees may meet this requirement individually or as a member of a regional group.

2.1.2 Continuing/Ongoing Activities

Our approach for education and outreach has been informed by surveys conducted in 2009 and 2013, which measured the public's knowledge and practices regarding stormwater, and helped inform priorities for specific topics to be addressed in our community. These results, as well as the requirements of the current Phase II Permit, continue to be a guide for our Public Education and Outreach Program (see Table 2). The City is considering conducting another survey in 2019 to determine whether our approach has resulted in changes in attitudes and behavior and how the programs could be revised to be more effective.

The Permit requires the City to continue a public education and outreach program and measure changes in behavior for at least one audience in at least one subject area. Since Edmonds is predominantly residential, we have focused on educating homeowners on natural yard care techniques to encourage them to protect water quality; this work is done in partnership with regional organizations who lead the effort to implement and evaluate the program's efficiency. Other topics we focus on include proper storage and disposal of pesticides, fertilizers and other household chemicals, BMPs for pet waste management, carpet cleaning, and auto and home repair and maintenance.

The City continues to partner with numerous organizations to encourage residents' involvement in educational opportunities. Current and ongoing partnering organizations include:

- Snohomish County Surface Water Management
- Snohomish Conservation District
- STORM (Stormwater Outreach for Regional Municipalities)
- Washington State University Extension (Snohomish County Master Gardeners)
- ECOSS (Environmental Coalition of South Seattle)
- EarthCorps
- Sound Salmon Solutions
- Students Saving Salmon
- Zero Waste Washington



While playing the "Poop Toss" game kids learn the proper way to bag and dispose of pet waste.

The annual 'Watershed Fun Fair', sponsored by the City of Edmonds' Parks and Recreation and Public Works departments was held again this year at the Willow Creek Fish Hatchery. The 'Watershed Fun Fair' is our fun family event that offers insight into why we like to say "*Puget Sound Starts Here*". This free, all ages, community event engages participants by guiding them through exhibits and information about Puget Sound stewardship, stormwater, fish and wildlife, backyard habitat, recycling & composting, energy conservation, water conservation, and other environmental topics. Kids took part in hands on activities such as face painting, nature crafts, interactive games, dancing to a live musical performance, and the always popular feeding of the hatchery fish! With an estimated 200 local residents and families attending this past year, this event continues to provide our community the education and knowledge to keep Edmonds at the forefront of sustainability and environmental stewardship.

The continued partnership with Snohomish County also brought forth the next workshop series in our Natural Yard Care program. These workshops were held on three consecutive weeks in September at the Rose Hill community center in Mukilteo. During these workshops, attendees from Edmonds, Mukilteo and Snohomish County were treated to engaging keynote speakers and Master Gardeners who discussed a myriad of sustainable and low-maintenance yard care topics. As the next step in evaluating our Natural Yard Care program, each participant was given a survey, pre and post workshop, and evaluating these results as well as continuing this process over the course of 2019 will help the City understand how to better move forward in directing our natural yard care education and outreach resources.



Natural Yard Care workshops provide residents with great information, and hands-on samples, for environmentally friendly gardening practices and products.

New to Edmonds in 2018 was the “*Certain Things Don’t Mix*” commercial series, the Marina Beach cleanup efforts supporting Zero Waste Washington’s ‘Escaped Trash Assessment Protocol’ testing, as well as funding EarthCorps’ Puget Sound Stewards to lead community volunteer habitat stewardship actions in our local watersheds.

The City, in partnership with STORM and Comcast Spotlight, helped fund the successful and well received three commercial series “*Certain Things Don’t Mix*”. In bringing public attention and awareness to the relationship between the environment and pollutants, these commercials took a light hearted but poignant look at how stormwater and pollutants mix together to effect the environment. In addition to airing on the Comcast networks through western Washington and reaching thousands of viewers, the videos were posted multiple times on the City webpage, Green Resource Room, City newsletter, online newspapers and social media where they received more than 1000 views and responses. The commercials were also aired by the Parks and Recreation Department at their Summer Outdoor Movies which reached another 1400 *local* viewers who attended the events.

In August of 2018, the City of Edmonds partnered with Zero Waste Washington to conduct a massive cleanup effort at Marina Beach Park in order to help test a new Escaped Trash Assessment Protocol being developed by the EPA. More than 80 volunteers joined the effort, which covered 267,379 square feet and removed 125lbs. of litter from the beach. A full summary of the results are included as Appendix E.

Lastly, while a partnership with the EarthCorps’ Puget Sound Stewards has existed for some time to help lead habitat stewardship activities in Edmonds, 2018 brought about new funding to secure ongoing support for this volunteer program. Approximately 16 Stewards are currently active in leading volunteer groups performing a variety of habitat stewardship projects in our forests, wetlands, and shorelines.

For a complete list of our public education and outreach activities see Table 2.

Table 2. Ongoing Public Education and Outreach Activities

Educational Material/Activity	Description of Educational Material/Activity	Phase II Permit Sections(s) (and Target Audience)
Brochures, Booklets, Fact Sheets and Other Written Material (available from Engineering Department at City Hall, the Parks Department at the Francis Anderson Center, or on the City website)		
Stormwater Addendum & Checklists	Includes information to supplement or elaborate on the guidelines and requirements outlined in Edmonds Community Development Code Chapter 18.30 Stormwater Management and Ecology's <i>Stormwater Management Manual for Western Washington</i> .	S5.C.1.a.i (General public and businesses) S5.C.1.a.i (Engineers, contractors, developers, review staff and land use planners)
Streamside Landowners Best Management Practices web page	This portion of the City's website discusses leaving stream banks natural, planting native plants and trees, limiting the use of lawn chemicals, proper car washing, and keeping pets out of streams. http://www.edmondswa.gov/water/stormwater/streamside-stewardship.html	S5.C.1.a.ii (Residents, landscapers and property owners/managers)
Natural Yard Care booklet	This booklet was prepared by Seattle/King County and Washington State University Extension and is available at Edmonds City Hall. https://s3.wp.wsu.edu/uploads/sites/2053/2015/09/NativeTreesforSmallYards_WSUSnohomishCountyExtension_2015.pdf?x97325	S5.C.1.a.ii (Residents, landscapers and property owners/managers)
How to be a Salmon Friendly Gardener brochure	Brochure describes building healthy soil with compost, using natural fertilizers, directing runoff to pervious areas, and protecting shoreline habitat. https://snohomishcountywa.gov/DocumentCenter/View/3769	S5.C.1.a.ii (Residents, landscapers and property owners/managers)
Safer Alternatives for the Home and Garden fact sheets	A collection of fact sheets prepared by Toxics Free Future (previously Washington Toxics Coalition) that lists less toxic fertilizers and describes alternatives to common toxic products for control of slugs, aphids, and weeds. https://toxicfreefuture.org/healthy-living/healthy-gardens/	S5.C.1.a.ii (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)

Protecting Water Quality in Urban Runoff	<p>Fact sheet published by USEPA that discusses urbanization's impact on the quality & quantity of stormwater runoff and what can be done to best manage this runoff.</p> <p>https://www3.epa.gov/npdes/pubs/nps_urban-facts_final.pdf</p>	<p>S5.C.1.a.i (General public and businesses)</p> <p>S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
Protecting Washington's Waters from Stormwater Pollution	<p>Eight page environmental education guide that discusses a variety of topics related to stormwater runoff and presents ways to protect receiving waters from the detrimental effects of uncontrolled stormwater runoff.</p> <p>https://fortress.wa.gov/ecy/publications/publications/0710058.pdf</p>	<p>S5.C.1.a.i and a.ii (General public and businesses)</p> <p>S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
City of Edmonds Stormwater Education and Outreach web page	<p>City's Stormwater Education and Outreach web page provides information on stormwater and stormwater regulations, including FAQs, and information on car washing, vehicle leaks, and links to City and regional outreach brochures, articles, and web pages.</p> <p>http://www.edmondswa.gov/stormwater-utility-system/stormwater-public-education-outreach.html</p>	<p>S5.C.1.a.i (General public and businesses)</p> <p>S5.C.1.a.ii (General public and businesses)</p> <p>S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
Car Wash brochures	<p>Two car wash brochures are available that discuss the issues of car wash water discharging to storm drains. One brochure is focused on how to best handle washing cars at home, the other covers the use of the City's car wash kit during fund raising events. Both are available online.</p> <p>http://www.edmondswa.gov/stormwater-utility-system/stormwater-public-education-outreach/car-washing-in-edmonds.html</p>	<p>S5.C.1.a.i (General public and businesses)</p> <p>S5.C.1.a.ii (General public and businesses)</p>

Stormwater articles in City's electronic newsletter, social media and print publications.	A variety of stormwater related articles were posted in the City's electronic newsletter, the City's web page, the City of Edmonds' <i>Facebook</i> page as well as <i>MyEdmondsNews.com</i> and the <i>Edmonds Beacon</i> . These articles touched on such topics as drain cleaning, street sweeping, clean car washing, pet waste, snow and ice removal, vehicle leaks, rain gardens and natural yard care. These articles aim to be daily reminders and educational tools for our local residents that stormwater runoff is the single largest non-point pollution source to our waterways. https://www.facebook.com/cityofedmonds/ https://edmondsbeacon.villagesoup.com/ https://myedmondsnews.com/	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)
Wildlife of Edmonds poster	Developed by City Parks and Recreation staff, the poster has photos of the many animals (and their habitat) that can be found in Edmonds. The overall goal is to foster environmental stewardship among citizens of Edmonds and those who visit our parks and beaches. It is expected that this will result in behavior changes, such as picking up pet waste and fixing leaky cars, which will benefit watersheds and wildlife. http://www.edmondswa.gov/images/COE/Services/Education/discovery-programs/Downloads/Wildlife_of_Edmonds_Poster.pdf	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Storm drain stenciling	Information regarding storm drain stenciling is provided on the City website http://www.edmondswa.gov/water/stormwater/storm-drain-stenciling.html . Free assistance and stenciling supplies are offered to volunteer groups that apply the stencil.	S5.C.1.a.i (General public and businesses)
Rain Garden Handbook for Western Washington	This handbook is available for pickup at City Hall and given out during rain garden tours and information sessions. The Handbook can be used by homeowners, landscapers, landscape architects, engineers and others to create rain gardens in Western Washington, whether or not required by stormwater regulations. https://fortress.wa.gov/ecy/publications/documents/1310027.pdf	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Presentations, Curriculums and Activities		
Spill Kit for Businesses Program – in partnership with ECOSS	The City continued to partner with ECOSS in 2018 to educate Edmonds' businesses on spill prevention and preparation. The businesses that received a spill kit were taught how to use the kit, the ways to minimize the occurrence and impact of future spills, and where their stormwater runoff flows to. In 2018, 16 businesses were identified and served with ECOSS spill kits. To date, ECOSS has worked with 147 businesses in Edmonds. Edmonds will continue their partnership with ECOSS in 2019 in hopes of continuing our outreach and education throughout the city. https://ecoss.org/	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Youth Education Program – in partnership with Snohomish Conservation District	The City continued to partner with Snohomish Conservation District to sponsor stormwater presentations at local K – 12 grade schools. From April 1 – June 30, 2018, SCD reached 113 students, 11 teachers/adult staff with 7 lessons taught. https://snohomishcd.org/	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)

