



## **Environmental and Surface Water Management**

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**2019 Stormwater  
Management Program  
(SWMP)**

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## **APPENDIX C**

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# 1. Introduction

## 1.1 The Purpose of the Stormwater Management Program Document

This document constitutes the City of Lynnwood 2019 Stormwater Management Program (SWMP) Plan as required under condition S5.A.2 of the *Western Washington Phase II Municipal Stormwater Permit* (the Permit). The purpose of the document is to detail actions that the City of Lynnwood plans to take between January 1, 2019 and December 31, 2019 to maintain compliance with conditions in the Permit. This SWMP will be an attachment to the Annual Compliance Report for the Permit for 2018, which is due to the Department of Ecology on March 31, 2019.

## 1.2 The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes and stream so that they can support “beneficial uses” such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface waters regulated by the Federal Government (Waters of the US) must obtain permits and comply with certain conditions or face fines and other penalties. NPDES permits have been written for discharges from construction sites, concentrated animal feeding operations, industrial activities, publicly-owned wastewater treatment plants, and municipal stormwater systems.

In Washington State, the US Environmental Protection Agency has delegated the authority over NPDES permits to the Washington State Department of Ecology (Ecology). Ecology has issued several general permits for discharges from stormwater systems that apply to municipalities with different sizes of populations and that are located in different regions of the State (Eastern and Western Washington). Phase I refers to municipalities of >100,000, and Phase II to those with a population of less than 100,000 but greater than 1,000 at the time of permit issuance in 2013.

## 1.3 The Western Washington Phase II Municipal Stormwater Permit

Lynnwood has a population of less than 100,000 and is in Western Washington. Thus our stormwater program must comply with conditions in the *Western Washington Phase II Municipal Stormwater Permit*. The permit governing this reporting period was originally issued on August 1, 2012, but was subsequently modified and re-issued on December 17, 2014, taking effect on January 16, 2015. This permit is set to expire July 31st, 2018, however Ecology has decided to extend this permit for an additional year and will now expire on July 31, 2019. Currently, Ecology is reviewing and responding to comments made on the proposed draft of the new permit which is on pace to take effect on August 1, 2019 and expire on July 31, 2024.

Although the draft permit has not been issued, the City of Lynnwood is moving forward as though all proposed requirements and deadlines will be issued as part of the new permit. The City will plan to meet these new requirements by addressing them in planning sessions for our current NPDES program.

The Permit allows municipalities to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes and streams, and to ground waters, as long as we implement programs to reduce pollutants in stormwater to the “maximum extent possible” by conducting programs and activities in the following program areas:

- Public Education and Outreach
- Public Involvement
- Illicit Discharge Detection and Elimination

- Construction and Post-construction runoff controls
- Municipal Operations and Maintenance
- Monitoring

The SWMP Plan must be prepared and submitted annually and must contain the planned actions and activities that will be used in the following year to gain compliance with the permit. In addition, the Permit requires the City to submit an Annual Compliance Report by March 31<sup>st</sup> of each year that details actions taken in the previous year to achieve compliance. The full text of the Permit is available at:

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIwww/wwphiipermit.html> or can be viewed upon request by contacting the City of Lynnwood Surface Water Management at (425) 670-5200.

## 1.4 Implementation Timing

The current Permit is valid for 5 years, beginning August 1, 2013 to July 31, 2018, and structures a phased in implementation timeline for several benchmark activities. This permit was extended to be valid for an additional year through July 31<sup>st</sup>, 2019. The draft permit is set to go into effect on August 1, 2019 and expire on July 31, 2024.

As of the writing of this document, the City is in compliance with all provisions of the Permit, with the exception of sections S5.C.5.b, S5.C.5.i and S5.C.4.c. G-20 letters acknowledging these deficiencies and the City's plan for compliance were submitted to Ecology on March 13, 2019 (S5.C.5.b & S5.C.5.i) and February 7<sup>th</sup>, 2019 (S5.C.4.c). The City intends to fulfill its commitment for compliance with the requirements and conditions of the Permit throughout 2019. In addition to continuing the programs developed in previous years, the major activities due in 2019 are noted below as required by Ecology:

