

CITY OF STANWOOD

Stormwater Management Program Analysis
March 2014

PACE Engineers, Inc.



CITY OF STANWOOD
STORMWATER MANAGEMENT (SWM) PROGRAM ANALYSIS SUMMARY
MARCH 2014

Stormwater Management Elements	Existing SWM Program				Future SWM Program				Total Gap			
	Staff FTE	Staff Cost (\$)	Expense Cost (\$)	Total Cost (\$)	Staff FTE	Staff Cost (\$)	Expense Cost (\$)	Total Cost (\$)	Total Staff (FTE) Gap	Staff Gap in Expense Cost (\$)	Total Gap in Expense Cost (\$)	Total Cost (\$) Gap
SWM Element #1 – Public Education and Outreach	0.00	\$0	\$0	\$0	0.08	\$8,021	\$3,000	\$11,021	0.08	\$8,021	\$3,000	\$11,021
SWM Element #2 – Public Involvement and Participation	0.02	\$1,744	\$0	\$1,744	0.05	\$5,013	\$2,500	\$7,513	0.03	\$3,270	\$2,500	\$5,770
SWM Element #3 – Illicit Discharge Detection and Elimination	0.02	\$1,744	\$0	\$1,744	0.41	\$41,109	\$11,500	\$52,609	0.39	\$39,365	\$11,500	\$50,865
SWM Element #4 – Controlling Runoff from New Development, Redevelopment, and Construction S	0.07	\$6,103	\$0	\$6,103	0.57	\$57,152	\$5,750	\$62,902	0.50	\$51,049	\$5,750	\$56,799
SWM Element #5 – Municipal Operations and Maintenance	1.57	\$136,885	\$42,500	\$179,385	3.05	\$305,812	\$95,500	\$401,312	1.48	\$168,927	\$53,000	\$221,927
SWM Element #6 – Program Implementation	0.00	\$0	\$0	\$0	0.07	\$7,019	\$1,000	\$8,019	0.07	\$7,019	\$1,000	\$8,019
SWM Element #7 – Total Maximum Daily Load Allocations: Stillaguamish River	0.00	\$0	\$0	\$0	0.07	\$7,019	\$15,000	\$22,019	0.07	\$7,019	\$15,000	\$22,019
SWM Element #8 – Monitoring	0.00	\$0	\$0	\$0	0.07	\$7,019	\$20,000	\$27,019	0.07	\$7,019	\$20,000	\$27,019
SWM Element #9 – Reporting	0.01	\$872	\$0	\$872	0.05	\$5,013	\$0	\$5,013	0.04	\$4,141	\$0	\$4,141
NPDES Permit Cumulative Subtotal	1.69	\$147,348	\$42,500	\$189,848	4.42	\$443,177	\$154,250	\$597,427	2.73	\$295,829	\$111,750	\$407,579
SWM Element #10 – Underground Injection Control Rule	0.00	\$0	\$0	\$0	0.07	\$7,019	\$1,500	\$8,519	0.07	\$7,019	\$1,500	\$8,519
Other Stormwater Program Obligations Cumulative Subtotal	1.69	\$147,348	\$42,500	\$189,848	4.49	\$450,195	\$155,750	\$605,945	2.80	\$302,848	\$113,250	\$416,098
SWM Element #11 – Stormwater Capital Improvement Program	0.14	\$12,206	\$710,000	\$722,206	0.75	\$75,200	\$825,000	\$900,200	0.61	\$62,993	\$115,000	\$177,993
Stormwater Capital Improvement Program Cumulative Subtotal	1.83	\$159,554	\$752,500	\$912,054	5.24	\$525,395	\$980,750	\$1,506,145	3.41	\$365,841	\$228,250	\$594,091
SWM Element #12 – Administrative and Additional Activities	0.26	\$22,669	\$313,557	\$336,226	0.26	\$26,069	\$360,591	\$386,660	0.00	\$3,400	\$47,034	\$50,434
TOTAL	2.09	\$182,223	\$1,066,057	\$1,248,280	5.50	\$551,464	\$1,341,341	\$1,892,805	3.41	\$369,241	\$275,284	\$644,525
GRAND TOTAL			\$1,248,280				\$1,892,805					
TOTAL GAP					(3.41)	(\$369,241)	(\$275,284)	(\$644,525)				

