

CHAPTER 7

FUTURE STORMWATER PROGRAM RECOMMENDATIONS

7.1 INTRODUCTION

With its location on Puget Sound, directly adjacent to the floodplain of the Stillaguamish River, the City of Stanwood is committed to establishing an efficient and effective flood control and Stormwater Management Program (SWMP). The City is also committed to providing for public safety and protecting properties and structures from the impacts of flooding and stormwater runoff. Effective stormwater management for this City is a key element in promoting the local and regional economy and sustaining the quality of life for its citizens. For the City of Stanwood, an efficient and effective SWMP involves:

- *Taking Care of Its Citizens and the Community:* Being responsive to the requests of its citizens for stormwater information and flood protection; sometimes this information and support come during a storm, and often during the middle of the night, in the form of sandbags and assistance to control and/or prevent localized flooding.
- *Building and Maintaining an Effective System of Capital Facilities:* This involves mapping and inventorying its collection of natural and manmade drainage facilities to ensure they are appropriately sized and always adequately repaired and maintained, in order to optimize performance and provide ongoing, continuous flow conveyance and flood protection. A properly sized, maintained, and functioning capital drainage system is the backbone of any effective SWMP. Such an effective SWMP is supported by an annually updated capital improvement program (CIP) that will ensure:
 - Repair/replacement of old, dysfunctional facilities.
 - Design and construction of needed capital facilities projects.
 - Upgrades to the system to keep it up to desired performance standards.
 - The ability to continue to meet the community's expectations for service.
- *Protecting, Preserving, and Restoring the City's Natural Environment:* The City's natural environmental and ecological systems are critical elements of the City's drainage, detention, water quality treatment, flood reduction, and aquifer recharge systems. Being located in a floodplain, where the freshwater of the Stillaguamish River meets the saltwater of Puget Sound, the City is surrounded by the rich, diverse, and productive ecological systems of the Stillaguamish estuary. The City is committed to creating an updated SWMP that protects and enhances water quality in wetlands, streams, floodplains, and adjoining natural drainage systems, in order to sustain and support the unique and productive nearby fish habitat and shellfish rearing areas.
- *Planning Ahead and Routinely Achieving Regulatory Compliance:* In addition, the City needs to plan ahead for existing and future regulatory requirements. The City is wise to begin to outline a path for enhancing its SWMP to be consistent with the requirements of a future

Permit, which could be issued to the City as soon as 2018. The regulatory gap analysis conducted as part of this SCP update provides a prioritized implementation plan with projected activities, staffing, and annualized costs to allow the City to come into compliance at its own pace, using procedures that are uniquely tailored to local conditions and community preferences and priorities.

- *Being a Good Intergovernmental and Regional Watershed Partner:* Working closely with the tribes, county, flood control/water quality and shellfish districts, land owners, businesses, and various regulatory agencies, citizen groups, and stakeholders, and coordinating with its neighbors on a local and regional basis is critical for the City’s new SWMP. Developing and implementing a watershed-based perspective to preserve, protect, enhance, and restore the region’s natural water resource systems and functions is important in order to sustain the benefits of the natural and manmade systems needed to support a consistent, uniform approach for the optimization of local resources. In order to achieve this, future land use and development need to be properly balanced with the protection and preservation of water quality, groundwater, habitat, and the myriad of naturally functioning systems that make up the City’s watersheds, protect local water supplies, and sustain surrounding natural systems.
- *Creating a Visionary, Yet Effective and Implementable Updated Stormwater Comprehensive Plan (SCP):* The purpose of developing this SCP is to create an updated mission for the City’s SWMP. The recommended SWMP will be supported by a long-term funding and comprehensive action plan to ensure effective annualized implementation. Through this planning process, the City’s existing SWMP was evaluated and compared to the needs of the community, the floodplain, and the watershed. Existing and future regulatory requirements, and future regional SWMP obligations were assessed and capital facility needs identified.

The product of the SWMP gap analysis, and the resulting SCP, will identify and quantify additional staff and resources needed to annually sustain an updated, viable, and effective SWMP. A viable annual SWMP has been assumed to proactively address the requirements of a future Permit, while maintaining effective capital and maintenance programs, as well as sustaining a healthy budget to routinely acquire necessary staff and equipment.

The results of the SWMP and Regulatory Compliance Gap Analysis, developed for the City of Stanwood, are presented in this final chapter of the SCP in the form of a recommended SWMP. The updated SWMP includes activities, prioritized capital projects, costs, and an implementation plan, with defined staffing levels, equipment, and annual revenue needs. The SCP is presented in the form of an annualized SWMP so it can be budgeted and implemented on an annual basis over the next ten years. This study gives the City “credit for its existing stormwater management activities,” with future SWMP needs defined as the “gaps” in the existing SWMP. The City’s existing SWMP, plus the activities and costs presented in the “gap”, constitute the future needs of the City’s annual SWMP.

Future Permit needs have been averaged over a hypothetical five-year planning period, and presented as one set of averaged, annualized costs for each of the twelve major stormwater management planning elements. Capital facility needs are normally achieved over a longer, 10-year to 20-year planning period in order to allow the needed resources to be realized for design and construction. This updated SCP presents an effective SWMP to assist in compliance with a future Permit and the design and construction of needed capital facilities.

City staff have also reviewed and adjusted the results of the gap analysis in order to ensure the updated SWMP is consistent with local priorities and financial capabilities. In this final chapter, the City's preferred level of SWMP resource allocation is documented and compared to both the City's existing SWMP and the SWMP from the Regulatory Gap (and CIP) Analysis, which also includes an updated CIP.

7.2 STRUCTURE OF CITY'S STORMWATER PROGRAM

To create the City's recommended annual SWMP, the various stormwater activities and services were divided into twelve stormwater management planning activities, or planning elements. Chapter 7 presents the City's SWMP as a series of recommended activities and services and includes an annual capital improvement program. Also presented are the results of the City's most recent SWMP-related policy decisions in regard to local priorities, resource allocation, and funding.

The SWMP described in this SCP is presented in the form of a spreadsheet that is organized according to each of the major elements, as summarized below. The complete detailed spreadsheet and supporting gap analysis are presented in Appendix B, NPDES Permit Gap Analysis.

