City of Edmonds
Stormwater Management Program (SWMP) Documentation

For Calendar Year 2009

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

By

Jerry Shuster, P.E.
Stormwater Engineering Program Manager

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1 INTRODUCTION

This document has been prepared in accordance with the *Western Washington Phase II Municipal Stormwater Permit* (Phase II Permit) issued by the Department of Ecology (Ecology) on January 17, 2007. This permit applies to the City of Edmonds from February 16, 2007 through February 15, 2012 (inclusive). This permit was amended by Ecology on June 17, 2009. Section S5.A of the Phase II Permit requires each Permittee to develop and implement a Stormwater Management Program (SWMP). The SWMP is a set of actions and activities intended to:

- Reduce the discharge of pollutants from the City's municipal separate storm sewer system (MS4) to the maximum extent practicable (MEP).
- Meet the State's requirements for using all known, available, and reasonable methods of prevention, control, and treatment (AKART).
- Protect water quality.
- Comply with the following components listed in sections S5.C.1 through S5.C.5 of the Phase II Permit:
    - Public Education and Outreach
    - Public Involvement and Participation
    - Illicit Discharge Detection and Elimination
    - Controlling Runoff form New Development, Redevelopment, and Construction Sites
    - Pollution Prevention in Municipal Operations

Section S5.2 of the Phase II Permit requires written documentation of the City of Edmonds' SWMP. Section S9 of the Phase II Permit requires the City of Edmonds to provide Ecology an annual report that summarizes the City's compliance with the Phase II permit. The written documentation of the SWMP is one components of the annual report. The annual report is due on March 31, of each year beginning in 2008. Each annual report covers the SWMP actions and activities for the proceeding calendar year. This SWMP covers the City of Edmonds' Phase II Permit actions and activities for calendar year 2009.

1.1 Stormwater Management in Edmonds

Edmonds has a population of approximately 40,000 and covers approximately 9 square miles of land area. Edmonds is largely a built-out community. The majority of the stormwater runoff from Edmonds eventually drains into Puget Sound with the balance entering the greater Lake Ballinger watershed that discharges into Lake Washington in Seattle. Edmonds is the oldest incorporated city in Snohomish County. Logger George Brackett founded Edmonds in 1890.

The City of Edmonds is committed to meeting the compliance requirements and deadlines of the Phase II Permit. The stormwater management program in Edmonds is lead by the City's

Stormwater Engineering Program Manager in the City's Public Works Department, Engineering Division. The Stormwater Engineering Program Manager works closely with the following:

- Public Works Department
    - Street/Storm Manager and Crew,
    - City Engineer, Engineering Program Manager, and Technicians
    - Recycling Coordinator
- Development Services Department – Planners
- Parks Department - Environmental Education Coordinator.

During calendar year 2009, due to the downturn in the nation and local economy, the City of Edmonds experienced a budget shortfall and all City employees, including those responsible for the stormwater management program, were required to take eight (unpaid) furlough days. In 2010, the City plans to revise its current Stormwater Comprehensive Plan and stormwater utility rate structure that will include asking the City Council for funding to implement the remaining requirements in the Phase II Permit.

1.2 Document Organization

The remaining section of this document has been organized to follow the sequence of Phase II Permit requirements S5.C.1 through S5.C.5. Permit requirement, current activities, planned activities and due dates for each of the five required elements are presented.

2 STORMWATER MANAGEMENT PLAN ELEMENTS

2.1 Public Education and Outreach

The required elements for a public education and outreach program (Section S5.C.1 of the Phase II permit) are summarized below, followed by a description of the current and planned SWMP activities that meet these requirements.

2.1.1 Permit Requirements

Section S5.C.1.a-c of the Phase II permit lists the following requirements:

- Provide an education and outreach program targeting the following audiences:
  - General public
  - General public, businesses (including home-based and mobile businesses)
  - Homeowners, landscapers, and property managers
  - Engineers, contractors, developers, City staff involved in review of development projects, and City staff involved in land use planning.
- Measure the understanding and adoption of target behaviors among the targeted audiences
- Track and maintain records of public education and outreach activities.

