

CITY OF SEDRO-WOOLLEY
Sedro-Woolley Municipal Building
720 Murdock Street
Sedro-Woolley, WA 98284
Phone (360) 855-0771
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Mark A. Freiberger, PE
Director of Public Works/City Engineer

March 31, 2009

Department of Ecology
Water Quality Program
Municipal Stormwater Permits
P.O. Box 47696
Olympia, WA 98504-7696

Subject: 2008 Annual Report

RE: Western WA Phase II Municipal Stormwater Permit No. WAR04-5555
City of Sedro-Woolley, WA

Dear Ecology,

Enclosed please find two signed originals of the 2008 Annual Report and Stormwater Management Plan due on March 31, 2009.

An electronic version was emailed to Ecology on this date as well.

Regards,

Mark A. Freiberger, PE
Director of Public Works/City Engineer

Cc: Eron Berg, City Supervisor/City Attorney
Patsy Nelson, CPA, City Clerk/Treasurer

I. Permittee Information	
Permittee Name City of Sedro-Woolley	Permittee Coverage Number WAR04-5555
Contact Name Mark Freiberger	Phone Number (360) 855-0771
Mailing Address 325 Metcalf Street	
City Sedro-Woolley	State Zip + 4 WA 98284
Email Address mfreiberger@ci.sedro-woolley.wa.us	


II. Regulated Small MS4 Location							
Jurisdiction City of Sedro-Woolley	Entity Type: Check the box that applies						
	<table border="1"> <thead> <tr> <th>County</th> <th>City/Town</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>	County	City/Town	Other		X	
County	City/Town	Other					
	X						
Major Receiving Water(s) Skagit River							

III. Relying on another Governmental Entity	
<p>If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. <i>Attach a copy of your agreement with the other entity to provide additional detail.</i></p>	
Name of Entity:	Permit Obligation(s):
Skagit Conservation District	S5.3.b, S5.C.1.a, S5.C.2.b

IV. Certification

All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees. Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

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.

Name  Title Mark A. Freiberger, PE, Director of Public Works/City Engineer Date 3/30/09

Name _____ Title _____ Date _____

Name _____ Title _____ Date _____

Name _____ Title _____ Date _____

Name _____ Title _____ Date _____

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

NOTE: Items that have future compliance dates must still be answered to indicate status.

NOTE: Highlighted questions indicate permit requirements that are due for calendar year 2008.

NOTE: For clarification on how to answer questions, place cursor over cells with red flags.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
1.	Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y		Attached	2008 SWMP Annual Report for the City of Sedro-Woolley
2.	Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	N		No annexations incorporations, or boundary changes that change the permittees areas during the reporting period. Sewer Moratorium was expired.	
3.	Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	N		Not yet required. However, started to implement additional comments for design review relating to the SWPPP and TESC sheets. Make additional BMP recommendations to be made available for contractors and ensuring best management practices are followed. GIS Mapping Project.	
4.	Began tracking costs or estimated costs of the development and implementation of the SWMP? (<i>Required</i> no later than January 1, 2009, S5.A.3.a)	Y		Done, information in files.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
5.	SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? (<i>Required to begin</i> by February 15, 2009, S5.C.1)	Y		Done through an interlocal agreement with Skagit Conservation District for public education and outreach for various audiences. In house, CESCL training was provided for own employees and outside contractors, engineers or anyone wishing to attend.	2008 SWMP, page 4 (EDUC-1), and Appendix A-2
6.	Distributed appropriate information to target audiences identified in the area served by the MS4? (<i>Required to begin</i> by February 15, 2009, S5.C.1.a)	Y		Done through an interlocal agreement with Skagit Conservation District for public education and outreach. In house, CESCL training was provided for own employees and outside contractors, engineers or anyone wishing to attend.	2008 SWMP, page 4 (EDUC-1), and Appendix A-2
6b.	Please mark a Y next to audiences targeted in Y/N/NA box:	y			
i	General Public	Y		CESCL training notification was prioritized but then the instructor advertisement was made available to anyone. Watershed Masters Volunteer Training Program, Volunteer Water Quality Monitoring ("Stream Teams"), Storm Drain Labeling, Storm Drain labeling project, "Home Tips for Healthy Streams" pamphlet, poster contest on stormwater (K-8th grade), ongoing updates to Council.	2008 SWMP, page 4 (EDUC-1), and Appendix A-2
ii	Home-based business	N			
iii	Elected officials	Y			
iv	Developers	Y		SCD conducted two LID workshops.	See 2008 SWM for detail.
v	Contractors	Y		SCD conducted two LID workshops.	See 2008 SWM for detail.
vi	Permittee Employees	Y			
vii	Residents	Y			
viii	Businesses	Y			
ix	Policy makers	Y			
x	Engineers	Y			
xi	Property managers	N			
xii	Homeowners	Y		Backyard Conservation Stewardship Program	See 2008 SWM for detail.

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
xiii	Mobile businesses	N			
xiv	Industries	N			
xv	Landscapers	N			
xvi	Planning Staff	Y		SCD conducted two LID workshops.	See 2008 SWM for detail.
7.	Tracked the types of public education and outreach activities implemented. (<i>Required to begin</i> by February 15, 2009, S5.C.1.c)	Y		Done with an interlocal agreement with Skagit Conservation District for public education and outreach. Reference 2008 SWMP Appendix A-1. Appendix A-2 Public Education and Outreach also involves public to comment on	2008 SWMP, page 4 (EDUC-5), and Appendix A-2
7b.	Number of activities implemented:		5	Five primary categories.	2008 SWMP Appendix A-2
8.	Measured the understanding and adoption of the targeted behaviors among targeted audiences. (<i>Required to begin</i> by February 15, 2009, S5.C.1.b)	Y		Five primary categories.	2008 SWMP, page 4 (EDUC-4), and Appendix A-2
9.	Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? (<i>Required</i> by February 15, 2008, S5.C.2.a)	Y		On Website: Annual Report, Permit, and Questions and Answers posted on website for public review. Public may comment if they desire. Newspaper notices. Further measures are required. Ref. 2008 SWMP Appendix A-1. Appx A-2 Public Education and Outreach also involves public to comment on the SWMP.	2008 SWMP, page 5 (PI-2), and Appendix A-1. Appendix A-2 also helps effort.
10.	Developed and implemented a process for public involvement and consideration of public comments on the SWMP? (<i>Required</i> by February 15, 2008, S5.C.2.a)	Y		On Website: Annual Report, Permit, and Questions and Answers are posted on website for public review. Public may comment if they desire. Reference 2008 SWMP Appendix A-1. Appendix A-2 Public Education and Outreach also involves public to comment on the SWMP.	2008 SWMP, page 5 (PI-2)
11.	Made the most current version of the SWMP available to the public. (S5.C.2.b)	Y		On Website: Annual Report, Permit, and Questions and Answers are posted on website for public review. Public may comment if they desire.	2008 SWMP, page 5 (PI-3)
12.	Posted the SWMP and latest annual report on your website. (S5.C.2.b)	Y		SWMP and latest annual report will be posted on website.	See below website.
12b.	NOTE website address in <i>Attachment</i> field:			Noted	http://www.ci.sedro-woolley.wa.us/Home/main.htm