- Annual Compliance Report for activities conducted in 2018 is due March 31, 2019.
- Annual written update of Permittee's SWMP Plan shall be attached to the Annual Compliance Report and placed on our website by May 31.
- Continuously update our MS4 maps with new connections and infrastructure (specifically due no later than February 2, 2018).
- Field screen at least 12% of our MS4 for potential IDDE, and continue to do so annually.
- Perform annual inspections of all treatment and flow control BMPs constructed after 2010.
- Continue education efforts targeting residents, schools, businesses, and developers, including measuring the effectiveness of our program.
- Create public involvement opportunities to influence our SWMP.
- Continue inspecting and maintaining at least 50% of municipal stormwater facilities, including catch basins and inlets.
- Update the City's Surface Water Management Comprehensive Plan.
- Ensure all appropriate staff are trained accordingly.
- Continue activities that were required in prior years of permit.

## 1.5 City Coordination and Responsibilities

Compliance with the Permit will require coordination and documentation of activities in several City departments. The Public Works Department Surface Water Utility staff will coordinate City efforts, and will meet with staff from other departments regularly to insure that on-going and planned activities meet Permit requirements (particularly with respect to implementing LID regulations and maintenance activities). It is anticipated that activities required for Permit compliance will be carried out largely by the Public Works, Community Development, Parks and Recreation, Administrative Services and Finance, and the City Attorney. The Fire/Building and Police departments will be involved to a lesser extent.

## **1.6 The Surface Water Utility – Other Activities**

This SWMP details activities that are planned and that fall under the purview of the Permit. Municipal Permit compliance is one part of the City's overall surface water management strategy. The Surface Water Utility conducts a suite of programs that reduce flooding, protect and improve water quality, and protect and restore aquatic habitat in the City's streams and lakes. Although not directly required, flood reduction and aquatic habitat restoration efforts can often further Permit compliance goals. For details on Surface Water Utility activities not addressed in this SWMP, including the Surface Water Management Comprehensive Plan, see the City website at <http://www.lynnwoodwa.gov/City-Services/Environmental--Surface-Water-and-Storm-Water.htm> or contact the Public Works Department at (425) 670-5200.

## **1.7 The Permit as Document Map**

The remainder of this document details the required elements of the SWMP as noted in Condition S5.C of the Permit, and notes current and planned compliance activities. The subsection of Condition S5.C associated with each section is noted in parentheses in the section on Permit Requirements.



## 2. Public Education and Outreach

### 2.1 Permit Requirements

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

- Educate target audiences in Lynnwood about stormwater problems, and provide specific actions to follow to minimize those problems.
  - Target audiences include general public, businesses, engineers, contractors, developers and land use planners
  - Educational subject areas will include general stormwater impacts, impacts of impervious surfaces, impacts of illicit discharges and how to report them, low impact development principles, stewardship opportunities, erosion control and technical standards, and stormwater treatment and flow control.
- Create stewardship opportunities.
- Measure the understanding and adoption of targeted behaviors.
- Maintain records of public education and outreach activities.
- Summarize activities in the Annual Report.

### 2.2 Current Activities

The City currently has numerous activities and programs that meet the Permit requirements. Table 2.1 lists target audiences and behaviors that are currently being addressed by education and outreach programs.

**Table 2.1 Current and Ongoing Education and Outreach Programs and Activities**

Item	Target Audience	Goal and/or Behaviors Promoted
Portable Education Booth	General Public	Raise awareness of stormwater impacts and ways that citizens can reduce these impacts
Dispensing Pet Waste Bags & Distributing Informational Cards	General Public	Raise awareness and reduce fecal coliform bacteria in waterways
Storm Drain Marking	General Public	Awareness, prevention of discharge of non-stormwater materials into the stormwater system
<i>Inside Lynnwood</i> Newsletter	General Public, Homeowners	General awareness of urban stormwater impacts and issues and the work we're doing
Stormwater Education Grants Program	K – 12 School Children	General awareness of urban stormwater impacts and issues
Salmon in the Classroom	K – 12 School Children	Link effects of stream health with the salmon, promote watershed stewardship
Source control technical assistance	Businesses	Work with businesses to develop practical methods of reducing or eliminating discharge of non-stormwater materials into the stormwater system

Construction and Contractor's Meetings	Engineers, Contractors, Developers, Review Staff, Land Use Planners	Increase awareness of technical standards for stormwater site and erosion control plans, Low Impact Development (LID) techniques and tools
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In addition, Lynnwood has also been an active participant in the STORM (Stormwater Outreach for Regional Municipalities) group to help identify appropriate program evaluation techniques. In 2018, Lynnwood again partnered with ECOSS to educate business on spill prevention and response, measure behavior change, and inform businesses of proposed changes to the upcoming Permit and how those changes will affect them. Lynnwood contracted with Nature Vision to provide in-class learning opportunities to schools within the City limits.