Natural Yard Care program – in partnership with Snohomish County	<p>Since 2014, the City has partnered with Snohomish County and other regional municipalities to deliver a comprehensive natural yard care training program. Based on recommendations made after the first workshops were conducted, the program now includes a mix of medium/large scale workshops and small scale expert-led demonstrations throughout the region in addition to locally sponsored on-going programs. In Edmonds, ongoing local programs include the City's Residential Rain Garden Program, pesticide reduction efforts in municipal land care practices, the City's Green Resource Room, and various natural yard care presentations to local groups.</p> <p>The 2018 training included three workshops presented at the Rose Hill Community Center in Mukilteo, and included keynote speakers, WSU master gardeners, NYC demonstrations, surveys, displays and handouts. Pre and post surveys were conducted; as of the writing of this report, results are still being evaluated, and educational/outreach opportunities are continuing into 2019. The City has committed continued funding for additional workshops and an outdoor demonstration day in 2019.</p>	<p>S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
Residential Rain Garden Tour and Information Session Program	<p>Staff from the Parks Department and Public Works led an autumn rain garden tour of the 3rd Ave. residential rain garden cluster on Oct. 6, 2018. Using the <i>Rain Garden Handbook for Western Washington</i> as a guide, participants explored the process of designing, building and maintaining a rain garden, and saw examples of key principles at work, and received a free copy of the <i>Handbook</i> and a list of local resources to take home.</p> <p>Fourteen people participated in the tour. Follow-up surveys were sent two weeks after the tour to 10 participants (some requested not to be contacted or provided inaccurate contact information); 50% (five) of those who received the survey completed it. All five respondents reported that their knowledge of rain gardens increased substantially as a result of the tour. Four out of five respondents reported that they were planning to explore the possibility of installing a rain garden in their yard; one participant reported that she was not planning to move ahead with the process because – upon further investigation after the tour – she determined that she did not have a suitable location for one.</p> <p>https://fortress.wa.gov/ecy/publications/documents/1310027.pdf</p>	<p>S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
Marina Beach Cleanup and Classification (Escaped Trash Assessment Protocol) – in partnership with Zero Waste Washington	<p>In August of 2018, the City of Edmonds partnered with Zero Waste Washington to conduct a massive cleanup effort at Marina Beach Park in order to help test a new Escaped Trash Assessment Protocol being developed by the EPA. More than 80 volunteers joined the effort, which covered 267,379 square feet and removed 125lbs. of litter from the beach.</p> <p>https://youtu.be/Og-VpU4mU3k</p>	<p>S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>

Watershed Fun Fair	This annual event was held this year on May 5, 2018 at the Willow Creek Fish Hatchery. Exhibits included information on soil health, water quality, clean stormwater, fish and habitat restoration, pervious pavement, recycling, amphibians, and backyard wildlife. An <i>Enviroscape</i> stormwater model showed the impacts of stormwater. Native plant starts from Edmonds Parks' greenhouse were given away to participants who completed their event 'Passport'. Students Saving Salmon presented on their stream monitoring efforts. Sound Salmon Solutions joined the event for the first time and provided macroinvertebrate investigations in Willow Creek. Total participation was 200 children and adults.	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Students Saving Salmon (Funding Support)	In 2018, the City of Edmonds continued its stewardship with <i>Students Saving Salmon</i> . This is a group/club of high school students led by a retired biologist who have under taken several small projects along Edmonds waterways, and performs hand-on in-field testing and observation of drainage courses. The City continues to provide funding to this program, which provides further engagement for those interested in stormwater and environmental related fields. Student projects are routinely covered in articles in the local newspaper, leading to increased awareness amongst a larger audience than just the students involved. In 2018, the students conducted water monitoring in the Edmonds Marsh and several creeks along with releasing Coho salmon eggs.	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Watershed Habitat Restoration Stewardship	In 2018, more than 2.2 acres of parkland was under active restoration with the goal of replacing invasive species with native trees and shrubs to both increase habitat diversity and resilience, and help control flooding and erosion. Restoration activities include site preparation, planting, and maintenance, with work being performed by Parks staff, contractors, and/or volunteers. EarthCorps' Puget Sound Stewards receive ongoing funding through the Parks Department to manage a volunteer program in Edmonds. Approximately 16 Stewards are active in Edmonds, leading volunteer stewardship events in our forests, wetlands, and shorelines.	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Other		
Green Resource Room	The City continues to promote and update the City's Green Resource Room, to showcase sustainability and low impact development (LID) techniques and provide guidance and information to Edmonds residents and developers. The Green Resource Room maintains a stock of low flow garden nozzles, garden timers, moisture meters and low flow shower heads that are offered free to the public. Solar Panels, rain barrels and a monitor which cycles through a variety of LID topics are also on display. A highlight of the room is the pervious pavement display which was created to spark interest and inform both residents and contractors of the benefits of incorporating infiltration on their properties. This display can be disassembled and brought to outreach events.	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
Mutt Mitt pet waste stations	"Leash and Scoop" signs are posted throughout Edmonds. Mutt Mitt pet waste stations are located at 11 parks and public areas in Edmonds, including the well-used and popular City dog park at Marina Beach. The <i>Off Leash Area Edmonds (OLAE)</i> non-profit organization help maintain and volunteer their time for maintenance and cleanups. These The pet waste stations are maintained daily by City of Edmonds Parks and Recreation staff. As a controllable pollution source, the pet waste stations have educated and encouraged dog owners to utilize them throughout the city, with the Marina Beach Dog Park approximately removing 300 pounds of pet waste every week..	S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)
City proclamation for "Puget Sound Starts Here Month"	Official City proclamation in May of each year to promote awareness of the <i>Puget Sound Starts Here</i> campaign which serves to educate the general public about local and regional water quality issues. This coincided with the Watershed Fun Fair, a substantial social media campaign, and a month long PSSH banner displayed over heavily travelled arterials for awareness.	S5.C.1.a.i (General public and businesses)

<p><i>“Puget Sound Starts Here”</i> Decals on City Vehicles</p>	<p>In 2018 the City continued to refresh and replace the 14 in. x 6in. <i>“Puget Sound Starts Here”</i> campaign decals on the 8 vehicles used by the Stormwater Department. These vehicles are out on the streets of Edmonds daily for residents to see and promote the idea of clean stormwater. These vehicles include a Vactor truck, 2 street sweepers, a dedicated stormwater TV truck, and fleet vehicles.</p>	<p>S5.C.1.a.i (General public and businesses)</p>
<p>Stormwater Community Research Report</p>	<p>In 2013, Edmonds sanctioned a survey of a sample of its residents and businesses to measure the public’s knowledge and practices regarding stormwater quality issues to be compared to a baseline study conducted in 2009 along with five other municipalities. These 2009/2013 studies continue to guide our public education and outreach activities and enable the City to measure change in target behaviors as a result of our efforts. The report has been posted on the City’s stormwater outreach web page.</p> <p>In 2018, the City was invited to participate in another similar survey which we are strongly considering for 2019.</p> <p>http://www.edmondswa.gov/images/COE/Government/Departments/Public_Works/Stormwater_Utility/pdf/2013_Edmonds_Stormwater_survey_report_FINAL_4_21_2014.pdf</p>	<p>S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses) S5.C.1.a.ii (Residents, landscapers and property owners/managers)</p>
<p>Puget Sound Starts Here Commercials <i>“Certain Things Don’t Mix”</i> Campaign.</p>	<p>In 2018, the City in partnership with STORM and <i>Comcast Spotlight</i> helped fund the successful and well received 3 commercials bringing public attention and awareness to how <i>“Certain Things Don’t Mix”</i>. The commercials took a light hearted but poignant look at how stormwater and pollutants mix together to effect the environment, and were posted multiple times on the City webpage, Green Resource Room, City newsletter, online newspapers and social media where they received upwards of 1000+ views. The commercials were also aired by the Parks Department at their Summer Outdoor Movies, and were seen by 1400 viewers who attended the events.</p> <p>https://www.youtube.com/watch?v=DjkwzGSz69g https://www.youtube.com/watch?v=B2JCLtUf7E8 https://www.youtube.com/watch?v=L-QeXauQQng</p>	<p>S5.C.1.a.i (General public and businesses) S5.C.1.a.ii (General public and businesses)</p>
<p>Participation in regional municipal stormwater educational forums/groups.</p>	<p>The City regularly attended local and regional meetings convened to share and promote outreach resources and techniques. The groups were formed with the intent of educating the general public and specific interest groups about stormwater and the impacts of stormwater on our environment. The City of Edmonds hosted a STORM regional meeting in February 2018.</p>	<p>S5.C.1.a.i (General public and businesses)</p>



Natural Yard Care Workshops continue to be well attended and draw interest from Edmonds residents.

2.1.3 Planned Activities

The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City generally plans to continue most existing education programs into 2019. Funding has been reserved to continue all education programs pending finalization of new permit requirements; some programs have already been committed to and will proceed regardless of permit changes.

The City has already coordinated another round of Natural Yard Care workshops in 2019 to educate and inform citizens of the best ways to responsibly manage their landscaping. Business outreach will continue through our partnership with ECOSS. The Watershed Fun Fair is planned again this May to coordinate with *Puget Sound Starts Here* month. The City also continues to provide support to the Student Saving Salmon program which provides high-school students a chance to be stewards of their environment and gain hands-on experiences with salmon recovery. The program includes local planting and habitat enhancement projects, water and sediment sampling projects, in-stream fish surveys/counts, and assisting with the fabrication and deployment of salmon hatch boxes in local streams.

Staff are considering recommissioning a survey of resident stormwater knowledge to follow-up on the previous 2009 and 2013 surveys. The data would likely drive our decision making on how to select new programs to implement, or existing programs to improve upon in coming permit cycles. Previous rounds of the Natural Yard Care program have also provided feedback data which can be used to modify the existing program to meet proposed permit requirements. A revised audience and/or topic have not yet been selected, and will not be selected until the final permit language is formally issued.