Requirements			City of Stanwood's Stormwater Program Analysis											
New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #1 – Public Education and Outreach														
S5.C.1.a and b	1.1 Outreach to Target Audiences	Begin implementing or participating in an education and outreach program. Prioritize target audiences and subject areas: -General Public about stormwater basics; -Businesses about chemical use/storage and illicit discharges; -Homeowners/Landscapers/Property Managers about yard care, fertilizers, carpet cleaning, auto maintenance, LID and pond maintenance; -Development Community about flow control, stormwater treatment, LID, and erosion control. -Focus education and outreach efforts on prioritized target audiences, including school- aged children and home-based/mobile businesses. -General public and business education program should include the subject area for impacts of illicit discharges and how to report them, Low Impact Development (LID) principles and LID Best Management Practices (BMPs), prevention of illicit discharges, and stewardship activities. -Residents, landscapers, and property manager/owners' education program should include LID principles and BMPs, vehicle, equipment and home/building maintenance, stormwater facility maintenance, and dumpster and trash compactor maintenance. -Engineers, contractors, developers, and land use planners education program should include technical standards for stormwater site and erosion control plans, LID principles and LID BMPs, and stormwater treatment and flow control BMPs/facilities. -Create a stewardship opportunity and/or build on existing organizations to encourage residents to participate in activities.	The City has no established public education and outreach program.	City Staff Questionnaire (March 2014)					Develop and implement a public education and outreach program toward prioritized target audiences. Create stewardship opportunities and/or build on existing organizations to encourage organizations to encourage residents to participate in activities. (See requirements column for more detail).	0.05	\$5,013	\$2,000	\$7,013	
S5.C.1.c	1.2 Measure Results of the Educational Activities	Begin participating in an effort to measure understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area. Public education requirements for measuring behaviors and implementing programs can be done locally or as a member of a regional group. Permittees shall begin measuring the understanding and adoption of the targeted behaviors for at least one new targeted audience in at least one new subject area. Permittee shall use the resulting measurements to direct education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors. Permittees may meet this requirement individually or as a member of a regional group.	No existing program in place.	City Staff Questionnaire (March 2014)					Develop and implement a program to measure the results of the effectiveness the City's public education and outreach activities.	0.02	\$2,005	\$500	\$2,505	
N/A	1.3 Maintain Records	Track and maintain records of public education and outreach activities. (No requirements on tracking and maintaining public education and outreach activities are listed in this section of the New Permit.)	No existing program in place.	City Staff Questionnaire (March 2014)					Track and maintain records for public education and outreach activities.	0.01	\$1,003	\$500	\$1,503	
Total – Element #1					0.00	\$0	\$0	\$0		0.08	\$8,021	\$3,000	\$11,021	The existing FTE allocates 0.02 FTE of administrative support time to participate in public education and outreach activities related to stormwater.
Total GAP in Element #1										(0.08)	(\$8,021)	(\$3,000)	(\$11,021)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #2 – Public Involvement and Participation														
S5.A.2	2.1 Input to SWMP Plan and Annual Report	Organize the SWM Plan Components in S5.C and update this document at least once a year for submittal with the Annual Report. The SWM Plan should be written to inform the public of the planned SWM Plan activities for the next calendar year.	The City has held public meetings around the ownership and maintenance of stormwater retention/detention ponds. They have also held meetings regarding the potential installation of a trail/path/berm on SR532 that mostly drew concerns about flood water levels in the valley.	City Staff Questionnaire (March 2014)					Develop and an annual SWM Plan to document the planned activities for the Stormwater Program each year, that includes a written description of internal coordination mechanisms regarding stormwater related issues. Create ongoing opportunities for public involvement and outreach regarding the stormwater program.	0.05	\$5,013	\$2,500	\$7,513	
S5.A.5.b		Provide a written description of internal coordination mechanisms in the Annual Report showing the coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the terms of the new Permit.												
S5.C.2.a		Create ongoing opportunities for public to participate in decision-making processes involving the development, implementation and update of the SWMP. Create opportunities through advisory councils, watershed committees, participation in developing rate structures, stewardship programs, environmental activities or other similar activities. Create ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate structures or other similar activities.												
S5.C.2.b	2.2 Availability of Stormwater Program Documents	Make the SWM Plan and the Annual Report available to the public by posting on the City Website. The Annual Report and SWM Plan must be posted on the jurisdiction's website no later than May 31 each year.	The City's website is the main venue for sharing information on the City's Stormwater Program, however, the City also sends out informational fliers and mailings on specific issues, as needed.	City Staff Questionnaire (March 2014)					Continue to keep the City's website up to date on current Stormwater Program elements. Make the SWM Plan available on the City's website.					
Total – Element #2					0.02	\$1,744	\$0	\$1,744		0.05	\$5,013	\$2,500	\$7,513	The existing FTE allocates 0.02 FTE of Administrative Support time to participate in public involvement and participation activities related to stormwater.
Total GAP in Element #2										(0.03)	(\$3,270)	(\$2,500)	(\$5,770)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #3 – Illicit Discharge Detection and Elimination														
S5.C.3.a	3.1 Storm Sewer System Map	Develop a municipal storm sewer system map of: -All storm sewer outfalls (including tributary areas and land use); -Receiving waters; -Structural stormwater facilities; -Connection points authorized during permit term; -Areas not draining to surface water. -Stormwater treatment and flow control BMPs/facilities and receiving waters other than ground water must be mapped. -Known MS4 Outfalls. -The City may rely on permanent stormwater controls plans for mapping of LID BMPs. -Tributary conveyances for all known outfalls with a 24-inch nominal diameter or larger. The following attributes must be mapped: tributary conveyances (type, materials, size where known), associated drainage areas, and land use. -Manning must include all connections to the MS4.	The City has a stormwater system network map in CAD and GIS (last updated January 2014).	City Staff Questionnaire (March 2014)					Ensure the City's stormwater system network map is in compliance with the requirements of the Permit. Keep network map up to date.	0.15	\$15,040	\$3,000	\$18,040	
S5.C.3.b	3.2 Illicit Discharge Ordinance	Develop and implement an ordinance prohibiting non-stormwater discharge to the MS4. The ordinance should cover: -Potable water flushing; -Lawn and landscape irrigation runoff; -Swimming pool discharges; -Street and sidewalk wash water; -Other non-stormwater discharge. Include enforcement procedures in the ordinance and develop an enforcement strategy. - Update IDDE ordinance to include uncontaminated water from crawl space pumps and a new conditional discharge: Spa and Hot Tub Discharges. All spa and hot tub discharges shall be thermally controlled to prevent an increase in temperature in receiving waters. -Update the IDDE Ordinance as needed to meet all new requirements in the Permit including effectively prohibit non-stormwater illegal discharges and/or dumping into the City's MS4. The ordinance shall include the elements required in the Permit.	No existing program in place.						Develop and adopt an IDDE Ordinance per the requirements of the Permit.	0.02	\$2,005	\$0	\$2,005	
S5.C.3 & S5.C.3.c	3.3 Detection and Elimination Program	Develop and implement program to detect and address non-stormwater discharges, including spills and illicit connections. Implement a compliance strategy that includes informal compliance actions such as public education and technical assistance. Implement an effective compliance strategy, the Permittee's ordinance or other regulatory mechanism may need to include the following: Source Control BMPs applications to prevent illicit discharges and the maintenance of stormwater facilities. Implement an ongoing program designed to identify and detect non-stormwater discharges and illicit discharges and illicit connections into the Permittee's MS4.	The City responds to illicit discharges and spills as reported to the City or observed by staff.	City Staff Questionnaire (March 2014)					Develop and implement an IDDE Program per the requirements of the Permit.	0.10	\$10,027	\$0	\$10,027	
		Develop procedures for: -Locating priority areas based on land use, previous complaints, and storage practices; -Field assessment during dry weather of outfalls in 3 priority receiving waters; Once a problem is reported or identified: -Characterizing nature and potential threat of illicit discharges; -Tracing the source of illicit discharge; -Notifying property owners; -Removing the source and conducting follow-up inspections. The City's IDDE compliance strategy should include the applicable operational and/or structural source control BMPs for pollutant generating sources associated with existing land uses and activities. -The strategy shall also include maintenance of permanent stormwater treatment facilities and catch basins. IDDE Program implementation and procedures shall include: 1) Develop procedures for conducting investigations for the purpose of detecting illicit discharges.	No existing program in place.					Develop procedures for IDDE field assessments per the requirements of the Permit.						