## 2.3 Planned Activities

The City of Lynnwood's stormwater education and outreach program currently targets a variety of audiences and behaviors. Activities to maintain compliance will center around prioritizing existing programs and developing new ones based on the audiences listed in the Permit, developing methods of evaluating, understanding and adoption of behaviors and of adjusting programs based on such evaluation, and tracking and maintaining records of public education and outreach activities. Table 2.2 summarizes education and outreach activities that are planned for 2019.

**Table 2.2 Education and Outreach Work Plan for 2019**

Item Title	Additional Departments Involved	Schedule Notes
Continue to evaluate and prioritize existing programs, and develop new programs as resources become available	City-Wide, STORM	Continue through 2019 and beyond
Continue coordination and collaboration with other NPDES jurisdictions to identify opportunities for regional awareness and behavior change programs	None	Continue through 2019 and beyond
Continue participating in STORM (Stormwater Outreach for Regional Municipalities), and the Puget Sound Starts Here efforts	None	Continue through 2019 and beyond
Refine strategy and methods to evaluate changes in understanding and adoption of target behaviors	None	Continue through 2019 and beyond
Continue activities listed in Table 2.1, and add additional activities as necessary	TBD	Continue through 2019

Continue partnering with ECOSS for business education, assistance, and behavior change	Business Licensing	Continue through 2019
Continue with Nature Vision to provide in-class learning opportunities	None	Continue through 2019
Continue operating fish hatchery in Hall Lake Basin, and provide salmon-in-the-classroom learning opportunities	Parks	Continue through 2019 and beyond
Rain Barrel sale program	Snohomish Conservation District	April 2019
Rain Barrel design and giveaway	Snohomish Conservation District, local youth, local artists	2019 Fair on 44th

## 2.4 Staffing

The City of Lynnwood's Surface Water Management Division of the Public Works Department has 3 full-time employee positions, and an occasional seasonal intern. Public education and outreach activities are primarily accomplished by the Stormwater Engineering Technician, however all personnel engage in education and outreach activities (as detailed in table 2.1 and 2.2) throughout the year.

Over the course of 2018 the City of Lynnwood's Surface Water Management Division encountered a large amount of turnover. In June 2018 the Environmental and Surface Water Supervisor was promoted out of the division and a month later the Project Manager from the same division left the City. These events left the Surface Water Management Division with only two full time employees and no supervisor. During this time of being severely understaffed the two remaining Surface Water Management Division employees did their best to continue their own work while taking on additional duties to keep everything moving. Unfortunately, some parts of the job were unable to be completed. In November of 2018 one of the employees was promoted to the supervisor position and in February of 2019 the division hired a new employee to fill the position that had been vacated. Now that the division is fully staffed up, the group is striving to meet all requirements of the current NPDES Phase II permit while planning for the issuance of the new permit.

## 3. Public Involvement and Participation

### 3.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to:

- Create opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures, stewardship programs and environmental activities of other similar activities. At a minimum, the public must be able to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, including posting on the City's website no later than May 31<sup>st</sup>.
- Summarize activities for the Annual Compliance Report.

### 3.2 Current Activities

The City currently has activities and programs that meet the Permit requirements. Such activities include:

- Posting of the SWMP on the City's website along with an invitation to the public to submit comments on the document.
- The City Council holds public hearings on budgetary expenditures, Surface Water Utility rates, and anytime a study or plan is contemplated for adoption.
- Staff created and regularly meet with a citizens advisory group to advise on activities within the Scriber creek corridor.
- Lynnwood partnered with Snohomish Conservation District to use volunteer resident labor to install rain gardens and rain barrels in 4 neighborhoods.
- Lynnwood is currently updating its Surface Water Utility Comprehensive Plan to be adopted in 2019.