2.2 Public Involvement and Participation

The SWMP requirements for public involvement and participation (Section S5.C.2 of the Phase II permit) are summarized below followed by a description of the recent and planned SWMP activities that meet these requirements.



The City of Edmonds provides opportunities for public involvement in its stormwater management program

2.2.1 Permit Requirements

Section S5.C.2 of the Phase II Permit states that Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures, or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP. The minimum performance measures are:

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



Resident volunteers assist with Beach Park clean-up which categorized trash gathered along the Puget Sound shoreline.

2.2.2 Continuing/Ongoing Activities

The Permit requires that the City continue to provide ongoing opportunities for the public to participate in SWMP decision-making, and to post the annual report for previous calendar year and updated SWMP Plan to the City's website by May 31st each year.⁴

The City's website also provides a portal for residents to contact staff and voice their opinions regarding the SWMP and includes the appropriate contact information for City staff⁵.

The City's budget is updated annually and includes a public hearing to allow for citizen input on stormwater proposals brought forth by the City. Stormwater utility rates were adopted January of 2017, with scheduled increases in 2018 & 2019, only after hosting a public hearing specific to that topic. Public hearings are also held before major code updates, including prior to the most recent LID code update, and allow the public to get involved in the helping shape the policies of the City.

2.2.3 Planned Activities

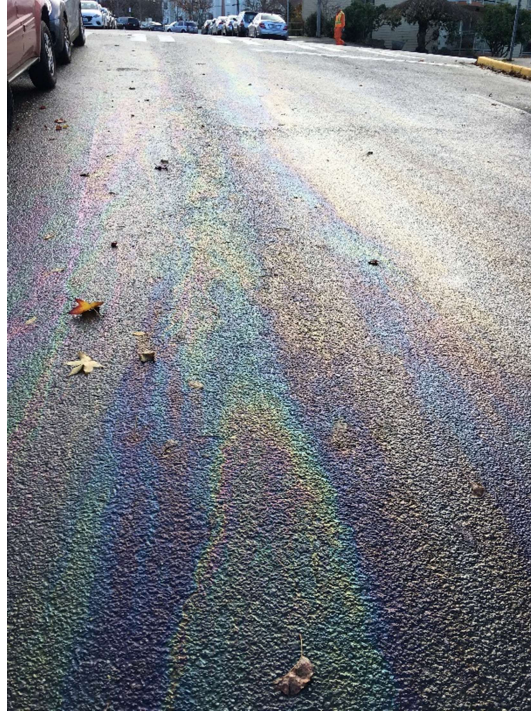
The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City generally plans to continue into 2019 with the same approach as previous years and will continue to engage citizens in the public decision making process. Delayed from 2018, the City will begin the process of updating the stormwater comprehensive plan this year; the plan update will involve several public participation opportunities in the form of workshops and public meetings. Additionally, previously approved stormwater rate increases end in 2019 and a joint utility rate adjustment (including water and sewer utilities) is being pursued this year. The utility rate adjustment process will also include public meetings and participation.

⁴ <http://www.edmondswa.gov/stormwater-utility-system/phase-ii-municipal-stormwater-permit-compliance-npdes.html>

⁵ <http://www.edmondswa.gov/homepage/contact-us.html>

2.3 Illicit Discharge Detection and Elimination

The SWMP requirements for illicit discharge detection and elimination (IDDE) (Section S5.C.3 of the Phase II permit) are summarized below, followed by a description of the ongoing and planned SWMP activities that meet these requirements.



Oil sheen found during illicit discharge investigation.

2.3.1 Permit Requirements

Section S5.C.3 of the Phase II permit states that the SWMP shall include an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4. The minimum performance measures are:

- Mapping of the MS4 shall continue on an ongoing basis. MS4 maps shall be periodically updated.
- Each Permittee shall 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.
- Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.
- Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.
- Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed

to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

- Recordkeeping: Permittees shall track and maintain records of the activities conducted to meet the requirements of this section.



Spill response in progress for fluids from a commercial vehicle.

2.3.2 Ongoing Activities

The Permit requires the City to continue implementing the enforceable mechanism to prohibit illicit discharges, have municipal staff training on illicit discharge detection, elimination and response, host a citizen hotline, and maintain an up to date map of the MS4. The City is currently implementing all these activities and has IDDE specific code in ECDC 7.200.

The following is a list of specific IDDE program activities for 2018 to comply with the Phase II permit, Section S5.C.3:

- The City continued to respond to illicit discharges as they are discovered by staff or reported by concerned citizens or responsible parties. Of the 36 events responded to, only 16 were determined to have reached the MS4.
- Continued partnership with ECOSS and their Spill Kits for Businesses program to reach an additional 16 business this year. The program, which was initiated in 2013 and has contacted 147 Edmonds' businesses to provide general stormwater information and educate owners/business operators on spill prevention and preparation.
- Continued field screening of the City's stormwater drainage system to facilitate the detection of illicit connections and non-stormwater discharges; 33% in 2018.
- Evaluated IDDE program based on reviews of responses to spill incidents and other investigations of illicit discharges or connections; no revisions were made to the IDDE

program this year but the streamside vegetation management procedures were reviewed and revised in response to incident that occurred this year.

- Continued to ensure all appropriate staff are properly trained on IDDE and spill response and inspection staff maintain CESCL certifications.
- Continued to maintain and update maps of the City's MS4; maps of the City's MS4 system are publically available in GIS on the City's mapping webpage⁶ and can be shared as shape files by request.

2.3.3 Planned Activities

The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City generally plans to continue existing IDDE programs into 2019. Field staff training has begun to update IDDE and Spill Response procedures to include the Ecology form which uses the specific Ecology schema which appears to be proposed in the draft new permit. Additionally, CESCL expiration dates were reviewed this year for field staff and training is being pursued as needed to maintain credentials.

⁶ <https://maps.edmondswa.gov>

2.4 Controlling Runoff from New Development, Redevelopment, and Construction Sites

The SWMP requirements for controlling runoff from new development, redevelopment, and construction sites (Section S5.C.4 of the Phase II permit) are summarized below, followed by a description of the ongoing and planned SWMP activities that meet these requirements.



The City continues to seek opportunities for LID retro-fit; including this newly install bio-retention area.

2.4.1 Permit Requirements

Section S5.C.4.a-f of the Phase II permit lists the following requirements:

- Develop and implement an ordinance or ordinance revisions that address runoff from new development, redevelopment, and construction projects in a manner that meets the minimum requirements established by Ecology.
- Develop and implement a site planning process and selection and design criteria for best management practices (BMPs) that will protect water quality and reduce the discharge of pollutants to the maximum extent practicable.
- Develop and implement an approval process for new development that includes inspections of and enforcement of maintenance standards for private stormwater facilities.
- By December 31, 2016, revise and implement provisions in development code regarding techniques for low impact development (LID) that make LID the preferred and commonly-used approach to site development, in order to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations.
- Develop and implement a permitting process with plan review, inspection, and enforcement capability for both public and private projects to ensure sufficient stormwater management, proper installation and maintenance of

erosion control BMPs and permanent stormwater facilities, and assignment of responsibility for post-construction maintenance.

- Inspect all construction sites before construction if they exhibit high potential for sediment transport during construction to ensure adequate erosion and sediment control BMPs, and again upon completion of construction to ensure proper installation of permanent stormwater controls.
- Implement an ordinance or other enforceable mechanism to verify long-term operation and maintenance (O&M) of post-construction facilities and BMPs.
- By December 31, 2016, establish standards for stormwater facility maintenance that are equivalent to those included in Ecology's Stormwater Management Manual for Western Washington (Ecology 2012).
- Conduct annual inspections of stormwater treatment and flow control facilities permitted by the City; inspect all new flow control and water quality treatment facilities for new residential developments that are part of a larger common plan for development or sale.
- Develop a record-keeping procedure for inspection reports, warning letters, notices of violations, and other enforcement records.
- Provide access to Notice of Intent (NOI) letters to representatives of proposed new development and redevelopment projects that require a Construction General Stormwater Permit or an Industrial Stormwater General Permit from Ecology.
- Train City staff responsible for implementing the program described above, including staff involved with permitting, plan review, construction site inspections, and enforcement.

Permit requirement S.5.C.4.g (Watershed-scale planning) does not apply to Edmonds since Snohomish County (the Phase I Permittee) has not selected a watershed that includes Edmonds in their watershed-scale planning process.



The City's custom-built pervious pavement display educates the public on the possibilities of LID BMPs; the display sits in the developments services lobby where the public comes for permitting needs and is displayed at the Watershed Fun Fair each May.

2.4.2 Ongoing Activities

The City will continue to implement and enforce City codes addressing construction/post-construction runoff controls, make Notice of Intents (NOIs) available for sites that require a Construction Stormwater General Permit or an Industrial Stormwater General Permit from Ecology⁷, perform site plan reviews and permitting per the Edmonds Community Development Code (ECDC) Chapter 18.30 (Stormwater Management), perform construction and post-construction inspections, require long-term maintenance, and train staff in all aspects of this Permit requirement.

City codes are now fully compliant with the permit requirements but ECDC 18.30 also includes two very specific provisions which demonstrate Edmonds commitment to stormwater management above the minimum requirements. The first is the addition of detention tanks at the end of the Ecology provided lists for LID BMPs. On many reviews in the City of Edmonds, which is plagued with till soils and steep slopes in many areas, this revision is the only way that stormwater mitigation is achieved on smaller projects. The City also has a 'retrofit' requirement, which requires re-development projects that meet drainage review thresholds to mitigate for a portion of their existing unmitigated surfaces. The two provisions result in requiring mitigation (on smaller projects) which otherwise would not be required by the minimum provisions of permit Appendix A and proactively make an attempt to correct the existing impacts that urbanization has already had on stormwater in the City.

⁷ Provided Ecology keeps it in a publicly available location on their website.

An error in City procedures was discovered during the process of gathering data for the annual report this year. It appears that the City's database may not have been corrected when the previous permit cycles "1 acre" threshold was removed from the permit language. Accordingly, the City database did not correctly reflect the number of private facilities which required inspection and the City did not inspect all of the required facilities annually as required per Section S5.C.4.c.iii. The City continued to inspect private drainage systems and nearly doubled the minimum number of inspection required over the life of the permit; however, the inspections were not performed at the *permit required* facilities.

The database has been corrected and the City now has sufficient information to better track and report the private facility inspections and believes it will comply with this section in the coming year. See the G20 letter, included as Appendix F of this document, for additional information.