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		Field Assessments of three high priority receiving waters. Complete field screenings of at least 40% of the City's conveyances and outfalls.	No existing program in place.						Conduct field screenings of three high priority receiving waters within the City and complete field screenings of at least 40% of the City's conveyance system and outfalls on an annual basis.	0.10	\$10,027	\$5,000	\$15,027	
		Field Assessments of at least one high priority receiving water. Implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Complete field screenings for at least 40% of the MS4 no later than December 31, 2017 and 12% each year thereafter.	No existing program in place.						Field Assessments of at least one high priority receiving water. Develop and implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Complete field screenings for at least 40% of the MS4 no later than 3 years into the Permit and 12% each year thereafter.					40% of the MS4 is loosely defined by Ecology. The City has the flexibility to define how to measure this. –Examples include total length of pipe, total drainage area, number of stormwater structures, etc.
		Characterization, source tracing (includes visual inspections, and when necessary opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures) and removal.	No existing program in place.						Characterization, source tracing, and removal.					
		Initiate an investigation within 21 days of any reported or discovery of a suspected illicit connection. Immediately respond to all illicit discharges, including spills which are determined to constitute a threat to human health, welfare or the environment. Investigate (or refer to the appropriate agency) within 7 days. All known illicit connections to MS4 shall be eliminated.	No existing program in place.						Initiate an investigation within 21 days of any reported or discovery of a suspected illicit connection. Immediately respond to all illicit discharges, including spills which are determined to constitute a threat to human health, welfare or the environment. Investigate (or refer to the appropriate agency) within 7 days. All known illicit connections to MS4 must be eliminated.					
S5.C.3.d	3.4 Public Education and Spill Reporting	Inform public employees, businesses, and general public of hazards associated with illegal discharges. Publicize a hotline for public reporting of spills and illicit discharges. Keep records of calls and follow-up actions taken. Include the new IDDE Response/Follow-Up Timeline in the new IDDE procedures.	The City currently reports spills generated by the City, primarily dealing with the City's wastewater department. Spill response is not a major issue for the City as a result of code enforcement.	City Staff Questionnaire (March 2014)					Conduct internal and public education on IDDE; establish and publicize an IDDE hotline, and perform spill and IDDE response to Ecology.	0.01	\$1,003	\$1,000	\$2,003	
S5.C.3.e	3.5 Program Evaluation and Tracking	Track number and type of illicit discharges, including spills, identified and inspections made. Track feedback from public education efforts.	No existing program in place.						Track number and type of illicit discharges and track feedback from IDDE public education efforts.	0.01	\$1,003	\$0.00	\$1,002.66	
S5.C.3.e	3.6 Staff Training	Train responsible staff on illicit discharge identification, investigation, clean-up, and reporting. All municipal staff who, as part of their normal job responsibilities, might come in contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, must be trained one time on the identification of illicit discharges and/or connections, and on the proper procedures for reporting and responding. Ongoing training for all municipal field staff and other appropriate staff on identification and reporting. Follow-up training should be provided on an as needed basis to address changes in the City's procedures, techniques, requirements and/or staffing. Document and maintain records of training.	No existing program in place.						Train staff responsible for the IDDE program. Document and maintain records of IDDE trainings.	0.02	\$2,005	\$2,500	\$4,505	
Total – Element #3					0.02	\$1,744	\$0	\$1,744		0.41	\$41,109	\$11,500	\$52,609	The existing 0.02 FTE represents a portion of 5 O&M Staff members working on stormwater to do spill and IDDE response.
Total GAP in Element #3										(0.39)	(\$39,365)	(\$11,500)	(\$50,865)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #4 – Controlling Runoff from New Development, Redevelopment, and Construction Sites														
S5.C.4.a	4.1 Stormwater Runoff Control Ordinance	Adopt an ordinance to address runoff from new development, redevelopment, and construction site projects. The ordinance should include: -Minimum technical requirements equivalent to the 2012 Ecology Manual; -Legal authority for inspection of private facilities; -Provisions to require LID techniques (See Element 4.7).	The City has adopted the 2005 Ecology Manual.	City Staff Interviews (2014)					Adopt an ordinance to address runoff from new development, redevelopment, and construction site projects. The ordinance should include: -Minimum technical requirements equivalent to the 2012 Ecology Manual; -Legal authority for inspection of private facilities; -Provisions to require LID techniques (See Element 4.7).					
		The City's site plan process, BMP selection, and design criteria must meet the 2012 Ecology Manual requirements OR follow a program approved by Ecology under the 2013 Phase I Permit. The one-acre threshold was eliminated; thresholds include replaced hard surfaces; Onsite Stormwater Management (LID) standards, and LID Code-related requirements: All codes, rules, standards, and other enforceable documents must be reviewed and revised to incorporate and require LID principles and LID BMPs. The City must conduct and review the revision process and report the results to Ecology. LID amendments must include: measures to minimize impervious surfaces, measures to minimize loss of native vegetation, and measures to minimize stormwater runoff.	Permitting is done through the City's Community Development Department and plan review is done both in-house and through the City's contracted City Engineer.	City Staff Questionnaire (March 2014)						Continue permitting and plan review programs currently in place. The City's site plan process, BMP selection, and design criteria must meet the 2012 Ecology Manual requirements OR follow a program approved by Ecology under the 2013 Phase I Permit. The one-acre threshold was eliminated; thresholds include replaced hard surfaces; Onsite Stormwater Management (LID) standards, and LID Code-related requirements: All codes, rules, standards, and other enforceable documents must be reviewed and revised to incorporate and require LID principles and LID BMPs. The City must conduct and review the revision process and report the results to Ecology. LID amendments must include: measures to minimize impervious surfaces, measures to minimize loss of native vegetation, and measures to minimize stormwater runoff.	0.03	\$3,008	\$0	\$3,008
S5.C.4.b	4.2 Site Plan Review and Inspection	Develop a permitting process with plan review, inspection, and enforcement for public and private projects that disturb one acre of land or greater. -Review all stormwater site plans; -Inspect high risk sites prior to clearing and construction; -Inspect all sites during and after construction; Verify all sites have a maintenance plan in place and maintenance responsibility has been assigned; -Implement an enforcement strategy. -Compliance = 80% of scheduled inspections. -Develop a permitting process with plan review, inspection, and enforcement to ensure that the ordinance guidelines meeting the 2012 Ecology Manual requirements.	Permitting is done through the City's Community Development Department and plan review is done both in-house and through the City's contracted City Engineer.	City Staff Questionnaire (March 2014)					Continue to implement the City's permitting and plan review process. Ensure that the permitting process and plan review meet all the requirements of the Permit.	0.20	\$20,053	\$0	\$20,053	Note: Permit fees, including site development permit fees, fund the on-call engineer to conduct plan review and the contractor to complete inspections as needed.
S5.C.4.c	4.3 Long Term Operation and Maintenance	Adopt an ordinance requiring inspection and maintenance of stormwater facilities and establishing enforcement procedures. The City is required to have the legal authority to inspect and enforce the maintenance standards for all private stormwater facilities.	The City is working on developing a program regarding private facility maintenance and ownership. Currently, the City weeds and does debris removal (trees, brush, shrubs) at all private detention and retention ponds, even if still owned by a private party.	City Staff Questionnaire (March 2014)					Develop and private facility inspection and maintenance program that is codified in the Stanwood Municipal Code. Ensure the City has the legal authority to inspect and enforce the maintenance standards for all private stormwater facilities.					
		Adopt maintenance standards for facilities consistent with the 2012 Ecology Manual. Include provisions to verify long term maintenance for stormwater treatment and flow control BMPs/facilities permitted and constructed pursuant to S5.C.4.b.	The City has adopted the 2005 Ecology Manual.	City Staff Questionnaire (March 2014)					Adopt maintenance standards consistent with the 2012 Ecology Manual, including provisions for long term maintenance, for stormwater treatment and flow control BMPs/facilities within the City.					
		Inspect new treatment and flow control facilities annually. Inspect all new stormwater treatment and flow control BMPs/facilities and catch basins for permanent residential developments every 6 months until 90% of lots are constructed to identify maintenance needs and enforce compliance of maintenance standards. Inspection compliance is achieved by conducting at least 80% of scheduled inspections. For new residential developments that are part of a larger common plan of development, inspect new water quality and flow control facilities every six months during building construction.	Inspections are currently being contracted out through the City's on-call City engineer and a Larsen Construction. Community Development is largely responsible for this process with any runoff or other issues being reported to code enforcement and Community Development. Public Works does conduct plan review and also receives complaints and concerns and makes field observations. Public Works works closely with the inspectors.	City Staff Questionnaire (March 2014)	See Element 12.3	See Element 12.3	See Element 12.3			Continue conducting current inspection program. Ensure the program inspects new treatment and flow control facilities annually and all new stormwater treatment and flow control BMPs/facilities and catch basins for permanent residential developments every 6 months until 90% of lots are constructed to identify maintenance needs and enforce compliance of maintenance standards. For new residential developments that are part of a larger common plan of development, inspect new water quality and flow control facilities every six months during building construction.	0.15	\$15,040	\$2,500	\$17,540