### 3.3 Planned Activities

The City plans to continue to solicit annual input on the SWMP and other aspects of the Surface Water Program as shown in the table below:

**Table 3.1 Public Involvement Work Plan for 2019**

Item Title	Additional Departments Involved	Schedule Notes
Conduct public involvement process for 2020 SWMP	Information Services	To be complete by December 31, 2019
Post SWMP and 2018 Annual Report on City website	Information Services	To be complete by March 31, and May 31 2019
Continue working with Scriber Corridor Advisory Committee	Parks and Recreation	Ongoing
Continue Surface Water Management Comprehensive Plan Update	Parks and Recreation	To be adopted in 2019
Continue Partnering with Snohomish Conservation District to target multiple	Snohomish Conservation District	Throughout 2019 as opportunities arrive

neighborhoods and City properties for rain garden and rain barrel installations		
Public Involvement opportunities for SW Comprehensive Plan adoption process	City Council	Second Half of 2019
Conduct open house for capital projects (Floodwall on 188th)		Second Half of 2019

## 4. Illicit Discharge Detection and Elimination

### 4.1 Permit Requirements

The Permit (Section S5.C.3) requires that the City:

- Develop an ongoing program to detect and remove illicit connections, discharges, and improper disposal including spills into the municipal stormwater system.
- Develop a municipal storm sewer map that includes attributes of stormwater system outfalls and notes receiving waters.
- Develop and implement an ordinance to prohibit non-stormwater discharges and dumping into the stormwater system.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track reports of discharges and actions taken to address the reported problem.
- Provide training for municipal field staff on the identification and reporting of illicit discharges into the stormwater system.
- Implement an ongoing program to address and eliminate illicit discharges, spills, and connections.
- Track and maintain records of all activities related to illicit discharges and response.
- Summarize activities for the Annual Compliance Report.

### 4.2 Current Activities

The City currently conducts activities that meet all the Permit requirements. Current illicit discharge detection and elimination (IDDE) activities that are part of Permit compliance include:

- The City maintains maps and an associated GIS database for the municipal separate stormwater system using Cartegraph and ARCMAP. The information and precise pinpoint mapping of both the public and private stormwater system is constantly being refined. Maps are available upon request.
- Surface Water staff regularly train, or send to off-site training, all field employees on illicit discharge identification and follow-up procedures.
- Outfall identification (of all sizes) to be included on our GIS map in an ongoing basis.
- Water quality complaints and reports of spills or dumping are investigated on average within 1 working day of receipt (usually within the same hour if during regular business hours).
- The City set up 425-670-KRUD as its illicit discharge hotline. This hotline is publicized in City publications, online, and in utility bills. Records are kept of calls received, and actions taken as a result of these calls.
- The City developed an IDDE Program Manual in 2011 to guide our IDDE program and response, and is regularly used.
- Basic sampling kits, and other equipment are kept on-hand to assist in identifying illicit discharges. Sampling and equipment include:
  - Surfactant testing equipment
  - Chlorine and fluoride sampling kits
  - Turbidimeter
  - Sterile sample bottles
  - Pipe cameras

### 4.3 Planned Activities

The City intends to continue compliance with the requirements of its Permit, and will be undertaking the actions identified in the table below:

**Table 4.1 Illicit Discharge Detection and Elimination Work Plan for 2019**

Item Title	Additional Departments Involved	Schedule Notes
Develop and fully implement City-wide IDDE program per Permit conditions, and internal implementation plan	Police, Fire, Parks and Recreation, Community Development	On-going
Continue refining storm system map to address data gaps and Permit conditions	Information Services	On-going
Migrate GIS data over to new asset management program (New CarteGraph)	Information Services	On-going through 2019
Define drainage area and other attributes as needed for each municipal separate stormwater outfall (regardless of diameter)	None	As need arises
Continue to input new connections to the municipal separate stormwater system as they are constructed	Information Services, Permit Center	On-going as new connections are made. This is done through the building permit process
Continue enforcement strategy and documenting enforcement actions taken	Community Development	On-going as needed
Review and enhance programs for providing education to the general public on reduction of pollutants in permitted non-stormwater discharges	Business Licensing	On-going
Verify that field staff have adequate training, provide and document additional training if needed	Community Development, Parks and Recreation, Building and Property Services	As needed
Develop and implement on-going training program for field staff	Community Development, Parks and Recreation, Building and Property Services	Biannually