2.1.2 Current Activities

The City currently provides the educational materials and public outreach activities summarized in Table 1. The City of Edmonds has extensive public education and outreach program. In addition, in 2009 (ahead of the permit schedule) the sanctioned a survey of sample of its residents to measure the public's knowledge and practices regarding stormwater quality issues. This study will be used as a baseline for targeting future public education and outreach activities. It will also serve as a baseline for comparison for measuring any change in target behaviors from future public education and outreach activities.

The City currently tracks and maintains records of public education and outreach activities. The number of "activities" is tabulated as follows: Each entry in Table 1 is counted as one "activity," except for the Sound Salmon curriculum which was presented four times during 2010 and was counted as four activities. Also, the letters sent in 2007 were not counted for this year.

Table 1 Current 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 (hard copies available from Engineering Dept. at City hall , the Parks Dept. or on City Website)		
Where in the World Is Your Watershed? brochure	Brochure describes pollutant sources from lawns and gardens, pet wastes, land clearing and construction activity, and vehicles. It provides a list of actions that citizens can do to protect their watershed.	S5.C.1.a.i (general public) S5.C.1.a.ii (general public) S5.C.1.a.iii (homeowners)
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.	S5.C.1.a.i general public) S5.C.1.a.ii (general public) S5.C.1.a.iii (homeowners)
Let's Discreetly Discuss Fluffy's Pet Waste brochure	Brochure prepared by the Snohomish County Solid Waste Management Division that outlines best practices for pet waste disposal.	S5.C.1.a.i (general public)
Natural Lawn Care booklet	This booklet was prepared by Seattle/King County and Washington State University Extension and is available at Edmonds City Hall.	S5.C.1.a.iii (homeowners)
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.	S5.C.1.a.i (general public) S5.C.1.a.iii (homeowners)
Household Hazardous Waste Drop-off Station bookmarks	Information regarding the County's Household Hazardous Waste Drop-off Station and proper disposal of lawn and garden chemicals, fertilizer, etc.	S5.C.1.a.ii (general public)
Natural Lawn Care booklet	This booklet was prepared by Seattle/King County and Washington State University Extension	S5.C.1.a.iii (homeowners)
Safer Alternatives for the Home and Garden fact sheets`	Fact sheets prepared by the Washington Toxics Coalition that describes alternatives to common toxic products for control of slugs, aphids, and weeds, and choosing fertilizers.	S5.C.1.a.ii (general public) S5.C.1.a.iii (homeowners)
Protecting Water Quality in Urban Runoff	Fact sheet published by USEPA that discusses urbanization's effect on the quality & quantity of stormwater runoff and what can be done to best manage this runoff.	S5.C.1.a.ii (general public) S5.C.1.a.iii (homeowners)
Protecting Washington's Waters from Stormwater Pollution	Eight page environmental education guide that discusses a variety of topic related to stormwater runoff and presents ways to protect receiving water from the detrimental effects of uncontrolled stormwater runoff.	S5.C.1.a.ii (general public) S5.C.1.a.iii (homeowners)
Business mailings	In August 2007, letters discussing best management practices and illegal discharges were mailed to automotive sales (new and used) companies, automotive repair companies, concrete contractors, and food service providers.	S5.C.1.a.ii (businesses)
Self-Guided Interpretive Tours		
Watershed Mystery Tour in Yost Park	Self-guided tour map that provides information on the general impacts of stormwater runoff and the impacts of growth and development (on City web site).	S5.C.1.a.i (general public)
Mutt Mitt pet waste stations	Scoop and Leash Your Dog signs are posted throughout Edmonds. Mutt Mitt pet waste stations are located at the City dog park.	S5.C.1.a.i (general public)