2.4.3 Planned Activities

The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City generally plans to continue enforcing existing codes into 2019, with a revision in the way private facility inspection are conducted. See the G20 letter, included as Appendix F of this document, for additional information of necessary revisions to inspection procedures in order to comply with this permit section moving forward. No code revisions are proposed until after the new permit language is issued.

2.5 Pollution Prevention and Operation and Maintenance for Municipal Operations

This section summarizes Phase II permit requirements related to pollution prevention and O&M for municipal operations (Section S5.C.5) and describes current and planned SWMP activities related to these requirements.



City Maintenance Crews replace cartridge filters at a public water quality facility.

2.5.1 Permit Requirements

Section S5.C.5.a-f of the Phase II permit lists the following requirements:

- By December 31, 2017, establish standards for stormwater facility maintenance that are equivalent to those included in Ecology's Stormwater Management Manual for Western Washington (Ecology 2012).
- Develop maintenance standards for facilities that currently do not have maintenance standards.
- Inspect municipally owned or operated permanent stormwater treatment and flow control facilities (other than catch basins) annually and take appropriate maintenance actions.
- Conduct spot checks of potentially damaged permanent treatment and flow control facilities (other than catch basins) after major (greater than 24-hour, 10-year recurrence interval rainfall) storm events.
- Inspect, and clean if necessary, all catch basins and inlets owned or operated by the City at least once by August 1, 2017, and then every two years thereafter. Compliance will be determined by the presence of an established inspection program designed to inspect all sites and achieving 95% of inspections.

- Establish and implement practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads, or highways owned or maintained by the City and road maintenance activities conducted by the City.
- Establish and implement policies and procedures to reduce pollutants in discharges from all lands owned and maintained by the City, including parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control facilities.
- Develop and implement an ongoing training program for City employees whose construction, operations, or maintenance job functions may adversely affect stormwater quality.
- Develop and implement a stormwater pollution prevention plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.
- Maintain records of inspections and maintenance or repair activities.



City crews perform routine maintenance on a public bio-retention facility.

2.5.2 Ongoing Activities

The City continued to maintain the MS4, inspect City-owned stormwater treatment and flow control BMPs/facilities, perform spot checks of facilities on a regular basis (especially after large storm events), follow the SWPPP for public storage and materials yards, and provide appropriate staff training. In 2014, the City increased the capacity of its decant facility at the Public Works Operations Yard to increase the amount and efficiency of handling Vector waste and street sweepings and the City continues to make good use of the extra capacity.

On average, City crews have been inspecting between one-third and one-half of the City's catch basins and facilities each year. This includes catch basins as well as formal City-maintained treatment facilities. All facilities and catch basins are cleaned at the time of inspection and maintenance is performed as needed at that time. Asset management software is used to track inspection schedules so that all facilities and catch basins receive routine attention.

A concern was raised this year about the City's compliance with the public facility maintenance schedule for this permit cycle, back to 2013. However, while previous rounds of the SWMP plan and annual report did not make it abundantly clear, the City is using an alternative cleaning schedule for Public Facility O&M. See the attached memo in Appendix B. Full maintenance records for all public facilities are also included in Appendix C. Based on our existing data, and firsthand knowledge from operating the existing system, the reduced inspection frequency has been, and will continue to be, adequate.

2.5.3 Planned Activities

The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City generally plans to continue existing O&M operations through the end of the current permit cycle. We generally believe our operations and maintenance program provides a maximum efficiency based on our limitations in work force.

Based on our available data and experience operating the system, we will likely propose an alternate catch basin inspection schedule for the new permit cycle in which we will inspect *and clean* all catch basins every three years instead of the draft-proposed 2-year cycle. This will allow our current catch basin inspection program to continue at current workload levels, while still accomplishing more sediment removal than inspection alone, per the minimum permit requirements of this section.

We are also in process of cleaning up our public facility database information, to make future reporting easier. The logic for this process has been documented in the included memo in Appendix B. After reviewing the available data, it is most likely that the City will continue with a reduced inspection frequency for public stormwater facilities as well. See Appendix C for full details and previous inspection data.

This year we chose to purchase electro-fishing equipment and train staff in this procedure as an increased efficiency in our operations and maintenance program. This will allow us to perform annual maintenance of our sediment structure in Perrinville Creek more cost-effectively. It will also give us the ability to relocate fish (with proper permission from WDFD) and be better prepared to respond to spills and emergencies which threaten fish survival.

This year will also be the first year our stormwater pipe replacement program kicks off. The stormwater utility rates were adjusted a couple years back to build revenue to begin replacing the aging pipe system within the City. Initial areas were selected based on known problem areas previously encountered by operations crews and one of the projects is planned to be built this year. A second project has been initiated, but due to complications during design, construction will not be able to begin until 2020. Data gathering for additional 2020 and 2021 project is also underway.

Additionally, the City completed purchase of a new video inspection truck. Crews are in process of completing a data gathering effort for more than 30,000 linear feet of pipe to be used in the stormwater comprehensive plan update later this year. In addition to screening for illicit connections, this information will help us develop priorities for the pipe replacement program in years to come. The SWPPP for each of the maintenance and storage yards are being updated this year as well.

2.6 Monitoring and Assessment

This section summarizes Phase II permit requirements related to stormwater monitoring and assessment (Section S8) and describes current and planned activities related to these requirements.



Stormwater Technician maps and monitors an outfall during low tide.

2.6.1 Requirements

Section S8 of the Phase II permit lists the following requirements:

- Provide a description of any monitoring activities conducted during the reporting period, separate from the Regional Stormwater Monitoring Program (RSMP).
- Status and trends monitoring - notify Ecology by December 1, 2013, whether the Permittee will pay into a collective fund (first payment due August 15, 2014) to implement the RSMP status and trends monitoring in Puget Sound, or will conduct the monitoring separate from any collective effort.
- Stormwater effectiveness studies – notify Ecology by December 1, 2013, whether the Permittee will pay into a collective fund (first payment due August 15, 2014) to implement RSMP effectiveness studies, or will conduct the monitoring separate from any collective effort.
- Source identification and diagnostic monitoring – each Permittee shall pay into a collective fund (first payment due August 15, 2014) to implement the RSMP Source Identification Information Repository (SIDIR).



Staff monitor the condition of a culvert downstream of Lake Ballinger

2.6.2 Recent/Ongoing Activities

In 2013, the City notified Ecology that it would pay into the collective fund for the RSMP status & trends monitoring, stormwater effectiveness studies, and the source identification information repository. The first payment for the RSMP was sent to Ecology before August 15, 2014 and the City has continued the payment in subsequent years.

2.6.3 Planned Activities

The coming year begins a new permit cycle, for which performance measures have not yet been defined. The City is undecided in how to achieved compliance with this section in the next permit cycle; however, it is most likely that we will continue to elect payments for the RSMP.

3 REFERENCES

City of Edmonds. 2010. Storm and Surface Water Management Comprehensive Plan. October 2010.

Ecology. 2014. Stormwater Management Manual for Western Washington. August. Washington Department of Ecology publication 14-10-055.