Conduct illicit connection inspections and field screening for approximately 1/2 of City (target goal)	None	2019
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# 5. Controlling Runoff from New Development, Redevelopment and Construction Sites

## 5.1 Permit Requirements

The Permit (Section S5.C.4) requires that the City develop, implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. This program must include:

- Adopt an ordinance that addresses runoff from new development, redevelopment and construction sites.
- Adopt minimum stormwater design standards that are equivalent to the minimum technical requirements in Appendix 1 of the permit.
- Implement a permitting process to review plans, inspect sites during construction, and to take enforcement action against those failing to follow approved guidelines or to provide facilities as required during plan review.
- Ensure our program includes provisions to verify long-term operation and maintenance of stormwater facilities.
- Make copies of the “Notice of Intent for Construction Activity” available for proposed new development and redevelopment.
- Provide for training staff on new / revised regulations, standards, processes and procedures.
- Ensure all City development regulations allow for the use of LID techniques.
- Track and maintain records of inspections and permit.

## 5.2 Current Activities

Lynnwood currently has a program that meets Permit requirements. Current activities associated with controlling runoff from new development, redevelopment, and construction sites associated with Permit compliance include:

- The City inspects and reviews all public and private projects that meet the minimum threshold within the WDOE SWMMWW 2012 / 2014. We require submittal and approval of a SWPPP and SPCC for all construction activities. All of the City’s inspectors and reviewers are Certified Erosion and Sediment Control Lead certified (CESCL). The Surface Water Division has a dedicated erosion control inspector for construction sites, and all Surface Water Division staff, and Engineering Development Review staff are CESCL certified.
- For projects greater than 1 acre in size, the City has adopted and enforces the same standards as the Washington Department of Ecology (in the General Construction NDPES Permit). Lynnwood gives all developers copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity during the predevelopment review phase.
- Lynnwood Municipal Code 13.40 addresses development standards for development, redevelopment and construction sites and includes a permit review and approval process, design standards, erosion control requirements, maintenance standards, inspection and maintenance of post-construction permanent stormwater controls, and enforcement provisions. These standards meet all of the requirements of Appendix 1 of the Permit. As was required and reported in the previous annual report, the City implements many aspects of LID through other sections of regulations as well.
- The City regularly inspects, keeps records of, and requires maintenance (when necessary) for private stormwater facilities.

- The City maintains records of review, inspection, and enforcement actions by staff.

### 5.3 Planned Activities

Lynnwood currently has a program that meets Permit requirements, but plans to take the following further actions:

- As needed, refine procedures for tracking and documenting permit-related plan review, inspection, enforcement, and compliance activities.
- Review plan review, inspection, and enforcement procedures and make alterations if needed.
- Review and revise inspection frequencies for stormwater treatment and flow control facilities both during and after construction as needed.
- Send staff to training when needed.
- Develop handouts and standards to educate the public (including engineers, contractors, and permit holders) about Low Impact Development design strategies and technologies (one of the target audiences under the “Public Education and Outreach” section of the Permit).
- Review our local stormwater regulations and make any updates deemed necessary to reduce or eliminate confusion, clarify intent, etc..

**Table 5.1 Controlling Runoff from New Development, Redevelopment and Construction Sites Work Plan for 2019**

Item Title	Additional Departments Involved	Schedule Notes
Continue to require submittal and approval of SWPPs and SPCCs prior to beginning construction activities	Building and Permitting Department	On-going
Regularly inspect construction sites	Building Department	On-going
Require maintenance of stormwater facilities as needed based on inspections	None	On-going
Continue to provide copies of the Notice of Intent for Construction Activities and the Notice of Intent for Industrial Activities to representatives of proposal new development and redevelopment	Community Development	On-going
Continue training staff	Community Development, Parks and Recreation, Building and Property Services	On-going

