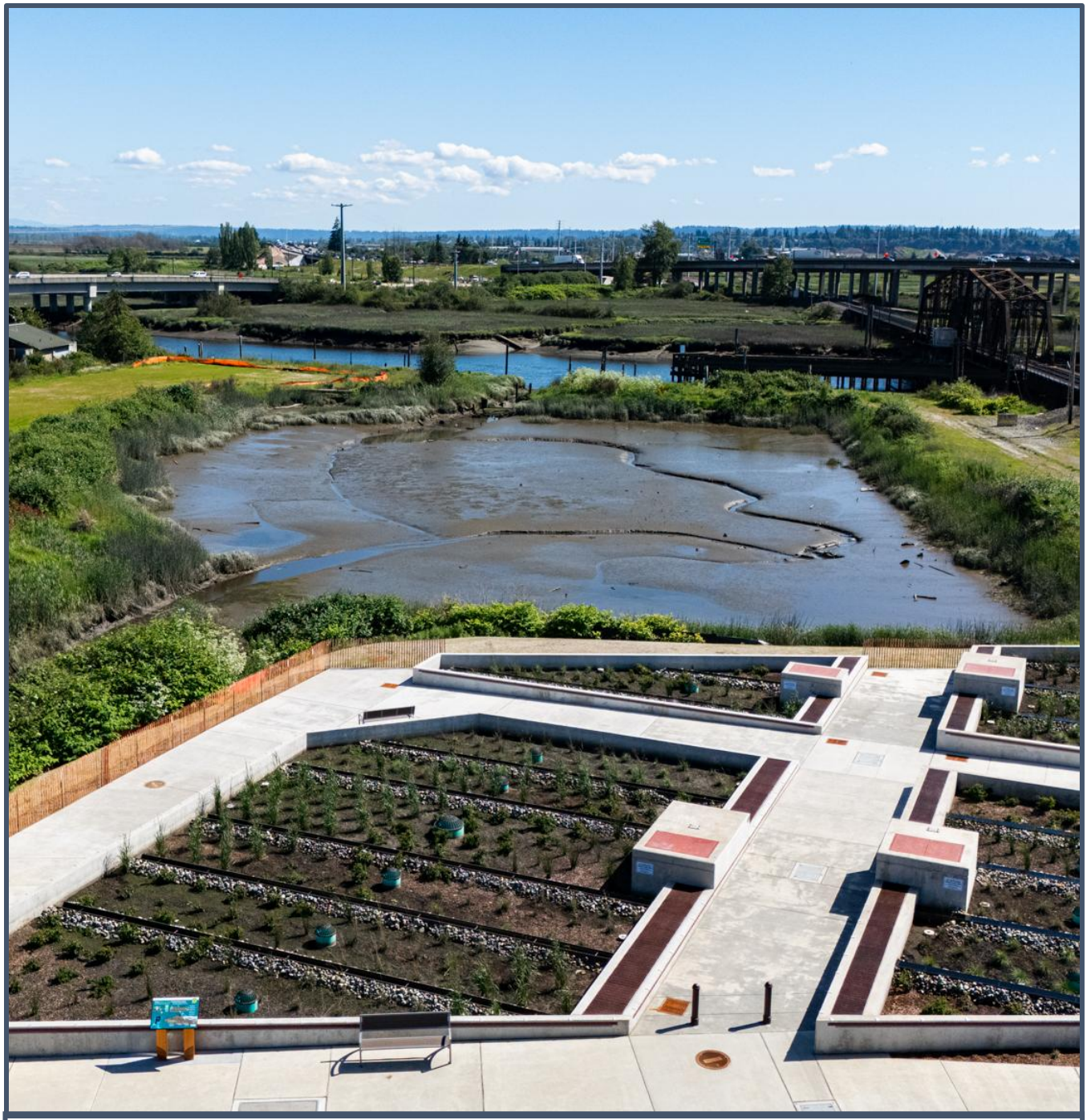


City of Marysville Stormwater Management Program Plan 2026

EST. 1891
MARYSVILLE
WASHINGTON

Table of Contents

Purpose

The National Pollutant Discharge Elimination System (NPDES) Permit (Permit) is a federal permit that regulates stormwater and wastewater discharges to waters of the State. While it is a federal permit, the regulatory authority has been passed to the Washington State Department of Ecology (Ecology) for program implementation. The first term of the modern Western Washington Phase II Municipal Stormwater Permit began in January of 2007. The current permit term is five years, beginning on August 1, 2024 and ending on July 31, 2029.

The current Permit requires that all regulated municipalities create and implement a Stormwater Management Program (SWMP), which addresses eight required program elements:

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

This SWMP must also describe the planed actions to meet Total Maximum Daily Load (TMDL) and Monitoring and Assessment requirements, if applicable to the City. Marysville is subject to both of these requirements, so they are also described for the upcoming calendar year.

This SWMP Plan will document what actions the City will take in 2026 to meet the Permit requirements. The SWMP Plan is designed to reduce the discharge of pollutants from the regulated small municipal separate storm sewer system (MS4) to the maximum extent practicable (MEP) and meet state AKART (all known and reasonable technologies) requirements and protect water quality.

Introduction

The City of Marysville is located in Snohomish County approximately five miles north of Everett, and adjacent to the southern border of the City of Arlington. Major highways within the City include Interstate 5, State Route 531, State Route 528 and State Route 529. The Burlington Northern Santa Fe Railroad also runs north to south through the City.

Population and Growth

The City of Marysville was incorporated in 1891 with 350 inhabitants. Timber related industries increased the population to 1250 residents by 1905. As new buildings, schools, streets, bridges and highways were built the town's population continued to grow. It took approximately 50 years for the City to double in size and in 1954 it had grown to 2,500 people. By 1980, the population had again doubled, but in half the time it had previously taken.

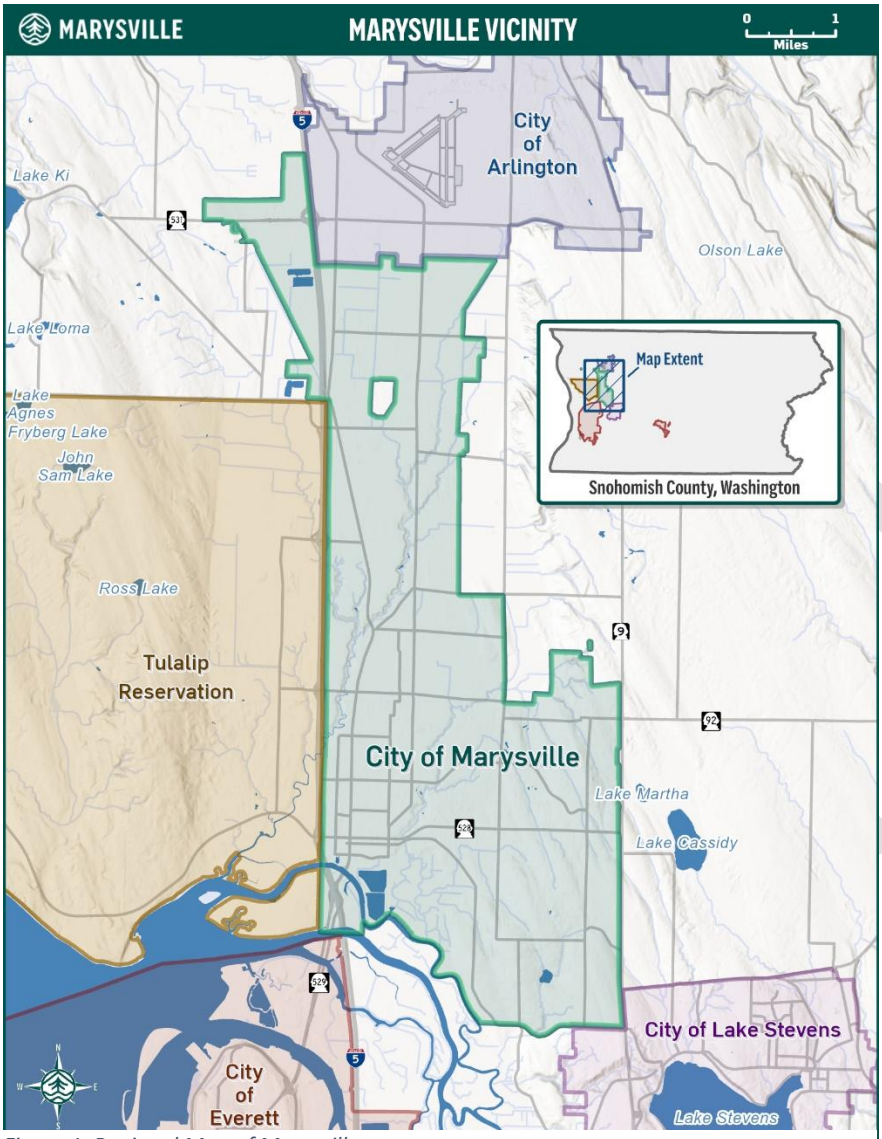


Figure 1. Regional Map of Marysville

Since 1980, the population has almost doubled with each decade through 2000. Marysville's location with proximity to major employment centers and transportation corridors, the beauty of the natural setting, the moderate size of the community, and the relatively reasonable housing costs make it an attractive City. Upon annexing the majority of its Urban Growth Area (UGA) in December 2009, the City grew to approximately 58,040 residents. The population of Marysville is 71,144, per a demographics survey carried out by the city in 2022.