Educational Material/Activity	Description of Educational Material/Activity	Phase II Permit Sections(s) (and Target Audience)
Storm drain stenciling	Information regarding storm drain stenciling is provided on the City website. Free assistance and stenciling supplies are offered to volunteer groups that apply the stencil.	S5.C.1.a.i (general public)
Classroom Presentations and Curriculums		
Sound Salmon curriculum	This school curriculum for grades 5 through 9, which can be downloaded from the City website, discusses decisions people make that can affect water quality such as disposing of waste oil and paint, washing cars, and landscaping. Presented to **4** classes in 2009. The program is offered as a classroom presentation by a Ranger-Naturalist for a $60 fee.	S5.C.1.a.i (general public) S5.C.1.a.ii (general public)
Shared Waters booklet	This booklet is used in elementary schools primarily for salmon education; it also discusses storm drains, hazardous waste disposal, pet waste disposal, washing cars, and landscaping.	S5.C.1.a.i (general public) S5.C.1.a.ii (general public)
Natural Lawn Care booklet	This booklet was prepared by Seattle/King County and Washington State University Extension and is available at Edmonds City Hall.	S5.C.1.a.iii (homeowners)
Classes and Seminars		
Rain Gardens, Rain Barrels, and Your Backyard	A 2-hour course taught by Snohomish Conservation District staff that provides step-by-step instructions for how to build your own rain barrel and rain garden (advertised in The CRAZE, a recreation newsletter published by Edmonds, Lynnwood, and Mountlake Terrace).	S5.C.1.a.iii (homeowners)
Watershed Fun Fair	Family event with displays and information about backyard wildlife habitat, recycling, energy, water conservation, and other environmental topics. Norm Nesting, City of Lynnwood's Surface Water Educator had an information table at the event, with an emphasis on proper pet waste management.	S5.C.1.a.i (general public)
Other		
Detention pond maintenance	Public Works Department educates businesses and homeowners associations on proper maintenance.	S5.C.1.a.iii (property managers)
Salmon-Friendly Lawn yard sign	Homeowners sign a pledge that declares their intent to place the sign and to practice natural lawn care and to educate neighbors and others on the basics of such care	S5.C.1.a.i (general public) S5.C.1.a.iii (homeowners)
Stormwater Community Research Report	Edmonds sanctioned a survey of sample of its residents to measure the public's knowledge and practices regarding stormwater quality issues. This study will be used as a baseline for targeting future public education and outreach activities. It will also serve as a baseline for comparison for measuring any change in target behaviors from future public education and outreach activities.	S5.C.1.a.iii (homeowners
"Puget Sound Starts Here" social marketing campaign	Edmonds participated in this social media campaign by having a link to and from the "PSSH" website.	S5.C.1.a.i (general public) S5.C.1.a.iii (homeowners
Charity car wash kit	Charity car wash kit with car wash runoff control materials is available to organizations that host car washes.	S5.C.1.a.ii (general public)

2.1.3 Planned Activities

In 2010 the City plans on continuing all of the public education and outreach activities presented in Table 1 that were implemented in 2009. Additional public education and outreach activities associated with Phase II Permit provisions S5.C.4 (Controlling Runoff from New Development, Redevelopment, and Construction Sites) and S5.C.5 (Pollution Prevention in Municipal Operations) will be part of the roll-out of these programs required for 2010.

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 current and planned SWMP activities that meet these requirements.

2.2.1 Permit Requirements

Section S5.C.2.a-b of the Phase II Permit lists the following requirements:

- Create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the SWMP.
- Develop and implement a process for consideration of public comments on the SWMP.
- Make the SWMP document and annual report submitted to Ecology available to the public.

2.2.2 Current Activities

In 2009, the City provided several opportunities for public involvement and participation as summarized in Table 2.

Table 2 Current Public Involvement and Participation Opportunities

Date	Stormwater Program Public Involvement and Participation Opportunity	Phase II Permit Section
February 24, 2009	Presentation given on the update of the Stormwater Comprehensive Plan and Stormwater Management Program to at City Council Meeting (with Public Comment period).	S5.C.2.a
March 31, 2009	SWMP document for CY 2008 posted on the City website with contact information provided for the Public to provide comments.	S5.C.2.b
March 31, 2009	Annual report for 2008 stormwater program activities posted on the City website with contact information provided for the Public to provide comments.	S5.C.2.b
June 9, 2009	Presentation given to City Council's CS/DS Committee regarding the ongoing updates to the Stormwater Management Code (ECDC 18.30) and the Illicit Discharge Code (ECC 7.200). Meetings are open to the Public.	S5.C.2.a
August 17, 2009	Public Hearing on the revision to the ECC 7.200, Illicit Discharge Code (with Public comment period).	S5.C.2.a
November 19, 2009	Public Open House presenting an overview and describing the planned approach to revising the Stormwater Management Code (ECDC 18.30). Public comment forms were distributed to all attendees.	S5.C.2.a
December 8, 2009	Presentation given to City Council's CS/DS Committee regarding the update to the Stormwater Management Code (ECDC 18.30). Meetings are open to the Public.	S5.C.2.a