Provide information regarding localized conditions to the public including engineers and contractors to inform decisions about using and installing Low Impact Development technologies	Community Development	On-going
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## 6. Municipal Operations and Maintenance

### 6.1 Permit Requirements

The Permit (Section S5.C.5) requires the City to:

- Implement a municipal operations and maintenance program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards that are as protective as those noted in chapter 4 of Volume V of the *Stormwater Management Manual for Western Washington*.
- Perform annual inspection of municipally owned and operated water quality treatment and flow control facilities.
- Spot check potentially damaged stormwater infrastructure after major storms, and repair if necessary.
- Inspect all catch basins in the City by August 1, 2017, and every 2-years thereafter (or as-needed with adequate documentation).
- Establish and implement policies and practices to reduce stormwater impacts and pollutants associated with maintenance operations for streets, parking lots, roads or highways, and from all lands owned or maintained by the City.
- Develop and provide training to assist staff in implementing practices and policies to reduce pollutants in runoff from maintenance operations.
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage yards, and material storage facilities owned or operated by the City.
- Maintain records of all activities required by the Permit.

### 6.2 Current Activities

Lynnwood currently has programs that meet Permit requirements including the following:

- The City adopted a Comprehensive Surface Water Management Plan in August 2009, a large portion of which is dedicated to Surface Water Operations and Maintenance (O&M). Implementation of these recommendations continues. An update of this plan is currently underway and will continue through 2018, with anticipated adoption in 2019.
- All O&M staff (in all utility departments) have attended training associated with pollutant reduction, and include annual refresher training.
- Water quality treatment and flow control facilities are inspected several times annually, and are cleaned and repaired as necessary.
- All catch-basins are inspected and cleaned at least every 2 years. This began in 1995. Many are done annually.
- The City developed a Stormwater Pollution Prevention Plan for its' Public Works facilities, adopted June 2009.
- In 2014, Public Works adopted, and currently implements a vegetation management IPMP.

Lynnwood currently has two G-20 non-compliance letters on file with WDOE. The first is in respect to section S5.C.5.b which requires "annual inspection of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities." The non-compliance issue revolves around unknown ownership status of several of these facilities. Research is currently underway to resolve this issue, and is anticipated to be complete by the end of 2019. The City anticipates full compliance by the end of 2019.

The second is in respect to section S5.C.4.c which requires "annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4". The non-compliance issue is due to staff turnover and inability to conduct field inspections. The Environmental and Surface Water group has added staffing over the last few months and has begun the process of becoming

compliant with their private facility inspections. The City anticipates full compliance by the end of March 2019.

### 6.3 Planned Activities

Lynnwood plans to continue complying with the Permit requirements, and currently has programs that seek to reduce pollutants in runoff from City facilities and maintenance practices, including:

- Continue to implement the maintenance standards as noted in the both the *Stormwater Management Manual for Western Washington*, and the *City's Surface Water Management Comprehensive Plan*.
- Continue to evaluate and revise as necessary our inspection procedures and frequencies for municipally owned or operated permanent water quality treatment and flow control facilities and catch-basins.
- Continue to evaluate and revise as necessary impacts from runoff or maintenance practices associated with municipally owned or operated streets, parking lots, and roads.
- Continue to evaluate and revise as necessary operation and maintenance practices for municipally-owned lands in order to reduce pollutants in runoff.
- Continue training for staff whose work could impact stormwater quality.
- Update tracking and documentation methods and procedures associated with inspection, maintenance or repair activities primarily in our new asset management system (Cartegraph).
- Continue to implement and comply with our Vegetation Management IPMP.
- Come into compliance with section S5.C.5.b.
- Come into compliance with section S5.C.4.c.