Land Use Distribution

Marysville is largely comprised of residential neighborhoods. A large majority of the commercial and industrial property is located on the east and west sides of State Avenue, which is the main north-south thoroughfare through the City. New commercial and industrial development is occurring in the Downtown, Lakewood and Smokey Point areas of Marysville.

Hydrologic Conditions

The City is part of the lower Snohomish River Basin, in Water Resource Inventory Area (WRIA) 7. Quilceda and Allen watershed are the two sub basins draining a majority of the City. The Quilceda/Allen watershed contains approximately 70 minor streams and tributaries and encompasses an area of approximately 49 square miles.
Approximately 11 square miles drains to Allen Creek and the other 38 square miles drains to Quilceda Creek. Both of these creeks empty into Ebey Slough near the mouth of the Snohomish River. The Quilceda Basin consists of till, outwash, Custer Norma and saturated soils with the central plain of the basin being comprised primarily of a combination of Custer Norma and

outwash soils. The eastern and western hillsides primarily consist of till soils. Till soils are dense and have limited infiltration capabilities, whereas Custer Norma and outwash soils drain well. However, due to high winter groundwater tables in the basin, surface water runoff is common. The Allen basin consists of till, outwash, Custer Norma and saturated soils. Again, due to high groundwater tables in the winter, surface water runoff is common in the Allen Basin. Marysville receives approximately 52 inches of precipitation annually with the majority concentrated in the fall and winter months.

Topography

The Marysville Trough is the most prominent topographic feature characterizing the City. The Marysville Trough is an expansive, nearly flat, alluvial plain and runs north south through much of the City.

Elevations along the trough range from approximately 130 ft. in the north to sea level in the south along Ebey Slough. The Trough is bordered to the west by the Tulalip Plateau and to the east by the Getchel Hill Plateau. The headwaters to Quilceda and Allen Creeks are located in the northeast, on the Getchel Hill Plateau.
The maximum elevation is 430 feet located at the intersection of 74th place and 83rd avenue and slopes in this area are generally northwesterly. The headwaters of Jones, Munson and King Creeks are located in the southeast on the top of the Getchel Hill Plateau. The maximum elevation in this area is 465 feet, between 60th and 64th streets on Highway 9 at the eastern edge of the City limits.

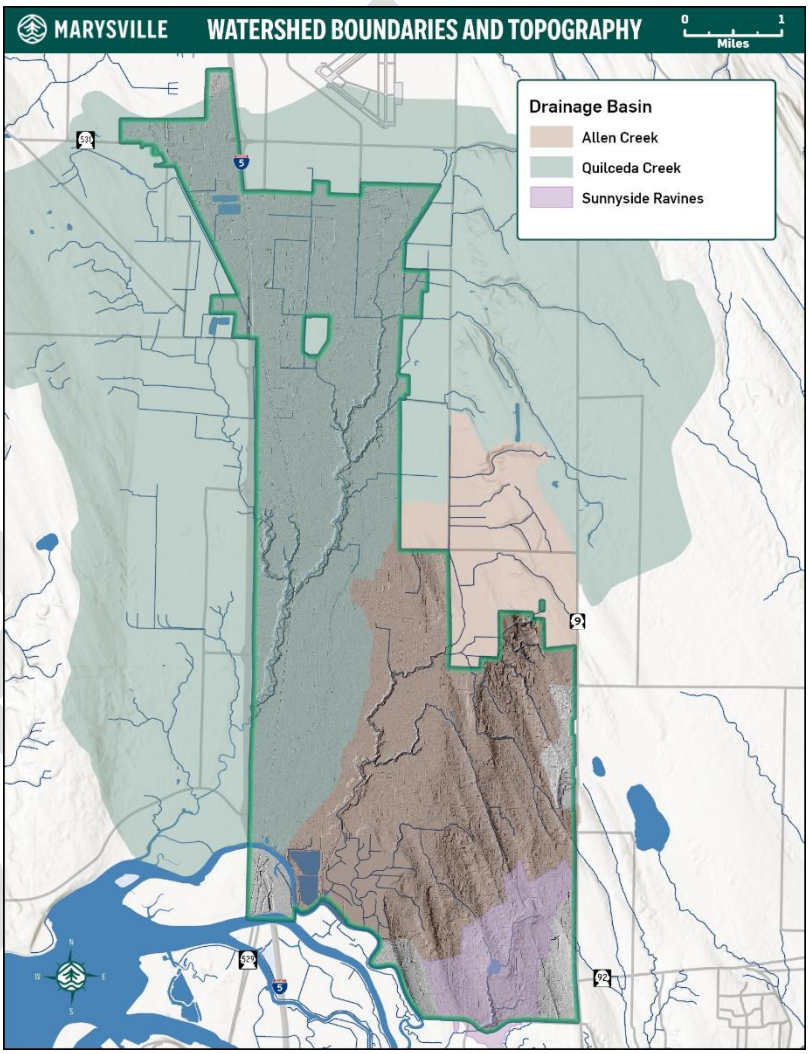


Figure 2. Marysville Topographic Watershed Map

Receiving Water Quality and Pollutants of Concern

Both Allen and Quilceda creeks have been placed on Washington State's 303(d) list for fecal coliform, requiring Total Maximum Daily Load (TMDL) cleanup plans. Other pollutants of concern within the Allen/Quilceda Watersheds include total suspended solids (TSS), fertilizers, petroleum, detergents, heavy metals and organic wastes. In the summer months, low dissolved oxygen levels are also a concern. Primary sources of pollution in the watershed may include high sediment loads, runoff from agricultural and pasture lands, failing septic systems in older neighborhoods and increased impervious runoff causing high pollutant loading from urbanization. All these activities have potentially detrimental effects on water quality within the watershed.

Stormwater Drainage System

Within Marysville, stormwater runoff from buildings, driveways, parking lots and other impervious surfaces is collected, then conveyed through public and private drainage systems to local waterways.
Most of the public drainage lines are within existing road rights-of-way. Much of the run-off is conveyed to public detention/water quality facilities prior to release, or detained and treated on-site in a private facility then released into the public system. The storm drainage system ultimately discharges stormwater to one of the local tributaries or directly to Ebey Slough.

Coordination

The Surface Water Division works both internally and externally to coordinate permit activities. General coordination activities that don't fall under a specific permit section are described below. The groups responsible for specific items required in the Permit are called out in the applicable section of this SWMP Plan.

S5.A.5.a: The City of Marysville borders the Cities of Arlington and Lake Stevens, Unincorporated Snohomish County and the Tulalip Tribes Reservation. The Cities of Arlington and Lake Stevens are Phase II Permittees and Snohomish County is a Phase I Permittee, while Tulalip Tribal Land is federally regulated and not covered by the Washington State NPDES Permit program. The primary mechanism for external coordination is the North Sound Permit Coordinators meetings. These quarterly meetings create a forum to coordinate stormwater management activities for shared water bodies among Permittees, and avoid conflicting plans, policies and regulations. External coordination is also accomplished through the Status and Trends Monitoring Option #1 of section S8 in the Phase II Municipal Permit.

The City coordinates with Fire District 12 for Illicit Discharge spill response. The Fire District has a Hazardous Materials Team and works as a part of the countywide response team. The City coordinates with Snohomish County, Department of Ecology and STORM (a regional educational outreach group) to provide education and outreach programs. The also participated in Sno-STORM, which is a regional sub-group of STORM, consisting of municipalities in Snohomish County. This allows for in depth regional coordination of planning, events, and other

outreach efforts. See a full description of those programs in the Education and Outreach section of this SWMP Plan.

S5.A.5.b: Within the City, the Surface Water division is the main work group responsible for Permit implementation. The primary mechanism for internal coordination is engagement with other City working groups through meetings and involvement in activities, thereby providing direct support or clarification when needed and reducing barriers to Permit compliance. Table 1 is a general overview of the Permit requirements and the City departments, or partners, which are responsible for each requirement. See Appendix 1 for City organizational charts.

Table 1. Overview of Responsibilities

Permit Section	Title	Divisions Responsible
S5.C.1	Stormwater Planning	Surface Water Division Community Development Dept.
S5.C.2	Public Education and Outreach	Surface Water Division Parks Dept. Marysville School District STORM & Sno-STORM
S5.C.3	Public Involvement and Participation	Surface Water Division
S5.C.4	MS4 Mapping and Documentation	Surface Water Division GIS (Geographical Information Services group)
S5.C.5	Illicit Discharge Detection and Elimination	Public Works All City Staff (reporting incidents) Fire District 12
S5.C.6	Controlling Runoff from New Development, Redevelopment, and Construction Sites	Surface Water Divison Community Development Dept. Engineering
S5.C.7	Stormwater Management for Existing Development	Surface Water Division
S5.C.8	Source Control Program for Existing Development	Surface Water Division
S5.C.9	Municipal Operations & Maintenance	

Public Works (PW)

The Surface Water Division is part of the Utility Services and MaintenanceDepartment, and the primary work group responsible for Permit implementation. This group creates permit related submittals, plans, reports and records. There are six staff members within the division, the Storm/Sewer Supervisor, a Permit Coordinator, two Surface Water Specialists, two Surface Water Inspectors. The Sewer/Storm Maintenance Division is managed by the same supervisor as the Surface Water Division. The Sewer/Storm Maintenance Division fulfills many of the Operation and Maintenance activities required by the Permit.