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
13.	Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? <i>(Required August 19, 2011, S5.C.3)</i>	N		Not yet required.	2008 SWMP, page 8 (IDDE-3)
14.	Developed and currently maintain a map of your MS4? <i>(Required by February 15, 2011, S5.C.3.a)</i>	N		Not yet required. Have invested in GIS mapping of all catch basins, ditches, control structures, and ponds. Will continue to detail.	2008 SWMP, page 8 (IDDE-1)
14b.	Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? <i>(S5.C.3.a.ii)</i>	N		Not yet required. Have invested in GIS mapping of all catch basins, ditches, control structures, and ponds. Will continue to detail.	2008 SWMP, page 8 (IDDE-1)
15.	Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? <i>(Required by February 15, 2011, S5.C.3.a.i)</i>	N		Not yet required. Have invested in GIS mapping of all catch basins, ditches, control structures, and ponds. Will continue to improve detail.	
16.	Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? <i>(Required by February 15, 2011, S5.C.3.a.i)</i>	N		Not yet required. Have invested in GIS mapping of all catch basins, ditches, control structures, and ponds. Will continue to improve detail. Sizing information is partially done. City plans to update 1997 Stormwater Management Plan in 2009, which will update this data.	
17.	Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? <i>(Required by February 15, 2011, S5.C.3.a.iii)</i>	N		Not yet required. Have invested in GIS mapping of all catch basins, ditches, control structures, and ponds. Will continue to detail. Pipe sizing information is partially done. Some treatment facilities are infiltration.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
18.	Map has been made available upon request? (S5.C.3.a.iv)	N		Not yet required. Mapping will be used internally to assess flood problems and provide for storm pond inventories (with inspection) and catch basin cleaning maintenance records.	
19.	Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illegal discharges, and/or dumping into the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.3.b)	N		Not yet required.	2008 SWMP, page 8 (IDDE-2)
20.	Developed and implemented an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the Permittee's MS4? (<i>Required</i> by August 19, 2011, S5.C.3.c)	N		Not yet required.	2008 SWMP, page 8 (IDDE-3)
21.	Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in spills? (<i>Required</i> by August 19, 2011, S5.C.3.c.i)	N		Not yet required.	
22.	Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? (<i>Required</i> by August 19, 2011, S5.C.3.c.ii)	N		Not yet required. Began mapping project.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
23.	Prioritized receiving waters for visual inspection? (<i>Required</i> by February 15, 2010, S5.C.3.c.ii)	N		Not yet required. Skagit River is primary; Brickyard Creek drains to Harts Slough and then to Skagit River.	
24.	Conducted field assessments for three high priority water bodies? (<i>Required</i> by February 15, 2011, S5.C.3.c.ii)	N		Not yet required.	
25.	Conducted field assessments on at least one high priority water body? (<i>Required</i> annually after February 15, 2011, S5.C.3.c.ii)	N		Not yet required. Concentrating on Brickyard Creek.	
26.	Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? (<i>Required</i> by August 19, 2011, S5.C.3.c.iii)	N		Not yet required.	
27.	Developed and implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? (<i>Required</i> by August 19, 2011, S5.C.3.c.iv)	N		Not yet required. City did begin a stream monitoring program with Skagit Conservation District on Brickyard Creek. Volunteers and one City employee take samples and the City's Sewer Lab conducts the tests.	
28.	Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? (<i>Required</i> by August 19, 2011, S5.C.3.c.v.)	N		Not yet required. We are looking at a prevention approach first by an intensive design review with an attached SWPPP plan to include 12 elements for any size project. Various prime and alternative BMPs provide more information to contractors to better conform to preventing illicit discharges. DOE is contacted for assistance.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
29.	Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? (<i>Required</i> by August 19, 2011, S5.C.3.d)	N		Not yet required. Started Public Education and Outreach Program with Skagit Conservation District.	
30.	Distributed appropriate information to target audiences identified pursuant to S5.C.1? (<i>Required</i> by August 19, 2011, S5.C.3.d.i)	N		Not yet required. Started Public Education and Outreach Program with Skagit Conservation District.	
31.	Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? (<i>Required</i> by February 15, 2009, S5.C.3.d.ii)	Y		Link is on City Website to Public Works Department Stormwater Section	2008 SWMP, page 8 (IDDE-4)
31b.	Number of hotline calls received:		3		
31c.	Number of follow-up actions taken in response to calls:		3		
32	Tracked the number and type of spills? (<i>Required</i> by August 19, 2011, S5.C.3.e)	N		Not yet required.	2008 SWMP, page 8 (IDDE-5)
32b.	Number of spills:		0		
33	Tracked the number of illicit discharges identified? (<i>Required</i> by August 19, 2011, S5.C.3.e)	N		Not yet required.	
33b.	Number of illicit discharges identified:		0		
34	Tracked the number of inspections made for illicit connections? (<i>Required</i> by August 19, 2011, S5.C.3.e)	N		Not yet required.	
34b.	Number of inspections:		0		
35	Received feedback from IDDE public education efforts? (<i>Required</i> by August 19, 2011, S5.C.3.e)	N		Not yet required. Partial work started Public Education and Outreach Program with Skagit Conservation District.	2008 SWMP, Appendix A as a start.
36	Attached report on IDDE public education efforts? (<i>Required</i> by August 19, 2011, S5.C.3.d, S5.C.3.e)	N		Not yet required.	2008 SWMP, Appendix A as a start.

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
37	Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? <i>(Required by August 15, 2009, S5.C.3.f.i)</i>	Y		CESCL training was provided by the City of Sedro-Woolley. Six (6) people within the city were trained and one already had training. Procedures must be worked on. Part of process will involve hot-line response training. Four (4) from Sewer, Streets, and Parks Depts also attended Illicit Discharge Detection component within a Roads and Storm Sewer Maintenance for Staff.	2008 SWMP, page 8 (IDDE-6); Hotline on Website.
37b.	Number of trainings provided:		2		
37c.	Number of staff trained:		10		
38	Provided follow-up training as needed to address changes in procedures, techniques or requirements? <i>(Required by August 15, 2009, S5.C.3.f.i)</i>	N		Not yet required.	2008 SWMP, page 8 (IDDE-6)
38b.	Number of trainings provided:		0		
38c.	Number of staff trained:		0		
39	Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? <i>(Required by February 15, 2010, S5.C.3.f.ii.)</i>	N		Not yet required. IDD Training: Four (4) from Sewer, Streets, and Parks Depts also attended Illicit Discharge Detection component within a Roads and Storm Sewer Maintenance for Staff course in Mount Vernon. Another title was "Water Quality Pollution Prevention and Good House Keeping Practices". CESCL certification covers 3 years so that puts most trained with certification through 2011. One will be recertified.	2008 SWMP, page 8 (IDDE-6); Hotline on Website.
39b.	Number of trainings provided:		0		
39c.	Number of staff trained:		0		

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
40	Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? <i>(Required by August 15, 2009, S5.C.4)</i>	N		Not yet required. However, started to implement additional comments for design review relating to the SWPPP and TESC sheets. Make additional BMP recommendations to be made available for contractors and ensuring best management practices per Ecology standards are followed. This might be inserted into our Public Works Standards. Site inspection will be by City	2008 SWMP, page 10 (CTRL-2)
41	Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4)</i>	N		Not yet required. However, started to implement additional comments for design review relating to the SWPPP and TESC sheets. Make additional BMP recommendations to be made available for contractors and ensuring best management practices are followed. This might be inserted into our Public Works Standards. Site inspection will be by City Inspectors and staff.	2008 SWMP, page 10 (CTRL-2)
42	Applied stormwater runoff program to private and public development, including roads? <i>(Required by August 15, 2009, S5.C.4)</i>	N		Not yet required. CESCL training and using DOE manual to accomplish part of this.	
43	Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4)</i>	N		Not yet required. CESCL training and using DOE manual to accomplish part of this. However, started to implement additional comments for design review relating to the SWPPP and TESC sheets. Make additional BMP recommendations to be made available for contractors and ensuring best management practices are followed. This might be inserted	
44	Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? <i>(Required by August 15, 2009, S5.C.4.a)</i>	N		Not yet required.	2008 SWMP, page 10 (CTRL-1)