The City's SWMP is organized into the following twelve major stormwater management elements, including:

- Element #1: Public Education and Outreach
- Element #2: Public Involvement and Participation
- Element #3: Illicit Discharge Detection and Elimination
- Element #4: Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Element #5: Municipal Operations and Maintenance
- Element #6: Program Implementation
- Element #7: Total Maximum Daily Load: Stillaguamish River
- Element #8: Monitoring
- Element #9: Reporting
- Element #10: Underground Injection Control Rule
- Element #11: Stormwater Capital Improvement Program
- Element #12: Administrative and Additional Activities

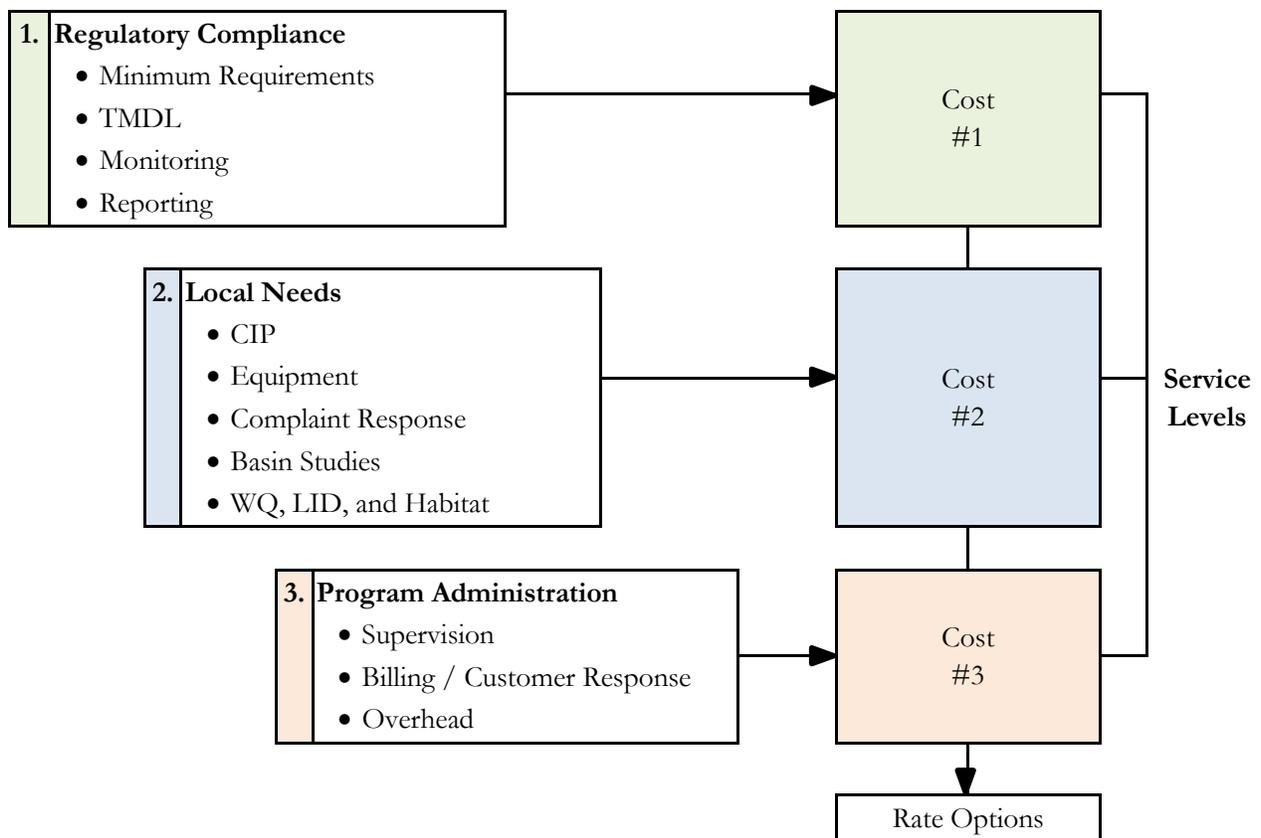
Conceptually, the City’s SCP was developed according to the schematic diagram shown in Figure 7-1, and includes regulatory compliance, local needs (including capital needs), program administration, and funding.

In developing and evaluating the City’s stormwater management services, the levels of needed staffing and funding were compared and contrasted with recommended capital projects and internal SWMP programmatic priorities. The results may be readily presented in the form of annualized levels of service and funding (and corresponding Drainage Utility rates) for review and approval by City staff, the public, and elected officials.

(Note: The public review process will conclude with the selection of one of the preferred levels of service and levels of funding, with associated Drainage Utility fees, as is currently being developed and presented by the City’s financial consultant. Their financial analysis is being jointly prepared and released to the public along with this SCP.)

Figure 7-1: Schematic Diagram of the City’s Stormwater Comprehensive Planning Process

Conceptual Process to Identify Service Levels and Create Utility Rate Options



Similar to the schematic diagram above, the City's existing annual SWMP has been created to address each of the following:

- *Regulatory Compliance:* including Elements #1-10, with the stormwater management activities related to the requirements of a future NPDES Phase II Municipal Stormwater Permit presented in Elements #1-9.
- *Local Needs:* including capital improvement projects and other local needs, such as equipment, water quality, and complaint response, as included in Element #11.
- *Program Administration:* including those additional administrative activities and costs, such as billings, accounting, financial support, and overhead, as summarized in Element #12.

Although the City is not currently under the requirements of a Permit, this chapter documents what stormwater management activities the City is currently performing on an annualized basis and what activities may be required by a future Permit. (Note: Establishing and maintaining an effective and annually funded CIP is not a Permit requirement, but is required by other regulatory means such as the Growth Management Act.)

Thus, as shown previously, the requirements of a future NPDES Permit are represented in the first nine of the twelve Stormwater Program Elements. Elements ten through twelve address the City's additional stormwater obligations, which include the Underground Injection Control (UIC) Rule, the City's Capital Improvement Program, and additional storm drainage activities, including SWMP administration and utility accounting, billing/financial services, and internal overhead.

7.3 IMPLEMENTATION PLANNING: ESTABLISHING PRIORITIES, ACTIVITIES, AND COSTS

The rate at which the City phases in its various SWMP elements to achieve compliance with a future Permit and fix local flooding problems, including the CIP, will determine the amount of staff and revenue needed each year. A few thoughts for establishing SWMP priorities are presented below.

7.3.1 Maintenance

Maintenance is one of those activities from which the City can obtain immediate returns for relatively little investment. Hiring one more full-time maintenance person and providing additional annual supplies and support services will bring immediate returns and allow the City to fix numerous historical localized flooding problems.

From an engineering perspective, maintenance allows the City to realize additional capacity, as if new CIP projects were being designed and constructed. When the system is properly maintained, the full original design capacity of the City's existing stormwater facilities can then be realized. Also, the citizens would see an immediate return on their investment, if the monthly Drainage Utility fees were to be raised at about the same time.

The suggested increase in annual funding (of \$221,927) does not have to be realized all at once to see immediate improvements in local drainage performance. An enhanced O&M

program could be phased in over a two- to three-year period, at about an additional \$75K to \$100K per year. Even with reduced annual funding, the results of an enhanced O&M program will still be very quick in terms of fixing and reducing a number of the City's existing local flooding problems.

7.3.2 Capital Projects

Capital projects are aimed at fixing historical design and capacity problems in the City's existing drainage system. They are often relatively expensive and take time to design, fund, permit, and construct, but in many cases, they are also the only possible solution. This is particularly true for those parts of the City where there is little to no existing drainage system, and a drainage system needs to be installed after the fact in order to reduce and/or eliminate localized flooding problems.

