

<b>I. Permittee Information</b>	
<b>Permittee Name</b> City of Mount Vernon	<b>Permittee Coverage Number</b> WAR04-5553
<b>Contact Name</b> Blaine Chesterfield	<b>Phone Number</b> 360-336-6204
<b>Mailing Address</b> 910 Cleveland Ave PO Box 809	
<b>City</b> Mount Vernon	<b>State</b> <b>Zip + 4</b> WA              98273-4212
<b>Email Address</b>	

<b>II. Regulated Small MS4 Location</b>		
<b>Jurisdiction</b> Mount Vernon	<b>Entity Type: Check the box that applies</b>	
	<b>County</b>	<b>City/Town</b>
		X
<b>Major Receiving Water(s)</b> Skagit River		

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

## IV. Certification

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

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

Name	<u>Blaine Chesterfield (see Att. #1)</u>	Title	<u>Public Works, Engineering Manager</u>	Date	<u>                    </u>
Name	<u>                                    </u>	Title	<u>                                    </u>	Date	<u>                    </u>
Name	<u>                                    </u>	Title	<u>                                    </u>	Date	<u>                    </u>
Name	<u>                                    </u>	Title	<u>                                    </u>	Date	<u>                    </u>
Name	<u>                                    </u>	Title	<u>                                    </u>	Date	<u>                    </u>

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

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

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

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

NOTE: Highlighted items indicate requirements that are due in 2009.

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

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. <b>Attached</b> annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y		SWMP is attached	Attachment #3 MountVernon_SWMP11.doc
2. <b>Attached</b> a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	NA		City has no annexations, incorporations, or boundary changes during the reporting period.	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	Y			
4. Began tracking costs or estimated costs of the development and implementation of the SWMP? (Required no later than January 1, 2009, S5.A.3.a)	Y		The City maintains a spreadsheet that tracks the costs of each NPDES permit related requirement and the associated costs.	

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? ( <i>Required to begin</i> by February 15, 2009, S5.C.1)	Y		Education and outreach program for the City is implemented by the Skagit Conservation District	
6. Distributed appropriate information to target audiences identified in the area served by the MS4? ( <i>Required to begin</i> by February 15, 2009, S5.C.1.a)	Y			
7. Tracked the types of public education and outreach activities implemented. ( <i>Required to begin</i> by February 15, 2009, S5.C.1.c)	Y		Skagit Conservation District sends the City an Annual Report each year summarizing all activities.	
7b. Number of activities implemented:		15	See attachment for SCD activities. In addition, the City also put up 12 pet waste signs and mtt mitts along the trails and in parks.	Attachment #4 Skagit Conservation District Annual Report
8. Measured the understanding and adoption of the targeted behaviors among at least one targeted audience in at least one subject area. ( <i>Required to begin</i> by February 15, 2009, S5.C.1.b)	Y		The Skagit Conservation District tracks the understanding of participants in all classes it provides by performing surveys. The City is also a member of the regional efforts conducted under the STORM group.	
9. Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? ( <i>Required</i> by February 15, 2008, S5.C.2.a)	Y		SWMP was posted on City's website and was presented to City Council in a public meeting with comment opportunity. Notices were posted in newspaper, internet, and announcements were made during televised council meetings.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
10.	Developed and implemented a process for public involvement and consideration of public comments on the SWMP? ( <i>Required</i> by February 15, 2008, S5.C.2.a)	Y		Process includes posting SWMP on internet for public comment 2 weeks prior to presentation at Public Works committee meeting. Public will be informed via newspaper, internet, and public television. Committee meeting is open to public.	
11.	Made the most current version of the SWMP available to the public. (S5.C.2.b)	Y			
12.	Posted the SWMP and latest annual report on your website. (S5.C.2.b)	Y			
12b.	NOTE website address in <i>Attachment</i> field:				<a href="http://www.ci.mount-vernon.wa.us/page.asp_Q_navigationid_E_739">http://www.ci.mount-vernon.wa.us/page.asp_Q_navigationid_E_739</a>
13.	Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? ( <i>Required</i> August 19, 2011, S5.C.3)	Y		City has draft map with outfall locations, has trained staff in IDDE awareness and detection, updated codes, and maintains spill hotline.	
14.	Developed and currently maintain a map of your MS4? ( <i>Required</i> by February 16, 2011, S5.C.3.a)	NA		Requirement not yet due.	
14b.	Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? (S5.C.3.a.ii)	Y		Map has been created and is in draft form. Map is being updated as data is collected throughout the city.	See Attachment #5 Draft City Map
15.	Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? ( <i>Required</i> by February 16, 2011, S5.C.3.a.i)	NA		Requirement not yet due.	