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
45	Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? (S5.A.4)	N		City's existing requirements are above thresholds required pursuant to S5.C.4.	
46	The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? (<i>Required</i> by August 15, 2009, S5.C.4.a.i)	N		Not yet required.	2008 SWMP, page 10 (CTRL-1)
47	The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		Not yet required.	2008 SWMP, page 10 (CTRL-1)
48	Were exceptions or variances to the minimum requirements in Appendix 1 granted? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		Not yet required.	
48b.	If so, how many were granted?		0		

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
49	The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? (<i>Required</i> by August 15, 2009, S5.C.4.a.ii)	N		Not yet required. Update City standards for this item. CESCL training and using DOE manual to accomplish part of this. However, started to implement additional comments for design review relating to the SWPPP and TESC sheets. Make additional BMP recommendations to be made available for contractors and ensuring best management practices are followed. This might be inserted into our Public Works Standards. Site inspection will be by City Inspectors and staff.	2008 SWMP, page 10 (CTRL-1)
49b.	Cite documentation to meet this requirement in <i>Attachment</i> field:	Y			2008 SWMP, page 10 (CTRL-1) start.
50	The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.4.a.iii)	N		Not yet required.	2008 SWMP, page 9 (CTRL-1)

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51	The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? (<i>Required</i> by August 15, 2009, S5.C.4.a.iv)	N	Not yet required. LID is already mentioned in City standards.	2008 SWMP, page 10 (CTRL-2)
52	If the ordinance or regulatory mechanism allows construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is <i>required</i> by August 15, 2009, S5.C.4.a.v)	N	Not yet required.	
53	Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (<i>Required</i> by August 15, 2009, S5.C.4.b)	N	Not yet required. Process is not official but action is being done with thorough plan review with alternative BMPs applied to the 12 storm elements applied to the TESC plan. Inspection done.	2008 SWMP, page 9 (CTRL-2)

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
54	Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4.b)</i>	N		Not yet required.	2008 SWMP, page 10 (CTRL-2)
55	Reviewed Stormwater Site Plans for new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.b.i)</i>	N		Not yet required. City staff do review stormwater site plans and drainage reports.	2008 SWMP, page 10 (CTRL-2)
55b.	Number of site plans reviewed during the reporting period:		0	Not yet required. None of the sites were greater than 1 acre during period, expect some in 2009.	
56	Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Potential? <i>(Required by August 15, 2009, S5.C.4.b.ii)</i>	N		Not yet required. Sites are inspected prior to design review. Extensive design review includes 12 elements of SWPPP and TESC controls by using correct BMPs and including alternatives or additional BMPs for the contractor and owner to be aware of. CESCL training helped with this.	2008 SWMP, page 10 (CTRL-2)
56b.	Number of qualifying sites inspected prior to clearing and construction during the reporting period:		0	All City projects are inspected prior to construction. 5 City projects usually involved trenchless technologies or sewer main replacement in 2008 and several Private Development Sites.	
57	Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? <i>(Required by August 15, 2009, S5.C.4.b.iii)</i>	N		Not yet required. Use of BMPs on TESC plan are discussed in the pre-construction meeting with the owner and contractor. We also discuss welcoming and having DOE, North Sound Baykeeper Field Inspector, or even CESCL training visit their sites to help compliance.	2008 SWMP, page 10 (CTRL-2)

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57b.	Number of sites inspected during the construction phase for the reporting period:		0	Not yet required. None with permit.	
58	Enforced as necessary based on the inspection at new development and redevelopment projects? (<i>Required</i> by August 15, 2009, S5.C.4.b.iii)	N		Not yet required.	2008 SWMP, page 10 (CTRL-2)
58b.	Number of enforcement actions taken during the reporting period:		0	None but not yet required.	
59	Inspected qualifying permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? (<i>Required</i> by August 15, 2009, S5.C.4.b.iv and v)	N		Not yet required.	2008 SWMP, page 10 (CTRL-2)
59b.	Number of qualifying sites known during the reporting period:		0	Not yet required.	
59c.	Number of qualifying sites inspected during the reporting period:		0	Not yet required.	
60	Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying projects? (<i>Required</i> by August 15, 2009, S5.C.4.b.iv)	N		Not yet required. Operations and Maintenance are to be filed with the County for owners to know their responsibilities but enforcement is difficult in long-term without private ownership understanding responsibilities and living up to them. DOE enforcement or education to	2008 SWMP, page 10 (CTRL-2)
61	Enforced regulations as necessary based on the inspection? (<i>Required</i> by August 15, 2009, S5.C.4.b.iv)	N		Not yet required. City needs DOE backing with inspection.	2008 SWMP, page 10 (CTRL-2)
61b.	Number of enforcement actions taken during the reporting period:		0	None inside City for this period. One in County resulting from citizen complaint and our forwarding information to DOE and Skagit County.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
62	Developed and implemented an enforcement strategy to respond to issues of non-compliance with the regulations for qualifying projects? (<i>Required</i> by August 15, 2009, S5.C.4.b.vi)	N		Not yet required. Ordinance work is required to back enforcement but lack of funding and staffing make it difficult to complete.	2008 SWMP, page 10 (CTRL-2)
63	Did the Permittee choose to allow construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2? (S5.C.4.b.vii)	N		Not yet required.	
63b.	If yes, how many waivers were allowed ?		0		
64	Developed and implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities and BMPs? (<i>Required</i> by August 15, 2009, S5.C.4.c)	N		Not yet required. Operations and Maintenance Manuals are required to be filed with the county. City is working on own contract manual for oil water separators, grease traps, and emergency spill separators. Signed contract shall include responsible owner and designated contractor.	2008 SWMP, page 10 (CTRL-4)
65	Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? (<i>Required</i> by August 15, 2009, S5.C.4.c.i)	N		Not yet required.	2008 SWMP, page 10 (CTRL-2)
66	Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? (<i>Required</i> by August 15, 2009, S5.C.4.c)	N		Not yet required.	2008 SWMP, page 10 (CTRL-2)
66b.	Number of sites inspected during the reporting period:		0	Not yet required. All construction sites were inspected.	
66c.	Number of structural BMPs inspected during the reporting period:		0	Not yet required. All applicable BMPs for the construction sites were inspected.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
66d.	Number of enforcement actions taken during the reporting period:		0	Not yet required.	
67	Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington ? (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Not yet required.	2008 SWMP, page 10 (CTRL-3)
68	Performed timely maintenance as per S5.C.4.c.ii? (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Not yet required.	
68b.	Attached documentation of any maintenance delays. (<i>Required</i> by August 15, 2009, S5.C.4.c.ii)	N		Not yet required.	
69	Annually inspected all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? (<i>Required</i> by August 15, 2009, S5.C.4.c.iii)	N		Not yet required. All stormwater sites were located with GIS for mapping. Staff and available records limited activity but City is organizing files for the 57 stormwater facilities. Some facilities constitute one system. Several facilities fail to have any information.	2008 SWMP, page 10 (CTRL-4)
70	If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii? (<i>Required</i> by August 15, 2009, S5.C.4.c.iii)	N		Not yet required.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
71	Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? (<i>Required</i> by August 15, 2009, S5.C.4.c.iv)	N		Not yet required. All stormwater treatment sites were inspected. No schedule was created other than the construction schedule.	2008 SWMP, page 10 (CTRL-4)
71b.	Number of facilities inspected during the reporting period:				
72	Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? (<i>Required</i> by August 15, 2009, S5.C.4.d)	N		Not yet required. Excel spread sheet will be used.	2008 SWMP, page 10 (CTRL-5)
73	Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment? (S5.C.4.e)	N		Not yet required.	2008 SWMP, page 10 (CTRL-6)