The Surface Water Division has prepared Standard Operating Procedures (SOPs) describing how procedural and tracking of permit activities is conducted within several City departments.
The Surface Water Division implements in house training efforts and assists other departments to receive external training when needed/appropriate. In house training for all PW Crews on Best Management Practices (BMP) and Illicit Discharge Detection and Elimination (IDDE) are typically held annually. While these trainings are utilized to convey the primary subject matter, they are also used to relay overall Permit concepts, changes in requirements and supporting documents like the Stormwater Pollution Prevention Plan (SWPPP) or BMP Documents. Multiple work groups within the PW department work to update and comply with the citywide SWPPP.
The surface water utility funds are used to support a variety of positions throughout the City because the staff members perform permit related job duties. These positions include Public Works and Community Development Department staff.

Engineering

Development Services, reviews development plans for technical requirements, specified in Appendix 1 and the Stormwater Manual. A weekly meeting with Development Services is attended by the Surface Water Inspector. This meeting creates an open dialogue regarding current issues throughout the development process and provides a forum for coordination.

Parks Department

The Parks department notifies a Surface Water staff member when bags are close to running out and the order is filled by Surface Water. They are typically refilled once a year, across all city parks. The Parks department is involved with many citywide events and coordinates facility reservations for meetings/events. The Parks department also works to update and comply with the citywide SWPPP and assists in the detection of spills and other discharges.

Other Departments

All city staff are responsible for reporting illicit discharges to the City's Spill Hotline.
The City maintains an internal web site, which opens as the home page. On the internal web site, there is a link to a Surface Water Division departmental page. This page has information and training videos posted. The City also has an internal newsletter that is distributed citywide. This newsletter can be used to post surface water related reminders.

S5.C.1 Stormwater Planning

S5.C.1.a: Each permittee shall continue to convene and inter-disciplinary team to inform and assist in the development, progress, and influence of this program.

The City has convened an interdisciplinary team to inform and assist in the development, progress, and influence of the Stormwater Planning program. The team includes the Community Development, Engineering, and other public work stakeholder staff. Other internal and external partners may be identified for specific tasks.

S5.C.1.c: Low impact development code-related requirements. Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed. The intent shall be to make LID the preferred and commonly used approach to site development. The local development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.

The City will continue implementing the low-impact development code-related requirements adopted in 2016. Annually, the City will assess and document any newly identified administrative or regulatory barriers to implementing LID Principles or LID Best Management Practices (BMPs). The City will develop measures to address any barriers identified. If applicable, the report will describe mechanisms adopted to encourage or require the implementation of LID principles or LID BMPs.

S5.C.1.d: Stormwater Management Action Plan (SMAP). No later than March 31, 2027, Permittees shall complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP…

In 2026, the city will continue the process of updating the existing SMAP to include new activities within the existing focus areas. These updates are based on both the progress of ongoing activities and retrofits, and additional information and data gathered since the SMAP was initially published. The city expects this to be reviewed internally by public works, engineering, and community development, before going through public review, revision and submission to Ecology.

S5.C.2 Public Education and Outreach

S5.C.2.a: Each permittee shall implement and education and outreach program. The program design shall be based on local or regional (or a combination of both) water quality information and priority audience characteristics to identify high priority audience, subject areas, and/or BMPs. Based on the priority audiences demographic, the permittee shall consider delivering its; selected messages in languages other than English, as appropriate to the audience.

City staff have developed an education and outreach program that will be implemented throughout the City. The program was designed to educate target audiences about

stormwater problems and provide specific actions they can follow to minimize these problems.

S5.C.2.a.i: To build general awareness, permittees shall annually select, at a minimum, on priority audience and one subject area.

The city hosts or participates in several programs and events each year. The following list is planned for this year but is subject to change throughout the year.

- Adopt-A-Drain: the city of Marysville is partnering with Adopt-A-Drain for catch basin stewardship, education, and outreach. Participants remove debris and litter from their drain, and participate in community activities. Individuals and communities received education and technical support from the organization and the city in return for their participation.
- Adopt-A-Street: The City of Marysville Adopt-A-Street Litter Control Program is a stewardship program designed to clean up litter along the right of way, preventing it from being washed into the MS4. This program is organized within the Streets Division. Participating groups volunteer to remove litter from an assigned section of the street at least four times a year over a two-year period. Groups are usually asked to remove litter from at least six street blocks. In return, the Public Works Department posts permanent signs identifying the adopting group and provides safety vests, hard hats, and trash bags. When the bags are filled, groups leave them at the clean-up site, and the City of Marysville solid waste collectors pick them up.
- Catch Basin Markers: The City has a catch basin marker program and uses adhesive storm drain markers. The drain markers indicate that this outlet drains to a nearby waterway, and eventually to Puget Sound. The city intends to expand and continue it's marking efforts for new and existing CBs in 2026.
- City Code: During the plan review process, Development Services staff members check for adherence to Stormwater Manual standards, ensuring that engineers, contractors, and developers are aware of the standards. The Marysville Municipal Code (MMC) contains Stormwater treatment and flow control BMPs/facilities standards, technical standards for stormwater, site, and erosion control plans, and low impact development (LID) principals and LID BMPs. The city adopted the 2019 Stormwater Management Manual for Western Washington with Ordinance 3218, effective July 1, 2022. All review staff and planners have this manual available to them. A link to the manual is provided on the City website.
- EDDS: The Development Services Division develops the Engineering Design and Development Standards (EDDS), which engineers, developers, and contractors must use to submit building plans to the City. The EDDS are publicized on the City website.
- Events: The city distributes general information about stormwater topics during events. The information distributed is tailored to the event. This information includes dog waste, IDDE, and catch basin maintenance. The city plans to attend several

events, but this list may change throughout the year, depending on circumstances and opportunities.

In 2026, Surface Water plans to attend the following events:

- Touch a Truck
- Earth Day
- Clean Sweep
- Poochella
- Farmer's Markets

- Facility Inspections: Surface Water Inspectors contact the owners of private commercial and residential stormwater systems. For most residential systems, each resident in the neighborhood is contacted after an inspection. This program informs owners about the stormwater system and how illicit discharges may affect the system they are responsible for maintaining. The educational inspections occur at older facilities and are not required to be inspected by the Permit. These inspections will be completed as time allows. All private facilities permitted by the City after February 16, 2010, will be inspected per section S5.C.7.b.b.
- Right-of-Way Facilities: The City has approved bioretention facilities in the right of way or open space areas at some new residential developments. The City is taking a private/public approach to the maintenance of these facilities. The City will conduct annual inspections and maintain the hard infrastructure pieces of the system. The homeowners are responsible for the landscaping. This policy is consistent with the approach taken for other landscaping strips and street trees planted within a typical sidewalk. To implement this approach, the City is conducting outreach to the homeowners' associations (HOA) of these developments.
- Pet Waste Bags: Numerous Pet Waste Stations have been installed in City Parks. The Stations and the information associated with them educate the general public on the health and environmental risks associated with pet waste. The Parks Department will continue to maintain the existing pet waste stations, while Surface Water provides supplies.
- Regional Campaigns: The City participates in the regional Stormwater Outreach for Regional Municipalities (STORM) group. The STORM group includes 57 cities and counties in conjunction with the Washington State Puget Sound Partnership and the Washington State Department of Ecology. The City plans to continue attending the regional STORM meetings and the local Snohomish County STORM subgroup, "Sno-STORM".
- School District Education: The City gives the Marysville School District a reduction in their surface water fees based on developing and implementing an environmental education program. Programs are being taught in the 5th, 7th, and High School grade levels. The Surface Water Division supports this by providing technical information and reviews or joining classes as guest speakers and for field trips.
- Source Control: The Source Control inspection program will continue site visits in 2026. This inspection program will offer businesses general and site-specific

information, and educational materials, about stormwater pollution. More details are included in Section 8, “Source Control Program for Existing Development”.

- Web Site/ Social Media: The City maintains a website with a surface water page. Topic-specific general information is posted on this page. The home page and social media are also used for event notifications and seasonally-specific information.

S5.C.2.a.ii: To affect behavior change, permittees shall select, at a minimum, on priority audience and on BMP.

In 2026, the city will focus on changing the behavior of the general public. The behavior change goals will be based on impacts on stormwater facilities, including catchbasins, inelts, and cuvlerts, and their maintenance. The city will work with Adopt-A-Drain, STORM, and other regional partners, who have developed outreach resources for the general public and changing behaviors that impact stormwater facilities.

The program will include events to distribute educational materials and information about stormwater facilities. This information will focus on the function of the facilities and how everyday behaviors impact them in both positive and negative ways. Surface water staff will demonstrate and encourage people to adopt behaviors that improve the system's overall function and protect their community's health.

The City anticipates that a behavior change program around the maintenance of surrounding facilities will reduce illicit discharges, water pollution, cleanliness, pests, illegal dumping, and safety and health within these communities. The team will continue to gather data to create behavior change reports detailing how behaviors in the city changed across what metrics.

S5.C.2.a.iii: Each permittee shall provide, partner with, or promote stewardship opportunities to encourage residence or businesses to participate in activities or events planned and organized within the community.

Larger stewardship events, such as Earth Day and restoration plantings, will be planned with our partners at Sound Salmon Solutions, Adopt-A-Stream, the Marysville School District, and other regional municipalities. The city will also continue to engage with the public to continuously seek opportunities to support and implement stewardship opportunities.

S5.C.3 Public Involvement and Participation

S5.C.3.a: Permittees shall create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and update of the permittees SMAP and SWMP. Permittees shall document specific outreach measures for overburdened communities.

To create opportunities for the public to participate in decision-making processes involving developing, implementing, and updating the SWMP Plan, Surface Water staff will post requests for public comments annually. A request for comments will be added to the City utility bills, posted on the front page of the City website, added to the surface water web page, and posted to the City's social media sites. In 2026 the City intends to explore options for translation, based on updated demographic information and community feedback. The draft version of the SWMP will be available for review and comment in no later than February 10th each year.