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
16.	Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? <i>(Required by February 16, 2011, S5.C.3.a.i)</i>	NA	Requirement not yet due.	
17.	Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? <i>(Required by February 16, 2011, S5.C.3.a.iii)</i>	NA	Requirement not yet due.	
18.	Map has been made available upon request? <i>(S5.C.3.a.iv)</i>	NA	Requirement not yet due.	
19.	Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4? <i>(Required by August 15, 2009, S5.C.3.b)</i>	Y	Municipal Code Section 13.33.080	
20.	Developed and implemented an ongoing program to detect and address non-stormwater illicit discharges, including spills, and illicit connections into the Permittee's MS4? <i>(Required by August 19, 2011, S5.C.3.c)</i>	NA	Requirement not yet due.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
21.	Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in illicit discharges, including spills? ( <i>Required</i> by August 19, 2011, S5.C.3.c.i)	NA		Requirement not yet due.	
22.	Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? ( <i>Required</i> by August 19, 2011, S5.C.3.c.ii)	NA		Requirement not yet due.	
23.	Prioritized receiving waters for visual inspection? ( <i>Required</i> by February 16, 2010, S5.C.3.c.ii)	Y		The City's IDDE Plan prioritizes three water bodies for visual inspection - Kulshan Creek, Trumpeter Creek, and Maddox Creek	
24.	Conducted field assessments for three high priority water bodies? ( <i>Required</i> by February 16, 2011, S5.C.3.c.ii)	NA		Requirement not yet due.	
25.	Conducted field assessments on at least one high priority water body? ( <i>Required</i> annually <b>after</b> February 16, 2011, S5.C.3.c.ii)	NA		Requirement not yet due.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
26.	Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? ( <i>Required</i> by August 19, 2011, S5.C.3.c.iii)	NA		Requirement not yet due.	
27.	Developed and implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? ( <i>Required</i> by August 19, 2011, S5.C.3.c.iv)	NA		Requirement not yet due.	
28.	Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? ( <i>Required</i> by August 19, 2011, S5.C.3.c.v.)	NA		Requirement not yet due.	
29.	Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? ( <i>Required</i> by August 19, 2011, S5.C.3.d)	NA		Requirement not yet due.	
30.	Distributed appropriate information to target audiences identified pursuant to S5.C.1? ( <i>Required</i> by August 19, 2011, S5.C.3.d.i)	NA		Requirement not yet due.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
31.	Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? ( <i>Required</i> by February 15, 2009, S5.C.3.d.ii)	Y			
31b.	Number of hotline calls received:		20		
31c.	Number of follow-up actions taken in response to calls:		20		
32	Maintained a hotline or other reporting number for public reporting of illicit discharges, including spills? ( <i>Required</i> by February 15, 2009, S5.C.3.d.ii)	Y			
32b.	NOTE hotline number in <i>Comments</i> field			360-336-6204	
33	Tracked the number of illicit discharges, including spills, identified? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	NA		Requirement not yet due.	
33b.	Number of illicit discharges identified:		0		
34	Tracked the number of inspections made for illicit connections? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	NA		Requirement not yet due.	
34b.	Number of inspections:		0		
35	Received feedback from IDDE public education efforts? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	NA		Requirement not yet due.	
36	<b>Attached</b> report on IDDE public education efforts? ( <i>Required</i> by August 19, 2011, S5.C.3.d, S5.C.3.e)	NA		Requirement not yet due.	
37	Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? ( <i>Required</i> by August 15, 2009, S5.C.3.f.i)	Y		All staff have had in-person training in 2008 or 2009. The remainder of staff that missed the training or is a new hire has taken the self-administered training.	
37b.	Number of trainings provided:		2		