CS/DS = Community Services/Development Services
ECDC = Edmonds Community Development Code
ECC = Edmonds City Code
SWMP = stormwater management program.

2.2.3 Planned Activities

In 2010, the City will be completing the revision to the Stormwater Code (ECDC 18.30) and updating its Stormwater Comprehensive Plan (last updated in 2003). Table 3 outlines recently completed and planned activities that offer opportunities for public involvement and participation in the City's stormwater program, and the associated Phase II permit deadlines.

Table 3 Planned Public Involvement and Participation Opportunities

Task ID	Task Description	Phase II Permit Schedule and Section
PI-1	Edmonds City Council briefing on revised Stormwater Management Code	March 23, 2010 Permit section: S5.C.2.a
PI-2	Revised SWMP document and Phase II permit annual report on the City website	Permit deadline: March 31, 2009 Permit section: S5.C.2.b
PI-3	Public Hearing on revised Stormwater Management Code	April 20, 2010 Permit section: S5.C.2.a
PI-4	Planned Periodic updates regarding the	Updates in April and June 2010 newsletters

Task ID	Task Description	Phase II Permit Schedule and Section
	Stormwater Comprehensive Plan update process in the Update on Edmonds newsletter	Permit section: S5.C.2.a
PI-5	Planning Board meetings on update to Stormwater Comprehensive Plan	May, 2010 Permit section: S5.C.2.a
PI-6	Public hearing on update to Stormwater Comprehensive Plan	June 2010 Permit section: S5.C.2.a

SWMP = stormwater management program.

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 current and planned SWMP activities that meet these requirements.

2.3.1 Permit Requirements

Section S5.C.3.a-f of the Phase II permit lists the following requirements:

- Develop a storm sewer map.
- Develop and implement an illicit discharge ordinance.
- Develop and implement an ongoing program to detect and address illicit discharges, spills, illicit connections, and illegal dumping.
- Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of waste.
- Adopt and implement procedures for IDDE program evaluation and assessment.
- Provide training to staff on identification and reporting of illegal discharges.

2.3.2 Current Activities

The City has accomplished the IDDE activities summarized in Table 4.

Table 4 Current Illicit Discharge Detection and Elimination Activities

Task	Description of Work	Phase II Permit Section
Storm sewer map	The City has developed a storm sewer map using AutoCAD and GIS software and is in the process of compiling all of this information in GIS.	S5.C.3.a
Illicit discharge ordinance	The City had an ordinance prohibiting illegal discharges prior to the effective date of the Phase II Permit. In August 2009, the City Council passed and ordinance was updating the illicit discharge code to consistency with Ecology's guidance for Phase II Permit compliance.	S5.C.3.b
Distribution of public information	In August 2007, the City mailed out information on best management practices and illegal discharges to food service businesses, auto repair facilities, auto sales businesses, and concrete contractors. The City also distributes information to known violators of the Illegal Discharge Code.	S5.C.3.d.i
Public listing for illegal discharge hotline	There are phone numbers on the "Streams, Lakes, Wetlands, and Critical Areas" web page of the City website for use by any citizen who sees signs of pollutant spills near or in a storm drain or water body.	S5.C.3.d.ii
Procedures for program evaluation and assessment	The City's Stormwater Engineering Program Manager and Public Works Crews respond to incidents, take photos, document the details of the incident and how it was dealt with, and logs this information in a tracking spreadsheet.	S5.C.3.e
Training of Municipal Staff	Training was conduced for 14 municipal staff members in August 2009 who are responsible for identification, investigation, termination, cleanup, and reporting illicit discharges. This training included the "Awareness Level" and "Response and Enforcement" level.	S5.C.3.f.i

GIS = geographic information system.