S5.C.3.b: 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.

The final version of the SWMP Plan and the annual report are required under S9. A are posted on the Surface Water web page titled "NPDES Phase II Permit" no later than May 31 each. All other submittals are available to the public upon request.

S5.C.4 MS4 Mapping and Documentation

S5.C.4.a: Ongoing mapping: each permittee shall maintain mapping data for features listed below.

The City employs three full-time GIS staff members within the Information & Geographic Services Department to handle the mapping requirements for all City utilities. Mapping information is updated on an ongoing basis. They digitize the MS4 system into ArcGIS utilizing paper and digital record drawings. A Global Positioning System (GPS) is also used in the field to verify the accuracy of the digitization and to map areas that do not have a record drawing. In 2007, GIS staff began mapping all public and private systems that are authorized and/or connected to the MS4.

The City's GIS system includes but is not limited to the following information:

- Known MS4 outfalls and known discharge points
- Receiving waters, other than ground water
- Stormwater treatment and flow control BMPs/facilities owned or operated by the City
- Areas served by the MS4 that do not discharge stormwater to surface waters
- Stormwater pipe (type, material, and size where known)
- Associated drainage areas
- Land use
- Connections between the MS4 owned or operated by the City and other municipalities or public entities
- All connections to the MS4 authorized or allowed by the City after February 16, 2007

S5.C.4.c: The required format for mapping is electronic (e.g. Geographic Information Systems, CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes), with fully described mapping standards.

Mapping of the MS4 is done using Geographic Information System (GIS) software called ArcGIS. All mapping data is retained digitally. The City has created a mapping standard operating procedure to describe the process used to record data.

S5.C.4.d: To the extent consistent with national security laws and directives, each permittee shall make available to ecology, upon request, available maps depicting the information required in S5.C.4.a through c above.

S5.C.4.e: Upon request, and to the extent appropriate, permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other permittees. This permit does not preclude permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other permittees.

The City's GIS information is available online at http://www.marysvillewa.gov/295/GISMaps. This website has links to data, pdf maps, and interactive online maps. The information is available to the public and Ecology at all times.

S5.C.5 Illicit Discharge Detection and Elimination

S5.C.5.a: The program shall include procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

The City Illicit Discharge Detection and Elimination (IDDE) program includes procedures for reporting and removing illicit connections, spills, and other illicit discharges when they are suspected or identified. The program includes procedures for addressing pollutants entering or leaving the MS4 from an interconnected, adjoining MS4. Illicit connections and illicit discharges are identified through:

- Field screening,
- Construction inspections,
- Maintenance inspections, and/or
- Monitoring information
- Spill Hotline
- "SeeClickFix" via the My Marysville App
- Contact Cards and Referrals

S5.C.5.b: Permittees shall inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.

The City uses internal meetings, newsletters, and trainings to inform employees about the Illicit Discharge Detection and Elimination (IDDE) program. General outreach programs have been developed to inform businesses and the general public of the hazards associated with illicit discharges and improper waste disposal. These programs were described in the Public Education and Outreach section.

S5.C.5.c: Each permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the permittees MS4 to the maximum extent allowable under state and federal law.

S5.C.5.c.iv: The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.

Marysville Municipal Code (MMC) Chapter 14.21- Illicit Discharge Detection and Elimination (IDDE) and other related sections in MMC are used to prohibit non-stormwater illicit discharges into the MS4. This Chapter is enforced by the Surface Water Division and the Code Enforcement Officers. The IDDE chapter includes a list of acceptable discharges, conditionally acceptable discharges, and prohibited discharges.

S5.C.5.d: Each permittees shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the permittees MS4.

The City will continue to implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the City's MS4 using the methods described below.

To detect and identify non-stormwater discharges and illicit connections to the MS4, the City has been using the methods described in the Illicit Connection and Illicit Discharge Filed Screening and Source Tracing Guidance Manual (IDDE Manual) prepared for the Washington State Department of Ecology by Herrera Environmental Consultants in 2013 and revised in May 2020.

The primary IDDE screening method includes investigation during regularly scheduled inspections and daily work activities. The City must conduct field screening of at least 12% of the system annually. To meet this requirement, Surface Water staff had to determine a reasonable method for quantifying the percentage of MS4 screened. After reviewing the definition of an MS4 in the Permit, public street miles were chosen as a proxy measure to represent the MS4.

The City catch basin inspections serve as the primary IDDE screening method. Catch basins are inspected on a grid basis, and the entire City is completed every four years. The Sewer/Storm Maintenance Division conducts catch basin inspections and cleaning. Each year, the lane feet with inspected catch basins are divided by the total lane feet in the City. This yields a percentage of MS4 field screened. Stormwater treatment and flow control BMPs/facilities are also screened during the regular annual inspections. However, including the lane miles of road draining to facilities would introduce areas being counted twice, once

for the catch basin screening and again for the facility inspection. Therefore, the screening conducted at facilities is not accounted for in the percentage of MS4 screened, and the percentage screened is underestimated.

During IDDE training for city employees, Surface Water staff members emphasize awareness of IDDE during daily activities. This ensures that the remaining areas of the City are observed for potential discharges by all city staff. Staff members often find incidents of illicit discharges during their daily work activities.

Table 2. Percent Ms4 Screening Quantification

Year	Lineal Ft of St inspected	% Screened for Year (Lineal Ft of St w/cb's inspected / Total Lineal Ft in City)	Total % MS4 Screened for Permit Term
2019	225,074	23%	7%
2020	291,659	26%	33%
2021	254,249	23%	56%
2022	359,179	32%	72%
2023	251,554	22%	84%
2024	283,840	24%	100%
2025		(numbers TBC)	
2026	Expected to Exceed 20%		

The City plans to maintain the spill reporting hotline in 2026. The hotline number connects to the City reception voicemail. If the caller dials 0, they are transferred to the receptionist. Illicit discharge calls can then be directed to a Surface Water staff member available at the time of the call. After hours, the on-call Public Works staff responds. The hotline is listed in the blue pages under "spill reporting." The number has also been advertised on brochures, coloring books, and magnets. The City keeps records of all calls received and follow-up actions taken.

The city has implemented See-Click-Fix as the primary method for residents to contact the city about maintence issues. Within the app and webpage there is a link to report a spill, pollution, or drainage issue.

The City also maintains "Report a Spill or Water Pollution" and "Code Enforcement: IDDE" web pages. A resident can click the main "I WANT TO…" drop-down menu from the City home page. Under the reporting section, click "Spill or Water Pollution," and a form automatically opens. Once the form is filled out, the request is sent to the Surface Water Division, which dispatches the appropriate staff member.

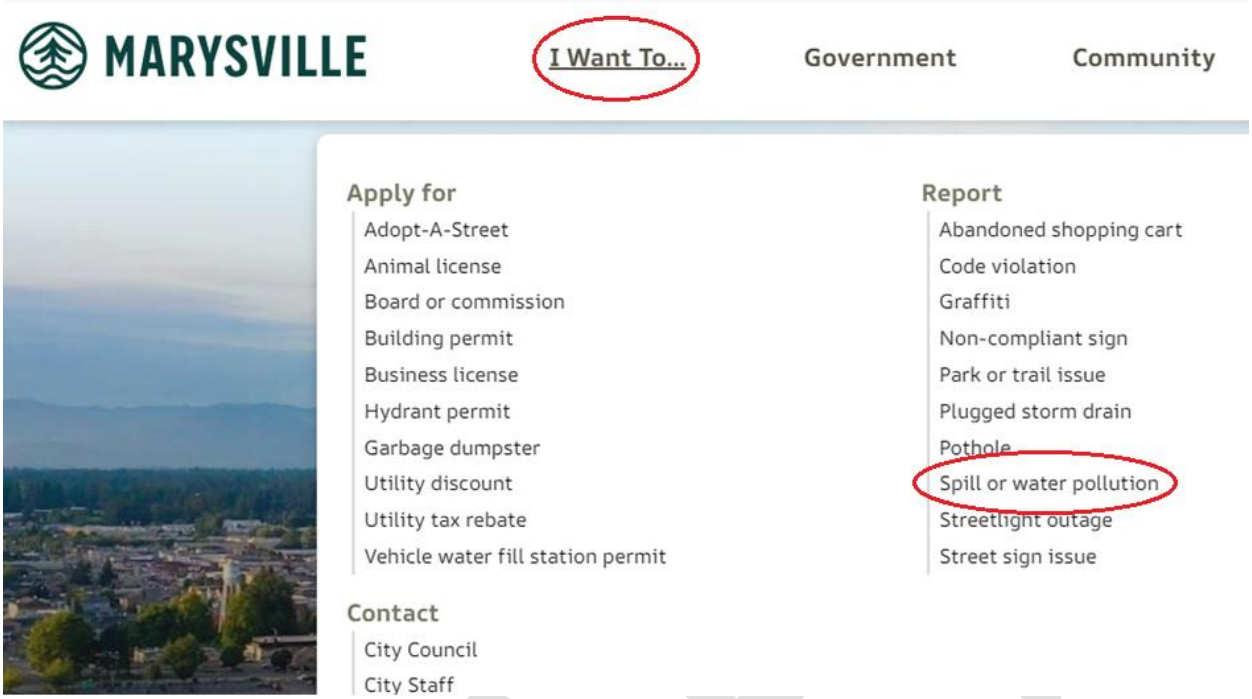


Figure 3. City Discharge Reporting Link

In 2026, Surface Water staff plans to conduct training for municipal field staff who might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4 as part of their regular job responsibilities. Follow-up training and updates to the training will be provided as needed to address changes in procedures, techniques, requirements, or staffing. A record of the training content and the staff members trained will be kept for each training event.