4 APPENDICES

4.1 Appendix A – IDDE Summary

City of Edmonds 2018 IDDE Summary Report

ID	Spill Date	Spill location	Resident / Owner / Caller	Description	Resolution	Immediate response to discharge	< 7 days to investigate discharge	21 days to Investigate illicit connection	Remove connection w/in 6 months	Currently under construction	IDDE/Spill Impacted MS4	IDDE/Spill Eliminated	Follow up Dates & Notes
18-001	1/9/2018	401 Howell Edmonds, WA 98020	Larry Taylor	Report of Edmonds Autobody washing cars into storm drain.	Spoke with owner and they are actively using a car wash kit when they wash vehicle and discharge to the building plumbing system. No illicit discharge actually occurred.	Yes	Yes	N/A	N/A	No	No	Y	
18-002	2/1/2018	17707 76th Ave Edmonds, WA 98026	Mr. & Mrs. Adams 17707 76th Ave W Edmonds, WA 98026	Crew (JW) reports and takes photos of sediment laden water leaving site without active permit.	Found contractor on-site who stated a well has 'popped' and he was minutes away from completing the repair and ending the discharge. Crews to re-inspect downstream CBs. (3-183 & 3-182)	Yes	Yes	N/A	N/A	Yes	Yes	Y	04/02/2018 -Followed up in morning to confirm work was completed. House has earthen driveway; sent letter educating property owner on potential erosion concerns of existing driveway. 4/23/2018 - Crews reinspected downstream CB's. No issues.
18-003	3/13/2018	8713 236 th St SW Edmonds, WA 98026	Public Works Operations	Crew found sediment collected on surface around CB and pumping equipment on active construction site.	Inspector working with contractor to get compliance.	Yes	Yes	N/A	N/A	Yes	Yes	Y	10/11/2019 - *See 18-030*
18-004	3/14/2018	8631 & 8623 218th St SW Edmonds, WA 98026	Public Works Operations	Crew found two poly lines discharging on a dry day.	Investigated and found discharges were in fact storm water from sump pumps for back yards; observed discharge and it was clean and free from sediment & suds. No illicit discharge occurred.	Yes	Yes	N/A	N/A	No	No	Y	
18-005	4/12/2018	16431 74TH PL W Edmonds, WA 98026	All Breed Mobile Grooming C/o Ms. Tigner 2215 189th Pl SW Lynnwood, WA 98036	Crew (MJ) found soapy discharge from mobile pet grooming vehicle at spill address.	Mailed letter to grooming business address alerting them of their operation being illegal if discharging to a storm drain and requested they cease operation until discharges are eliminated. Notified code enforcement officer of mobile business name & history for potential future enforcement.	Yes	Yes	N/A	N/A	No	Yes	Y	
18-006	5/2/2018	21107 70th Ave. W. Edmonds, WA 98026	Kuzma Fish Market C/o Ken Hewitt	Building Inspector found concrete cutting crew washing concrete slurry into storm drain.	Investigated and found a water/slurry discharge from recent concrete cutting. However, the water/slurry discharge did not reach the MS4. Notified the crew and owner of the business of potential hazards. No illicit discharge occurred.	Yes	Yes	N/A	N/A	Yes	No	Y	05/04/2018 - Re-Inspected and found no further issues. This property is still under construction.
18-007	5/4/2018	1012 9th Ave N Edmonds, WA 98020	Maria Acob-Nash & Thomas Nash	Staff have noticed a continual flow from a discharge pipe at this property. Upon closer investigation, a fair amount of sediment is being washed out onto the ADA ramp and into the adjacent CB. Also appears that it would be a freezing hazard in winter months.	Sent letter to resident informing them of the discharge concerns and that the sediment wash out was an illicit discharge. Required correction in 60-days.	Yes	Yes	N/A	N/A	No	Yes	Y	06/07/2018 - Resident notified Zack of his intentions to install a dry well on property to mitigate the discharge.
18-008	1/24/2018	612 7th Ave. S. Edmonds, WA 98020	Contractor	Contractor for private development hit an existing water service releasing an est. 4,000 gal. of water into MS4 which drains to Shellabarger Creek.	Damaged 3/4" service line was repaired after 2 hours. The remaining sediment on the surface was swept and removed.	Yes	Yes	N/A	N/A	Yes	Yes	Y	01/25/2018 - Z.R. filed an ERTS
18-009	5/12/2018	420 Bell St. Edmonds, WA 98020	Law Office of Mike Healy	IDDE reported via ERTS (#681277) on 05/12/18 Reporting of sewage over parking lot and into CB by citizen.	Inspected site and took pictures on 5/14. Found a sewer repair took place and small amount of what looks to be toilet paper was not properly cleaned up. No sign or smell of sewage was present. Currently no indication of sewage is present in MS4 affecting WQ.	Yes	Yes	N/A	N/A	No	No	Y	
18-010	5/16/2018	1135 Viewland Way Edmonds, WA 98020	Robert and Kathy Waltz	Citizen called in to report of turbid construction water bypassing BMP and flowing downhill into MS4	Inspected site and took pictures on 5/17. Found contractor had struck an old french drain on excavating site which allowed silt/clay soil to enter our MS4 for an undetermined amount of time. Contractor has since laid down straw wattles as a BMP.	Yes	Yes	N/A	N/A	Yes	Yes	Y	05/17/2018 - Recommended that contractor clean the storm system on east side of 11th PL W. This property is still under construction.
18-011	6/1/2018	15927 75th PL W Edmonds, WA 98026	Scott Conahan	Resident reported that the creek had turned green.	Inspected creek to find that it was a light shade of green. Spill traced it upstream to 15931 72nd Ave. W. where Ace Const. had dye tested a private storm system.	Yes	Yes	N/A	N/A	Yes	Yes	Y	06/02/2018 - This construction is remodel and will follow up with Eng. Tech to continue to enforce.
18-012	6/4/2018	10426 243rd PL SW Edmonds, WA 98020	Craig Hutchins	Caller reported a Republic Garbage truck that had blown a hydraulic line around 1300. IDDE reported via ERTS (#681734) on 06/04/2018	Mike J received the ERTS at 1530 and was informed Republic Services were taking care of the spill. However, Mike J was called back to the spill address to clean up between 1830-2015. Republic contractors were not on scene until 2015 at night. An estimated 10 gallons of Hydraulic Oil was spilled.	Yes	Yes	N/A	N/A	No	No	Y	06/05/2018 - Best Parking Lot Cleaning were the contracted cleaning company. 15 bags of dry sweep was used by Mike J. Ops sweeper was sent to continue cleanup on 06/05. 06/08/2018 - Initiated Call for Jeff W. to place CB inserts and booms near 24310 107th PL SW per request of resident. 06/12/2018 - Best Parking Lot Cleaning still onsite pressure washing road.
18-013	6/5/2018	21003 Woodlake Dr. Edmonds, WA 98026	Public Works Operations (Skylar Merback)	Ops crew notified Pat J. at 0830 of a 'sudsy-high flowing' CB. Faint detection of detergent or sewer also reported. Filed WO#7161 in Aktivov.	Pat J inspected the CB at 1500 and found residual suds and higher than normal flow. No sign of car washing or contractor maint.	Yes	Yes	N/A	N/A	No	No	Y	06/06/2018 - Followed up and continued to see high flow and trace amount of suds. This is not considered to be an IDDE. Likely caused by draining of the de-chlorinated Bowdoin Reservoir at five corners.
18-014	6/11/2018	24305 87th PL W Edmonds, WA 98026	Megan Darrow (Republic Services)	Republic Services called in a 5 gallon coolant spill at 0900 that reached the MS4. Equipment failure was the cause. Reported promptly and filed an ERTS (#681866)	Republic Services responded by spreading dry sweep and having a 'Best Parking Lot Cleaning' Vactor and Sweeper tend to the effected CB. Mike J. attended cleanup scene around 1130. Spill was confined to the one cb and did not spread to the MS4.	Yes	Yes	N/A	N/A	No	No	Y	06/12/2018 - Followed up and found the spill scene was properly cleaned up.
18-015	6/11/2018	820 Dayton Ave. Edmonds, WA 98020	John Zimmerman	Mike J. received a call from 752 Dayton St. of dirty stream water around 1500. Inspected and found contractor, Action Jackson to be rodding a pipe at a private tributary that flows to Shellabarger Creek. Ordered them to stop.	The contractor cut the stuck hose and ceased operation. Properties downstream as far as 7th/Maple are affected with turbid water and sediment. Notified the residents that were home.	Yes	Yes	N/A	N/A	No	Yes	Y	06/12/2018 - Reinspected address and noticed turbid water is settling. Still murky in the ponds. Resident is now informed of his private drainage and how it connects to the MS4. 06/14/2019 - Reinspected site to find almost no residual sedimentation. No further action necessary.
18-016	6/18/2018	16000 75th PL SW Edmonds, WA 98026	Jorge Florez	Asphalt truck tipped over coming down NMR. Asphalt spilled over roadway.	Zack attended accident scene. The vehicle did not lose fluids nor did the asphalt reach the MS4. Will follow up to ensure cleanup and this will not affect the storm system during a rain event.	Yes	Yes	N/A	N/A	No	No	Y	