2.3.3 Planned Activities

In addition to the IDDE activities discussed in the previous section, Table 5 outlines planned activities and the associated permit deadlines.

Table 5 Planned Illicit Discharge Detection and Elimination Activities

Task ID	Task Description	Phase II Permit Schedule, Status, and Section
IDDE-1	Complete the storm sewer map, including tributary conveyances, drainage areas, and land use associated with large outfalls (i.e. outfalls with a pipe diameter of at least 24 inches) and verification of the locations and types of catch basins and compile all of this information on a GIS storm sewer map.	Permit deadline: February 15, 2011 Status: ongoing Permit section: S5.C.3.a
IDDE-3	Develop and implement an ongoing program to detect and eliminate illicit discharges that includes the following: ▪ Procedures for locating priority areas ▪ Field assessment activities ▪ Discharge characterization procedure ▪ Source tracing procedures ▪ Source removal procedures.	Permit deadline: August 19, 2011 Status: To be developed Permit section: S5.C.3.c
IDDE-4	Develop a prioritized list of water bodies and associated drainage areas for IDDE focus.	Permit deadline: February 15, 2010 Status: To be developed Permit section: S5.C.3.c.ii
IDDE-5	Conduct field assessment on three high-priority water bodies.	Permit deadline: February 15, 2011 Status: To be developed Permit section: S5.C.3.c.ii
IDDE-6	Conduct field assessment on one site per year.	Permit deadline: after February 15, 2011 Status: To be developed Permit section: S5.C.3.c.ii
IDDE-7	Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.	Permit deadline: August 19, 2011 Status: To be developed Permit section: S5.C.3.d
IDDE-9	Adopt procedures for IDDE program evaluation (number and type of spills, ID, inspections, and feedback from public education efforts).	Permit deadline: August 19, 2011 Status: To be developed Permit section: S5.C.3.e
IDDE-11	Conduct training for all municipal staff that might come in contact with or observe an illicit discharge/connection on the proper procedures for identifying, reporting, and responding to the illicit discharge/connection.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.3.f.ii

IDDE = illicit discharge detection and elimination.

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 current and planned SWMP activities that meet these requirements.

2.4.1 Permit Requirements

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

- Develop and adopt a new 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.
- Adopt a site planning process and selection and design criteria for best management practice (BMPs) that will protect water quality and reduce the discharge of pollutants to the maximum extent practicable.
- Develop an approval process for new development that includes inspections of private stormwater facilities.
- Develop provisions for techniques for low impact development (LID) that take into account site conditions, access, and long-term maintenance.
- Develop and implement a permitting process with plan review, inspection, and enforcement capability for all sites that disturb a land area of 1 acre or more.
- 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.
- Adopt an ordinance or other enforceable mechanism to verify long-term operation and maintenance (O&M) of post-construction facilities and BMPs.
- Establish standards for stormwater facility maintenance that are equivalent to those included in Ecology's Stormwater Management Manual for Western Washington (Ecology 2005).
- 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 copies of notice of intent (NOI) letters to representatives of proposed new development and redevelopment projects.
- Train City staff responsible for implementing the program described above, including staff involved with permitting, plan review, construction site inspections, and enforcement.

2.4.2 Current Activities

The City has accomplished the activities listed in Table 6 to control runoff from new development, redevelopment, and construction sites.