S5.C.5.e: Each permittee shall implement and ongoing program designed to address illicit discharges, including spills and illicit connections, into the permittees MS4.

Public Works will implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the City's MS4.

The City has a written procedure for characterizing the nature of and potential public or environmental threat posed by an illicit discharge. The procedures follow the guidance in the IDDE Manual.

The City has a written procedure for tracing the source of an illicit discharge. The procedures follow the guidance in the IDDE Manual. The procedures include visual inspections, opening manholes, using mobile cameras, and collecting and analyzing water samples.

The City has written procedures for eliminating illicit discharges. The procedures follow the guidance in the IDDE Manual. Measures include notifying appropriate authorities and the property owner, providing technical assistance for eliminating the discharge, follow-up inspections, escalating enforcement, and legal actions if the discharge is not eliminated. If

an illicit connection is found, the enforcement actions specified in MMC 14.21 will be used to eliminate the illicit connection within six months.

The City follows the established procedures to respond, investigate, refer and resolve illicit discharges. All illicit discharges, including spills, which may constitute a threat to human health, welfare, or the environment, are investigated immediately. All other investigations, or referring of investigations, will occur within 7 days of receiving a complaint, report or monitoring information indicating an illicit discharge. All field investigations will occur within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection. Upon confirmation of an illicit connection, the compliance strategy will be used in a documented effort to eliminate the illicit connection within 6 months.

S5.C.5.f: 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.

All staff responsible for identifying, investigating, terminating, cleaning, and reporting illicit discharges, including spills and illicit connections, have received training based on the IDDE Manual. The response staff includes the Surface Water, Sewer/Storm Maintenance, or Streets divisions. IDDE training will continue to be implemented by the Surface Water staff members. Training developed by others will also be attended, including training external, professional training opportunities. The Public Works Administrative Secretary tracks training attended by any Public Works staff member in a digital database.

S5.C.5.g: Recordkeeping: each permittee shall track and maintain records of the activities conducted to meet the requirements of this section. In the annual report, each permittee shall submit data for the illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the permittee during the previous calendar year. The data shall include the information and format specified in appendix 13 and WQWedIDDE. Each permittee may either use their own system or WEWebIDDE for recording this data.

The city uses web-based management software to manage customer calls, inspections, and follow-up work orders associated with the illicit discharge program. Surface Water staff track and maintain records for most activities conducted to meet the requirements of this section. Other divisions create some records during the initial reporting or clean-up activities. The data is exported from the software and formatted as a spreadsheet for the annual report. The final submission of IDDE data follows the instructions, timelines, and format described in Appendix 12 of the permit.

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

S5.C.6.a: Implement an ordinance or other enforceable mechanism that addresses runoff form new development, redevelopment, and construction site projects.

The Surface Water Division, Engineering, and Community Development Department will implement the stormwater design requirements found in the 2019 Stormwater Manual. The 2019 edition was adopted with Ordinance 3218 and became effective on July 1, 2022. The Stormwater Manual vesting timeframes are now included in Marysville Municipal Code (MMC) 14.15.015 Stormwater management manual adopted.

S5.C.6.c: The program shall include a permitting process with site plan review, inspection, and enforcement capability to meet the standards listed in (i) through (iv) for both private and public projects, using qualified personnel. At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i.

The Surface Water Division, Engineering, and Community Development Department will continue implementing a permitting process that includes the requirements, limitations, and criteria in the Stormwater Manual. Marysville Municipal Code (MMC) Title 14 requires using the thresholds and definitions in Appendix 1 and provides the legal authority to inspect and enforce maintenance standards for private stormwater facilities.

All development plans received are first reviewed by Planning for general requirements. Then, plans are sent to Development Services to be reviewed for technical requirements specified in Appendix 1 and the Stormwater Manual. Concurrent with each review cycle, the Surface Water Division routes the plans for additional review and comment. Information regarding development plans is entered into a database.

The inspection program is implemented for private and public projects and is completed by the Surface Water Inspector and Construction Inspectors. The Surface Water Division meets with the Development Services Manager and Construction Inspectors semi-monthly to discuss ongoing construction projects. The Surface Water Inspector conducts inspections based on Appendix 7, Determining Construction Site Sediment Damage Potential. The City has chosen to inspect all construction sites based on the criteria in Appendix 7. The Surface Water Inspector inspects active construction projects weekly and plats with active home-building sites every six months. The Surface Water and Construction Inspectors verify that sediment controls are installed and functioning correctly throughout the construction project. Inspectors enforce as necessary based on the inspection.

Enforcement actions include escalating procedures, including informal verbal communication onsite during work activities, formal letters, and stop work orders. These procedures are implemented per MMC Title 4 and Title 22. Construction and Building Inspectors within Community Development complete project checklists when development is completed. They verify the proper installation of permanent stormwater facilities.

S5.C.6.d: The program shall make available to representatives or proposed new development and redevelopment, as applicable: the link to the online Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity, a link to the online Industrial Stormwater General Permit NOI form for industrial activity, and a link to the online registration requirements for Underground Injection Control (UIC) wells. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issues by Ecology.

Links to the Notice of Intent for Construction Activity, Notice of Intent (NOI) for Industrial Activity, and the NOI for the requirement of registration of UICs are available on the City web site.

S5.C.6.e: Each permittee shall ensure that all staff whose primary job duties are implementing the program to Control Stormwater runoff from New Development, Redevelopment, and Construction Sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training will be provided, as needed, to address changes in procedures, techniques, or staffing. The Public Works Administrative Assistant tracks the expiration dates of the relevant certifications. Participants are notified when their certification expires, and follow-up courses are scheduled accordingly.

S5.C.7 Stormwater Management for Existing Development

S5.C.7.a: Permittees shall implement stormwater facility retrofits or tailored SWMP actions that meet the criteria described in appendix 12, using on or a combination of the following: strategic stormwater investments identified in SMAP or similar process, and/or opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.

The city has outlined priorities for stormwater retrofits in the 2023 SMAP. The city is currently evaluating these priorities, alongside other opportunities that meet the criteria in appendix 12. In 2025, the city created a list of priorities that for that area and are in the process of executing on that list. These efforts will continue in 2026, with a focus on retrofits in Jennings Park and water quality in the Allen Watershed.

S5.C.7.b: With each annual report each permittee shall provide a list of planned individual projects scheduled for funding or implementation during this permit term for the purposes of meeting the assigned equivalent acreage in appendix 12. This list shall include, at a minimum the information and use the formatting specified in appendix 12.

The list of projects and activities, including timeline, will be submitted with the annual report.

S5.C.8 Source Control Program form Existing Development

S5.C.8.a: Permittees shall enforce ordinances or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources with existing land uses and activities.

The city has implemented a source control program that applies BMPs and treatment facilities, inspects pollutant-generating sites, and applies local ordinances. The city will continue to support and expand this program in 2026.

S5.C.8.b: Permittees shall implement a program to identify publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. Permittees shall update the inventory at least once every 5 years.

The City adopted ordinance 3222 requiring the application of source control BMPs for pollutant-generating sources associated with existing land uses and activities. The ordinance requires source control BMPs from the Stormwater Manual. In cases where the Stormwater Manual lacks guidance for a specific source of pollutants, the City will work with the owner/operator to implement or adapt BMPs based on the best professional judgment.

In 2022, the City established a business inventory identifying publicly and privately owned institutional, commercial, and industrial sites that have the potential to generate pollutants to the MS4. The inventory includes businesses and/or sites identified based on the presence of pollutant-generating activities. Based on complaint responses, additional businesses and/or sites will be added to the inventory. In 2023, staff worked to verify the entries on the list. The list will be continually refined and revised as necessary to represent the presence of pollutant-generating activities. The City hosts a GIS-based map and shows the sites identified for inspection. In 2025, the surface water team reviewed entries for accuracy and applicability. Additions, reviews, and revisions of the list will continue in 2026.

S5.C.8.c: Permittees shall implement an inspection program, performed by qualified personnel, for sites identified pursuant to S5.C.8.a.i above.

In 2023, the City created a new position, a second Surface Water Inspector, and began conducting inspections. The City was awarded a water quality assistance grant from the Department of Ecology to partially funded this new position's first 2.5 years of salary. The grant concluded in 2025, and the position is now funded by surface water rates. Inspection duties will continue in 2026.

The City has created outreach materials for all sites with a business address. The information will describe activities that may generate pollutants and source control requirements. Annually, the City will conduct a number of inspections equal to 20% of the sites listed in the source control inventory. Follow-up inspections and denial of entry will be included in the inspection count. All sites identified through complaints will be inspected.

S5.C.8.d: Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period, as specified below.

The City adopted ordinance 3222, establishing a progressive enforcement policy requiring sites to comply with stormwater requirements within a reasonable time period as specified in the Permit. The City will use education and technical assistance to help businesses reach compliance with source control measures. If these measures fail, then enforcement actions will be taken. Records of inspection reports and letters will be maintained in the City's asset management software.

S5.C.8.e: Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority of for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

The City will train staff who are responsible for implementing the source control program. The City will document and maintain records of the training provided and the staff trained using the database maintained by the Public Works Administrative Services group.