A series of responsive CIP projects has been included in the development of the City's new SWMP. The complete success of the proposed CIP projects is in part dependent on the design and construction of a new major conveyance improvement system that will remove high water from the older downtown area during a major rain/flood event and allow the flatter portions of the City to effectively drain by gravity. This is the intent of the Irvine Slough Stormwater Separation Project (ISSSP), which was started in 2014. Without this project, there will continue to be significant backwater effects within the City's drainage system, causing localized flooding and standing water in many parts of the City.

The drainage CIP projects need to be prioritized by the public and City Council in order to allocate the annual CIP revenues. For the purposes of this "gap analysis" we have assumed an annual drainage CIP of \$900,200 per year. This is an annual increase of \$177,994 above the current level of \$722,206. The development of the City's new drainage CIP will likely cause one of the largest increases in annual Drainage Utility fees, assuming the City uses the annual revenues from the Utility to fund capital improvement projects on a "pay-as-you-go" basis. Due to the severe nature of the City's flooding problems, both urban flooding and river flooding, accelerating the construction of major CIP projects would be very beneficial. The City is concurrently conducting a financial review of its funding options, including potentially adjusting its annual Drainage Utility fees.

7.3.3 Permit Compliance

When it comes to the various permit requirements, there are many stormwater management activities that could be phased in over time to create positive drainage effects throughout the City. (Note: The earliest the City might expect a Permit from Ecology is 2018, and this could even be delayed to 2023 or beyond, when the City realizes a population of over 10,000.) Activities that might have the most significant positive impacts on enhancing the City's existing SWMP include:

- Increasing the annual maintenance staffing and annual allocations of supporting supplies and services, as discussed above.

- Adopting the Washington State Department of Ecology’s 2012 Stormwater Management Manual for Western Washington (SWMMWW). This would help address the drainage needs of new development and redevelopment, as well as preserve the integrity and capacity of the City’s existing drainage system and proposed CIP.
- Enhancing the City’s permitting, development review, and inspection program by establishing or raising developer fees for development-related services provided by the City.
- Establishing a new Illicit Discharge Detection and Elimination (IDDE) Program would take time and special training; however, if done correctly, it is also one of the best ways to begin to improve water quality throughout the City.

7.4 ANNUAL SWMP, CIP, AND REGULATORY COMPLIANCE PROGRAM

This section presents a discussion of the results of the Regulatory Compliance (and CIP) Gap Analysis, according to each of the SWMP Elements. It summarizes major stormwater activities and identifies the net change or financial “gap” that needs to be met by the City on an annual basis in order to achieve and maintain compliance with a future Permit, and support an updated CIP. A summary of the regulatory gap analysis, including CIP, is presented in Section 7.4.2. It is followed in Section 7.4.3 by a revised gap analysis as preferred by City staff. These gap analysis summaries are followed by a brief explanation in Section 7.5 of each of the enhanced elements of the City’s update SWMP.

7.4.1 Introduction and Overview

The following analysis of the City’s SWMP has been presented in three parts:

- The first part is referred to in the text as the Regulatory (and CIP) Gap Analysis, with a summary of the results presented in Table 7-1 and discussed in Section 7.4.2.
- The second part is referred to in the text as the City Staff Preferred/Gap Analysis, with a summary of results presented in Table 7-2 and discussed in Section 7.4.3.
- The third part is a comparison of the two analyses and identification of the City’s future SWMP needs, based on the priorities set by City staff in Section 7.4.3, and is presented according to each of the 12 SWMP Elements in Section 7.5.

7.4.2 Summary of SWMP Regulatory Gap (and CIP) Analysis

The City’s stormwater management needs are addressed in the Regulatory Gap (and CIP) Analysis and a recommended SWMP is presented in the form of an annualized SWMP, as summarized in Table 7-1. The existing SWMP Regulatory Gap (and CIP) Analysis, based on the City’s 2014 budget, is presented in Appendix B, and the City’s 2014 Budget is presented in Appendix A.15.

The results of the gap analysis show that the City needs an additional 3.41 staff and expense funding, costing an additional \$644,525 annually, with a total annual SWMP cost of \$1,892,805 which includes an annual CIP of \$900,200. This is an annual increase of \$644,525 above the existing SWMP of \$1,248,280. Highlights of the recommended annual SWMP, according to the Regulatory (and CIP) Gap Analysis, include the following:

Annual Costs:

- An increase in annual operating costs from \$1,248,280 to \$ 1,892,805 (\$1,248,280 + \$644,525)
- An increase in annual costs by \$644,525, which includes \$369,241 for staffing and \$275,284 for expenses
- And an annual increase in CIP costs by \$177,994, from \$722,206 to \$900,200, where the additional CIP dollars have been included in the increased funding for CIP expenses.

Staffing Level:

- An increase in permanent staffing from 2.09 full-time equivalents (FTE) to 5.50 FTE. This is an increase in annual staffing of 3.41 FTE, with 1.0 FTE for a full-time SWM manager who will primarily help with the Permit, 1.48 FTE for maintenance, 0.61 FTE for CIP supervision, and the remaining 0.32 FTE for GIS support, financial support, administration, and implementation of the Permit.

7.4.3 City's Preferred Level of Resource Allocation

Because the City is not currently under a Permit, the level and type of annual SWMP and CIP activities, including adoption of the 2012 Ecology Stormwater Manual, amended in 2014, are internal policy decisions to be made by City staff, the City Council, and the public, as the City's SWMP is developed over time. At this time, the City has elected to implement the results of the regulatory and programmatic "gap analysis" in steps and phases. Based on local priorities and considerations, City staff are suggesting the preferred SWMP reduce future internal staffing by 1.93 FTE to a total of 3.57 FTE, with 0.61 FTE for CIP Supervision being outsourced. The net result is an SWMP that increases by \$507,205 annually, rather than by \$644,526, as suggested in the Regulatory Gap Analysis. This is a difference of \$137,321 in annual SWMP funding (to \$1,755,485), and a difference of 1.32 FTE in new annual SWMP staffing (to total SWMP staffing of 3.57 FTE). (All future SWMM expenses from the Regulatory Gap Analysis totaling \$275,284 have been retained, plus \$62,994 has been included for new CIP staffing support, for a total increase in expenses of \$338,278.)