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
37c.	Number of staff trained:		5		
38	Provided follow-up training as needed to address changes in procedures, techniques or requirements? ( <i>Required</i> by August 15, 2009, S5.C.3.f.i)	Y		City intranet hosts self administered training with videos for new employees and refresher training.	
38b.	Number of trainings provided:		50		
38c.	Number of staff trained:		50		
39	Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? ( <i>Required</i> by February 16, 2010, S5.C.3.f.ii.)	Y		Hosted three in person training sessions and the City intranet hosts self administered training with videos for new employees and refresher training.	
39b.	Number of trainings provided:		3		
39c.	Number of staff trained:		91		
40	Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? ( <i>Required</i> by February 16, 2010, S5.C.4)	Y		See Ordinance No. 3453	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
41 Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? ( <i>Required</i> by February 16, 2010, S5.C.4)	Y		See Ordinance No. 3453	
42 Applied stormwater runoff program to private and public development, including roads? ( <i>Required</i> by February 16, 2010, S5.C.4)	Y		See Ordinance No. 3453	
43 Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? ( <i>Required</i> by February 16, 2010, S5.C.4)	Y		See Ordinance No. 3453	
44 Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? ( <i>Required</i> by February 16, 2010, S5.C.4.a)	Y		See Ordinance No. 3453	
45 Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? (S5.A.4)	Y		Pre-Permit requirements for sites less than 1 acre remain in force.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
46 The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? ( <i>Required</i> by February 16, 2010, S5.C.4.a.i)	Y		See Ordinance No. 3453	
47 The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? ( <i>Required</i> by February 16, 2010, S5.C.4.a.i., and Section 6 of Appendix 1)	Y		See Ordinance No. 3453	
48 Were exceptions or variances to the minimum requirements in Appendix 1 granted? ( <i>Required</i> by February 16, 2010, S5.C.4.a.i., and Section 6 of Appendix 1)	N			
48b. If so, how many were granted?		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
49 The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? <i>(Required by February 16, 2010, S5.C.4.a.ii)</i>	Y			
49b. Cite documentation to meet this requirement in <i>Attachment</i> field:				Ordinance No. 3453
50 The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? <i>(Required by February 16, 2010, S5.C.4.a.iii)</i>	Y		See Ordinance No. 3453	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51 The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? ( <i>Required</i> by February 16, 2010, S5.C.4.a.iv)	Y		See Ordinance No. 3453	
52 If the ordinance or regulatory mechanism allows construction sites to apply the <b>Erosivity Waiver</b> in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is <i>required</i> by February 16, 2010, S5.C.4.a.v)	NA		Erosivity Waiver not allowed.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
53 Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? ( <i>Required</i> by February 16, 2010, S5.C.4.b)	Y			
54 Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? ( <i>Required</i> by February 16, 2010, S5.C.4.b)	Y			
55 Reviewed <b>Stormwater Site Plans</b> for new development and redevelopment projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.i)	Y			
55b. Number of site plans reviewed during the reporting period:		29		
56 Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 <b>Determining Construction Site Sediment Potential?</b> ( <i>Required</i> by February 16, 2010, S5.C.4.b.ii)	Y			
56b. Number of qualifying sites inspected prior to clearing and construction during the reporting period:		20		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57 Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iii)	Y			
57b. Number of sites inspected during the construction phase for the reporting period:		22		
58 Enforced as necessary based on the inspection at new development and redevelopment projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iii)	Y			
58b. Number of enforcement actions taken during the reporting period:		3	Written correction notice	
59 Inspected qualifying permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv and v)	Y			
59b. Number of qualifying sites known during the reporting period:		13		
59c. Number of qualifying sites inspected during the reporting period:		13		
60 Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv)	Y			