S5.C.9 Operations and Maintenance

S5.C.9.a: Each permittee shall implement standards that are as protective, or more protective, of facility function than those specified in the SWMMWW or a phase I program approved by ecology. For facilities which do not have maintenance standards, the permittee shall develop a maintence standard.

The City has implemented the maintenance standards in the 2019 Stormwater Manual. If the Stormwater Manual does not have a maintenance standard that applies to a stormwater facility, then the City will use the manual developed by the manufacturer of the facility. In all cases, the applicant shall provide the proposed maintenance program to the City for approval before construction of the facility occurs.

Unless there are circumstances beyond the City's control, when an inspection identifies maintenance requirements, then the maintenance is performed:

- Within 1 year for typical maintenance of facilities, except catch basins.
- Within 6 months for catch basins.
- Within 2 years for maintenance that requires capital construction of less than $25,000.

S5.C.9.b: Maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee.

The Surface Water Division and Community Development Department require measures to ensure adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities. Residential projects record the long-term maintenance obligations as a plat document. A Stormwater Covenant and Easement has been developed to be recorded against the title of newly developed or redeveloped parcels with private stormwater facilities in commercial developments. The Stormwater Covenant and Easement was created to supplement the requirements in MMC, Title 14.

The City uses the maintenance standards in the Stormwater Manual when conducting annual inspections of publicly or privately owned stormwater treatment and flow control BMPs/facilities.

Inspection records are stored digitally in project tracking software during the construction phases and in asset management software after construction is completed. When inspections identify an exceedance of the maintenance standard, a work order is created and assigned to the Surface Water Inspector. The Surface Water Inspector is responsible for coordinating with the private facility owner to complete the maintenance within the appropriate timeframes. Records for inspection, maintenance, and enforcement actions are maintained.

S5.C.9.c: Maintenance of stormwater facilities owned or operated by the permittee.

Annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities are completed by the Sewer/Storm Maintenance Division or Surface Water staff, and maintenance needs are recorded. The inspections are tracked digitally using devices in the field.

When an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed per the timeframes in the Permit section S5.C.7.a. For small maintenance tasks, the staff member completing the inspection will correct the problem at the time of inspection and note that correction in the inspection log. A work order will be created and assigned to the responsible staff member(s) for more extensive maintenance needs.

A route with facilities throughout the City has been created for spot checks. The facilities are representative of the storm system and characterize the conditions of other facilities around them. When there is a significant storm event, Surface Water staff conducts informal inspections of the facility route. Inspection forms are digitally recorded as needed. If damage is found, then all stormwater facilities that may be affected will be inspected. If no damage is found, inspection of the spot checks will not be recorded. Repairs will be conducted based on the results of inspections. This spot-check route is updated periodically by the Surface Water Division with input from the crew and through a review of drainage records.

The Permit requires all municipally owned and operated catch basins to be inspected every two years. However, Permittees can alter the catch basin inspection frequency as appropriate based on maintenance records of double the time of the new proposed inspection frequency.

In August 2017, ten years of inspection data was analyzed. Based on the results of that analysis, the City adopted a four-year cycle inspection cycle. The grids were modified and divided into eight smaller grids. This allows Surface Water Staff and the Sewer/Storm Maintenance Division smaller areas to track and provides a specific schedule to complete each grid. In 2025, the city completed Grid 8 and Grid 1, starting the 4-year inspection cycle over. In 2026, the city will continue the 4 year inspection cycle, with Grids 2 and 3.

The City cleans a “High Traffic” inspection/cleaning route each year. Based on the data analysis, the high-traffic routes have been expanded. This will ensure that areas with consistently higher sediment accumulation are inspected and cleaned more frequently than other areas. The high-traffic routes are treated as an additional route to be cleaned in the spring when sand is applied in the winter.

The decant water from cleaning catch basins is disposed of per Appendix 6 Street Waste Disposal and the Health Department Solid Waste Facility Operations Plan provisions. The City operates a decant facility at the Public Works shop area. Decant water from this location drains to the sanitary sewer. The remaining solid materials are managed onsite and then reused or disposed of via landfill. These procedures have been developed in accordance with the Health Department Permit (Permit #SW449).

The inspection and maintenance program is designed to inspect all sites and to achieve at least a 95% inspection rate. The city has established a method for recording each maintenance activity described above.

S5.C.9.d: Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the permittee, and road maintenance activities under the functional control of the permittee.

The policies and practices to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City are consistent with the Stormwater Manual. The City has produced a reference book titled “Operations and Maintenance: Stormwater Best

Management Practices 2022" to organize the BMPs that apply to each activity and the crew completing that activity. The City will continue to implement these policies and practices.

The City has expanded its street sweeping program, partly thanks to a 2019 grant from the Department of Ecology. Sediment on streets and roads may contain a variety of pollutants, including oil, grease, fuel, antifreeze, brake and transmission fluids, brake pad dust, plastics, fertilizer, pesticides, and fecal coliform bacteria from pet and animal waste.

The grant concluded in 2023, but the City continues the expanded street sweeping program. The City estimates that the increase in sweeping will remove an additional 33-55% more sediment than the program was previously and reduce the volume of material entering surface waters by an estimated 763 cubic yards per year. The City continually assesses the street sweeping program for opportunities to expand or improve.

S5.C.9.e: Implement a stormwater pollution prevention plan for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the permittee in areas subject to this permit that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity.

Surface Water staff developed an ongoing training program for employees whose construction, operations, or maintenance job functions may impact stormwater quality. Various training methods are used. Surface Water Staff usually present information about BMPs to the field crews annually. All Public Works crews have been given the City's previously mentioned BMP manual as a guide in the field. Surface Water staff also check for other training opportunities for external training.

The City maintains an internal website. Applicable training materials are posted on a Surface Water page. This approach ensures that all employees have access to the materials, even if they were absent on the training day. Follow-up training is provided to address changes in procedures, techniques, or requirements.

S5.C.9.f: implement a stormwater pollution prevention plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the permittee in areas subject to this permit that are not required to have coverage under the industrial stormwater general permit or another NPDES permit that authorizes stormwater discharges associated with the activity.

Surface Water staff has developed a Storm Water Pollution Prevention Plan (SWPPP) for all City-owned heavy equipment, maintenance and storage yards, and materials storage facilities. This document was created collaboratively between many departments in the City. The City completed the construction of a new Civic Campus at the end of 2022. Staff and equipment have been moved to new locations, and the SWPPP has been updated accordingly.

The Department managers or supervisors are responsible for implementing BMPs applicable to their work groups. The SWPPP includes detailed descriptions of the operational and structural BMPs at each City facility. Annual inspections of the facilities and observation of discharges from the facilities are conducted to evaluate the effectiveness of the BMPs. The SWPPP includes an inventory of the on-site materials and equipment, as well as any activities that could result in stormwater pollution if BMPs are not in place. The SWPPP has a site map showing the stormwater system, outlets, and areas of potential pollutant exposure. Each site map shows the location of spill kits, and the corresponding text has a plan for preventing and responding to spills.

S5.C.9.g: Implement ongoing training program for employees of the permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPS, selecting appropriate BMPs, street sweeper operation, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow up training shall be provided as needed address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.

The City will train staff who are responsible for implementing operations and maintenance. The City will document and maintain records of the training provided and the staff trained using the database maintained by the Public Works Administrative Services group.

S5.C.9.h: Maintain records of the activities conducted to meet the requirements of this section.

The City will maintain records of inspections and maintenance activities conducted as a permit requirement. Public Works uses the previously mentioned software to track many of the requirements from this section.