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S5.C.4.c	4.4. Permit Tracking and Inspection Records	Keep records of all inspections, enforcement actions, maintenance activities, and construction sites. Implement a procedure for keeping records of inspections and enforcement actions, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections, and maintenance activities.	Copies of inspection reports are kept both at Community Development, Public Works and with code enforcement.	City Staff Questionnaire (March 2014)					Continue to keep copies of inspection reports are kept both at Community Development, Public Works and with code enforcement. Ensure all records are kept for all inspections, enforcement actions, maintenance activities, and construction sites. Ensure there is a procedure to keep records of inspections and enforcement actions, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections, and maintenance activities that meet the requirements of the Permit.	0.02	\$2,005	\$500	\$2,505	
S5.C.4.d	4.5 NOI for Construction Activity	Make copies of the "Notice of Intent for Construction Activity" and/or "Notice of Intent for Industrial Activity" available to developers.	No existing program in place.						Make copies of the "Notice of Intent for Construction Activity" and/or "Notice of Intent for Industrial Activity" available to developers at the Front Desk at City Hall.	0.01	\$1,003	\$250	\$1,252.66	A copy of the NOI can be found on Ecology's Website: https://fortress.wa.gov/ecy/publications/publications/ecy02085.pdf
S5.C.4.e	4.6 Staff Training	Conduct training for staff in permitting, plan review, construction site inspection, and enforcement concerning the Stormwater Runoff Control program (Element 4.1). Document and maintain records of training. Conduct follow-up training for staff as needed to address changes in procedures, techniques, or staffing.	One City staff member has a CESCL certification.	City Staff Questionnaire (March 2014)					Conduct training for all Public Works and inspection staff in permitting, plan review, construction site inspection, and enforcement concerning the Stormwater Runoff Control program (Element 4.1). Document and maintain records of training. Conduct follow-up training for staff as needed to address changes in procedures, techniques, or staffing.	0.03	\$3,008	\$2,500	\$5,508	
S5.4.f	4.7 LID Code	Review, revise, and make effective the City's code on local development-related codes, standards, etc., to incorporate and require LID principles and LID BMPs. A summary of the City's review and revision of code, standards, etc., will need to be written and submitted with the City's Annual report due March 31 each year. The summary shall be organized by a) Measures to minimize impervious surfaces, b) Measures to minimize loss of native vegetation; and c) Other measures to minimize stormwater runoff.	No existing code in place.	City Staff Questionnaire (March 2014)					Develop and implement LID Code into the Stanwood Municipal Code.	0.08	\$8,021	\$0	\$8,021	
S5.4.g	4.8 Watershed-Scale Stormwater Planning	The City may participate with the Snohomish County for watershed-scale stormwater planning to participate in.	City Staff participate in watershed scale planning with the Stillaguamish Watershed Council.	City Staff Interviews (2014)					Continue to participate in watershed planning through the Stillaguamish Watershed Council and other watershed planning being conducted by Snohomish County that may overlap with the City's drainage basins.	0.05	\$5,013	\$0	5013	
Total – Element #4					0.07	\$6,103	\$0	\$6,103		0.57	\$57,152	\$5,750	\$62,902	The existing 0.05 FTE represents a portion of 5 O&M Staff members working on stormwater and 0.02 FTE for the Public Works Director.
Total GAP in Element #4										(0.50)	(\$51,049)	(\$5,750)	(\$56,799)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #5 – Municipal Operations and Maintenance														
S5.C.5.a	5.1 Adopt Maintenance Standards	Adopt maintenance standards consistent with the 2012 Ecology Manual.	The City has adopted the 2005 Ecology Manual; however, the City has no existing O&M Plan.	City Staff Interviews (2014)					Adopt maintenance standards consistent with the 2012 Manual and development/implement Stormwater O&M Standards.	0.10	\$10,027	\$0	\$10,027	
S5.C.5.b	5.2 Annual Inspections of Water Quality and Flow Control Facilities	Conduct annual inspections of City owned stormwater treatment and flow control facilities; Perform necessary maintenance actions in accordance with the new maintenance standards adopted in Element 5.1. Compliance = 95% of scheduled annual inspections.	City structures, such as tide gates are inspected at least twice annually. Some other areas are inspected during heavy rains. All catch basins and lines are cleaned and inspected at least once every 2 years by an outside contractor.	City Staff Questionnaire (March 2014)					Conduct annual inspections of City owned stormwater treatment and flow control facilities; Perform necessary maintenance actions in accordance with the new maintenance standards adopted in Element 5.1. Compliance = 95% of scheduled annual inspections.	0.75	\$75,200	\$25,000	\$100,200	
S5.C.5.c	5.3 Spot Checks after Storm Events	Spot check stormwater treatment and flow control facilities after major storm events (>10-year recurrence interval) (24-hour storm event with a 10-year or greater recurrence interval); Conduct repairs as necessary. Spot checks after all storm events are required for permanent stormwater treatment and flow control BMPs/facilities.	No existing program in place.						Spot check stormwater treatment and flow control facilities after major storm events (>10-year recurrence interval) (24-hour storm event with a 10-year or greater recurrence interval); Conduct repairs as necessary. Spot checks after all storm events are required for permanent stormwater treatment and flow control BMPs/facilities.	0.40	\$40,106	\$15,000	\$55,106	
S5.C.5.d	5.4 Catch Basin Inspection	Inspect all catch basins and inlets at least once during the permit term; Clean catch basins as necessary; Dispose of decant water appropriately. Inspect all catch basins and inlets owned or operated by the City, and every two years thereafter. This schedule of all catch basins and inlets to be inspected every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency. Inspections every two years thereafter may be conducted on a "circuit basis" whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs.	See Element 5.2.						Inspect all catch basins and inlets at least once during the permit term; Clean catch basins as necessary; Dispose of decant water appropriately. Inspect all catch basins and inlets owned or operated by the City, and every two years thereafter. This schedule of all catch basins and inlets to be inspected every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency. Inspections every two years thereafter may be conducted on a "circuit basis" whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs.	0.75	\$75,200	\$15,000	\$90,200	Future local decant facility may be required.
S5.C.5.f	5.5 Road Maintenance/Non-Roadway Maintenance	Implement practices, policies, and procedures to reduce stormwater impacts from all lands. Lands owned or maintained by the Permittee including, but are not limited to, streets, parking lots, roads, highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. Address the following activities: -Pipe and culvert cleaning; -Ditch and roadside vegetation management; -Street cleaning; -Street repair, resurfacing, and striping; -Snow and ice control; -Utility installation; -Dust control - Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts; - Sediment and erosion control; - Landscape maintenance and vegetation disposal; - Trash and pet waste management; - Building exterior cleaning and maintenance. The City may clean the entire MS4 within a circuit once during the Permit term. The system must be cleaned once during the Permit term.	The City has an Interlocal Agreement with Snohomish County, for maintenance work that has primarily been for pavements and roadway markings. The City is considering an ILA for pond maintenance and ditch cleaning.	City Staff Questionnaire (March 2014)					Implement practices, policies, and procedures to reduce stormwater impacts from all lands. Lands owned or maintained by the City including, but are not limited to, streets, parking lots, roads, highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. Address all the activities required by the Permit. The City shall clean the entire MS4 circuit once during the Permit term.	0.75	\$75,200	\$30,000	\$105,200	