**Table 6.1 Municipal Operations and Maintenance Work Plan for 2019**

Item Title	Additional Departments Involved	Schedule Notes
Continue maintenance standards established in Surface Water Comprehensive Plan	None	On-going
At least once, inspect municipally owned water quality treatment and flow control facilities and maintain if needed	None	Annually
Evaluate maintenance and operation practices to reduce pollutant runoff from City streets	None	On-going
Review maintenance and operation practices for City-owned lands and review if necessary to reduce pollutants in runoff	Parks	On-going
Continue training program for City staff whose work could impact water quality	Parks and Recreation, Community Development, Fire, Building and Property Management	On-going

Implement Vegetation Management Integrated Pest Management Plan	None	Annually
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## 7. Total Maximum Daily Load (TMDL)

### 7.1 Permit Requirements

The Permit (Appendix 2: WRIA 8 – Swamp Creek) requires the City to:

- Inspect commercial animal handling areas and commercial composting facilities to ensure implementation of source control BMPs for bacteria.
- Conduct public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management behavior.
- Install and maintain animal waste collection and/or education stations at municipal parks and other City owned and operated lands reasonably expected to have a substantial domestic animal (dog and horse) use and the potential for pollution of stormwater.
- Screen for bacteria sources in any screened MS4 subbasins which discharge to surface waters in the TMDL area.
- Identify a high priority area that will be the focus of source identification and elimination efforts of the current permit cycle.
- Implement source control identification and elimination efforts in the MS4 subbasins discharging to the identified high priority area.
- Monitor for fecal coliform in at least one location monthly.

### 7.2 Current Activities

Lynnwood currently has programs that meet Permit requirements including the following:

- The City inspected animal handling areas before August 1<sup>st</sup> of 2016 and plans to follow up in 2019 to re-inspect facilities with bacteria source control problems.
- Continue conducting public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management behavior.
- Continue to install and maintain animal waste collection and/or education stations at municipal parks and other City owned and operated lands reasonably expected to have a substantial domestic animal (dog and horse) use and the potential for pollution of stormwater.
- Continue screening for bacteria sources in any screened MS4 subbasins which discharge to surface water in the TMDL area.
- Continue to implement source control identification and elimination efforts to MS4 subbasins discharging to identified high priority area.
- Continue monthly fecal coliform monitoring at four sites.
- Submit available TMDL data to the Environmental Information Management (EIM) by May 31<sup>st</sup>, 2019.

### 7.3 Planned Activities

The City intends to continue compliance with the requirements of its Permit, and will be undertaking the actions identified in the following table

**Table 7.1 Total Maximum Daily Load Plan for 2019**

<b>Item Title</b>	<b>Additional Departments Involved</b>	<b>Schedule Notes</b>
Continue fecal coliform monitoring at four sites	None	Monthly
Re-inspect animal handling facilities with bacteria source control problems.	None	June 2019
Continue to distribute dispensing pet waste bags and informational handouts to increase public awareness	None	On-going
Continue to install and maintain animal waste collection and/or education stations at municipal parks and other City owned and operated lands	Parks	On-going
Continue to screen City MS4 for bacteria sources	None	On-going



# Appendix A

## Record of Public Comment:

Floodplain Development Regulations Update was adopted by City Council resolution on January 22, 2018. No comments made.

City Council awarded contract for Scriber Creek Trail Improvements Phase I on February 26, 2018. No comments made.

City Utility Rate Discount Program Ordinance was adopted by City Council on May 14, 2018. No comments were made.

City Council approved a consultant contract supplement for Scriber Creek Trail Improvements on August 13, 2018. No comments were made.

City staff participated in National Night Out on August 7, 2018. Comments were received, none of which were about the Surface Water Program.

City staff participated in the Fair on 44<sup>th</sup> on September 8, 2018. Comments were received. All comments were regarding the City of Lynnwood's Rain Garden Program.

Scriber Creek Corridor Citizen Advisory Committee did not hold any meetings in 2018.

Several citizens exercised their "opt-out" option from herbicide spraying.

# Appendix B

## **G20 Non-Compliance Notification**

Annual Inspections of Stormwater Treatment and Flow  
Control BMP's and Facilities that Discharge to MS4.  
(S5.C.4.c.iii)

**DEPARTMENT**

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February 7, 2019

Department of Ecology  
Northwest Regional Office  
Attn: Colleen Crotty  
3190 160th Ave SE  
Bellevue, WA 98008-5452

RE: G20 Non-Compliance Notification

Dear Ms. Crotty,

After the January 8<sup>th</sup>, 2019 meeting with Washington State Department of Ecology staff, a discussion was held internally about our NPDES program and it became known that the City of Lynnwood was not in compliance with our Municipal Stormwater Permit. Section S5.C.4.c requires "annual inspection of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4". The City was in compliance with the inspection of private facilities in 2017, but not for 2018.