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74	All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (Required by August 15, 2009, S5.C.4.f)	N		Not yet required. CESCL training in 2008 for six employees with certification coverage till 2011, 1 more current certification good till 2010.	2008 SWMP, page 9 (CTRL-7)
74b.	Number of trainings provided:		6	Sewer Dept=2, Engr = 2, Streets =2	
74c.	Number of staff trained:		7	Sewer Dept=2, Engr = 2, Streets =2, Bldg Inspector	
75	Developed and implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (Required by February 15, 2010, S5.C.5)	N		Not yet required. Storm basin cleaning program ongoing with new vacor truck purchased. All staff knowledgeable with on the job training. Storm GIS drawings will provide better coverage and inventory of what catch basins and storm lines were cleaned. Skagit County Sub-flood Zone group is responsible to maintain Brickyard Creek.	2008 SWMP, page 12 (O&M-1)
76	Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 <i>Stormwater Management Manual for Western Washington</i> ? (Required by February 15, 2010, S5.C.5.a)	N		Not yet required.	2008 SWMP, page 12 (O&M-1)
77	Performed timely maintenance as per S5.C.5.a.ii? (Required by February 15, 2010, S5.C.5.a.ii)	N		Not yet required.	
77b.	Attached documentation of any maintenance delays. (Required by February 15, 2010, S5.C.5.a.ii)	N		Not yet required.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78	Annually inspected and maintained all stormwater treatment and flow control facilities (other than catch basins)? <i>(Required by February 15, 2010, S5.C.4.c.iii)</i>	N		Not yet required. Files are being created for 57 facilities (e.g. ponds). Visually inspected all ponds during the Nov. 2008 flooding period and recorded every area of concern. We are analyzing those and looking for solutions.	2008 SWMP, page 12 (O&M-1)
78b.	Number of known facilities:		55	Storm systems may contain multiple facilities. They are shown separate on GIS and will be grouped when filed and fully investigated for their use.	
78c.	Number of facilities inspected during the reporting period:		55	57 GIS located. All inspected by staff but not inventoried. City owned facilities were inspected.	
79	If using reduced inspection frequency, Attached documentation as per S5.C.5.a.ii? <i>(Required by February 15, 2010, S5.C.5.b)</i>	N		Not yet required.	
80	Conducted spot checks of stormwater facilities after major storms? <i>(Required by February 15, 2010, S5.C.5.c)</i>	Y		Not yet required. This function is on going with the November flooding issues and concerns.	2008 SWMP, page 12 (O&M-2)
80b.	Number of known facilities:		55		
80c.	Number of facilities inspected during the reporting period:		22	Approximate visually. 22 visually by Engineering but Streets probably checked 10 or more additional areas. 4 inspected in depth.	
81	Inspected municipally owned or operated catch basins at least once before the end of the Permit term? <i>(Required by February 15, 2010, S5.C.5.d)</i>	Y		Not yet required. Done annually and maintained.	2008 SWMP, page 12 (O&M-3)
81b.	Number of known catch basins:		2600+	Number includes CBs and Manholes.	
81c.	Number of inspections:		433	Approximate. Includes SDMH, Control Structure, CBs.	
81d.	Number of catch basins cleaned:		433	Approximate. Also jet, vactor lines & ditches.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
82	Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? <i>(Required by February 15, 2010, S5.C.5.f)</i>	N		Not yet required.	2008 SWMP, page 12 (O&M-4)
83	Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? <i>(Required by February 15, 2010, S5.C.5.g)</i>	N		Not yet required.	2008 SWMP, page 12 (O&M-4)
84	Initiated or implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? <i>(Required by February 15, 2010, S5.C.5.h.)</i>	N		Not yet required.	2008 SWMP, page 12 (O&M-5)
84b.	Number of trainings provided:		0		
84c.	Number of staff trained:		0		

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
85	Initiated or implemented 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? (<i>Required</i> by February 15, 2010, S5.C.5.i)	N		Not yet required.	2008 SWMP, page 12 (O&M-6)
86	Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N		Not yet required.	
87	Complied with the specific requirements identified in Appendix 2? (S7.A)	NA			
88	Attached status report of TMDL implementation? (S7.A)	NA			
89	Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A)	NA			
90	Took appropriate action to correct or minimize the threat to human health or the environment or otherwise stop or correct the condition of any instances of non-compliance with any of the terms and conditions of this Permit, including discharges from the Permittee's MS4 which may cause a threat to human health or the environment? (G20.A)	N		No instances of noncompliance occurred.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
90b. Attached a summary of the status of implementation of any actions taken pursuant to S4.F and any information from an assessment and evaluation procedures collected during the reporting period. (S4.F.2.d)	NA		None.	
91 Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20.B)	NA		None.	
92 Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G20.C)	NA		No such discharge occurred in 2008.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part A for all annual reports.

NOTE: Please note in Row 1 of the table if you have no information to report.

NOTE: Please limit your entries to 255 characters per cell. You may include additional information in your Supplemental Documentation attachment and reference it below with the page number.

A. Information Collection

Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)	Who/how to contact for additional information?
1. No information to report.	
2.	
3.	
4.	
5.	
6.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

B. SWMP Evaluation

You are required to assess the appropriateness of the BMPs you have selected to implement your SWMP. This evaluation is necessary to evaluate whether the MEP standard set by the permit is protective of water quality in your receiving water bodies. This assessment may be entirely qualitative. Answer **NA** if you are not yet implementing BMPs for a component of the SWMP. (S8.B.2 and S9)

Question	Y/N/NA	Comments (50 word limit)
1. Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	NA	
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	NA	
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	NA	
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	NA	
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	NA	
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	NA	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part C for all annual reports.

C. Changes in BMPs or objectives (S8.B)

If any of the BMPs or objectives is being changed, list the old BMP and objective, the new BMP and objective, and a justification for the change below. (S8.B.2., and S9)

NOTE: You may choose to attach additional documentation justifying Changes in BMPs or objectives. Note such attachments in the *Justification for change* field.

	Old BMP	Old Objective	New BMP	New Objective	Justification for Change
1	NA	NA	NA	NA	
2					
3					
4					
5					
6					
7					

VII. Information Collection, BMP Evaluation, and Monitoring

D. Preparation for future, long-term monitoring

Complete section D for the fourth annual report only.