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
55.C.5.g	5.7 Staff Training	Implement ongoing training activities for staff whose primary construction, operation, or maintenance job functions may impact stormwater. Include training on: -O&M standards; -Inspection procedures; -Selecting appropriate BMPs; -Reducing water quality impact in daily activities; -Reporting of water quality concerns and illicit discharges. Document and maintain records of training.	Public Works staff has been trained on operation or the City's sweeper and vactor equipment. There has been no training of O&M staff on detention/retention pond maintenance and Best Management Practices.	City Staff Questionnaire (March 2014)					Implement training activities for all O&M staff and other applicable City staff whose primary construction, operation, or maintenance job functions may impact stormwater. Include training on: -O&M standards; -Inspection procedures; -Selecting appropriate BMPs; -Reducing water quality impact in daily activities; -Reporting of water quality concerns and illicit discharges. Document and maintain records of training.	0.10	\$10,027	\$5,000	\$15,027	
55.C.5.h	5.8 SWPPP for Maintenance Yards	Develop and implement Stormwater Pollution Prevention Plans (SWPPP) for all equipment maintenance and storage yards not covered under the Industrial Stormwater General Permit. Include an implementation schedule for structural BMPs and conduct occasional visual inspection of discharge from the site.	The City's Public Works/Maintenance Yard does not currently have a SWPPP document.	City Staff Questionnaire (March 2014)					Develop and implement a SWPPP document for the Public Works/Maintenance Yard.	0.15	\$15,040	\$5,000	\$20,040	
55.C.5.i	5.9 Record Keeping	Maintain records of inspection and/or repair activities.	The Public Works Department uses IWORQ's work order system.	City Staff Questionnaire (March 2014)					Maintain records of all O&M activities using IWORQ.	0.05	\$5,013	\$500	\$5,513	
Total – Element #5					1.57	\$136,885	\$42,500	\$179,385		3.05	\$305,812	\$95,500	\$401,312	The existing 1.39 FTE represents a portion of 5 O&M Staff members working on stormwater, one of which is seasonal, 0.01 FTE for Administrative Support, 0.11 FTE for the Supervisor, and 0.03 FTE for the Public Works Director. The 2014 Stormwater Program expense dollars allocated in this element include Fuel (\$1,500), Small Equipment (\$1,000), Rentals (\$500), Utilities (\$10,000), Repair/Maintenance (\$4,500) and Machinery/Equipment (\$25,000).
Total GAP in Element #5										(1.48)	(\$168,927)	(\$53,000)	(\$221,927)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments				
SWM Element #6 – Program Implementation																		
S5.A.1	6.1 SWM Plan Implementation	Develop and implement a SWM Plan that covers the geographic area subject to the permit. Included with Elements 1 through 5.	Not Applicable at this time.						Develop and implement a SWM Plan (as defined by the Ecology Permit) that covers the geographic area subject to the permit. Included with Elements 1 through 5.	0.02	\$2,005	\$0	\$2,005	Please note: The reference to "SWM Plan" in this element is different than the City's current Comprehensive Stormwater Plan project.				
S5.A.2	6.2 SWM Plan Documentation	Prepare written documentation of the SWMP and issue annual updates with the Annual Report to Ecology. Starting in 2015, Annual Reports on the new Permit must be submitted using Ecology's WA WebDMR program and include attachments to support work completed during the reporting period. Attachments to the annual report should include summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirement of the permit during the reporting period.	Not Applicable at this time.						Prepare written documentation of the SWMP and issue annual updates with the Annual Report to Ecology.	0.01	\$1,003	\$0	\$1,003					
S5.A.3	6.3 NPDES Program Tracking	Track the cost or estimated cost of development and implementation of the SWM Plan; provide this information to Ecology upon request.	Not Applicable at this time.						Track the cost or estimated cost of development and implementation of the SWM Plan; provide this information to Ecology upon request.	0.01	\$1,003	\$1,000	\$3,005					
		Track the number of inspections, enforcement actions, and public education activities. Include this information in the Annual Report.	Not Applicable at this time.					Track the number of inspections, enforcement actions, and public education activities.	0.01	\$1,003								
S5.B	6.4 MEP and AKART	Design the SWM Plan to reduce discharge of pollutants to the Maximum Extent Practicable (MEP), meet State AKART requirements, and protect water quality.	Not Applicable at this time.						Design the SWM Plan to reduce discharge of pollutants to the Maximum Extent Practicable (MEP), meet State AKART requirements, and protect water quality.	0.02	\$2,005	\$0	\$2,005					
Total – Element #6							0.00	\$0.00	\$0.00	\$0.00			0.07	\$7,019	\$1,000	\$8,019		
Total GAP in Element #6														(0.07)	(\$7,019)	(\$1,000)	(\$8,019)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.
SWM Element #7 – Total Maximum Daily Load Allocations: Stillaguamish River																		
S7.A	7.1 Permit Recognized TMDLs	Applicable TMDLs are listed in Appendix 2 of the NPDES Permit.	Not Applicable at this time; however, there is a EPA approved implementation plan for a TMDL on the Stillaguamish River.	Ecology Website					This element assumes TMDL implementation will be required by the City under a future Permit.	0.03	\$3,008	\$15,000	\$18,008	For more information on the Stillaguamish TMDL see: http://www.ecy.wa.gov/programs/wq/tmdl/StillaguamishTMDL.html . This element assumes TMDL implementation will be required by the City under a future Permit.				
S7.B	7.2 TMDLs not Listed in Permit	Compliance with TMDLs not listed in Appendix 2 of the Permit is achieved by meeting the requirements of the Permit. It includes keeping records and reporting activities relevant to applicable TMDLs.	Not Applicable at this time; however, there is a EPA approved implementation plan for a TMDL on the Stillaguamish River. This element assumes TMDL implementation will be required by the City under a future Permit.	Ecology Website					This element assumes TMDL implementation will be required by the City under a future Permit.	0.02	\$2,005	\$0	\$2,005					
S7.C	7.3 TMDLs Approved during the Permit Cycle	Comply with future TMDL requirements issued through permit modifications.	Not Applicable at this time; however, there is a EPA approved implementation plan for a TMDL on the Stillaguamish River. This element assumes TMDL implementation will be required by the City under a future Permit.	Ecology Website					This element assumes TMDL implementation will be required by the City under a future Permit.	0.02	\$2,005	\$0	\$2,005					
Total – Element #7							0.00	\$0.00	\$0.00	\$0.00			0.07	\$7,019	\$15,000	\$22,019		
Total GAP in Element #7														(0.07)	(\$7,019)	(\$15,000)	(\$22,019)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments		
SWM Element #8 – Monitoring																
S8.B	8.1 Existing Monitoring	The requirements of this element are population based. At the time the Permit would be issued, if Stanwood has a population less than 10,000 therefore the City may not be required to identify two outfalls or conveyances where stormwater sampling could be conducted. If this requirement had been applicable to the City, one outfall would have been required to represent commercial land use and the second represent high-density residential and use. Describe any stormwater monitoring or studies and type of information gathered in annual report; Assess the appropriateness of the BMPs in the SWM Plan and note any proposed changes.	No existing program in place.						If Stanwood's population exceeds 10,000 at the time of Permit issuance, the City will identify two outfalls or conveyances where stormwater monitoring should be conducted.							
S8.C.1.a	8.2 Stormwater Monitoring	Prepare for future monitoring by selecting two outfalls for flow-weighted composite sampling (must meet Ecology requirements). Document site selection, possible constraints, basin description, and water quality concerns in receiving waters.	In partnership with Snohomish County, the City has completed some stormwater monitoring for bacteria in Irvine Slough.	City Staff Questionnaire (March 2014)					Prepare for future monitoring by selecting two outfalls for flow-weighted composite sampling (must meet Ecology requirements). Document site selection, possible constraints, basin description, and water quality concerns in receiving waters.							
S8.C.1.b	8.3 SWMP Effectiveness Monitoring	Prepare for future monitoring by identifying two questions be studied and selecting monitoring sites. Develop a monitoring plan based on Ecology requirements.	No existing program in place.						Prepare for future monitoring by identifying two questions be studied and selecting monitoring sites. Develop a monitoring plan based on Ecology requirements.	0.07	\$7,019	\$20,000	\$27,019			
S8.A, S8.C.2	8.4 Annual Reporting	Describe the status of identifying monitoring sites, questions, and developing monitoring plan. In the City's annual report provide a description of any new stormwater monitoring or stormwater-related studies conducted by the City during the reporting Permit.	No existing program in place.						Describe the status of identifying monitoring sites, questions, and developing monitoring plan. In the City's annual report provide a description of any new stormwater monitoring or stormwater-related studies conducted by the City during the reporting Permit.							
S8.B.1.2	8.5 Status and Trends Monitoring	The City has two options for status trends monitoring. They are required to notify Ecology of which option is selected.	No existing program in place.						The City has two options for status trends monitoring. They are required to notify Ecology of which option is selected.							
S8.C.1.2	8.6 Effectiveness Studies	The City has two options for effectiveness studies. They are required to notify Ecology of which option is selected.	No existing program in place.						The City has two options for effectiveness studies. They are required to notify Ecology of which option is selected.							
S8.D.1.2	8.7 Source Identification and Diagnostic Monitoring Information Repository	The City has two options for source identification and diagnostic monitoring information repository. They are required to notify Ecology of which option is selected.	No existing program in place.						The City has two options for source identification and diagnostic monitoring information repository. They are required to notify Ecology of which option is selected.							
Total – Element #8							0.00	\$0.00	\$0.00	\$0.00			0.07	\$7,019	\$20,000	\$27,019
Total GAP in Element #8										(0.07)	(\$7,019)	(\$20,000)	(\$27,019)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.		