City of Edmonds 2018 IDDE Summary Report

18-017	6/18/2018	1125 Olympic Ave. Edmonds, WA 98020	Nicholas Cooper	Runaway truck with trailer rolled down Viewland Dr. and crashed into 1125 Olympic Ave. Mike J notified Zack.	Zack attended accident scene. Spoke with Fire Dept. and was informed the truck had a small fuel leak which was contained by the Fire Dept. Only the emergency hydrant water was discharged. Not considered an IDDE.	Yes	Yes	N/A	N/A	No	No	Y	
18-018	7/1/2018	170 W. Dayton St. Edmonds, WA 98020	Dept. of Ecology	Anonymous caller provided Dept. of Ecology a report of an illicit paint washing near the marsh in Harbor Square. ERTS (#682309)	Met DoE at address and investigated to find paint residue. The private CB connects to two City structures before draining to the marsh. Contractor will be instructed to clean private CB. Will follow up with DoE.	Yes	Yes	N/A	N/A	No	Yes	Y	07/02/18 - Spoke with contractor who will clean private CB. Will follow up. 07/09/2018 - Contractor cleaned CB and sediment filter. Emailed Ecology with follow up. No further action necessary.
18-019	7/5/2018	21940 Hwy 99 Edmonds, WA 98026	Susan Dier	Citizen reported 'white residue' running off sidewalk and into storm drain. First noticed the discharge on June 29th. ERTS (#682400)	Investigated area (strip mall near Winco) but due to the span of time from witnessed to reported, there was no clear and obvious sign of 'wash water'.	Yes	Yes	N/A	N/A	No	No	Y	07/09/2018 - Followed up via email with DoE and received pics.
18-020	7/18/2018	6th & Bell, Edmonds, WA 98020	Public Works Operations (Mike Johnson)	Mike J noticed an odor from a CB located at 6th & Bell. He feels this is a food/grease dumping. He contacted the Event Organizer for the Summer Market.	Mike talked to me on 7/18 about this issue. I told him to make an Aktivov WO for a Vactor cleaning before the next rainfall. He will follow up with his contact person regarding illegal food waste dumping.	Yes	Yes	N/A	N/A	No	Yes	Y	07/18/2018 - Mike J. spoke with Christina from the Edmonds Museum who will enforce and monitor any future dumpings. The Vactor also cleaned the contaminated CB.
18-021	7/18/2018	1021 Brookmere Dr. Edmonds, WA 98020	Linda Hoffman	Resident reported that Shell creek had turned white around 15:30-16:00 Called Public Works around 16:30.	I investigated the residents address at Shell Creek as well the surrounding streets and outfalls to the creek and found no evidence. Due to the elapsed time the spill/discharge had dissipated. I spoke with the resident who will continue to monitor the creek.	Yes	Yes	N/A	N/A	No	No	Y	07/19/2018 - Followed up again in surrounding streets to find no indication of illegal dumping.
18-022	7/25/2018	1152 Viewland Way Edmonds, WA 98020	Megan Darrow (Republic Services)	Resident called the Fire Dept. to notify of a coolant leak from a Republic Garbage Truck.	Republic Services responded to address with a sweeper and clean up crew to clean an estimated 2 gallons of coolant that spilled around 13:00. The spill did not reach the MS4 but will also clean the nearby CB. An Ops manager was also sent to the scene.	Yes	Yes	N/A	N/A	No	No	Y	07/27/2018 - Did a site visit to find all spill evidence was largely cleaned up.
18-023	4/27/2018	1011 Brookmere Dr. Edmonds, WA 98020	Public Works Operations (Tod Moles)	On 07/27/2018 (3 months after the spray) I was notified via email that Ops had sprayed roundup near Shell Creek. Resident sent emails to Joe Scordino/ Carrie Hite / Rich Lindsay.	Street/Storm Manager spoke to Street Leadworker in regards to when and where it is appropriate to spray Roundup. I will follow up with Parks Dept. and the Street/Storm Manager. The original Aktivov WO is # 6239	Yes	Yes	N/A	N/A	No	No	Y	Public Works Operations purchased Avenger spray to use in critical areas.
18-024	8/23/2018	1120 Edmonds St. Edmonds, WA 98020	Public Works Operations (Darren Browning)	Approx. 12:45pm, Darren Browning notified me of a non-permitted Pool draining at 1120 Edmonds St.	Darren took a photograph of the incident and I will proceed with a follow up to the resident as well as the hired Pool/Spa company.	Yes	Yes	N/A	N/A	No	Yes	Y	10/25/2018 - Sent letter to Mobile Pool & Spa
18-025	8/30/2018	Seaview Park, Edmonds, WA 98020	Engineering (Jack Carlock)	Contractors truck had a minor fuel spill in the parking lot of Seaview Park. Contractor immediately attended spill and used kitty litter and absorbant pads.	Jack Carlock followed up the next day to find all precautions and cleanup was excuted well and to the contractors best ability. No further action is necessary. The spill did not enter the MS4.	Yes	Yes	N/A	N/A	Yes	No	Y	
18-026	8/31/2018	111 2nd Ave. S. Edmonds, WA 98020	Engineering (Jennifer Lambert)	A crane loading the counterweights from the construction crane tipped over causing a minor spill.	Jennifer Lambert was on scene shortly after the incident and notified Engineering Dept. of the spill. The spill did not reach the MS4.	Yes	Yes	N/A	N/A	Yes	No	Y	09/03/2018 - A site visit indicated that the accident was cleaned up, as was the minor fluid spill. No further action is necessary.
18-027	9/14/2018	74th PL W & MBR, Edmonds, WA 98026	Public Works (Royce)	Concrete truck heading uphill spilled concrete out the back. Minor spill.	Concrete company called out a sweeper to clean the roadway. The spill did not reach the MS4 as it was a dry day.	Yes	Yes	N/A	N/A	Yes	No	Y	
18-028	9/24/2018	7416 176th St SW, Edmonds, WA 98026	Craig Holmes (Email to PW)	Plat under construction on south-east corner; appears exposed slopes toward roadways suffered surface rilling in this weekends rains. Sediment washed into 2 CBs which are part of the City's MS4; quantity unknown but appears relatively minor given amount of displaced soils on slope. Adjacent property owner had defended against flood water and directed runoff into CBs with sandbags, etc.	City inspectors contacted developer to request action to clean up spill and address erosion concern. CB cleaning will be required.	Yes	Yes	N/A	N/A	Yes	Yes	Y	10/29/2018 - Confirmed cleaning was done.
18-029	10/15/2018	700 Admiral Way, Edmonds, WA 98020	Dan Ritchie (VM to SW Eng)	Diver reported 'yellow-ish discharge from submerged pipes approximated 200' south of marina park jetty. Believed to be the Willow Creek (City) or WSDOT outfall near Marina Beach park.	Inspected upstream CBs and found no evidence of pollution; observations made on the shoreline did not indicate pollution discharge either. No illicit discharge was confirmed.	Yes	Yes	N/A	N/A	N/A	No	Y	
18-030	10/11/2018	8713 236th St SW Edmonds, WA 98026	Jeff W. (Operations)	Jeff W. noticed muddy discharge entering MS4 from construction site.	Notified Chris and Natalie (Engineering) of reported discharge. This is the second reported incident of muddy discharge at this construction site.	Yes	Yes	N/A	N/A	Yes	Yes	Y	10/11/2018 - Confimed with Natalie that this was being taken care of. 10/16/2018 - Site visit showed contractor was not discharging water into CB, and CB had insert placed in it to protect against further construction debris. 03/21/2019 - Jobsite has now been completed and no further action is necessary.
18-031	10/15/2018	7527 210th ST SW, Edmonds, WA 98026	Mike Thies via unknown identity	House at 7527 210th ST SW was reported to have an IDDE of car washing water/suds	10/24/2018 - Conducted site visit and found no residual surfactants and/or IDDE issues.	Yes	Yes	N/A	N/A	No	No	Y	10/24/2018 - Sent 'clean car wash' mailer to reported address. No further action necessary
18-032	10/11/2018	202 Edmonds St., Edmonds, WA 98020	Resident at 202 Edmonds St.	Resident notified city that the sewage pump had stopped running and that sewage was likely to overflow.	Engineering Dept and Operations attended site to find that the sub contractor restarted the pump and the system resumed normal operation. The overflow of sewage was very minimal and not quantifiable and did not reach the MS4. Mike D will follow up with contractor.	Yes	Yes	N/A	N/A	Yes	No	Y	
18-033	10/25/2018	505 Bell St. Edmonds, WA 98020	Public Works Operations (Jimmy Ward)	Public Works Operations on the request of Pat Johnson cleaned 8-975 and found remnants of food waste discharge from Summer Market.	Public Works Operations cleaned CB, pressure washed surface and removed sediment catch which held the grease/food waste. Will follow up with organizers of Summer Market to ensure this won't happen in the future.	Yes	Yes	N/A	N/A	No	Yes	Y	10/26/2018 - Received email from Summer Market stating they will address my concerns.
18-034	11/23/2018	74th & 210th St SW, Edmonds, WA 98026	Resident (Greg Malowiki)	Resident reported a 1 gallon paint spill. Took a picture.	Followed up 11/26/2018 and found no residual traces of paint in the MS4 or on the street surface. Will contact company responsible to educate and notify them.	Yes	Yes	N/A	N/A	No	No	Y	
18-035	11/27/2018	2nd Ave. S & James St. Edmonds, WA 98020	Landau Assoc. (Ken Reid)	Employee of Landau reported a sheen at the intersection of 2nd and James. Said it had been there since at least 8am.	Site visit confirmed spill. Likely diesel fuel and estimated at no more than 1/2 gallon. Vacuum sweeper called in to clean road surface best it could. Currently no rain. Will follow up.	Yes	Yes	N/A	N/A	No	Yes	Y	11/28/2018 - Absorbant Pads in CB's. 12/17/2018 - Follow up visit; pads pulled, no sign of spill.
18-036	12/11/2018	8525 Talbot Rd, Edmonds, WA 98020	Public Works Operations (Pat Rochford)	Public Works Operations (Pat Rochford) called in an illicit discharge involving a permitted jobsite allowing muddy water in gutter line.	Followed up with Jennifer Lambert and Chris Rivera (12/11) to resolve the contractor issue. They contacted the contractor immediately to fix the situation.	Yes	Yes	N/A	N/A	Yes	Yes	Y	12/17/2018 - Site visit; hay bails along curbline. Sediment in gutter and cb's. 2-36 had a sediment sock installed. Will continue to monitor.

4.2 Appendix B – Memo: RE: Public Facilities List for Operations & Maintenance per S5.C.5.b



MEMORANDUM

Date: March 27, 2019
To: File
From: Zachary Richardson, Stormwater Engineer *ZR*
Subject: Public Facilities List for Operations & Maintenance per S5.C.5.b

In a meeting with our Ecology Permit Coordinator earlier this year, it was noted that the City data for O&M inspection seemed flawed and would suggest that the City may not have been meeting the minimum requirements of S5.C.5.b.

During review of the concern, it was found that our current facilities data was not reported or formatted in a way that was conducive to permit required reporting. All “non-typical” catch basins were being individually selected and listed as facilities. This often included multiple manholes to be listed for a single facility (i.e. if a vault had 4 access points, it was reported as 4 facilities). Additionally, it was discovered that past engineers had an affinity toward installing risers and control structures in miscellaneous catch basins associated with the MS4. Such risers were never formally designed as detention facilities and most carry too much upland flow to be of any significance at the limited 12”-36” pipe diameters which exist upstream of such risers.

Accordingly, control structures or risers which meet the following conditions were determined to be “hydraulic control structures” rather than formal detention or water quality facilities:

- Upstream pipe is 12” or less, OR
 - It was assumed that 12” pipes and smaller could not provide sufficient storage volume to be considered a formal detention facility.
- Control structures which are in-line and which receive upstream flow from more than one neighborhood or road (i.e. are part of the conveyance system).
 - It was determined that volume from such large surfaces could not be adequately detained in the small pipe diameters available and such systems were not designed to a detention standard.

Conversely, the following were assumed to be public detention or water quality facilities:

- Systems with a riser and upstream pipe larger than 12", built after 1977 (first City drainage code), and which only drain a single road or single neighborhood that was developed as a common plat, were assumed to be detention systems.
 - These types of systems were assumed to have been installed as a development requirements for flow control and were considered facilities when dedicated for public maintenance or located within the right-of-way.
- Any risers with upstream pipes exceeding 36" were assumed to be detention systems.
- Any system with proprietary products used for water quality treatment were assumed to be pre-treatment and included as a water quality facilities.
- Any riser or BMP proceeding a detention facility was assumed to be pre-treatment and included as a water quality facility.

Two facilities were reviewed and determined to be privately maintained facilities and were removed from the public facility list. The engineer also decided to leave any risers located immediately upstream of the Edmonds Marsh as "water quality facilities"; while not designed as formal facilities that would meet this definition, it was recognized that these risers may have significant value to the highly sensitive ecological area immediately downstream and would be best served by annual inspection as a 'facility'.

The net result of the reevaluation of public facility determinations are as follows:

- Total Reported Non-typical Manholes (as of Jan 2019): 178
- Hydraulic Control Structures: 70
- Manholes combined into other facilities: 35
- Determined to be Private Facilities: 2
- Public Facilities Subject to S5.C.5.b: 71

Since beginning the process of reviewing our data and the data submitted under previous permit annual reports, I have come to understand that my predecessor had intended to communicate that the City was using an alternate schedule to meet the requirements of Section S5.C.5.b.

Each year, the engineer uploaded data for the facilities that were inspected that year; the data included the full record of past inspection and maintenance activities for each facility. The current City program for inspection includes performing maintenance activity at the time of inspection and thus, where the records submitted indicate "serviced" without additional notes, it should be interpreted as "performed routine sediment removal but did not find anything of note during the inspection". While not well explained, it was the intent of the

engineer to show that the historic records indicated that “serviced” was the only record of note for nearly all facilities and therefore the current City program for operation and maintenance of City-owned facilities was adequate. Accordingly, it is my interpretation that a G-20 letter is not needed for previous City operations pertaining to Section S5.C.5.


I made an error in reporting when I broke with the previous format while uploading the 2017 annual report and did not provide all facility records for 2017, as my predecessor had in the past. The full maintenance history of each of these remaining facilities will be reviewed and included with this year's SWMP to more clearly document and address the City plan moving forward.

The City will continue with this methodology until the current permit cycle has ended. With the corrected data as noted above, staff will reevaluate needs and workloads to determine the most appropriate schedule to be used for compliance during the new permit cycle beginning in 2019.

***4.3 Appendix C – Memo: RE: Alternate Schedule for Public Facility
Operations & Maintenance***



MEMORANDUM

Date: March 27, 2019
To: File
From: Zachary Richardson, Stormwater Engineer 
Subject: Alternate Schedule for Public Facility Operations & Maintenance

In preparing the 2018 Annual Report and 2019 Stormwater Management Program (SWMP) Plan, the City has undergone a relatively large revision to our GIS and asset management data bases in order to easier report permit requirements each year. I have reviewed the available maintenance data and believe the data supports an alternate maintenance schedule for as allowed under draft permit language for section S5.C.7.c.i (existing permit language in section S5.C.5.b).

The attached data represents all maintenance information for the revised list of public stormwater facilities. In order to understand the data, it is critical to note that the use of the term “serviced” was intended to indicate that no additional maintenance was needed. The City of Edmonds has a unique program which inspects *and* cleans all catch basins and facilities at the same time. This results in slower inspection times, but more sediment actually removed from the system. “Serviced” was the general term for that combined effort when not accompanied by a note or comment. Therefore, the term “serviced” can be interpreted as “removed sediment but nothing else of note”.