Question	Y/N/NA	Comments (50 word limit)	Name of Attachment? Page Number?
1. Identified outfalls or conveyances for long-term stormwater monitoring?			
1b. Attach site maps and descriptions. (S8.C.2.a)	y		
2. Identified at least two questions for SWMP effectiveness monitoring and developed monitoring plans? (S8.C.2.b)			
2b. Attach the proposed questions and monitoring plans for SWMP effectiveness monitoring.	y		
3. Monitoring plan developed for each question? (S8.C.1.b.iii)			
3b. Attach a copy of the monitoring plan.	y		
4. Identified sites in preparation for future, long-term monitoring? (S8.C.1.a., and S8.C.2.b)			
4b. Attach a summary of the status of site identification for long-term stormwater monitoring; proposed questions for SWMP effectiveness monitoring; and status of developing the SWMP effectiveness monitoring plans.	y		

*This 2008 SWMP is an attachment to the City's 2008 Annual Report to the
Department of Ecology for its Phase II NPDES Permit*

2008 Stormwater Management Program Annual Report for

City of Sedro-Woolley

Prepared for:
City of Sedro-Woolley, Washington
Public Works Department
325 Metcalf Street
Sedro-Woolley, WA 98284

March 31, 2009

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CITY OF SEDRO-WOOLLEY STORMWATER MANAGEMENT PROGRAM

I. INTRODUCTION

I.1 Overview and Background

The recently issued *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Western Washington*, hereafter referred to as the Phase II Permit, outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act. All Phase II communities are expected to develop a Stormwater Management Program (SWMP) that includes all the required activities, implement those activities within the required timeframes of the permit term (i.e. 2007–2011), and submit annual reports to Ecology by March 31st each year to document progress toward complete program implementation.

The Phase II permit was issued by Ecology on January 17, 2007, and became effective on February 16, 2007. The permit covers a five-year period that expires on February 15, 2012. While the actual years of the permit run from February 16 to February 15 of the next year, the reporting requirements cover a calendar year from January 1 to December 31. The permit will be reviewed and renewed for a second five-year period, starting in 2012.

The Phase II Permit applies to cities with populations less than 100,000 located within or partially within, an urbanized area and that operate a municipal separate storm sewer system (MS4) which discharges to a water of Washington State. Urbanized areas are defined as population centers with greater than 50,000 people and densities of at least 1,000 people per square mile, and are based on the 2000 census. For future permits, the urbanized area will be based on the most recent federal census.

Ecology also can designate entities with a population of 10,000 or more that are located outside of urbanized areas as additional permittees. Designation criteria can include considerations such as discharge to sensitive waters, high population density, high growth or growth potential, contiguity to an urbanized area, significant contribution of pollutants to waters of the US, or ineffective protection of water quality by other programs. The City of Sedro-Woolley has been designated by Ecology as a Phase II permittee based on the current population (approx. 9,380) and location within the Mt. Vernon Urban Area, along the banks of the Skagit River.

The City of Sedro-Woolley first incorporated in 1898, when two cities decided to combine with each other. The City retains a rural character, although its economy recently has shifted from agriculture and timber industries to light manufacturing and services. A recent focus has been the formation of a stormwater utility, which the City adopted, along with an ordinance governing rates, upon receipt of a Phase II permit in 2007.

I.2 Departmental Implementation of Responsibilities

Within the City organization, several staff from different departments will contribute toward meeting permit requirements. Currently, the stormwater management program is primarily the responsibility of

the Public Works Department. This department manages the stormwater program and capital improvements, in addition to stormwater related maintenance, mapping and illicit discharge detection and elimination (IDDE). Public Works also conducts street maintenance, while the Public Works Inspector and the Code Enforcement Department handles code compliance. The Engineering and Planning Departments conduct development review, and Engineering provides site inspection services. The Finance Department supports Public Works by providing utility billing.

1.3 Document Organization

This report comprises written documentation of the City's SWMP that is required to be submitted with the Annual Report. In accordance with the Phase II Permit terms, the SWMP has been designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), meet state AKART requirements, and protect water quality. The following sections describe the actions that Sedro-Woolley has taken, or will take to comply with the requirements of the Phase II permit during 2009.

To aid in tracking NPDES permit requirements, this document has been organized into sections that correspond with the Special Conditions and are outlined in the Phase II Permit as follows:

- Section 2.0 - Public Education and Outreach, Special Condition S5.C.1
- Section 3.0 - Public Involvement and Participation, Special Condition S5.C.2
- Section 4.0 - Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.3
- Section 5.0 - Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.4
- Section 6.0 - Pollution Prevention and Operation and Maintenance for Municipal Operations, Special Condition S5.C.5

Special Conditions S7 (TMDLs), S8 (Monitoring), and S9 (Reporting) also apply to permit holders. However, while compliance activities are not required to be included in the SWMP, compliance with S7 and S8 are to be addressed in the Annual Report.

In addition, permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G20, apply to permit holders, though they do not result in specific program activities, nor is the SWMP required to document compliance with these activities. These additional conditions cover topics such as who is covered by the Phase II Permit, what discharges are authorized under the permit, legal guidelines for transferring, revoking, and appealing the permit, and penalties for non-compliance.

2. PUBLIC EDUCATION AND OUTREACH

This section describes the permit requirements, current city activities, and planned actions to be implemented.

2.1 Permit Requirements

Section S5.C.1 requires the following:

- Develop and administer an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The program must target residents, businesses, industry, and city employees at all levels.
- Develop a method to allow measurement and evaluation of the education program's effectiveness at changing targeted behaviors.
- Track and maintain records of public education and outreach activities.

2.2 Current Activities

The City of Sedro-Woolley stated in its March 2003 Notice of Intent (NOI) its intention to educate children about fish habitat requirements and implement a storm drain stenciling program in 2003. However, this program has not been developed or implemented, and constitutes the sole activity considered during 2007.??

Much of this work is being done under an interlocal agreement with Skagit Conservation District for public education and outreach. Reference Appendix A, Section A-2 for additional detail for the stated activities below.

1. Backyard Conservation Stewardship Program
2. Resource Materials/Education for Local Schools
3. CSMP Logo/Theme/Poster Contest for Local Youth
4. Stormwater Educational Brochures and Fact Sheets.
5. Stormwater Education Program for Local Business
6. Partnerships were also established with the City of Burlington, City of Sedro-Woolley, City of Mount Vernon, and Skagit County, which will allow our community to work together in implementing a stormwater education and outreach program to meet the requirements of the Phase II planning process, avoid duplication of efforts, share resources, and save money. Skagit Conservation District staff is also working closely with the WA Dept. of Ecology to assure all projects meet the requirements of the Phase II program. In addition, SCD staff, Kristi Carpenter, attended all 4 LID training sessions hosted last fall in Bellingham by the Puget Sound Partnership and has received certification for this effort.

Reference Appendix A, Section A-1 for additional detail for the activity stated under Public

Participation and Involvement, which can also be used as Public Education and Outreach.

1. “Skagit Stream Team” was part of a stream monitoring program on Brickyard Creek to locate possible illicit discharges which is primarily done with sampling from volunteers and one City employee. The samples are tested by the Sewer Department Lab.

The City had also provided CESCL training to staff, outside contractors, engineers or anyone wishing to attend. The City’s CESCL training resulted in six being certified until 2011.

2.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the Public Education and Outreach Program and meet the compliance deadlines in the Phase II Permit.

Much of this work is being done under an interlocal agreement with Skagit Conservation District for public education and outreach. Reference Appendix A, Section A-2.1 for additional detail for **Projects slated for 2009.**

Table 2-1		
Public Education and Outreach		
Purpose: Develop an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.		
Applicability: Target audiences as identified. May include general public, businesses, landscapers and property managers, engineers, contractors, developers, review staff and land use planners.		
Task ID	Task Description	Schedule Notes
EDUC-1	Develop a formal written public education and outreach strategy for target audiences	Due date of February 15, 2009 Status: Under development with interlocal agreement with Skagit Conservation District .
EDUC-2	Present the public education and outreach strategy to elected leaders for review and approval.	Due date of February 15, 2009 Status: Under development with interlocal agreement with Skagit Conservation District.
EDUC-3	Develop and distribute a survey designed to provide a baseline for evaluating the effectiveness of educational materials.	Due date of February 15, 2009 Status: Under development with interlocal agreement with Skagit Conservation District.
EDUC-4	Develop a system for recording and analysis of the survey results.	Due date of February 15, 2009 Status: Under development with interlocal agreement with Skagit Conservation District.