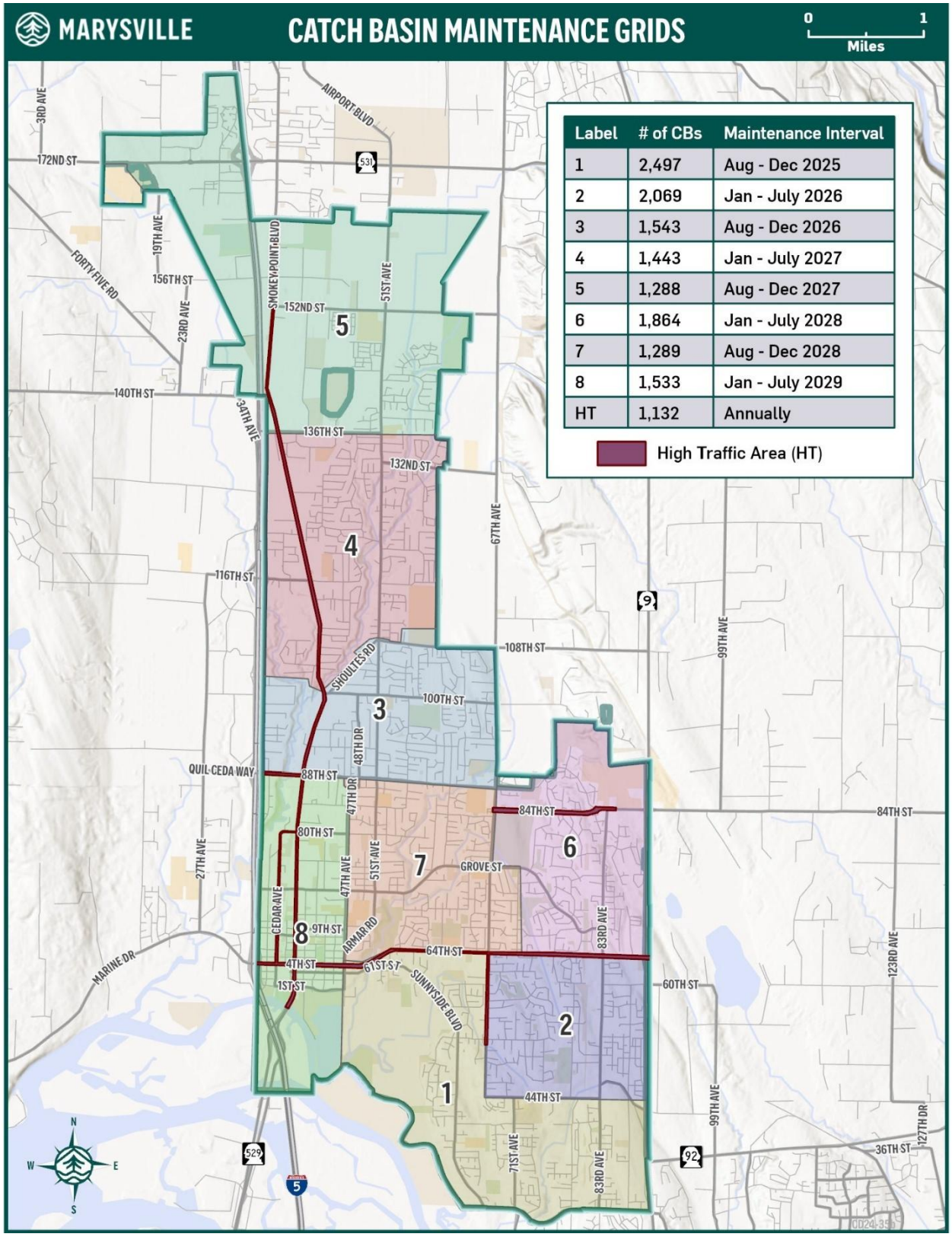


Figure 4. Catch Basin Cleaning Grids

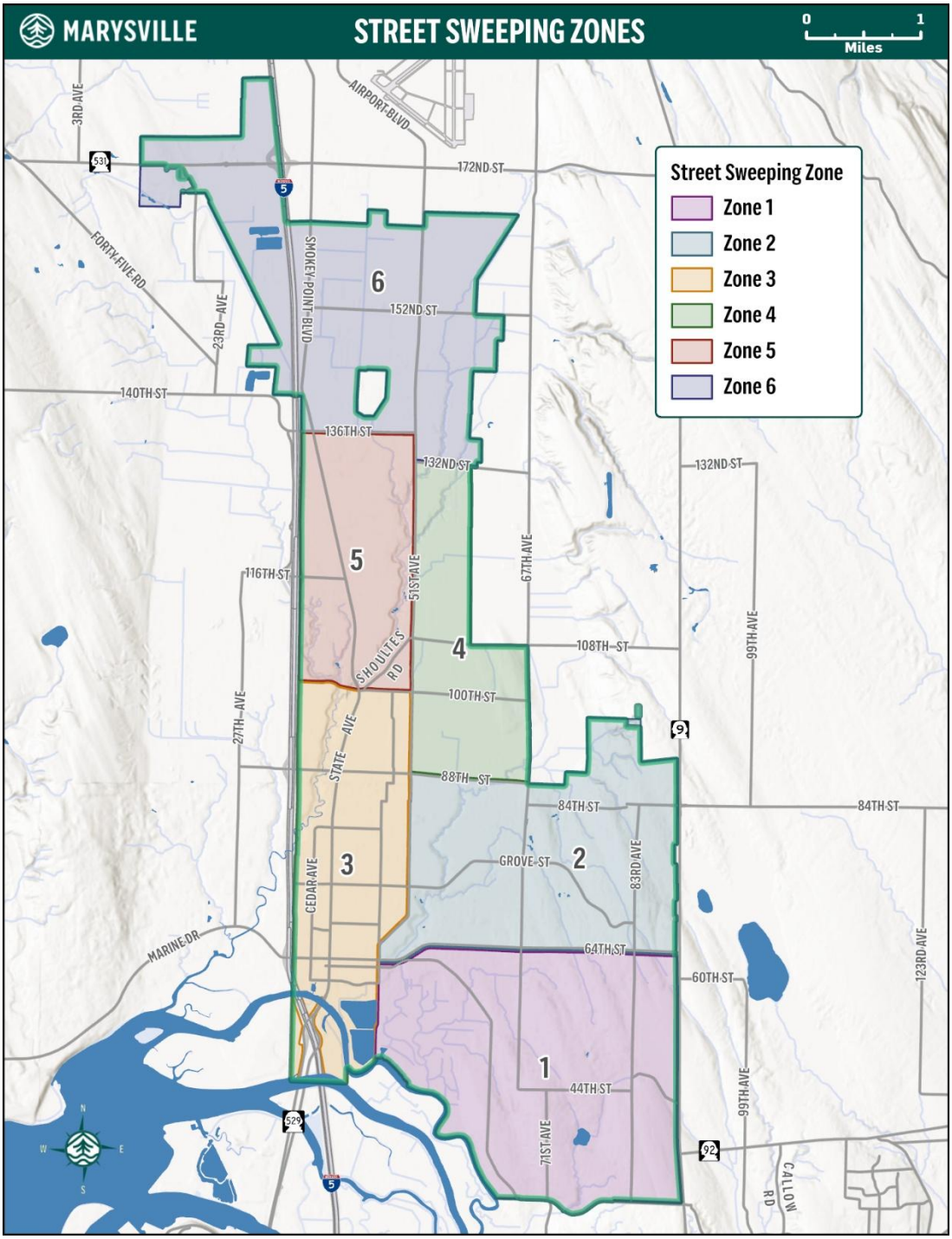


Figure 5. Street Sweeping Grids

TMDL

Business Inspection: Each Permittee shall continue their ongoing inspection programs for facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities). If the Permittee determines, through inspections or otherwise, that a facility has failed to adequately implement BMPs to prevent bacteria source potential, each Permittee shall re-inspect the facility at least once more during the permit term to verify compliance, and/or initiate enforcement actions.

Inspections at commercial animal handling areas and composting facilities within the City were completed in 2024. None of the facilities had bacteria source control problems. The city will inspect facilities in 2026, including any new facilities added to the inventory.

Public Education and Outreach: Each Permittee shall include public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP under General Awareness.

The surface water division will continue to conduct outreach on pet waste at city events. This will include information on the dangers of pet waste, how to dispose of pet waste properly, and materials with additional information on the connection between pet waste and fecal coliform bacteria.

Operations and Maintenance: Each Permittee shall maintain Pet Waste collection stations at Permittee owned or operated lands that are reasonably expected to have domestic animal (dog and horse) use and the potential for pollution to stormwater.

The surface water division will continue to partner with the parks department to provide bags and technical assistance for pet waste stations at all city parks.

When conducting IDDE field screening during normal course of business (as required by S5.C.5.d for Phase II Permittees, and IC/IDDE as required by S5.C.9.c for Phase I Permittees) in a TMDL area, Permittees shall obtain a grab sample to screen for bacteria sources when at the drainage circuit's most downstream accessible sampling location if there is water flow. For the purposes of IC/IDDE, stormwater quality sampling is defined as obtaining and processing a grab samples of stormwater within the conveyance system of the MS4, at discharge points, and/or outfalls (if there is flow) at each drainage circuit's most downstream accessible sampling location. Permittees shall follow their adopted IDDE Procedures to conduct source tracing efforts if bacteria levels and/or observations trigger a response (see IDDE guidance manual for bacteria trigger levels).

Qualitative and quantitative information about the source identification and elimination activities, including procedures followed, sampling locations, and results (including

documenting no flow) shall be annually documented in TMDL reporting as required in the Permittees' Annual Report.

The city has developed a plan to sample outfalls within the catch basin inspection grids being covered that year. The city uses a modified catch basin inspection schedule and inspects two of it's eight grids every year. While the Storm/Sewer Crew is inspecting a grid as part of normal O&M and IDDE Screening, the surface water team will sample from outlets in that same grid. These samples will be tested per the normal testing requirements. The results of this testing will be included in the annual report.

S8 Monitoring and Assessments

S8.A.a: Make annual payments into a Stormwater Action Monitoring (SAM) collective fund to implement regional receiving water status and trends monitoring of either: small streams and marine nearshore in Puget Sound, or urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin, depending on the Permittee's location.

The City has chosen Regional Status and Trends Monitoring Option "a" to meet this requirement. Option "a" requires the City to pay annually into a collective fund for small stream and marine nearshore status and trends monitoring in the Puget Sound area.

S8.B.a: Make annual payments into a collective fund to implement effectiveness and source identification studies.

The City has chosen Effectiveness Studies and Source Identification Studies Option "a" to meet this requirement. The City will pay annually into a collective fund to implement these studies. The City will provide information when requested for the Effectiveness and Source Identification Studies. The scope of the requests is limited to records of SWMP activities and associated data tracked and/or maintained in accordance with the Permit. There is a maximum of three requests during the permit term. The City will respond within 90 days to provide the requested information.

S9 Reporting Requirements

S9.A.1: No later than March 31 of each year beginning in 2025, each Permittee shall submit an Annual Report. The reporting period for the first Annual Report will be from January 1, 2024, through December 31, 2024. The reporting period for all subsequent Annual Reports will be the previous calendar year unless otherwise specified.

The city will submit a report of its activities to the dept. of ecology, annually.