It is also worth noting, that the City implemented a new asset management system between 2016 and 2017. Accordingly, separate reports must be run through both systems to perform this assessment. The two reports are attached, with all sheets from one system followed by all sheets from the other system. Most facility numbers should correspond to a sheet in each of the two sets. Maintenance activities exceeding the typical “serviced” indication are highlight in yellow.

With this is mind, it appears that a reduced inspection cycle has been used in most previous years with the average time between inspections for most facility ranging between 2 and 3 years. A large majority of the inspections rendered no


additional work needed. Upon follow up, facilities which have vegetation management or brush cutting called out for multiple years are already on a separate list for brush cutting and do get inspected annually for that component of work. Accordingly, it appears the already used reduced inspection frequency is adequate and can continue to be used. The City should strive to inspect at least 35% of all public facilities annually to keep up with this alternate schedule.

The only exception to reduced maintenance needs may be Filterra devices. The City has performed more frequent maintenance on these system, but it is unclear if that is a result of a learning curve with new technologies or an actual need to have performed the work. Accordingly, we will perform annual inspection of all Filterra devices, perform maintenance only as needed, and update inspection frequency accordingly.

4.4 Appendix D – Memo: RE: S4.F Letter Dated 1/25/2018



MEMORANDUM

Date: March 21, 2019
To: File
From: Zachary Richardson, Stormwater Engineer 
Subject: S4.F Letter Dated 1/25/2018

Attachments: SF4 Letter dated 1/25/2018
Email from Andrew Funk 1/29/2018

This memo is meant to address confusion regarding the single S4.F letter that the City of Edmonds submitted to Ecology in the 2018 permit year. The letter was provided in error, and the discharge did not warrant an S4.F letter. Accordingly, no additional follow up is needed.

As a new permit coordinator, I misunderstood the distinction between the G3 notices and S4.F notices required under the permit. In an abundance of caution, I submitted both documents for the same spill. Upon further understanding, and confirmation from our Permit Manager at Ecology, the discharge did not actually warrant the S4.F letter and the ERTS filed for the spill was adequate reporting of the spill.

City of Edmonds



Public Works Department
Engineering Division



CITY OF EDMONDS

121 5TH AVENUE NORTH · EDMONDS, WA 98020 · 425-771-0220 · FAX 425-672-5750
Website: www.edmondswa.gov

PUBLIC WORKS DEPARTMENT
Engineering Division

DAVE EARLING
MAYOR

January 25, 2018

Andrew Funk,
Municipal Stormwater Planner
Department of Ecology
3190 – 160th Ave SE
Bellevue, WA 98008-5452

Subject: NPDES Phase II Municipal Stormwater Permit
S4.F Notification
Water Service Break on 7th Ave S, Discharge to Shellabarger Creek

Dear Mr. Funk:

The purpose of this letter is to notify the Department of Ecology under section S4.F.1 of the Permit that a discharge from the City of Edmonds' (City) Municipal Separate Storm Sewer System (MS4) has caused or contributed to a likely violation of water quality standards in Shellabarger Creek, a tributary to Puget Sound.

In the morning of January 24, 2018, a contractor for a private development was trenching to install new utility connections and the contractor hit an existing water service line that was not properly located. The damage to the water line released pressurized water into the construction trench. The water and entrained soil from the open trench flowed to the surface of the trench and into the City's MS4 on 7th Ave S. The incident was reported as an environmental issue online to Ecology's Northwest Regional Office (NWROID #57).

It took approximately 2 hours to get the ¾" service line shut off and discharge to the MS4 to terminate. It is estimated that approximately 4,000 gallons of water were released during this time. The portion of the release which reached the surface of the excavated trench flowed into the City's MS4 on 7th Ave S. At least one catch basin contained inlet protection, however it is not clear that all of the runoff entered the MS4 through this catch basin. The City's MS4 from 7th Ave S meanders north and west along public roads to the intersection of 3rd Ave S & Dayton Street, before turning south down 3rd Ave S. The runoff travels more than 4,300 feet (0.81 miles) in the City's MS4 before reaching lower Shellabarger Creek. Shellabarger Creek then discharges underneath Edmonds Way to the Edmonds Marsh and ultimately to the Puget Sound.

The damaged line has been repaired and remaining sediments on surfaces were swept and removed.

Please contact me should you require additional information on this incident. I can be reached at 425-771-0220, extension 1323 or at zachary.richardson@edmondswa.gov.

In accordance with Permit section G19:

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Sincerely,



Zachary Richardson
Stormwater Engineer, City of Edmonds

cc: Phil Williams, Director, Public Works and Utilities
Rob English, P.E., City Engineer
Tod Moles, Street and Storm Manager
Mike Johnson, Storm Division Lead

Richardson, Zachary

From: Funk, Andrew (ECY) <afun461@ECY.WA.GOV>
Sent: Monday, January 29, 2018 9:46 AM
To: Richardson, Zachary
Subject: RE: Potable Water Spill into MS4
Attachments: Compliance with Standards Guidance.pdf; Reporting Discharges and Spills under the Municipal Stormwater NPDES Permits.pdf

Zachary,

I see in the ERTS that the potable discharge picked up sediment on the way to the MS4 system. Did you or someone observe (or sample) the turbid water discharging from the MS4 outfall into the receiving water? That connection between MS4 and receiving water is what's needed to trigger an S4.F notification letter. I have attached Ecology's S4.F guidance document or your reference. I also attached the guidance on G3/ERTS notifications, which explains the possible connection to and S4.F notification.

Let me know if you need any assistance.

Regards

Andrew Funk

Municipal Stormwater Planner

Washington State Dept. of Ecology

Northwest Regional Office

Office: (425) 649-7215

Cell: (360) 489-5047

afun461@ecy.wa.gov

"Conservation is a positive exercise of skill and insight, not merely a negative exercise of abstinence or caution."
—Aldo Leopold

From: Richardson, Zachary [mailto:Zachary.Richardson@edmondswa.gov]

Sent: Thursday, January 25, 2018 4:12 PM

To: Funk, Andrew (ECY) <afun461@ECY.WA.GOV>

Subject: RE: Potable Water Spill into MS4

Thanks for the response! From your voicemail message, I had assumed you were out after noon today so I went ahead and filed both an ERTS and an S4 letter today before your called.

When you get back we can chat about what the best thing to do next with the S4 letter.

Enjoy your weekend!

Zachary Richardson, PE

Stormwater Engineer | City of Edmonds

121-5th Ave N | Edmonds, WA 98020

425.771.0220 | Ext. 1323

Zachary.Richardson@edmondswa.gov

From: Funk, Andrew (ECY) [<mailto:afun461@ECY.WA.GOV>]
Sent: Thursday, January 25, 2018 4:00 PM
To: Richardson, Zachary <Zachary.Richardson@edmondswa.gov>
Subject: Potable Water Spill into MS4

Zachary,

I just left you a voicemail. You should go ahead and enter an ERTS for this discharge into the MS4. Discharges of potable water are allowed, but on the condition that the residual chlorine concentration is 0.1ppm or less, and the discharge is volumetrically and velocity controlled to prevent resuspension of sediments in the MS4. Since this is an accidental discharge of up to 40K gallons to the MS4 it does not seem these two conditions could have been considered or met.

We can talk further on whether S4F notification applies here.

Regards

Andrew Funk

Municipal Stormwater Planner

Washington State Dept. of Ecology

Northwest Regional Office

Office: (425) 649-7215

Cell: (360) 489-5047

afun461@ecy.wa.gov

"Conservation is a positive exercise of skill and insight, not merely a negative exercise of abstinence or caution."

—Aldo Leopold

4.5 Appendix E – Beach Park Escaped Trash Protocol Summary

Escaped Trash Assessment Protocol (ETAP)