EDUC-5	Develop a system to track and maintain records of public education and outreach activities.	Due date of March 31, 2008 Status: Under development with interlocal agreement with Skagit Conservation District.
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2.4 Lead Department and Support

The Public Works Department will have primary responsibility for implementing Public Education and Outreach activities. The City's Public Works Department will coordinate activities with the Skagit Conservation District on a year by year contract. The system used to track and maintain records for public education and outreach activities is part of the responsibility of the Conservation Group.

3. PUBLIC INVOLVEMENT

This Section describes the Permit requirements, and current and planned compliance activities.

3.1 Permit Requirements

Section S5.C.2 of the Permit requires the City to:

- Provide ongoing opportunities for public involvement through advisory boards and commissions, watershed committees, public participation in developing rate structures and budgets, stewardship programs, environmental activities or other similar activities. The public must be able to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP document and Annual Report available to the public. Post these documents on either the City's or Ecology's website. Any other submittals required by Ecology also must be available on the website.

3.2 Current Activities

Sedro-Woolley has supported the Master Participation.. The City's Public Works Department coordinated activities with the Skagit Conservation District on a year by year contract under an interlocal agreement. One project was a stream monitoring program on Brickyard Creek to locate possible illicit discharges which is primarily done with sampling from volunteers and one City employee. The samples are tested by the Sewer Department Lab. This activity will continue annually.

Reference Appendix A, Section A-1 for additional detail for the stated activities below.

1. Public Meetings/Steering Committee
2. Watershed Masters Volunteer Training Program
3. Skagit Stream Team

3.3 Planned Activities

The following table outlines the implementation plan for 2009 to achieve the goals and objectives of the Public Involvement Program and meet the compliance deadlines in the Phase II Permit. Reference Appendix A, Section A-1.1 for additional detail for the stated planned activity, “Storm Drain Labeling Program”. The City has approximately 2600 storm structures that could be labeled. Those with curb and gutter will use the glued on emblem and others will use the stencil method. The City and Skagit Conservation District will coordinate to have volunteers and City staff conduct this activity on an on going basis.

Table 3-1		
Public Involvement		
Purpose: Solicit public review of the City’s SWMP.		
Applicability: Applies to general public as well as advisory councils, watershed committees, stewardship programs, and other similar groups.		
Task ID	Task Description	Schedule Notes
PI-1	Develop policy directive to create opportunities for public to participate in SWM development and implementation, including ordinance development.	Due date of February 15, 2008 Status: Official Policy under consideration. See Appendix A for public involvement activities.
PI-2	Set-up public meetings and provide response locations on the website for public to comment on stormwater program.	Due date of February 15, 2008 Status: Website has information and the public can contact Public Works. Under development.
PI-3	Post the SWMP, the Annual Report, and all other required permit submittals on the City’s website, and make them available at City Hall.	Due date of March 31, 2008. Status: Required submittals have been posted on the City website.

3.4 Lead Department and Support

The Public Works Department will have primary responsibility for implementing Public Involvement activities.

4. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section describes the permit requirements, programs, and planned activities related to Illicit Discharge Detection and Elimination (IDDE).

4.1 Permit Requirements

Section S5.C.3 of the Permit requires the City to:

- Implement an ongoing program to detect and remove illicit discharges, connections and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City.
- Develop a storm sewer system map, implement ordinances to prohibit illicit discharges, and create a program to detect and address illicit discharges that includes escalating enforcement penalties and an enforcement strategy.
- Publicize a hotline or other local telephone number for reporting of spills or other illicit discharges. Track illicit discharge reports and actions taken in response to calls.
- Adopt and implement procedures for IDDE program evaluation and assessment.
- Provide appropriate training to staff on identification and reporting of illicit discharges.
- Summarize all illicit discharges and connections reported to the City and response actions taken in the Annual Report; including updates to the SWMP document.

4.2 Current Activities

Current Sedro-Woolley activities in this area include:

- The City has compiled a storm system map in GIS format. The mapping effort for obtaining a GPS reading for each structure is 95% complete. This includes: locating 57 storm facilities some of which constitute individual storm systems, storm catch basins, storm manholes, drainage ditches, and culverts. Flow direction between catch basins has not been completed. Flow direction, pipe sizes, and other information to create complete attribute tables is a future task.
- City code (Sedro-Woolley Municipal Code 13.36) has sections that address illicit discharges and civil infractions.
- The City relies upon the Sewer Division of Public Works, the Fire Department and Ecology for assistance with spill response. The hot-line on the website will facilitate a more timely response to complaints.

4.3 Planned Activities

The following table outlines the implementation plan for 2008 to achieve the goals and objectives of the IDDE Program and meet the compliance deadlines in the Phase II Permit.

Table 4-1

Illicit Discharge Detection and Elimination

Purpose: Detect and remove illicit connections, illicit discharges, and improper disposals (including spills) into the MS4.

Applicability: Applies to the City’s municipal separate storm sewer system.

Task ID	Task Description	Schedule Notes
IDDE-1	Continue efforts to locate and map all outfalls, tributary areas, and stormwater facilities in an electronic mapping format.	Due date of February 15, 2011. Status: 2600 catch basins and manholes have been located (95% complete), 57 stormwater facilities, and 15% of the mains have been mapped. Attributes and additional details are under development.
IDDE-2	Existing ordinance needs to be reviewed and updated to include all elements outlined in the NPDES Phase II Permit	Due date of August 15, 2009. Status: Under development.
IDDE-3	Document and implement a program for detecting and eliminating illicit discharges.	Due date of August 15, 2011. Status: Under development. One project is the stream monitoring program for Brickyard Creek mentioned above.
IDDE-4	Identify a phone number and advertise the hotline to allow the public to report spills and illicit discharges.	Due date of February 15, 2009. Status: Website has phone number and information. Also under review.
IDDE-5	Develop a system to track and maintain records on calls received and enforcement actions taken in response to calls.	Due date of August 15, 2009. Status: Under development.
IDDE-6	Conduct training for Public Works staff (Engineering and O&M) who would respond to IDDE complaints.	Due date of August 15, 2009. Status: Under development. CESCL training was done in 2008 with certification good through 2011.

4.4 Lead Department and Support

The Public Works Department will take the lead with implementing Illicit Discharge Detection and Elimination activities.

5. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

This section describes the permit requirements, programs, and planned activities related to Controlling Runoff from New Development, Redevelopment and Construction Sites.

5.1 Permit Requirements

Section S5.C.4 of the Permit requires the City to:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff that enters the municipal separate storm sewer system from new development, redevelopment and construction site activities. The program must apply to both private and public projects.
- Adopt and implement a regulatory process, with necessary legal authority, for plan review, inspection, and escalating enforcement procedures necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in either the 2005 Ecology Stormwater Management Manual for Western Washington or equivalent Manual approved by Ecology.
- Provide provisions to allow non-structural preventive actions and source reduction approaches such as Low Impact Development techniques (LID), and measures to minimize the creation of impervious surfaces and the disturbance of native soils and vegetation.
- Adopt regulations that include provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and best management practices in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for drainage systems as protective as those in Chapter IV of the 2005 Ecology Stormwater Management Manual for Western Washington.
- Train staff on the new codes, standards, processes and procedures.
- Develop a process to record and track all plan reviews, inspections, maintenance, and enforcement actions by staff for inclusion in the Annual Report.
- Summarize annual activities for the Annual Report; identify any update to Program document.