At the present time, the City does not think it needs all of the recommended SWMP staffing and will phase in the new SWMP, and its staffing and annual funding increases, in small steps over an extended period of time. Highlights of the annual SWMP preferred by City staff include the following:

- The new SWM Manager position will not be needed in the near future; this saves the future SWMP \$110,000 annually (including benefits). All SWMP Manager responsibilities will be absorbed by existing Public Works staff. (Note: This position has been omitted from the City's future annual SWMP.)
- The 1.48 additional FTE for annual maintenance (O&M) have been retained by City staff, bringing the total O&M staffing to 3.05 FTE (existing O&M staffing of 1.57 FTE increases by 1.48 FTE). These new staff will be hired and added internally when needed, as the City's annual maintenance needs increase over time. This will cost the City \$168,927 annually for additional Public Works staff, plus expenses of \$53,000, for a total increase in annual O&M costs of \$221,927. (Note: These staffing and expense costs have been added to the City's future annual SWMP, making the total SWMP staffing level equal to 3.57 FTE. No other additional staff have been added to the new SWMP preferred by City staff, other than these 1.48 FTE added to the annual maintenance crew.)
- All GIS/mapping-related work will continue to be done internally by existing staff; separate GIS staffing and outside source costs have not been included in the future SWMP recommended by either the Regulatory (and CIP) Gap Analysis or the City Staff Preferred Gap Analysis.
- Additional engineering support to assist with the enhanced annual CIP (an increase of 0.61 FTE costing \$62,993) will be outsourced and is not included in the new annual SWMP staff count; these future CIP staffing costs, however, are included in the new SWMP CIP expense costs.
- Expenses of \$177,993 annually for new CIP projects will be included in the future SWMP. (Note: The CIP staffing cost of \$62,993 moves into CIP-related expenses, increasing the CIP costs from \$115,000 to \$177,994 annually. This increases the annual CIP from \$722,206 to \$900,200.)
- Any future needs for increased administrative and overhead staff will be absorbed internally by existing City staff; there is, therefore, no increase in annual SWMP administrative costs, other than for increased expenses. These future administrative expenses are for the cost of Ecology's regional monitoring program that is associated with a future Permit, plus a modest increase in existing overhead costs.

In summary, the City's preferred SWMP does not retain a SWM Manager. It continues to do GIS in-house, outsources CIP staffing with other CIP activities, and internally hires only future maintenance staff, retaining supporting annual O&M expense funds and the expense funds for the other SWMP elements, as summarized below:

Annual Costs:

- The annual increase in SWMP costs has been reduced from \$644,526 to \$507,205 by City staff, a reduction of \$137,320. The annual SWMP increase of \$507,205

includes an increase of \$221,922 for annual maintenance, \$177,993 in annual CIP (*as calculated from \$115,000 for increased CIP expenses, plus \$62,993 for 0.61 FTE in supporting CIP staffing that will be contracted out*), plus an additional \$107,285 for future Permit monitoring costs and small increases in other SWMP administrative costs.

- This reduces the future SWMP operating costs from \$1,892,805 to \$1,755,485, as calculated by adding the cost of the existing SWMP (of \$1,248,280) to the annual SWMP increase (of \$507,205).

Staffing Level:

- The City's annual staffing needs can be reduced from an additional 3.41 FTE to only 1.48 new FTE in the future for maintenance support. This is an annual reduction of 1.93 FTE, with 0.61 in CIP FTE shifting to CIP expenses. Total SWMP staffing is thus reduced to 3.57 FTE (2.09 existing, plus 1.48 for new maintenance staff).
- The \$62,994 for 0.61 FTE in CIP support staff is moved from internal staffing into future CIP expense costs due to being outsourced. (Note: These CIP staffing dollars have been included with the CIP expense amount of \$115,000, bringing the increase in CIP expenses to \$177,994.)

Table 7-1: Detailed SWMP and Gap Analysis Results

Storm Drainage Program Elements	Existing (2014) Staff FTE(2)	Existing (2014) Staff Cost (\$)	Existing (2014) Expense Cost (\$)	Existing Total Costs (\$)	Future Staff FTE (2)	Future Staff Cost (\$)	Future Expense Cost (\$)	Future Total Costs (\$)	Total Net Change
Element #1: Public Education and Outreach (1)	0.00	\$0	\$0	\$0	0.08	\$8,021	\$3,000	\$11,021	\$11,021
Element #2: Public Involvement and Participation (1)	0.02	\$1,744	\$0	\$1,744	0.05	\$50,13	\$2,500	\$7,513	\$5,770
Element #3: Illicit Discharge Detection and Elimination (1)	0.02	\$1,744	\$0	\$1,744	0.41	\$41,109	\$11,500	\$52,609	\$50,865
Element #4: Controlling Runoff from New Development, Redevelopment and Construction Sites (1), (3)	0.07	\$6,103	\$0	\$6,103	0.57	\$57,152	\$5,750	\$62,902	\$56,799
Element #5: Municipal Operation and Maintenance (1)	1.57	\$136,885	\$42,500	\$179,385	3.05	\$305,812	\$95,500	\$401,312	\$221,927
Element #6: Program Implementation (1)	0.00	\$0	\$0	\$0	0.07	\$7,019	\$1,000	\$8,019	\$8,019
Element #7: Total Maximum Daily Load Allocations: Stillaguamish River (1)	0.00	\$0	\$0	\$0	0.07	\$7,019	\$15,000	\$22,019	\$22,019
Element #8: Monitoring (1)	0.00	\$0	\$0	\$0	0.07	\$7,019	\$20,000	\$27,019	\$27,019
Element #9: Reporting (1)	0.01	\$872	\$0	\$872	0.05	\$5,013	\$0	\$5,013	\$4,141
NPDES Permit Cumulative Subtotal (1)	1.69	\$147,348	\$42,500	\$189,848	4.42	\$443,177	\$154,250	\$597,427	\$407,579
Element #10: Underground Injection Control Rule	0.00	\$0	\$0	\$0	0.07	\$7,019	\$1,500	\$8,519	\$8,519

Table 7-1: Detailed SWMP and Gap Analysis Results

Storm Drainage Program Elements	Existing (2014) Staff FTE(2)	Existing (2014) Staff Cost (\$)	Existing (2014) Expense Cost (\$)	Existing Total Costs (\$)	Future Staff FTE (2)	Future Staff Cost (\$)	Future Expense Cost (\$)	Future Total Costs (\$)	Total Net Change
Other Stormwater Program Obligations Cumulative Subtotal	1.69	\$147,348	\$42,500	\$189,848	4.49	\$450,195	\$155,750	\$605,945	\$416,098
Element #11: Stormwater Capital Improvement Program	0.14	\$12,206	\$710,000	\$722,206	0.75	\$75,200	\$825,000	\$900,200	\$177,993
Stormwater Capital Improvement Program and Other Stormwater Program Obligations Cumulative Subtotal	1.83	\$159,554	\$752,500	\$912,054	5.24	\$525,395	\$980,750	\$1,506,145	\$594,091
Element #12: Administrative and Additional Activities	0.26	\$22,669	\$313,557	\$336,226	0.26	\$26,069	\$360,591	\$386,660	\$50,434
Total	2.09	\$182,223	\$1,066,057	\$1,248,280	5.50	\$551,464	\$1,341,341	\$1,892,805	\$644,525
GRAND TOTAL		\$1,248,280				\$1,892,805			\$644,525
TOTAL GAP					(3.41)	(\$369,241)	(\$275,284)	(\$644,525)	

Notes:
 (1) Required SDP Elements of City's NPDES Permit
 (2) Full Time Equivalent = FTE
 (3) May be supported by Future Developer Fees



7.5 SWMP ENHANCEMENTS BASED ON CITY STAFF POLICY DECISIONS

The Regulatory Compliance (and CIP) Gap Analysis focused on comparing the activities of the City's existing SWMP to the requirements of a future Permit, as modeled after the NPDES Phase II 2013-2018 Permit for Western Washington. An expanded summary of the results of the "Regulatory Gap (and CIP) Analysis" for each of the twelve elements within the City's SWMP is presented below, including the enhancements that are needed for the City to comply with a future Permit. (Note: These SWMP enhancements presented below include only those SWMP increases that have been approved by City staff, and previously presented in Sections 7.3 and 7.4.3.)