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #9 – Reporting														
S9.A&B	9.1 Annual Reports	Submit annual reports each year on the previous year's NPDES Phase II activities. Report includes current SWM Plan, Annual Report Form (Appendix 3 of Phase II Permit), and applicable supporting documentation. Submit an annual report no later than March 31 of each year. Submit annual report electronically using Ecology's WA WebDMR program which is available through Ecology's website. Include attachments to the annual report including summaries, descriptions, reports and other information as required, or as applicable to meet the requirements of the Permit during the reporting period.	No existing program in place.						Develop and submit an Annual Report on the status of Permit requirements to Ecology annually in March.	0.01	\$1,003	\$0	\$1,003	
S9.C.2	9.2 Ongoing Tracking	To support annual report submittal, maintain records of activities completed and implementation status of each element in Elements 1 through 5. Track progress toward meeting minimum performance measures and plans for meeting future permit deadlines.	No existing program in place.						Track all the activities of the Stormwater Program, specific to the requirements of the Permit.	0.01	\$1,003	\$0	\$1,003	
S9.C	9.3 Maintaining Records	Maintain records of SWM Plan and permit activities for five years.	Public Works uses IWORQ's work order system to track and document all Stormwater Program related activities.	City Staff Questionnaire (March 2014)					Maintain records of SWM Plan and Permit activities with IWORQ.	0.01	\$1,003	\$0	\$1,003	
S9.D	9.4 Public Access	Make all records of SWMP and permit activities available to the public at reasonable times during business hours.	No existing program in place.						Make all records of SWMP and Permit activities available to the public at reasonable times during business hours.	0.01	\$1,003	\$0	\$1,003	
S9.E.4	9.5 LID Barriers	Submit a LID barriers memo that summarizes the City's identified barriers to the use of LID.	No existing program in place.						Submit a LID barriers memo that summarizes the City's identified barriers to the use of LID.	0.01	\$1,003	\$0	\$1,003	
Total – Element #9					0.01	\$872	\$0.00	\$872		0.05	\$5,013	\$0	\$5,013	The existing FTE includes a 0.01 FTE for Administrative Support.
Total GAP in Element #9										(0.04)	(\$4,141)	\$0	(\$4,141)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments				
SWM Element #10 – Underground Injection Control Rule																		
WAC 173-218-0701.a.i-iv	10.1 Register Wells	Complete Ecology Registration forms and submit (WAC 173-218-070.1.a.i-v). Information includes: Operator/Owner information; site location; BMPs used to protect groundwater quality, UIC well description; information necessary to demonstrate that the non-endangerment standard (WAC 173-218-080 and WAC 173-218-090) has been met.	There is one UIC well currently registered with Ecology within the City of Stanwood.						Register future publically owned UIC wells built in the City limits.	0.01	\$1,003	\$0	\$1,003	In the City, there is one UIC well registered with Ecology.				
WAC 173-218-070 1.b.i	10.2 Assess Wells	According to WAC 173-218-090.2.a.ii, the approach to conducting the well assessment will be determined by the Owner. The assessment evaluates the potential risks to groundwater from the use of UIC wells. Any assessment that identifies a well as a high threat to groundwater must include a retrofit schedule (WAC 173-218-090.a.iii), and immediate action must be taken to correct the use of a well that is determined to be an imminent public health hazard (WAC 173-218-090.a.iv).	Not Applicable at this time.						Develop and conduct a UIC assessment protocol.	0.03	\$3,008	\$1,500	\$4,508					
WAC 173-218-070 1.b.i	10.3 New Well Requirements	Prior to use, new wells must meet the requirements of WAC 173-218-080 and WAC 173-218-090 which call for preventing the movement of fluid containing any contaminant into the groundwater if it may cause a violation of groundwater quality standards. Compliance with the nonendangerment standard can be met through one or a combination of two approaches: presumptive (WAC 173-218-090.1.c.i.A-D) or demonstrative (WAC 173-218-090.1.c.ii.A-E).	Not Applicable at this time.						Ensure new UIC wells meet all WAC requirements.	0.01	\$1,003	\$0	\$1,003					
WAC 173-218-070 1.b.ii	10.4 Annual Updates	After initial well registrations have been sent to Ecology, provide an annual update on any well status changes.	Not Applicable at this time.						Provide annual UIC reports to Ecology.	0.01	\$1,003	\$0	\$1,003					
WAC 173-218-120	10.5 Well Decommissioning	Wells must be decommissioned by filling or plugging the well so that it will not result in an environmental, public health or safety hazard, and will not serve as a channel for movement of water or pollution to the aquifer as specified in WAC 173-218-120.3.b.i-ii). Ecology must be notified 30 days prior to decommissioning wells that pose an imminent public health hazard, otherwise notification must occur within one year of closure.	Not Applicable at this time.						Ensure all UIC well decommissioning meet the requirements of the WAC.	0.01	\$1,003	\$0	\$1,003					
Total – Element #10							0.00	\$0.00	\$0.00	\$0.00			0.07	\$7,019	\$1,500	\$8,519		
Total GAP in Element #10														(0.07)	(\$7,019)	(\$1,500)	(\$8,519)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.