5.2 Current Activities

Current Sedro-Woolley activities in this area include:

- The City had adopted the 2001 Ecology Manual, with the 1992 thresholds, to guide stormwater management from new development and redevelopment projects covering the period in 2008. However, most engineering designs used the 2005 Ecology Manual standards and the City reviewed those on that level. Ordinances have to be updated.
- The City conducts extensive site plan review, inspect all construction sites, and management of the existing permitting process. Extensive engineering review includes recommendation of including the 12 storm elements for a SWPPP and TESC sheet. BMPs are provided on the site and the review evaluates the engineer submittal but also recommends additional BMPs that may be optional but provide the contractor with more information to ensure the site prevents erosion and controls their sediment. This design is further discussed in the pre-construction

meeting with the owner and contractor. One part of the pre-construction notes mention that are City sites are open to Ecology inspectors, watchdog groups such as North Sound Baykeeper Field Inspector, and any of the City staff.

5.3 Planned Activities

The following table outlines the implementation plan for 2009 to achieve the goals and objectives of the program to control runoff from New Development, Redevelopment, and Construction Sites and meet the compliance deadlines in the Phase II Permit.

Table 5-1		
Controlling Runoff From New Development, Redevelopment, and Construction Sites		
Purpose: Establish a program to reduce pollutants in stormwater runoff from new development projects, redevelopment projects, and construction sites. Apply the minimum technical requirements of Appendix 1 of the Phase II Permit (or equivalent).		
Applicability: All new development, redevelopment, and construction sites that disturb one acre or greater and smaller projects that are part of a larger development plan.		
Task ID	Task Description	Schedule Notes
CTRL-1	Revise the existing stormwater management ordinance to bring it into compliance with NPDES Phase II requirements.	Due date of August 15, 2009. Status: Revision in progress.
CTRL-2	Increase site plan review, construction and post-construction inspections, enforcement activities, and enhance permitting process where needed to handle full implementation of Phase II requirements.	Due date of August 15, 2009. Status: Under development.
CTRL-3	Revise existing stormwater facilities maintenance standards to bring it into compliance with NPDES Phase II requirements.	Due date of August 15, 2009. Status: Under development.
CTRL-4	Develop a program and schedule to inspect all stormwater facilities on an annual basis.	Due date of August 15, 2009. Status: Under development.
CTRL-5	Establish procedures for tracking and keeping records of development projects, inspections, enforcement actions, and maintenance inspections.	Due date of August 15, 2009. Status: Under development.
CTRL-6	Make copies of the Notice Of Intent available to developers.	Due date of August 15, 2009. Status: Under development.
CTRL-7	Provide training for staff in permitting, plan review, inspection and enforcement procedures consistent with NPDES Phase II requirements.	Due date of August 15, 2009. Status: Under development.

5.4 Lead Department and Support

The Public Works Engineering Department will take the lead with implementing Controlling Runoff from New Development, Redevelopment, and Construction Sites, with assistance from the Planning, Building, and other Public Works Departments.

6. POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This section describes the permit requirements, programs, and planned activities related to Pollution Prevention and Operation and Maintenance for Municipal Operations.

6.1 Permit Requirements

Section S5.C.5 of the Permit requires the following from the City:

- Develop and implement an operations and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Establish maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the 2005 Ecology Manual.
- Conduct inspections of stormwater flow control and treatment facilities and catch basins according to required frequencies, unless previous inspection data show that a reduced frequency is justified.
- Establish and implement procedures to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities including but not limited to streets, parking lots, roads or highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- Develop and implement an ongoing training program for staff whose job functions may impact stormwater quality. Document the training program.
- Prepare Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City that are not covered by an Industrial Stormwater General Permit.
- Summarize annual activities for the Annual Report. Include any updates to the SWMP document.

6.2 Current Activities

Current Sedro-Woolley activities in this area include the following:

- The City maintains and inspects city owned storm drain facilities annually or on an as needed basis. Catch basins and associated lines are cleaned throughout the year depending on work load. The City is developing a program to inspect all privately owned facilities annually but there is not adequate staff. Currently, privately owned facilities are inspected on an as need basis.

- The City performs periodic maintenance activities on stormwater conveyance and publicly owned stormwater facilities to reduce impacts from stormwater runoff.
- Street sweeping and gutter cleaning are performed on a regular basis.
- Staff received training on maintenance procedures on an as needed basis.

6.3 Planned Actions

The following table outlines the implementation plan for 2009 to achieve the goals and objectives of the Operations and Maintenance Program and meet the compliance deadlines in the Phase II Permit.

Table 6-1		
Pollution Prevention and Operations and Maintenance		
Purpose: Develop an O&M program to prevent or reduce pollutant runoff from municipal operations.		
Applicability: All stormwater treatment and flow control facilities, catch basins, streets and roadways, and non-roadway public properties managed by the City.		
Task ID	Task Description	Schedule Notes
O&M-1	Establish a formal annual inspection program for permanent stormwater treatment and flow control facilities, including necessary maintenance.	Due date of February 15, 2010. Status: Mapping storm facilities complete. Begin development.
O&M-2	Establish a program designed to inspect all sites after major storm events.	Due date of February 15, 2010. Status: Begin development.
O&M-3	Establish a formal program to inspect and maintain 25% of all catch basins and inlets per year. Track and record efforts.	Due date of February 15, 2010. Status: Begin development.
O&M-4	Evaluate current practices and document ways to minimize stormwater impacts from runoff on municipally owned lands through enhanced activities.	Due date of February 15, 2010. Status: Begin development.
O&M-5	Conduct periodic training for all O&M and other appropriate staff during staff meetings.	Due date of February 15, 2010. Status: Begin development.
O&M-6	Identify and screen all known facilities, evaluate practices, develop SWPPPs, and identify training needs at facilities.	Due date of February 15, 2010. Status: To begin in 2008.

6.4 Lead Department and Support

The Public Works Department will assume responsibility for implementing Pollution Prevention and Operations and Maintenance activities.

7. CONCLUSION

This SWMP has been prepared to demonstrate compliance with the requirements of the NPDES Phase II Permit. The implementation tables indicate planned activities as of March 2009. This SWMP is a living document that will be updated annually to reflect progress with implementing the stormwater management program components required for compliance with the Phase II Permit.

Appendix A-

- Public Participation and Involvement
- Education and Outreach

The following report is a coordination effort resulting in an interlocal agreement with the City of Sedro-Woolley and Skagit Conservation District.

2008 Stormwater Public Involvement and Education and Outreach Report

Information obtained from Kristi Carpenter, Skagit Conservation District for the City of Sedro-Woolley.

A-1: Public Participation and Involvement

Public Meetings/Steering Committee

Some planning for this task was initiated with the City of Sedro-Woolley – will be completed in 2009.

Watershed Masters Volunteer Training Program

- Program was conducted September 24th through November 12th (8-week training) with 27 individuals completing the training.
- 80 volunteer hours conducted by the 2008 Watershed Masters between November 12, 2008 and December 31, 2008.
- 1,754 hours reported from Watershed Masters overall in 2008 (includes 2006 & 2007 Watershed Master program participants)
- Program evaluation forms were completed by program participants.