7.5.1 Element #1: Public Education and Outreach

- Cost: Increase existing activities by \$3,000 for expenses.
- Activity: Initiate a new public education program, with an emphasis on water quality.
- City's Existing SWMP: The City currently has no established public education and outreach program.
- Additional Permit Requirements: The issuance of a Permit will require the City to implement Public Education and Outreach activities that include:
 - Focusing Public Education and Outreach efforts on prioritized target audiences, including school-aged kids and mobile business.
 - IDDE, Low Impact Development (LID) Best Management Practices (BMPs), vehicle equipment, home/building maintenance, stormwater facility maintenance, etc., as part of the education outreach efforts.
 - Focusing on an education program for engineers, contractors, developers, and land use planners which includes technical standards for stormwater site and erosion control plans, LID principles, LID BMPs, and stormwater treatment and flow control BMPs/facilities.
 - Creating stewardship opportunities and/or building on existing organizations to encourage residents to participate positively in stormwater quality activities.
 - Measuring results of educational activities including understanding the adoption of the targeted behaviors for at least one target audience in one subject area.
 - Tracking and maintaining records of public education and outreach activities.

The City intends to develop a strong emphasis on stormwater quality, as the backbone of its new Public Education and Outreach program.

ELEMENT #1	ADDITIONAL RESOURCES			
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0	0.08	0	0
Staff Costs (\$)	\$ 0	\$ 8,021	\$ 0	\$ 0
Expense Costs (\$)	\$ 0	\$ 3,000	\$ 3,000	\$ 3,000
Total Costs (\$)	\$ 0	\$ 11,021	\$ 3,000	\$ 3,000

7.5.2 Element #2: Public Involvement and Participation

- Cost: Increase existing activities by \$2,500 for expenses.
- Activity: Will need to create public participation opportunities, including SWMP and Annual Report to Ecology (when under a Permit).
- City's Existing SWMP: The City currently conducts some public involvement and participation activities, including:
 - Holding public meetings around the ownership and maintenance of stormwater retention/detention ponds.
 - Maintaining a website, the main venue for sharing information on the City's SWMP.
 - Sending out informational flyers and mailings on specific issues, as needed.
- Additional Permit Requirements: Issuance of a Permit will also require the City to implement additional Public Involvement and Participation activities including:
 - Developing a Stormwater Comprehensive Plan (SCP already being developed by the City) and Annual Reporting documents per the Permit requirements, annually due to Ecology every March.
 - Making the SCP and Annual Report available to the public for review and comment, no later than May 31 each year (when under a Permit).
 - Creating ongoing opportunities for the public to participate in decision-making processes involving the development, implementation, and update of the SCP, including advisory councils, watershed committees, and stewardship programs.

ELEMENT #2		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.02	0.03	0	0
Staff Costs (\$)	\$ 1,744	\$ 3,269	\$0	\$ 1,744
Expense Costs (\$)	\$0	\$ 2,500	\$ 2,500	\$ 2,500
Total Costs (\$)	\$ 1,744	\$ 5,769	\$ 2,500	\$ 4,244

7.5.3 Element #3: Illicit Discharge Detection and Elimination (IDDE)

- Cost: Increase existing activities by \$11,500 for expenses.
- Activity: Will need to develop and implement an IDDE program; start outfall screening and develop appropriate codes, fines, and enforcement procedures, as well as staff training.
- City's Existing SWMP: The City has started developing portions of a comprehensive IDDE program including:
 - Mapping a base stormwater system network, including location of facilities that contain some material and pipe diameter information.
 - Responding to illicit discharges and spills, as reported to the City or observed by staff.
 - Reporting spills generated by the City, primarily dealing with the City's Wastewater Department. Spill response is currently not a major issue for the City as a result of thorough code enforcement.
- Additional Permit Requirements: Issuance of a Permit will also require the City to implement the following additional IDDE activities:
 - Updating stormwater system mapping to ensure the City's stormwater system mapping is in compliance with the requirements of the Permit.
 - Developing and adopting an IDDE Ordinance per the requirements of the Permit.
 - Developing and implementing an IDDE Program per the requirements of the Permit.
 - Developing procedures for IDDE field assessments per the requirements of the Permit.
 - Conducting field screenings of three high priority receiving waters within the City and completing the field screenings of at least 40% of the City's conveyance system and outfalls on an annual basis.

- Conducting field assessments of at least one high priority receiving water; developing and implementing field screening methodology appropriate to the characteristics of the MS4 and water quality concerns.
- Initiating an investigation within 21 days of any report or discovery of a suspected illicit connection; immediately responding to all illicit discharges, especially spills that are determined to constitute a threat to human health and welfare or the environment. Investigate within seven days. *(All known illicit connections to MS4 must be eliminated.)*
- Conducting internal and public education on IDDE; establishing and publicizing an IDDE hotline; and performing and reporting spill IDDE responses to Ecology.
- Tracking number and type of illicit discharges, and feedback from IDDE public education efforts.
- Training staff responsible for the IDDE program; documenting and maintaining records of IDDE training.

ELEMENT #3		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.02	0.39	0	0.02
Staff Costs (\$)	\$ 1,744	\$ 39,365	\$ 0	\$ 1,744
Expense Costs (\$)	\$0	\$ 11,500	\$ 11,500	\$ 11,500
Total Costs (\$)	\$ 1,744	\$ 50,865	\$ 11,500	\$ 13,244

7.5.4 *Element #4: Controlling Runoff from New Development, Redevelopment, and Construction Sites*

- Cost: Increase existing activities by \$5,750.
- Activity: Will need to adopt 2012 Manual and increase inspection and enforcement, including WQ monitoring of sites, and required increase in annual maintenance frequency.
- City's Existing SWMP: The City has started developing portions of a comprehensive program to Control Runoff from New Development, Redevelopment, and Construction Sites, including the following activities:

- Adopting the 2005 Ecology Manual.
- Permitting is done through the City’s Community Development Department; plan review is done both in-house and through the City’s contract on-call City Engineer.
- Developing a program regarding private facility maintenance and ownership. Currently, the City weeds and conducts debris removal at all private detention and retention ponds, even if on private property.
- Contracting stormwater facility inspections through the City’s on-call City Engineer. 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 reviews and also receives complaints/concerns and makes field observations. Public Works staff typically work closely with the inspectors.
- Retaining copies of inspection reports in the Community Development and Public Works Departments, and with code enforcement.
- Participating in watershed-scale planning with the Stillaguamish Watershed Council.
- Assuring that one City staff member has a CECSL certification.
- Additional Permit Requirements: Upon issuance of a Permit, the City is also required to implement additional activities for a program to control runoff from new development, redevelopment, and construction sites, including:
 - Adopting the 2012 Ecology Manual, including provisions to require Low Impact Development (LID) techniques.
 - Ensuring permitting and plan review programs are consistent with the requirements of the 2012 Ecology Manual.
 - Codifying the City’s private facility inspection and maintenance program in the Stanwood Municipal Code.
 - Adopting maintenance standards consistent with the 2012 Ecology Manual.
 - Enforcing an inspection program for new treatment and flow control facilities annually, and all new stormwater treatment and flow control BMPs/facilities and catch basins of permanent residential developments every six months until 90% of the lots are constructed.
 - Inspecting water quality and flow control facilities every six months during building construction.
 - Making copies of the “Notice of Intent for Construction Activity” and/or “Notice of Intent for Industrial Activity”

ELEMENT #4		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.07	0.50	0	0.07
Staff Costs (\$)	\$ 6,103	\$ 51,049	\$ 0	\$ 6,103
Expense Costs (\$)	\$0	\$ 5,750	\$ 5,750	\$ 5,750
Total Costs (\$)	\$ 6,103	\$ 56,799	\$ 5,750	\$ 11,853

7.5.5 Element #5: Municipal Operation and Maintenance

- Cost: Increase existing activities by \$221,927 (fully funded: \$168,927 for the staffing of 1.48 FTE, and \$52,000 for additional expenses).
- Activity: Will need to increase annual maintenance including inspections, spot checks, training, development of SWPPP, and recordkeeping.
- City's Existing SWMP: The City has started developing portions of a comprehensive Operation and Maintenance Program including the following activities:
 - Adopting the 2005 Ecology Manual, but has no existing O&M Plan.
 - Inspecting structures, such as tide gates, at least twice annually; some other areas are inspected during heavy rains.
 - Cleaning and inspecting all catch basins and stormwater conveyance pipes at least once every two years by an outside contractor.
 - Entering into an Interlocal Agreement (ILA) with Snohomish County for maintenance work that has primarily been for pavement and roadway markings. The City is considering an ILA for pond maintenance and ditch cleaning.
 - Training Public Works staff on operation of the City's sweeper and vector equipment. There has been no training of O&M staff on detention/retention pond maintenance and BMPs.
 - Using an iWorQ's work order system in the Public Works Department.
- Additional Permit Requirements: Issuance of a Permit will also require the City to implement additional Operation and Maintenance Program activities, including:
 - Adopting maintenance standards consistent with the 2012 Ecology Manual and develop/implement Stormwater O&M Standards.
 - Conducting annual inspections of City-owned stormwater treatment and flow control facilities, and performing needed maintenance actions.
 - Spot-checking stormwater treatment and flow control facilities after major stormwater events (>10-year recurrence interval); conducting repairs as needed.



- Inspecting all catch basins and inlets at least once every two years, and conducting needed maintenance.
- Implementing operation and maintenance practices, policies, and procedures to reduce stormwater impacts from all lands.
- Implementing training activities for all O&M staff and other applicable City staff whose primary job functions include O&M and construction.
- Developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) document for the Public Works/Maintenance Yard.
- Continuing to keep O&M records of all activities using iWorQ.

ELEMENT #5		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	1.57	1.48	1.48	3.05
Staff Costs (\$)	\$ 136,885	\$ 168,927	\$ 168,927	\$ 305,812
Expense Costs (\$)	\$ 42,500	\$ 53,000	\$ 53,000	\$ 95,500
Total Costs (\$)	\$ 179,385	\$ 221,927	\$ 221,927	\$ 401,312

7.5.6 Element #6: Program Implementation

- Cost: Increase existing activities by \$1,000 for expenses.
- Activity: Will need to develop a program to track, record, and report annual SWM Program activities and costs to Ecology.
- City's Existing SWMP: The City has not yet started developing a compliance strategy for SWMP Implementation. The City will need to implement the following SWMP implementation activities upon issuance of a Permit, including:
 - Developing and implementing an SCP (as defined by the Permit) that projects future activities.
 - Preparing an Annual Report to Ecology, due in March of each year.
 - Tracking the cost or estimated cost of development and implementation of the SCP; providing information to Ecology upon request.
- Additional Permit Requirements: Additional expenses will be needed to implement the new activities for this element. As listed above, the City will need to develop a program to track, record, and report annual SWM Program activities and costs to Ecology; some additional expense money (\$1,000) has been allocated for this purpose.

ELEMENT #6		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0	0.07	0	0
Staff Costs (\$)	\$ 0	\$ 7,019	\$ 0	\$ 0
Expense Costs (\$)	\$ 0	\$ 1,000	\$ 1,000	\$ 1,000
Total Costs (\$)	\$ 0	\$ 8,019	\$ 1,000	\$ 1,000

7.5.7 Element #7: TMDL for Stillaguamish River

- Cost: Increase existing activities by \$15,000 for expenses.
- Activity: Will need new program to support TMDLs.
- City's Existing SWMP: The City is currently not required to conduct any activities related to the TMDL for the Stillaguamish River. However, compliance with these TMDL water quality actions will likely become a Permit requirement in the future. For additional information on the Stillaguamish River TMDL, see Chapter 3: Regulatory Requirements and Guidance Documents.
- Additional Permit Requirements: It is likely that additional expenses will be needed to implement these new activities for this element. Some additional expense money (\$15,000) has been annually allocated for this purpose.

ELEMENT #7		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Results of Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0	0.07	0	0
Staff Costs (\$)	\$ 0	\$ 7,019	\$ 0	\$ 0
Expense Costs (\$)	\$ 0	\$ 15,000	\$ 15,000	\$15,000
Total Costs (\$)	\$ 0	\$ 22,019	\$ 15,000	\$ 15,000



7.5.8 Element #8: Monitoring

- Cost: Increase existing activities by \$20,000 for expenses.
- Activity: Will likely need to pay Ecology an annual Permit regional monitoring fee similar to other municipalities (*this cost is an estimate from comparison with existing NPDES permittees).
- City's Existing SWMP: The City conducts the following stormwater monitoring activities:
 - In partnership with Snohomish County, the City has completed some stormwater monitoring for bacteria in Irvine Slough; additional annual monitoring is likely.
- Additional Permit Requirements: Issuance of a Permit will also require the City to implement additional monitoring program activities including:
 - If Stanwood's population exceeds 10,000 at the time of Permit issuance, the City may be required to opt in to pay Ecology to support their annual regional monitoring program, or develop and conduct status and trends monitoring, effectiveness monitoring, source identification, and diagnostic monitoring.