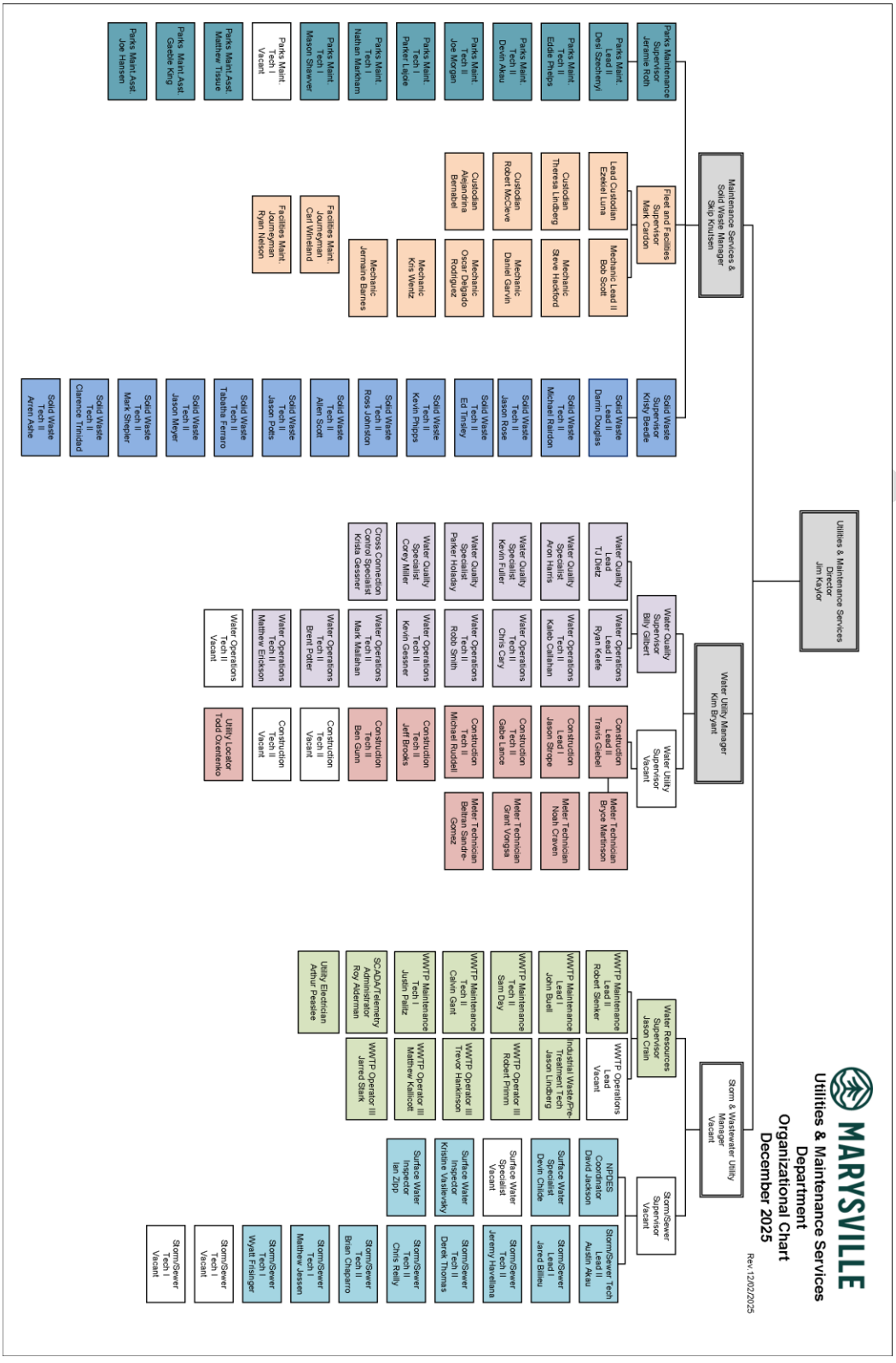
S9.B: Each Permittee is required to keep all records related to this Permit and the SWMP for at least five years after the expiration date of this Permit.

The city will retain all records of its activities for at least five years past the permit expiration date.

S9.C: Each Permittee shall make all records related to this Permit and the Permittee's SWMP available to the public at reasonable times during business hours. The Permittee will provide a copy of the most recent annual report to any individual or entity, upon request.

To ensure information is tracked throughout the year, the Surface Water staff members complete memos to document actions that are not easily tracked in a database. Memos are also created when database information is checked throughout the year to ensure all requirements are met within the scheduled timeframe. When the annual report is compiled, the information in these memos supplements the information that can be pulled from our management software or other databases. Some of these memos become the attachments required for specific program elements.

Appendix 1: Organization Charts



Appendix 2: 2026 Schedule

Permit Section	Sub-Section	Pemit Item	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
S5	A	Prepare/update a written SWMP Plan annually	Work		Deadline									Planning
	A.5	Document coordination mechanisms among departments, submit w/ annual report	Work		Deadline									Planning
C1: Stormwater Planning	a	Convene inter-disciplinary team to assist in the development of the planning program						Ongoing						
	b.i.a	Coordination with long-range plan updates by assessing how plans incorporated stormwater between 2013-2019						Ongoing						
	b.i.b	Coordination with long-range plan updates by assessing how plans will incorporate stormwater between 2019-2024	Deadline										Work	
	c	Low impact development code-related requirements	Work		Deadline									
	d.i	Stormwater Management Action Planning (SMAP), receiving water assessment						Ongoing						
C2: Public Education and Outreach	a.i	Build general awareness by annually selecting a target audience and subject from list						Work						Deadline
	a.ii.a	Behavior change program targeting one audience and one BMP	Planning						Work					Deadline
	a.ii.b	Evaluate effectiveness of ongoing behavior change from 2013 permit term						Work						Deadline
	a.ii.c	Use social marketing practices to develop a campaign						Work						Deadline
	a.ii.d	Implement the social marketing campaign						Ongoing						
	a.ii.e	Evaluate social marketing campaign	Work		Deadline									
	a.ii.f	Use evaluation to direct future programs						Ongoing						
	a.iii	Provide stewardship opportunities	Planning					Work					Planning	Deadline
C3: Public Involvement and Participation	a.i	Document specific public involvement opportunities												
	b	Post SWMP and annual report	Planning		Deadline									
C4: MS4 Mapping and Documentation	a	Ongoing mapping						Ongoing						
	b	New mapping requirement for collecting attributes, mapping connections												
	c	Data format should be electronic						Ongoing						
	d	Provide data to Ecology upon request						Ongoing						
	e	Provide data to others upon request						Ongoing						
C5: Illicit Discharge and Elimination	a	IDDE program procedures	Work		Deadline									
	b	Inform employees, businesses and the public of the hazards associated with IDDE						Ongoing						
	c	Implement the IDDE ordinance						Ongoing						
	d.i	Document IDDE program procedures and screen 12% of the MS4 annually	Work		Deadline				Work					Planning
	d.ii	Publicly list an IDDE hotline number												
	d.iii	Ongoing training program for field staff who could see an IDDE		Planning				Work						
	e	Implement the IDDE program, establish procedures and respond within the timeline described						Ongoing						
	f	Train staff responsible for IDDE program and discharge elimination		Planning				Work						
	g	Appendix 12 data format submittal	Work		Deadline									
C6: Controlling Runoff from New Development, Redevelopment, and Construction Sites	a/b	Adopt ordinance to adopt Appendix 1/SWMMWW 2024, and the vesting timeline												
	c	Program shall include plan review, inspection and enforcement						Ongoing						
	d	Make available the NOI for Construction and Industrial general permits						Ongoing						
	e	Train staff responsible for the program												
C7: Stormwater Management for Existing Development	a	Implement stormwater facility retrofits that meet the criteria described in appendix 12						Ongoing						
	b	Provide a list of planned retrofit projects with the annual report	Work		Deadline									
C8: Source Control Program for Existing Development	a	Adopt ordinance to require source control BMPs						Ongoing						
	b.i	Update inventory of sites that have the potential to generate pollutants												
	c	Implement the inspection program	Deadline						Ongoing						Deadline
	c.i	Provide information to all identified sites with a business address												
	c.ii	Annually inspect 20% of the sites listed						Work						Deadline
	c.iii	Inspect all complaints						Ongoing						
	c.v	Report on inspections, annually, organized by type of pollutant generating activities												
	d	Implement a progressive enforcement policy and keep associated records												
	e	Train staff responsible fore the source control program					Work							
C9: Operations and Maintenance	a	Implement maintenance standard equal to the SWMMWW						Ongoing						
	b	Inspect facilities pursuant to S5.C.6.c and in accordance with S5.C.9.a, achieve 80% of inspections annually, keep records		Planning					Work					
	c.i	Annually inspect public facilities		Planning						Work				
	c.ii	Conduct spot checks after large storms						Ongoing						
	c.iii	Inspect catch basins	Work						Planning		Work			Planning
	d	Implement practices policies and procedures to reduce stormwater impacts from public lands. Document procedures						Ongoing						
	f	Implement a SWPPP, add all required elements then update as needed						Ongoing						
	g	Train staff	Planning				Work							
	h	Create and maintain maintenance records						Ongoing						
S7/Appendix 2: TMDL Requirements	A	Include a summary of TMDL activities in the annual report						Ongoing						
	Appendix 2	Business Inspections at commercial animal handling areas. Implement ongoing inspection program to inspect every three years.					Work							
	Appendix 2	TSID&E review data and identify a new high priority area	Work		Deadline									
	Appendix 2	TSID&E submit documentation from review	Work		Deadline									
	Appendix 2	TSID&E begin actions in the identified area		Planning						Work				
	Appendix 2	Surface water monitoring data to EIM		Work			Deadline				Work			