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
61	Enforced regulations as necessary based on the inspection? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv)	Y			
61b.	Number of enforcement actions taken during the reporting period:		1		
62	Developed and implemented an enforcement strategy to respond to issues of non-compliance with the regulations for qualifying projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.vi)	Y			
63	Did the Permittee choose to allow construction sites to apply the <b>Erosivity Waiver</b> in Appendix 1, Minimum Requirement #2? (S5.C.4.b.vii)	N			
63b.	If yes, how many waivers were allowed ?		0		
64	Developed and implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities and BMPs? ( <i>Required</i> by February 16, 2010, S5.C.4.c)	Y		See Ordinance No. 3453	
65	Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? ( <i>Required</i> by February 16, 2010, S5.C.4.c.i)	Y		See Ordinance No. 3453	
66	Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? ( <i>Required</i> by February 16, 2010, S5.C.4.c)	Y		Post construction inspections are conducted prior to surety device release for development and redevelopment.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
66b.	Number of sites inspected during the reporting period:		9		
66c.	Number of structural BMPs inspected during the reporting period:		12		
66d.	Number of enforcement actions taken during the reporting period:		0		
67	Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the <b>2005 Stormwater Management Manual for Western Washington</b> ? ( <i>Required</i> by February 16, 2010, S5.C.4.c.ii)	Y		City has adopted the 2005 Stormwater Management Manual for Western Washington	
68	Performed timely maintenance as per S5.C.4.c.ii? ( <i>Required</i> by February 16, 2010, S5.C.4.c.ii)	Y			
68b.	<b>Attached</b> documentation of any maintenance delays. ( <i>Required</i> by February 16, 2010, S5.C.4.c.ii)	NA			
69	Established program to annually inspect all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? ( <i>Required</i> by February 16, 2010, S5.C.4.c.iii)	Y			
70	If using reduced inspection frequency, <b>Attached</b> documentation as per S5.C.4.c.iii? ( <i>Required</i> by February 16, 2010, S5.C.4.c.iii)	NA		City does not use a reduced inspection frequency.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
71 Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? ( <i>Required</i> by February 16, 2010, S5.C.4.c.iv)	Y		City inspects all new stormwater treatment and flow control facilities to verify adequate long term operation and maintenance for those facilities constructed after February 2010, when the Permit requirements and the 2005 Ecology Manual were adopted into City code.	
71b. Number of facilities inspected during the reporting period:		3		
72 Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? ( <i>Required</i> by February 16, 2010, S5.C.4.d)	Y			
73 Provided copies of the <b>Notice of Intent for Construction Activity</b> and <b>Notice of Intent for Industrial Activity</b> to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y		NOIs are available at the front desk of the Community and Economic Development Department.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74 All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? ( <i>Required</i> by February 16, 2010, S5.C.4.f)	Y			
74b. Number of trainings provided:		1		
74c. Number of staff trained:		6		
75 Developed and implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? ( <i>Required</i> by February 16, 2010, S5.C.5)	Y			
76 Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 <i>Stormwater Management Manual for Western Washington</i> ? ( <i>Required</i> by February 16, 2010, S5.C.5.a)	Y		City has adopted the 2005 Stormwater Management Manual for Western Washington	
77 Performed timely maintenance as per S5.C.5.a.ii? ( <i>Required</i> by February 16, 2010, S5.C.5.a.ii)	Y			
77b. <b>Attached</b> documentation of any maintenance delays. ( <i>Required</i> by February 16, 2010, S5.C.5.a.ii)	NA		No maintenance delays.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78	Designed a program to annually inspect and maintained all stormwater treatment and flow control facilities (other than catch basins)? <i>(Required by February 16, 2010, S5.C.4.c.iii)</i>	Y			
78b.	Number of known facilities:		205	120 ponds and 85 oil separators / control structures. Only 11 of these facilities were permitted after February 2010 and require annual inspection	
78c.	Number of facilities inspected during the reporting period:		105	in addition to the 11 required facility inspections, the City also inspected and maintained an additional 94 facilities	
79	If using reduced inspection frequency, <b>Attached</b> documentation as per S5.C.5.a.ii? <i>(Required by February 16, 2010, S5.C.5.b)</i>	NA			
80	Conducted spot checks of stormwater facilities after major storms? <i>(Required by February 16, 2010, S5.C.5.c)</i>	Y			
80b.	Number of known facilities:		8		
80c.	Number of facilities inspected during the reporting period:		8		
81	Inspected municipally owned or operated catch basins at least once before the end of the Permit term? <i>(Required by February 16, 2010, S5.C.5.d)</i>	Y			
81b.	Number of known catch basins:		5412		
81c.	Number of inspections:		3614		
81d.	Number of catch basins cleaned:		3614		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
82 Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? (Required by February 16, 2010, S5.C.5.f)	Y			
83 Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? (Required by February 16, 2010, S5.C.5.g)	Y			
84 Implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (Required by February 16, 2010, S5.C.5.h.)	Y			
84b. Number of trainings provided:		3		
84c. Number of staff trained:		91		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
85 Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit? (Required by February 16, 2010, S5.C.5.i)	Y			
86 Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N		Requirement does not apply.	
87 Complied with the specific requirements identified in Appendix 2? (S7.A)	NA		Requirement does not apply.	
88 <b>Attached</b> status report of TMDL implementation? (S7.A)	NA		Requirement does not apply.	
89 Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A)	NA		Requirement does not apply.	
90 Took appropriate action to correct or minimize discharges into or from the MS4 which may constitute a threat to human health, welfare, or the environment? (G3)	Y		8 illicit discharges and 12 spills were reported in 2010. Attachment shows the contacts that were made and actions that were taken.	Attachment #6 2010 IDDE Reports to Ecology.doc
90b. <b>Attached</b> a summary of the status of implementation of any actions taken pursuant to S4.F and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d)	Y		See attachment.	Attachment #6 2010 IDDE Reports to Ecology.doc