ELEMENT #8		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.00	0.07	0	0
Staff Costs (\$)	\$ 0	\$ 7,019	\$ 0	\$ 0
Expense Costs (\$)	\$ 0	\$ 20,000	\$ 20,000	\$20,000
Total Costs (\$)	\$ 0	\$ 27,019	\$ 20,000	\$ 20,000

7.5.9 Element #9: Reporting

- Cost: Increase existing activities by \$0.
- Activity: Will need a new program to develop an Annual Report and SCP to be submitted to Ecology; also will need to make records available to the public and write memo regarding local barriers to using LID.
- City's Existing SWMP: The City has started developing portions of their reporting program including the following activities:
 - Public Works uses iWorQ's work order system to track and document all SWMP-related activities.

- Additional Permit Requirements: Issuance of a Permit will also require the City to implement annual reporting program activities, including:
 - Developing and submitting an Annual Report to Ecology in March of each year.
 - Tracking all activities within the SWMP.
 - Continuing to maintain records of the SCP and all Permit-related activities with iWorQ.
 - Making records of SCP and Permit activities available to the public.
 - Writing and submitting a Low Impact Development (LID) Barriers memo to Ecology.

ELEMENT #9		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.01	0.04	0	0
Staff Costs (\$)	\$ 872	\$ 4,140	\$ 0	\$ 872
Expense Costs (\$)	\$0	\$0	\$ 0	\$ 0
Total Costs (\$)	\$ 872	\$ 4,140	\$ 0	\$ 872

7.5.10 Element #10: Underground Injection Control (UIC) Rule

- Cost: Increase existing activities by \$1,500 for expenses.
- Activity: Will need new activities to record, assess, and report UIC status to Ecology (as new UIC facilities are added to the City's drainage system).

(Note: Ecology's UIC rule does not currently apply to the City of Stanwood, since the City currently has so few UIC facilities. However, it will become applicable as new UIC facilities are added to the City's growing drainage system. In anticipation of this future need, a small amount of funding has been proactively added to the City's new, updated SWMP for UICs. Outside support services consisting of \$1,500, have been assigned for future UIC compliance, as shown in Table 7-1.)

- City's Existing SWMP: There is currently one public-owned UIC well within the City of Stanwood. (Note: Element #10, Compliance with the State UIC Rule, does not apply to the current SWMP, but will likely be needed within the City's SWMP in future years, especially when under a Permit.)

- Additional Permit Requirements: Resources have been allocated for the City to conduct the following activities in order to be in compliance with Ecology’s UIC Rule in the future, including:
 - Registering future publically-owned UIC wells built within the City limits.
 - Developing and conducting a UIC assessment protocol.
 - Ensuring new UIC wells meet all state requirements.
 - Providing annual UIC reports to Ecology.
 - Ensuring all UIC well decommissioning meets the requirements of the state.

ELEMENT #10		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City’s Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0	0.07	0	0
Staff Costs (\$)	\$ 0	\$ 7,019	\$ 0	\$ 0
Expense Costs (\$)	\$ 0	\$ 1,500	\$ 1,500	\$1,500
Total Costs (\$)	\$ 0	\$ 8,519	\$ 1,500	\$ 1,500

7.5.11 Element #11: CIP Program

- Cost: Increase existing activities by \$177,993 for expenses (fully funded, however, no internal staffing; budget includes an additional \$115,000 for CIP projects and \$62,993 for CIP support staff (0.61 FTE), which will be contracted out with the other CIP work).
- Activity: Will need to increase small works program to include larger CIP projects and funding. (Note: This is not a Permit requirement; it is the City’s annual Capital Improvement Program.)
- City’s Existing SWMP: The City currently includes annual budget dollars for stormwater CIP Projects. The City does not currently have a long-term stormwater infrastructure replacement program; however, the City does have a small works project program through which they build small drainage improvement projects each year. The future program includes the design and construction of long-term stormwater infrastructure replacement projects, in addition to CIP Projects and small works projects.
- Additional Permit Requirements: Having an effective, annually-funded CIP is not a Permit requirement and will not likely become one in the future.

ELEMENT #11		ADDITIONAL RESOURCES		
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.14	0.61	0	0.14
Staff Costs (\$)	\$ 12,206	\$ 62,994	\$ 0*	\$ 12,206
Expense Costs (\$)	\$ 710,000	\$ 115,000	\$ 177,994*	\$ 887,994
Total Costs (\$)	\$ 722,206	\$ 177,994	\$ 177,994*	\$ 900,200

**Note: New CIP support staff (of 0.61 FTE) have been outsourced and included in the CIP expenses of \$177,994 (\$115,000 for CIP expenses + \$62,994 for 0.61 FTE in staffing).*

7.5.12 Element #12: Administrative and Additional Activities

- Cost: Increase existing activities \$47,034 for expenses.
- Activity: Will need to increase administration costs; supplies will increase as will taxes and internal overhead costs
- City's Existing SWMP: Administrative and additional stormwater program activities and needs currently include:
 - Uniforms and Supplies for the stormwater program.
 - Program Overhead costs, including meetings, training, travel, inter-fund payments for service and transfers-out.
 - Insurance, B&O taxes, and State Operating Permits to support the Stormwater Program.
 - Miscellaneous Expenditures including communication costs.
- Additional Permit Requirements: Additional expenses will be needed to implement this SWMP element in the future; \$47,034 has been allocated annually for this activity, in addition to what the City is currently spending on SWMP administration.

ELEMENT #12	ADDITIONAL RESOURCES			
	Existing SWMP Resource Staffing and Funding (A)	Recommended Increase Based on Regulatory (and CIP) Gap Analysis (B)	City's Preferred Level of Resource Allocation (C)	Total Resources Needed to Support Future SWMP (A+C)
Staff (FTE)	0.26	0	0	0.26
Staff Costs (\$)	\$ 22,669	\$ 3,400	\$ 0	\$ 22,669
Expense Costs (\$)	\$ 313,557	\$ 47,034	\$ 47,034	\$ 360,591
Total Costs (\$)	\$ 336,226	\$ 50,343	\$ 47,034	\$ 383,260

Summary:

Total annual SWMP (including CIP) based on City policy decisions for the revised SWMP is \$137,320 less per year than is recommended in the Regulatory Gap Analysis presented in Appendix B and summarized in Table 7-1.