Table 6 Current Activities to Control Runoff from New Development, Redevelopment, and Construction Sites

Task	Description of Work	Phase II Permit Section
Ordinance revisions that address runoff from new development, redevelopment, and construction projects	The City has worked throughout 2009 to develop a new stormwater management ordinance to both update current requirements and standards and to comply with the Phase II Permit requirements. A Public Open House was held on November 19, 2009 to solicit input on the proposed revisions.	S5.C.4.a
Private stormwater facility inspections	The City has legal authority, through the maintenance inspection program, to inspect private stormwater facilities that discharge to the City's storm sewer system.	S5.C.4.a.iii
Erosivity Waiver	The City does not allow construction sites to apply for the Erosivity Waiver.	S5.C.4.a.v S5.C.4.b.vii
Stormwater site plan review	The City Engineering Division (public Works Department) requires all development and construction projects with more than 1 acre of disturbed soils to develop a stormwater pollution prevention plan that is reviewed by the City Development Services Department.	S5.C.4.b.i
Inspections before clearing and construction	The City Engineering Division inspects, before clearing (pre-con inspection) and during construction, (TESC inspection) all known development sites that have a high potential for sediment transport.	S5.C.4.b.ii
Inspections during construction	The City Engineering Division inspects all known permitted development sites during construction to verify proper installation and maintenance of erosion and sediment control BMPs.	S5.C.4.b.iii
Inspections upon completion of construction	The City Engineering Division inspects all permitted development sites upon completion of construction to ensure proper installation of permanent stormwater facilities and structural BMPs.	S5.C.4.b.iv
Enforcement strategy	The City Engineering Division has an enforcement strategy to respond to issues of noncompliance (Edmonds Community Development Code, Section 18.30.080).	S5.C.4.b.vi
Long-term operation and maintenance ordinance	The City has ordinances that identify ownership, maintenance, repairs, operation, and inspection of private stormwater systems (Edmonds Community Development Code, Sections 18.30.100 and 18.30.120 and 18.30.130).	S5.C.4.c.i
Inspections of existing facilities	The City has a maintenance inspection program but is not inspecting all stormwater treatment and flow control facilities on an annual basis.	S5.C.4.c.iii
Inspections of new facilities	The City's engineering technicians currently inspect new flow control and water quality treatment facilities.	S5.C.4.c.iv
Record-keeping	The City uses PermitTrax software to keep records of inspections and enforcement actions by staff related to development projects that require a building permit. For those sites that do not require a building permit, other electronic tracking means are used. In all cases the following are tracked inspection reports, warning letters, notices of violations, and other enforcement records.	S5.C.4.d
Notice of intent availability	The City Development Services Department has made available copies of the Notice of Intent for Construction Activity and copies of the Notice of Intent for Industrial Activity. For large site projects where a pre-application meeting is needed, these two documents are included in the agenda,	S5.C.4.e

Task	Description of Work	Phase II Permit Section
Training	City engineering inspectors have attended formal workshops and training courses regarding erosion and sediment control practices and inspections. Five of the Engineering Staff members are Certified Erosion and Sediment Control Leads (CESL). New inspectors and plan reviewers receive on-the-job training regarding inspection practices, review of erosion and sediment control practices, and review of permanent stormwater facilities.	S5.C.4.f

BMP = best management practice.
TESC = Temporary Erosion and Sediment Control

2.4.3 Planned Activities

In addition to the activities discussed in the previous section, Table 7 outlines planned activities and the associated permit deadlines.

Table 7 Planned Activities to Control Runoff from New Development, Redevelopment, and Construction Sites

Task ID	Task Description	Phase II Permit Schedule, Status, Section
DEV-1	Develop and adopt a new ordinance or ordinance revisions that address runoff from new development, redevelopment, and construction projects.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.a.
DEV-2	Adopt a site planning process and selection and design criteria for BMP that will protect water quality and reduce the discharge of pollutants to the maximum extent practicable.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.a.ii
DEV-3	Develop provisions for LID techniques that take into account site conditions, access, and long-term maintenance.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.a.iv
DEV-4	Review the inspection record-keeping system to determine whether 95 percent of sites are inspected.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.b.v
DEV-5	Require formal maintenance plans upon completion of construction for permanent stormwater controls such as stormwater treatment and detention facilities and other structural BMPs.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.c.i
DEV-6	Establish maintenance standards equivalent to those specified in the Stormwater Management Manual for Western Washington (Ecology 2005).	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.c.ii
DEV-7	Increase frequency of stormwater treatment and flow control facility inspections to an annual basis, unless there are maintenance records to justify a different frequency.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.c.iii
DEV-8	Increase frequency of flow control and water quality treatment facility inspections for new residential developments (that are part of a larger common plan of development or sale) to once every 6 months during the period of heaviest home construction.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.c.iv

Task ID	Task Description	Phase II Permit Schedule, Status, Section
DEV-9	Ensure training is provided to all City staff that are responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including staff involved with permitting, plan review, construction site inspections, and enforcement, and develop and implement a system for tracking this training.	Permit deadline: February 16, 2010 Status: under development Permit section: S5.C.4.f

BMP = best management practice.
LID = low impact development.