Skagit Stream Team

- Coordination/planning with City of Sedro-Woolley staff to develop a Stream Team program for Brickyard Creek was conducted.
- SCD contracted with the Padilla Bay National Estuarine Research Reserve to draft Quality Assurance Project Plan for the Brickyard Creek Stream Team program. The draft QAPP was submitted to the City of Sedro-Woolley and the WA Dept. of Ecology for final review and comment. It is anticipated that the final QAPP will be completed by the end of April 2009 (waiting for Ecology comments).
- 6 Stream Team volunteers for Brickyard Creek 2008/09 season.
- 6 monitoring stations on Brickyard Creek are being monitored twice a month by Stream Team volunteers.
- Samples are analyzed for fecal coliform, turbidity, dissolved oxygen, temperature, and depth. The City of Sedro-Woolley Waste Water Treatment Plant, a certified local lab, is conducting lab for the fecal coliform samples and maintaining Stream Team monitoring kits at their office.
- Annual Stream Team training was held Sept. 10th, 11th, and 13th 2008.

- Data is being entered on excel spreadsheet and will also be entered on Ecology's EIM system by District staff.
- Coordination with Brickyard Creek Stream Team volunteers is ongoing.

Storm Drain Labeling Program

- This task will be initiated in early 2009.
- Educational fliers promoting the Storm Drain labeling volunteer opportunity were developed and distributed. In addition, the program is promoted in the SCD newsletter which is distributed to over 4,500 local residents twice a year.

A-2: Public Education and Outreach

Backyard Conservation Stewardship Program

- Coordination for Spring 2009 class was conducted. The training is scheduled to begin March 18, 2009 and will continue through April 22, 2009.
- 70 individuals have registered to participate in the program.
- The program will feature environmentally friendly gardening practices, native plant landscaping, composting, mulching, integrated pest management, introduction to Low Impact Development, on-site septic system maintenance, building healthy soils, water conservation, storm water runoff education, water conservation tips, household hazardous waste, and more.
- Program evaluation forms will be completed by class participants. A 1-year post project follow-up survey to determine if class participants have made any behavior changes to reduce their impacts on water quality will also be conducted.

Resource Materials/Education for Local Schools

- Stormwater educational materials were incorporated in the annual teacher's packets that were distributed to 550 local teachers.
- 7 stormwater education presentations were conducted to 364 Mount Vernon students using the stormwater enviroscape watershed model.
- 9 local educators used the Skagit Conservation Districts resource library in 2008.

CSMP Logo/Theme/Poster Contest for Local Youth

- A "Stormwater Awareness" Poster contest was coordinated for Sedro-Woolley and Burlington School Districts in November 2008 – entry deadline is February 2009.

Stormwater Educational Brochures and Fact Sheets.

- Home Tips for Healthy Streams – over 500 distributed at local events.
- Tips sheets and educational posters will be completed over the next quarter.

Stormwater Education Program for Local Business

- A Low Impact Development Workshop was coordinated by staff and held on February 22, 2008 with 60 attendees. Additional partners were also solicited to gain support for the event. Target audience included: builders, developers, municipal planners, permittees, engineers, water resource professionals and interested citizens.

- Workshop evaluation forms were compiled with 49 (out of 60 participants) completing and returning the evaluation forms. Individuals completing the workshop evaluation form identified themselves as: 15 contractors/developers; 16 government employees; 4 engineers; 3 State government employees; 2 Tribal representatives; 5 Consultants; 3 Non-profit organizations; 5 interested citizens; and 2 “other.”
- A Low Impact Development Field Tour was coordinated and held on Feb. 29th, 2008 with 26 attendees. The purpose of the field tour was to highlight Low Impact Development (LID) applications on Whidbey Island and provide an opportunity to learn from the coordinators, developers, planners, and others who were directly involved in developing these projects. Multiple LID features were highlighted during the tour, including a site visit to a new LID development in Langley, the Bayview Corner redevelopment project in Langley, Coupeville High School project, a subdivision of single family homes in Coupeville and Fort Nugent Park in Oak Harbor.
- LID field tour evaluation forms were completed by 17 of the 26 participants. Individuals completing the evaluation forms identified themselves as: 1 contractor; 5 local government employees; 1 tribal government employee; 2 engineers; 2 state government employees, 1 private consultant; 5 interested citizens.

Partnerships were also established with the City of Burlington, City of Sedro-Woolley, City of Mount Vernon, and Skagit County, which will allow our community to work together in implementing a stormwater education and outreach program to meet the requirements of the Phase II planning process, avoid duplication of efforts, share resources, and save money. Skagit Conservation District staff is also working closely with the WA Dept. of Ecology to assure all projects meet the requirements of the Phase II program. In addition, SCD staff, Kristi Carpenter, attended all 4 LID training sessions hosted last fall in Bellingham by the Puget Sound Partnership and has received certification for this effort.

A-2.1: Projects slated for 2009 are outlined below:

- Car Wash kits and educational materials will be available for all local Phase II jurisdictions by June 30, 2009.
- 2 local LID demonstration sites to be established by June 30, 2011 – staff is currently working with the Skagit County Maintenance Department to incorporate a rain garden and pervious pavement (sidewalk and parking lot) at the County re-construction project on Continental Drive in Mount Vernon. We are seeking at least 1 more project – perhaps a City park?
- The Brickyard Creek Stream Team program will continue. The annual Stream Team training will occur once again in September of 2009. Staff will continue to coordinate with the City of Sedro-Woolley.
- Promotion of the annual Backyard Conservation Stewardship Program is currently underway, with the training scheduled to begin Wednesday, March 18th and will continue every Wednesday through April 22nd.
- Staff will continue to provide technical support to the Skagit Valley Backyard Wildlife Habitat Team Steering committee to involve businesses, schools, parks, and residents in conducting practices that will enhance wildlife habitat and reduce water quality impacts to our local streams.

- Informational packets highlighting stormwater and water quality education will once again be distributed to local schools.
- A minimum of two local workshops focused on LID and stormwater will be held in 2009.
- Educational presentations on LID and stormwater will be provided to community groups upon request.
- The Skagit Conservation District's stormwater educational presentations will be promoted with local schools – we currently already have 13 school presentations scheduled for 2009.
- Several stormwater education brochures and fact sheets will be developed and distributed over the year. SCD staff will work with the City of Mount Vernon, City of Burlington, City of Sedro-Woolley and Skagit County to determine priorities.
- Storm drain labeling with local volunteers will continue in 2009. In addition, staff will organize a community volunteer day specifically to install more storm drain labels in the City of Mount Vernon, City of Burlington, City of Sedro-Woolley, and Skagit County.
- SCD staff will organize a public meeting in partnership with the City of Burlington to promote Stormwater awareness and solicit community support.
- A stormwater themed educational display will be developed and displayed at various events and locations.
- The Watershed Masters Volunteer training program will be conducted in the fall of 2009. In addition, ongoing support and volunteer opportunities will be provided to individuals who have already completed the program (they are required to return 40 hours of volunteer time).
- News articles highlighting stormwater education, LID practices, and volunteer opportunities will be included in each of the Skagit Conservation District's newsletter, which is distributed twice a year to over 4,500 people.
- All projects will be tracked, evaluation surveys conducted when appropriate, and reporting will continue.

End of Document