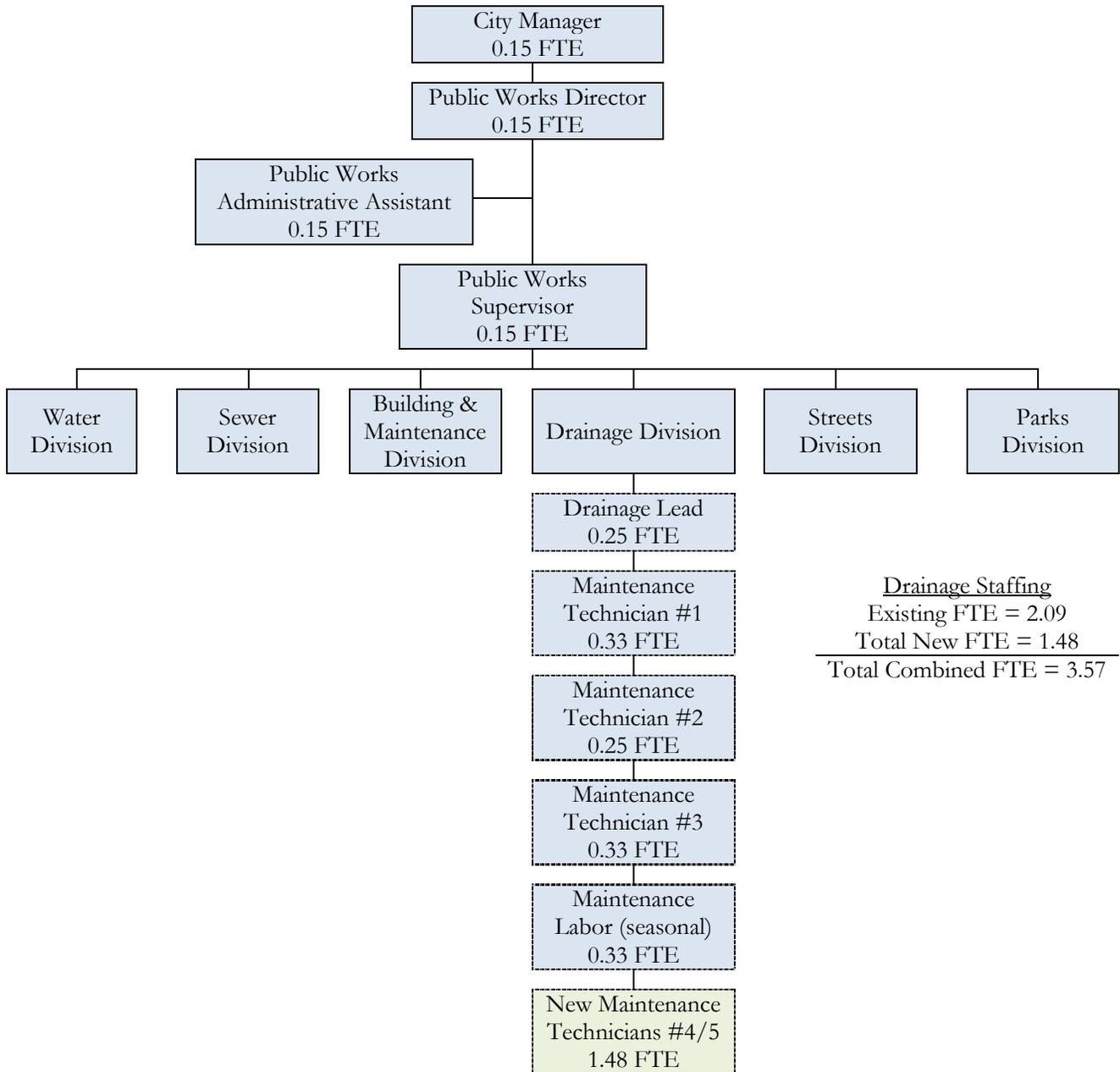
In summary, the net change or financial “gap” which needs to be met by the City on an annual basis in order to realize the recommended updated SWMP, as requested by City staff, is \$507,205 per year. This update to the City’s SWMP will increase total annual operating costs from \$1,248,280 to \$1,755,485. The updated annual SWMP includes the hiring of additional maintenance staff (1.48 FTE), an increase in CIP of \$177,994, an increase in Operations and Maintenance of \$221,927, an increase in Administration of \$47,034, and an increase in other SWMP-related expenses of \$60,250.

Compliance with a future Permit will cost the City’s SWMP \$329,211 per year of the projected \$507,205 annual increase. This amount is calculated by summing the costs of SWMP Elements #1-12, subtracting out the annual amount needed for CIP (\$177,944), and leaving in a sum of up to an additional amount of \$47,034 to address the annual regional monitoring costs associated with a future Permit. This also leaves a small sum within the \$47,034 to support future increases in annual Administrative costs.

7.6 ANNUAL STAFFING FOR NEW SWM PROGRAM

Annual permanent staffing will increase from 2.09 to 3.57 FTE, as discussed in sections 7.4 and 7.5. This is an increase of 1.48 FTE for SWMP maintenance, which will be increased incrementally over a five-year period on an as needed basis. Table 7-1, previously presented, summarizes future SWMP staffing needs and costs. The following organizational chart, presented in Figure 7-2, shows where the new staff will be placed within the maintenance group of the City’s Drainage Division.

Figure 7-2: Public Works Organizational Chart showing Existing and Future SWMP Staff Positions



7.7 STORMWATER PROGRAM SUMMARY AND IMPLEMENTATION RECOMMENDATIONS

SWMP implementation conclusions and recommendations include the following:

- *Continue to Make Drainage a Priority:* It is clear from this SWMP and Regulatory Gap Analysis that, although the City has a history of flooding and drainage problems, it has taken a proactive approach in addressing both regulatory compliance and capital facility needs.
- *Proactive Planning is Critical:* This analysis will allow the City to further its SWMP vision and begin to raise the needed revenue to initiate the new CIP projects and prepare in advance for a future Permit.
- *New Revenues Needed/Optimization of Existing Revenue Sources:* Existing revenue sources need to be reviewed and new sources, especially for capital projects, will need to be identified. Review and development of all potential funding options is key to optimizing the creation of new revenues for stormwater management.
- *Water Quality/TMDL/Shellfish/Habitat:* Water quality will continue to be an important local and regional issue, requiring increased coordination and likely additional interlocal agreements and funding; pursuing grants would be a good financial strategy for this part of the City's SWMP.
- *Interagency Coordination Will Increase In Importance:* Partnering with other regional agencies will help share responsibilities and increase opportunities to attract new local and regional funding. The pending ISSSP will be a major step forward in identifying solutions and building the needed inter-jurisdictional support to dewater the low-lying western parts of the City.
- *Phasing In of Staffing to Ease Costs:* Staffing will likely need to be phased in over the next five years (or longer) as the SWMP grows; maintenance and capital programs will need staffing to be implemented on an annual basis.
- *Continued Proactive Approach is Critical:* It is recommended that the City continue to be proactive in regard to the Permit, water quality, TMDLs, and other local and regional water resources, flooding, and watershed-related issues. If the Permit were to be implemented today, the City would be significantly behind in terms of compliance, staffing, training, and revenues. The City needs to continue to be proactive in its planning in its preparation for a future Permit in order to gradually achieve Permit compliance, as local funding and staffing allow.

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