New Permit Section Reference or Other Reference	Stormwater Program Element	Activities/BMPs Needed for Regulatory Compliance (includes the current NPDES Phase II Permit activities/BMPs, effective August 1, 2013)	Current Activities	Source of Information	Existing Staff FTE (Based on 2014 Adopted Budget for Storm Drainage)	Existing Staff Cost (\$)	Existing Expenses (\$)	Total Existing Program Costs	Future Activities (in addition to Current/ Previously Completed Activities)	Future Staff FTE	Future Staff Cost (\$)	Future Total Expense (\$)	Total Future Program Costs	Comments
SWM Element #11 – Stormwater Capital Improvement Program														
	11.1: Stormwater CIP Projects	This element covers stormwater related stormwater related CIP Project design and construction.	The City as an existing 2014 CIP Project List.				\$645,000		Continue to design and construct Stormwater CIP projects.	0.50	\$50,133	\$650,000	\$700,133	The 2014 CIP Costs are covered out of the 2014 Capital Budget (\$645,000).
	11.2 Long Term Stormwater Infrastructure Replacement	This element covers long term stormwater infrastructure replacement needs.	The City does not currently have a long term stormwater infrastructure replacement program.						Identify, design and construct long term stormwater infrastructure replacement projects each year.	0.15	\$15,040	\$100,000	\$115,040	
	11.3 Small Works Stormwater Projects	This element covers annual/as-needed small works projects.	The City does currently has a small works stormwater project program, where they build small drainage improvement projects each year.				\$65,000		Continue to identify, design and construct small works drainage improvement projects each year.	0.10	\$10,027	\$75,000	\$85,027	The 2014 Drainage Improvement Projects are covered out of the 2014 Capital Budget (\$65,000).
Total – Element #11					0.14	\$12,206	\$710,000	\$722,206		0.75	\$75,200	\$825,000	\$900,200	The existing FTE includes a 0.05 FTE allocation for the City Manager, 0.05 FTE for the Public Works Director, 0.02 FTE for the Supervisor, and 0.02 FTE for Administrative Support.
Total GAP in Element #11										(0.61)	(\$62,993)	(\$115,000)	(\$177,993)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.
SWM Element #12 – Administrative and Additional Activities														
	12.1 Materials and Supplies	This element covers uniforms and supplies for the Stormwater Program.	This element covers the cost of uniforms and supplies for the Stormwater Program.				\$5,200	\$5,200	Continue to fund the costs of uniforms and supplies (assumes a 15% increase needed in the future program).	0.01	\$1,003	\$5,980	\$6,983	The 2014 Stormwater Program expense dollars allocated in this element include Supplies (\$4,000) and Uniforms (\$1,200).
	12.2 Program Overhead, Administration and Transfers Out	This element covers Program Overhead for the Stormwater Program including meetings, trainings, travel, interfund payment payments for service and transfers-out.	This element covers Program Overhead for the Stormwater Program including meetings, trainings, travel, interfund payment payments for service and transfers-out.				\$225,457	\$225,457	This element covers Program Overhead for the Stormwater Program including meetings, trainings, travel, interfund payment payments for service and transfers-out (assumes a 15% increase needed in the future program).	0.10	\$10,027	\$259,276	\$269,302	The 2014 Stormwater Program expense dollars allocated in this element include Meeting, Training and Travel (\$750), Interfund Payment for Service (\$51,507), and Less-Transfers Out (\$173,200).
	12.3 Professional Services	This element covers Professional Services to the support the Stormwater Program.	This element covers Professional Services to the support the Stormwater Program.				\$42,500	\$42,500	This element covers Professional Services to the support the Stormwater Program (assumes a 15% increase needed in the future program).	0.10	\$10,027	\$48,875	\$58,902	The 2014 Stormwater Program expense dollars allocated in this element include Professional Services (\$42,500).
	12.4 Insurance, Taxes and Permits	This element covers Insurance, B&O Taxes, and State Operating Permits, to the support the Stormwater Program.	This element covers Insurance, B&O Taxes, and State Operating Permits, to the support the Stormwater Program.				\$37,400	\$37,400	This element covers Insurance, B&O Taxes, and State Operating Permits, to the support the Stormwater Program (assumes a 15% increase needed in the future program).	0.04	\$4,011	\$43,010	\$47,021	The 2014 Stormwater Program expense dollars allocated in this element include Insurance (\$30,600), B&O Taxes (\$6,200) and State Operating Permits (\$600).
	12.5 Miscellaneous Expenditures	This element covers Miscellaneous Expenditure, including Communication, to the support the Stormwater Program.	This element covers Miscellaneous Expenditure, including Communication, to the support the Stormwater Program.				\$3,000	\$3,000	This element covers Miscellaneous Expenditure, including Communication, to the support the Stormwater Program (assumes a 15% increase needed in the future program).	0.01	\$1,003	\$3,450	\$4,453	The 2014 Stormwater Program expense dollars allocated in this element include Communication (\$3,000).
Total – Element #12					0.26	\$22,669	\$313,557	\$336,226		0.26	\$26,069	\$360,591	\$386,660	The existing FTE includes a 0.10 FTE allocation for the City Manager, 0.05 FTE for the Public Works Director, 0.02 FTE for the Supervisor, and 0.09 FTE for Administrative Support.
Total GAP in Element #12										0.00	(\$3,400)	(\$47,034)	(\$50,434)	This line item shows the "gap" or difference between the existing allocated FTE and expenses and the FTE and expenses needed to fully implement the future program.
					TOTALS	2.09	\$182,223	\$1,066,057						
					GRAND TOTAL	2.09	\$1,248,280							
					FUTURE TOTALS					5.50	\$551,464	\$1,341,341		
					GRAND TOTAL FUTURE					5.50	\$1,892,805			
					TOTAL GAP					(3.41)	\$369,241	\$275,284		