In June of 2018 the City of Lynnwood promoted their Environmental Surface Water Supervisor who oversaw compliance of the NPDES Phase II Permit. The supervisor oversaw three employees and shortly after their promotion, one of those employees left the City. This left the group with only two employees and no supervisor for the time being. During this time of being severely understaffed the two remaining Environmental and Surface Water employees did their best to continue their own work while taking on additional duties to keep everything moving. Unfortunately, some parts of the job were unable to be completed, including the City's annual private facility inspections for 2018.

In November of 2018 an Environmental and Surface Water employee was promoted as the supervisor of the group and will have a new employee starting work on February 11<sup>th</sup>, 2019. With increasing the group size to three, the Environmental and Surface Water group will look to complete their 2019 annual private facility inspections by the end of March as opposed to later in the year. This will greatly reduce the length of gap in the required private facility inspections as the City usually conducted the inspections November through December.

If you have any further questions, please contact Environmental and Surface Water Supervisor Derek Fada at 425-670-5242 or via e-mail at [dfada@lynnwoodwa.gov](mailto:dfada@lynnwoodwa.gov)

Sincerely,



William Franz  
Public Works Director, City of Lynnwood

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

# Appendix C

## **G20 Non-Compliance Notification**

Annual Inspections of Municipally Owned or Operated  
Stormwater Treatment and Flow Control BMP's and  
Facilities (S5.C.5.b)

&

Maintain Records of Inspections and Maintenance or Repair  
Activities (S5.C.5.i)

**DEPARTMENT**

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March 7, 2019

Department of Ecology  
Northwest Regional Office  
Attn: Colleen Crotty  
3190 160th Ave SE  
Bellevue, WA 98008-5452

RE: G20 Non-Compliance Notification

Dear Ms. Crotty,

After the January 8<sup>th</sup>, 2019 meeting with Washington State Department of Ecology staff it was determined that the City of Lynnwood needed to follow up on a G20 Non-Compliance Notification regarding annual inspections of municipally owned stormwater treatment and flow control facilities. On March 4<sup>th</sup>, 2019, after many hours of going through our internal records, the City of Lynnwood became aware they were not in compliance with the following:

**S5.C.5.b – “Annual inspection of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities”**

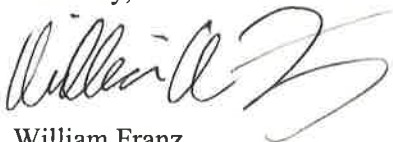
In 2018 our Maintenance and Operations data, including recorded facility inspections, was migrated over to our new asset management software (Cartegraph) system. During the migration of the data, it appears all records of inspections of the facilities were lost. An effort was led by city staff in early 2019 to track down the previous inspection records but was unsuccessful. Since the City can no longer produce records of municipally owned facility inspections prior to 2018, Lynnwood is unable to comply with section S9.B, which states “Each Permittee is required to keep all records related to this permit and the SWMP for at least five years.” The City of Lynnwood plans to be in compliance with the annual inspection requirement, as well as record keeping requirements by the end of 2019.

**S5.C.5.i – “Maintain records of inspections and maintenance or repair activities conducted by the Permittee”**

The City of Lynnwood lost their records of inspections on municipally owned stormwater treatment and flow control facilities in 2018, during a migration to a new asset management software (Cartegraph) system. Since the City can no longer produce records of municipally owned facility inspections and maintenance prior to 2018, Lynnwood is unable to comply with section S9.B, which states “Each Permittee is required to keep all records related to this permit and the SWMP for at least five years.” The City of Lynnwood plans to be in compliance with the annual inspection requirement, as well as record keeping requirements by the end of 2019.

The City will continue to comply with all other requirements of the Municipal Stormwater Permit, and will continue to keep Ecology aware of our progress to become compliant in the areas discussed herein where we are deficient. If you have any further questions, please contact Environmental and Surface Water Supervisor Derek Fada at 425-670-5242 or via e-mail at [dfada@lynnwoodwa.gov](mailto:dfada@lynnwoodwa.gov)

Sincerely,



William Franz  
Public Works Director, City of Lynnwood

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