

City of Everett

City of Everett Comments for 2024 Permit consideration addressing TMDL, Appendix 2 for the Snohomish River Tributaries is attached.



CITY OF EVERETT
Public Works

MEMORANDUM

TO: Abbey Stockwell and Department of Ecology Permit Writers

FROM: City of Everett

DATE: February 2022

RE: Everett White Paper Requesting Appendix 2 Required Actions related to Monitoring be Removed-2024 Western Washington Phase II Municipal Stormwater Permit Reissuance Comments

The City of Everett is requesting that the “Actions Required” for WRIA 7-Snohomish River Tributaries within the Appendix 2, Total Maximum Daily Load (TMDL) Requirements of the Western Washington Phase II Municipal Stormwater Permit be revised for the reasons described below.

Item 1: Recommend Ecology re-format Permittee specific “Action Required” similar to format in the TMDL WRIA 8-Issaquah Creek Basin Water Cleanup Plan, page 18. The reasoning for this is that Appendix 2 “Action Required” should be for like causes/effects situations (i.e., pollutants and their sources) as described in the TMDL’s water quality cleanup plan.

Once recommended formatting by Permittee is complete, we request that “Action Required” for the City of Everett match the water quality cleanup plan objectives. The water quality Cleanup Plan did not call out Everett as a fecal coliform source, this section of the Permit should be revised.

The Lower Snohomish River Tributaries Fecal Coliform Total Maximum Daily Load (TMDL) Detailed Implementation Plan, (Svrjcek 2003) suggested the upper section of Wood Creek (Wood Creek/Larimer Road station) may be in good condition and that it should be a lower priority for action and is unlikely to be a major source of bacterial pollution.

Item 2: Request Ecology to remove the surface water monitoring and targeted source identification & elimination (TSIE) from City of Everett’s “Actions Required”. The “Actions Required” in Appendix 2 need to have an established tie to the permittee’s MS4 ownership and

operational responsibilities. The surface water monitoring requirements and TSIE are receiving water monitoring requirements and are not MS4 discharge specific, which is Everett's point of compliance. In addition, the City of Everett MS4 does not directly discharge into the listed receiving water, which is the Marshland Watershed Segment.

Rationale

Surface Water Monitoring in Appendix 2 of the Permit is an "Action Required" for characterization and long-term trends evaluation of fecal coliform bacteria in accordance with a Quality Assurance Project Plan (QAPP). The City is required to collect a minimum of 12 samples in at least one location annually and provide a data summary and narrative evaluation in the City's Annual Municipal Stormwater Compliance Report to Ecology. The City is also required to identify a minimum of one new high priority area (stream or tributary), stormwater sampling for bacteria sources is required as part of this focused TSIE effort and includes grab samples of stormwater discharging to or from the MS4 or receiving waters during a storm.