Notes

- Activities are based on the *Western Washington Phase II Municipal Stormwater Permit*, issued January 17, 2007, and modified June 17, 2009, and the New Final Western Washington Phase II Municipal Permit effective August 2013.
- The permit effective dates are February 16, 2007, through August 15, 2013. The New Permit will be effective August 15, 2013, through August 15, 2018.
- "Permit End" means 180 days prior to the expiration date of the permit (8/19/2011)
- "2005 Ecology Manual" refers to the Washington State Department of Ecology's 2005 *Stormwater Management Manual for Western Washington*.
- "2012 Ecology Manual" refers to the Washington State Department of Ecology's 2012 *Stormwater Management Manual for Western Washington*.
- Monitoring requirements vary based on City or County population. Guidelines listed here are for small cities (population between 10,000 and 75,000).

EXISTING GRAND TOTAL	\$1,248,280
FUTURE GRAND TOTAL	\$1,892,805
GRAND TOTAL GAP	(\$644,525)

From City of Stanwood - 2014 Budget

Drainage Utility Revenues

Description	2013 Actual	2014 Budget	Allocation to Elements
Beginning Balance	\$578,866	\$600,000	
<u>Revenues</u>			
Charges for Services	\$425,000	\$425,000	
Misc. Revenues	\$1,300	\$1,300	
Total Revenues	\$426,300	\$426,300	

Drainage Utility Expenditures

Description	2013 Actual	2014 Budget	Allocation to Elements
<u>Operating Expenditures</u>			
Salaries and Wages	\$96,400	\$121,520	See FTE Spreadsheet
Overtime	\$400	\$463	See FTE Spreadsheet
Social Security	\$7,500	\$9,332	See FTE Spreadsheet
Retirement	\$8,000	\$11,897	See FTE Spreadsheet
Medical Benefits	\$23,500	\$32,803	See FTE Spreadsheet
L & I	\$2,600	\$2,549	See FTE Spreadsheet
Unemployment Insurance	\$1,200	\$3,659	See FTE Spreadsheet
Supplies	\$2,500	\$4,000	12.1
Uniforms	\$1,200	\$1,200	12.1
Fuel	\$1,500	\$1,500	5
Small Equipment	\$400	\$1,000	5
Professional Services	\$42,500	\$42,500	12.3
Communications	\$3,000	\$3,000	12.5
Rentals	\$500	\$500	5
Insurance	\$30,600	\$30,600	12.4
Utilities	\$10,000	\$10,000	5
Repair/Maintenance	\$4,500	\$4,500	5
B & O Tax	\$6,200	\$6,200	12.4
Meeting, Training and Travel	\$758	\$750	12.2
State Operating Permits	\$600	\$600	12.4
Interfund Payment for Service	\$46,395	\$51,507	12.2
Advertising	\$0	\$0	N/A
Total Operating Expenditures	\$290,253	\$340,080	N/A
<u>Non-Operating Expenditures</u>			
Machinery & Equipment	\$0	\$25,000	5
Total Non-Operating Expenditures	\$0	\$25,000	N/A
Total Expenditures	\$290,253	\$365,080	N/A
Less: Transfers-Out	\$110,000	\$173,200	12.2
Ending Cash Balance	\$604,913	\$488,020	N/A

Total \$538,280

Capital Budget Expenditures	2014 Budget	Allocation to Elements
Protect the Community From Flooding		
SR532 Berm/Bike and Pedestrian Path	\$100,000	11.1
Irvine Slough Pump Station Restoration	\$245,000	11.1
Irvine Slough Conveyance Study	\$300,000	11.1
Drainage Improvement Projects	\$65,000	11.3

Total \$710,000

City of Stanwood - 2014 Staffing Levels for Drainage Program

Name	FTE Allocated to Drainage		Allocation to Elements
Deborah Knight	0.15	City Manager	11, 12
Kevin Hushagen	0.15	Public Works Director	4, 5, 11, 12
Lisa Noonchester	0.15	Admin Support	2, 5, 9, 12
Supervisor (Vacant)	0.15	Supervisor	5, 11, 12
Trevor Harrison	0.25	O&M	3, 4, 5
Dave Smith	0.33	O&M	5
Scott Justesen	0.25	O&M	5
Nathan Towse	0.33	O&M	5
Seasonal	0.33	O&M	5
Total	2.09		

Total FTE Costs*	\$182,223
Average Hourly Rate	\$41.92
Future Hourly Rate*	\$48.20

**Assumed 2,080 Hours/FTE*

**Assumed an increase of 15% in staff costs for the future program for future planning purposes.*