Marina Beach Park, Edmonds - 8/1/18

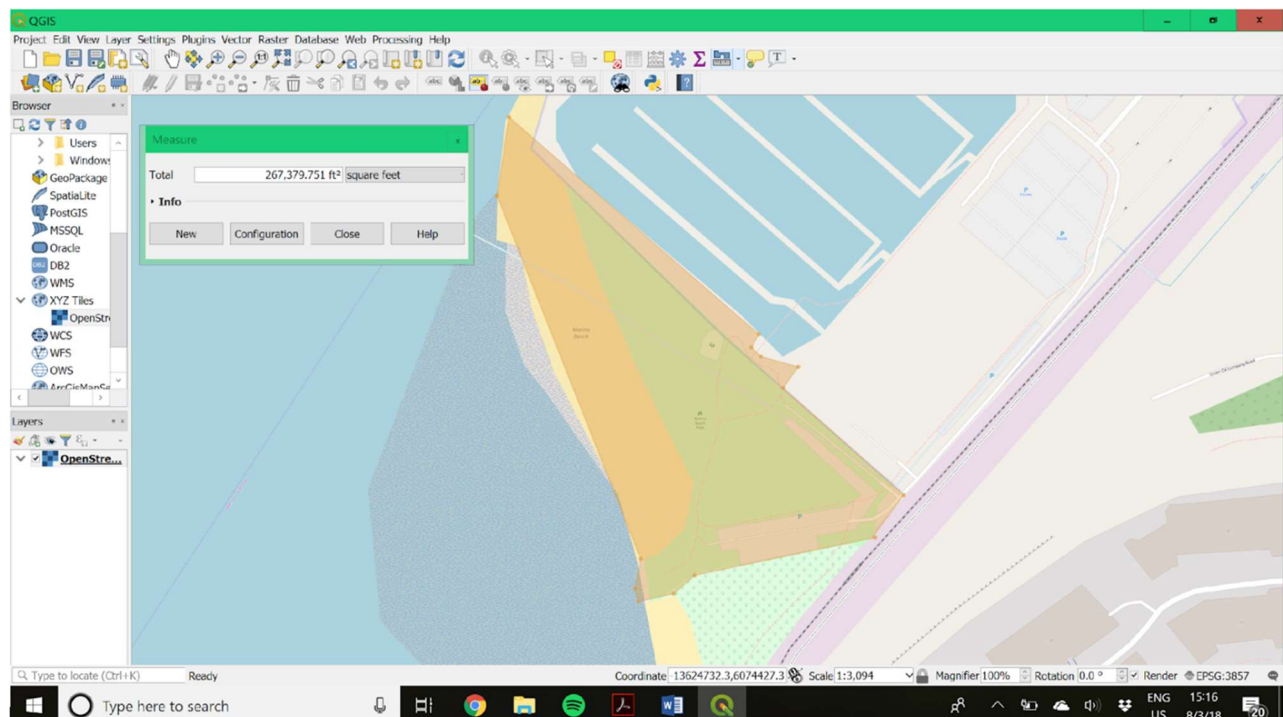
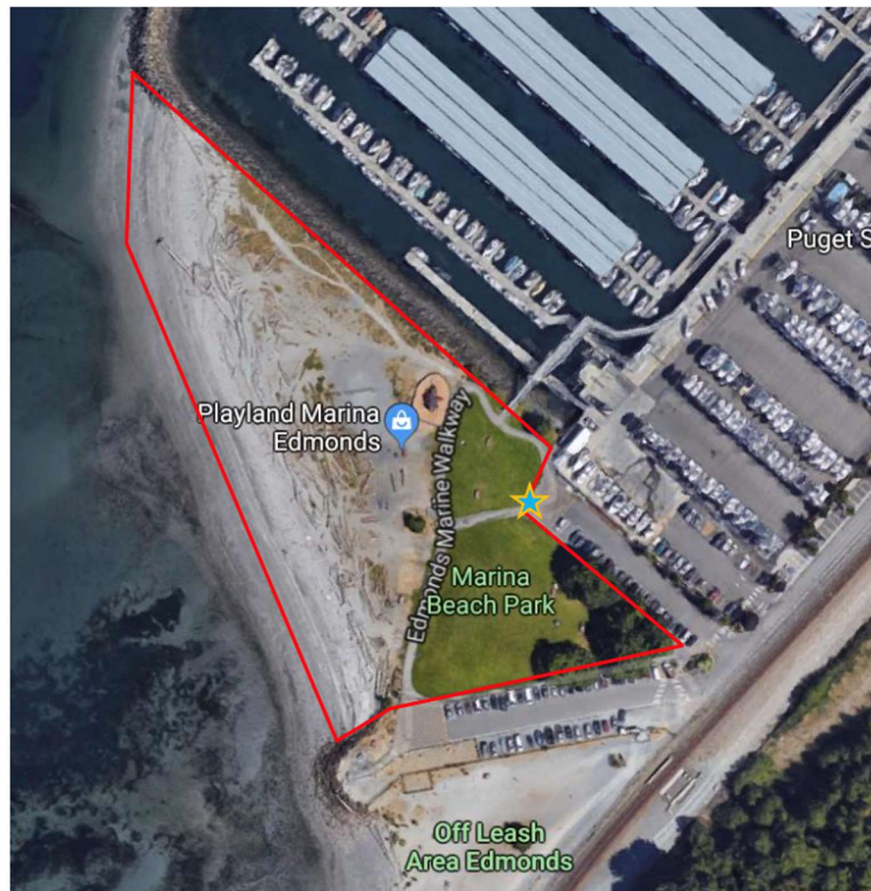
Team Leads: Jennifer Leach, Heather Trim, and Jessica Mitchell



A massive effort to cleanup Marina Beach Park

On a cloudy Wednesday in August, about 80 volunteers showed up to help Zero Waste Washington and the City of Edmonds with EPA's Escaped Trash Assessment Protocol. The goal of the protocol is to compile a network of litter data around the Seattle area so that we can officially list "litter", or "escaped trash", as an impairment under the Clean Water Act. The Edmonds cleanup was our largest one so far. We covered a total of 267,379 square feet and collected 125 lbs. of litter.

The area of the cleanup (Google Maps and GIS)



The data (litter counts and # item per 100 square feet)

		Item List	Total #	# items found per 100 square feet	Weight/volume metric (pounds)
Paper	1	Bags	1	0.0029	0.0032
	2	Cups	3	0.0087	0.0007
	3	Beverage and Food Cartons	0	0	0
	4	Other Disposable Food Serviceware Items	64	0.1857	8.82E-05
	5	Food and Other Product Packaging	44	0.1276	0.0786
	6	Cardboard (corrugated)	0	0	0
	7	Paper and paper pieces	362	1.050	0.33
Glass	8	Beverage Bottles and Containers	13	0.0377	7.68
	9	Food and Other Packaging	0	0	0
	10	Glass fragments (≥2.5 cm) - packaging/containers/unidentifiable	85	0.2467	3.96
	11	Glass fragments (< 2.5 cm)	40	0.1161	0.0003
Metal	12	Beverage Cans and Containers	30	0.0871	2.38
	13	Bottle Caps and Beverage Packaging	50	0.1451	0.0004
	14	Food and Other Product Packaging	148	0.4295	8.82E-05
	15	Metal pieces (≥2.5cm) - packaging/containers/unidentifiable	64	0.1857	0.0003
	16	Metal pieces (<2.5 cm)	37	0.1074	0.0002
	17	Bags	46	0.1335	0.0013
Plastic	18	Beverage Bottles and Containers	31	0.0899	5.45
	19	Straws and Stirrers	64	0.1857	0.1764
	20	Bottle Caps	77	0.2234	0.0009
	21	Other Beverage Packaging (Lids, Seals..)	7	0.0203	0.0004
	22	Disposable Food Serviceware Items (cups, utensils, plates..)	35	0.1016	0.61
	23	Food Wrappers and Pouches	292	0.8473	0.49
	24	Other Food and Other Product Packaging	119	0.3453	1.27
	25	Fragments/Pieces (≥2.5 cm)	394	1.1433	0.7937
	26	Fragments/Pieces (<2.5 cm)		0	0.4147
	27	Cigarettes/ Cannabis butts. Filters and ends	1002	2.9076	0.7495
Other	28	Smoking/drug paraphernalia	11	0.0319	0.0002
	29	Sharps - Medical/Drug/ Personal	0	0	0
	30	Sharps - Fishing/recreational/other	0	0	0
	31	Medical Waste Supplies/ Non-sharps	36	0.1045	0.0007
	32	Toiletries/ Personal Products	59	0.1712	0.3009
	33	Textiles and Shoes	44	0.1277	8.09
	34	Electronics	3	0.0087	0.0012
	35	Entertainment/ Recreation Items	145	0.4208	4.91

36	Household/ Camping Items	19	0.0551	1.26
37	Commercial/Industrial/Office/Agricultural	11	0.0319	0.319
38	Construction and Demolition Debris	109	0.3163	62.96
39	Paint, Chemical Containers and Other Hazardous	9	0.0261	0.0288
40	Fishing/Maritime Gear	26	0.0754	4.04
41	Vehicle/Vessel Parts	0	0	0
42	Furniture/Carpet/and Other bulky Items (Please Write in)	0	0	0
43	Foamed pieces/fragments of docks, floats..		0	0
44	Illegal Dumping - Whole bags of trash	0	0	0
45	Organic Matter/Items		0	3.96
46	Write in (firewood; charred)	78	0.2263	14.95

*categories with counts above 20 items are highlighted in orange

The park had been cleaned up as normal by Park employees, but we still found an enormous amount of litter. Over 1,000 cigarette butts, a multitude of plastic food packaging, and a surprising amount of firewood (for a fire-free beach); there was certainly no shortage of litter.

The sheer man-power of 80 people made this cleanup particularly rigorous and thorough. It was truly satisfying to clean the *whole* park, not just a section of it. This data will be useful as we continue to adapt and revise the protocol.

4.6 Appendix F – G20 Letter



CITY OF EDMONDS

121 5TH AVENUE NORTH · EDMONDS, WA 98020 · 425-771-0220 · FAX 425-672-5750
Website: www.edmondswa.gov

DAVE EARLING
MAYOR

PUBLIC WORKS DEPARTMENT

Engineering Division

March 28, 2019

Colleen Crotty
Department of Ecology NWRO
3190 160th Ave SE
Bellevue, WA 98008-5452

RE: G-20 Notification For WAR04-5513
Western Washington Phase II Municipal Stormwater Permit
Permit Section S5.C.4.c.iii – Private Facility Inspections

Dear Ms. Crotty,

This letter is being provided in compliance with section G20 of the permit as City staff have recently reviewed inspection data and found that the City has not met Permit condition S5.C.4.c.iii, which requires annual inspection of private facilities permitted as stormwater facilities (as defined within the permit).

Upon review of the data for the entire permit cycle, it appears that the definition of stormwater facilities was not adjusted when the 2013 permit was released. The 2013 version of the permit removed the 1 acre threshold which was previously used for defining the facilities to be inspected under this permit section. However, the acre requirement remained built into the City's database for private systems; accordingly, not all facilities were correctly captured, resulting in a shortage of inspections on required facility types.

Additionally, new staff in both the stormwater engineer and stormwater technician positions for the last permit year resulted in attention being directed to older private storm systems within the City, which may not have met the definition of "stormwater facility", per the permit. So, while the City continued inspections of private systems, the number which counted toward the minimum permit requirements was limited. Staff admittedly misunderstood the permit requirements, but still worked to achieve long-term operation and maintenance of private systems which could be negatively impacting the MS4 and waters of the state; we believe the *intent* of the permit section was still met.

Below is a table providing revised data for the entire permit cycle based on the corrected data:



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Engineering Division

Year	Private Facilities Per Permit Definition	Required Facility Inspections	Total Private Inspections Performed
2013	26	1	90
2014	31	8	160
2015	46	3	43
2016	52	1	26
2017	63	8	31
2018	66	8	65
Totals	284	29	415

As noted above, total private facility inspections over the life of the current permit cycle well exceeded the minimum number of inspections to have met the requirements of the permit; the lack of compliance came more as a result of inspecting the *wrong* facilities. With the data having been corrected for easier tracking and reporting, direction to the stormwater technician, who performs the private facility inspections, has been made more clear. The stormwater technician will inspect all private facilities meeting the permit definition (and the clarification provided in the frequently asked questions section of the Ecology webpage¹) before spending time on additional older systems which may not meet this definition. With this relatively minor change in procedure and corrected database, we believe the City will be able to fully meet this permit requirement in the coming permit year and future permit cycles.

If you have any further questions, please contact Zachary Richardson, Stormwater Engineer at 425-771-0220, ext. 1323 or zachary.richardson@edmondswa.gov.

In accordance with Permit section G19:

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

¹ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Stormwater-permittee-guidance-resources/Municipal-stormwater-permit-FAQs#maintenance>



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PUBLIC WORKS DEPARTMENT

Engineering Division

DAVE EARLING
MAYOR

Sincerely,

Phil Williams
Director of Public Works and Utilities

cc: Rob English, P.E., City Engineer
Tod Moles, Street and Storm Manager
Mike DeLilla, P.E., Senior Utility Engineer
Zachary Richardson, P.E., Stormwater Engineer
Pat Johnson, Stormwater Engineering Technician