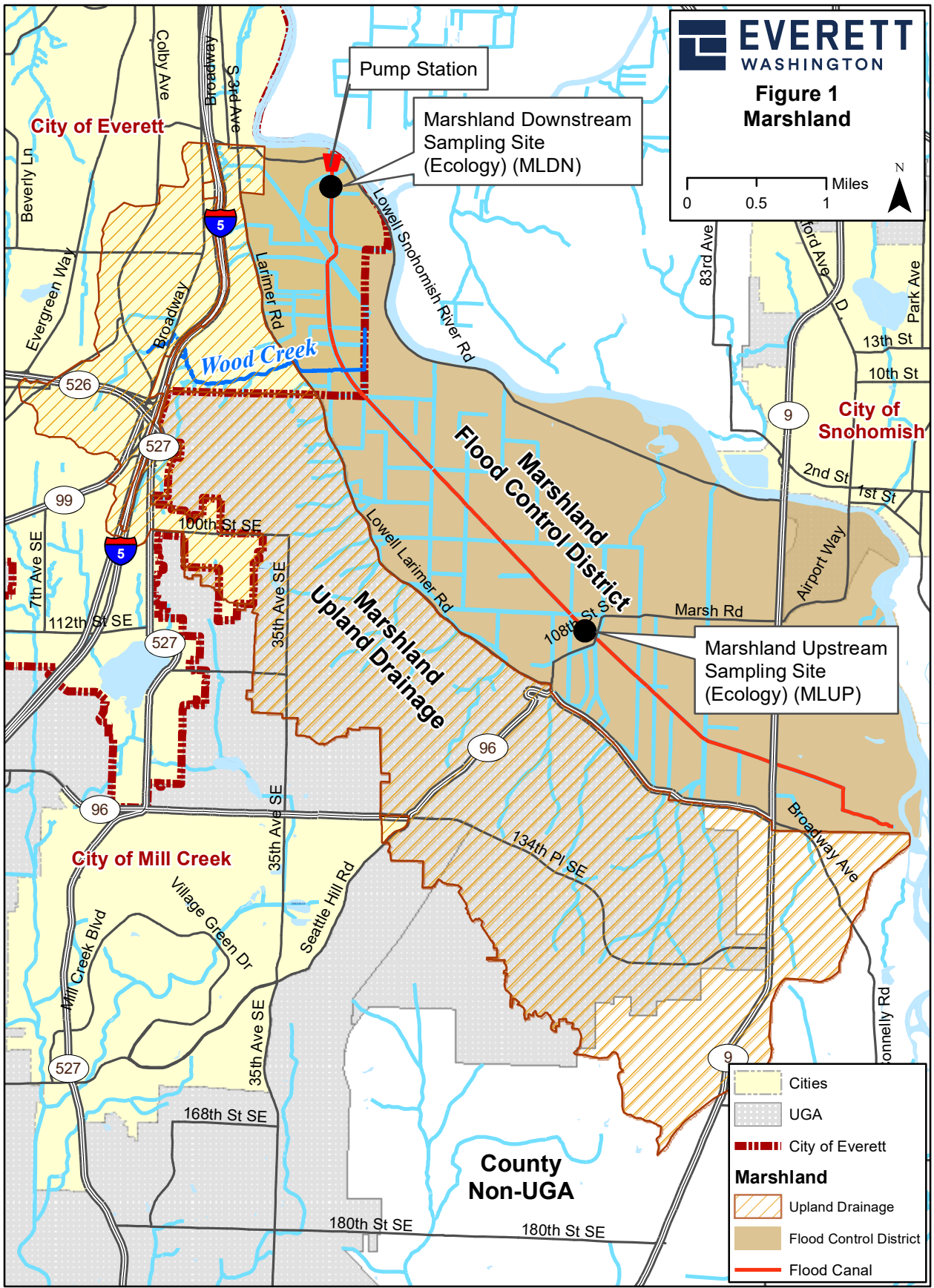
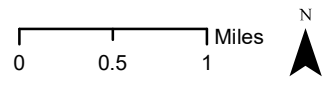
Within the City of Everett, flow from the City MS4 to the Marshland Watershed is primarily via Wood Creek (Figure 1). Wood Creek is the only tributary within the City that has perennial flow draining to the Marshland Watershed segment, as a result Wood Creek is the waterbody sampled to meet this surface water monitoring "Action Required". The City has sampled Wood Creek since 2007 as part of the required Permit Special Condition S7 TMDL compliance monitoring. The City's TMDL sampling per Appendix 2 has continued to demonstrate that Wood Creek is not a source of fecal coliform bacteria to the Marshland segment.

The City of Everett does not have an MS4 directly connected to the Marshland Watershed Segment, XW79FQ (Figure 2). In addition, the Marshland Flood Control District manages the system of canals and ditches. The "Actions Required" in Appendix 2 need to have an established tie to the permittee's MS4 ownership and operational responsibilities. In this case, Everett does not have MS4 discharging into the Marshland Watershed Segment and the Marshland watershed segment is controlled and operated by the Marshland Flood Control District. Wood Creek, which the City does have MS4 contribute to, has shown since 2007 not to be a source of fecal coliform bacteria to the Marshland Watershed. Any monitoring not associated with the MS4 is requested to be removed from Everett's Actions Required.





**Figure 1
Marshland**



| | |
|------------------|------------------------|
| | Cities |
| | UGA |
| | City of Everett |
| Marshland | |
| | Upland Drainage |
| | Flood Control District |
| | Flood Canal |