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.

2.5.1 Permit Requirements

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

- 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 all catch basins and inlets owned or operated by the City at least once before the end of the Phase II permit term; clean catch basins if necessary.
- 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 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.

2.5.2 Current Activities

The City has accomplished the following activities related to pollution prevention and O&M for municipal operations that are listed in Table 8.

Table 8 Current Pollution Prevention and Operation and Maintenance Activities

Task	Description of Work	Phase II Permit Section
Maintenance standards	The City currently has maintenance standards (Edmonds Community Development Code, Section 18.30.100) but will revise them in 2009 to make them equivalent with the Stormwater Management Manual for Western Washington (Ecology 2005).	S5.C.5.a
Post-storm spot checks	The City storm crew does spot checks of some potentially damaged permanent stormwater treatment and flow control facilities after major storm events. The City conducts repairs to systems immediately if necessary to protect the public health, safety, welfare, or public resources.	S5.C.5.c
Catch basin and inlet inspections	The City has already inspected all if its catch basins and inlets during this permit cycle. The City will continue routine inspections and can typically cover 70 to 100 percent of its catch basins and inlets annually.	S5.C.5.d
Practices to reduce stormwater impacts from runoff and road maintenance	The City currently has established practices to reduce stormwater impacts due to runoff from streets, parking lots, and highways owned or maintained by the City and road maintenance activities conducted by the City, but it needs to formalize these procedures to meet the requirements of the Phase II permit.	S5.C.5.f
Policies and procedures to reduce pollutants in discharges	The City has established and implemented many policies and procedures to reduce pollutants in discharges from lands owned and maintained by the City, but further work is needed to meet this requirement.	S5.C.5.g

2.5.3 Planned Activities

In addition to the activities discussed in the previous section, Table 9 outlines planned activities and the associated permit deadlines.

Table 9 Planned Pollution Prevention and Operation and Maintenance Activities

Task ID	Task Description	Phase II Permit Schedule, Status, and Section
PPOM-1	Revise maintenance standards to be equivalent with the Stormwater Management Manual for Western Washington (Ecology 2005).	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.a
PPOM-2	Conduct annual inspections of stormwater treatment and flow control facilities.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.b
PPOM-3	Establish and implement a system to track inspection and maintenance related to the Phase II permit requirements.	Permit deadline: February 15, 2010 Status: ongoing Permit section: S5.C.5.e
PPOM-4	Formalize practices to reduce impacts due to runoff from streets, parking lots, and highways owned or maintained by the City and road maintenance activities conducted by the City for the following activities: ▪ Pipe cleaning ▪ Cleaning of culverts that convey stormwater in ditch systems ▪ Ditch maintenance ▪ Street cleaning ▪ Road repair and resurfacing, including pavement grinding ▪ Snow and ice control ▪ Utility installation ▪ Pavement striping maintenance ▪ Maintaining roadside areas, including vegetation management ▪ Dust control.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.f
PPOM-5	Establish and implement policies and procedures to reduce pollutants in discharges from lands owned and maintained by the City for the following activities: ▪ Application of fertilizer, pesticides, and herbicides, including the development of nutrient management and integrated pest management plans ▪ Sediment and erosion control ▪ Landscape maintenance and vegetation disposal ▪ Trash management ▪ Building exterior cleaning and maintenance.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.g
PPOM-6	Develop and implement a training program for construction and operation and maintenance staff.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.h
PPOM-7	Develop and implement a municipal stormwater pollution prevention plan for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.i
PPOM-8	Maintain records of inspections and maintenance or repair activities.	Permit deadline: February 15, 2010 Status: under development Permit section: S5.C.5.j