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
91 Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20)	NA		Requirement does not apply.	
92 Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G3)	Y		4 of 20 calls received by the City regarding spills and illicit discharges were reported to the Department of Ecology.	Attachment #6 2010 IDDE Reports to Ecology.doc
93 <b>Attached</b> a summary of identified barriers to the use of low impact development (LID) and measures to address the barriers (Required to be submitted by March 31, 2011, S9.E.4.a)	Y		Barrier and report are all included within one document, see Attachment	Attachment #7 LID_Report_MountVernon_2011
94 <b>Attached</b> a report describing LID practices currently available and that can be reasonably implemented, potential or planned non-structural actions and LID techniques to prevent stormwater impacts, goals and metrics to identify, promote, measure LID; and schedules to require and implement non-structural and LID techniques on a broader scale (Required to be submitted by March 31, 2011, S9.E.4.b)	Y		Barrier and report are all included within one document, see Attachment	Attachment #7 LID_Report_MountVernon_2011

**VII. Information Collection, BMP Evaluation, and Monitoring**

Complete Part A for all annual reports.

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

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

**A. Information Collection**

<b>Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)</b>	<b>Who/how to contact for additional information?</b>
1. The Skagit Conservation District continues to monitor 5 sites in both the Kulshan and Trumpeter watersheds. The samples were collected by volunteer "stream teams." This program is part of the "Citizen Volunteer Water Quality Monitoring Program" that is meant to serve as an educational program for citizens to learn more about water quality and the streams with the City limits. Samples are collected twice per month and are not storm driven.	Skagit Conservation District Kristi Carpenter Blaine Chesterfield
2.	
3.	
4.	
5.	
6.	

## VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

### B. SWMP Evaluation (S8.B & S9)

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

Question	Y/N/NA	Comments (50 word limit)
1. Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	Y	City has selected BMPs and the Skagit Conservation District has implemented BMP activities such as car wash kits, storm drain stenciling, commercial posters, etc.
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	Y	City's process is to post City's SWMP on website and request public comment 2 weeks prior to Public Works Committee Meeting. Announcements are made about Public Works Committee meeting, which is open to public, where the SWMP is then presented to public and City Council.
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City has developed most of the BMPs for the Illicit Discharge Detection and Elimination program. Many of the BMPs have been selected, but not all have been implemented. They will be implemented per the schedule set in the Permit.
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	Y	The City adopted Ordinance 3453 in 2009 that adopts the 2005 Stormwater Management Manual for Western Washington and lists the requirements necessary to minimize pollutants from Construction sites
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	Y	The City adopted Ordinance 3453 in 2009 that adopts the 2005 Stormwater Management Manual for Western Washington and lists the requirements necessary to minimize pollutants from Construction sites

<p>Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?</p>	<p>Y</p>	<p>The City adopted Ordinance 3453 in 2009 that adopts the 2005 Stormwater Management Manual for Western Washington and lists the requirements necessary to minimize pollutants from Construction sites . The City has also developed a SWPP for the maintenance facility, IPM for vegetation management, and a Pollution Prevention Plan for Buildings and Facilities.</p>
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## VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part C for all annual reports.

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

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

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

	Old BMP	Old Objective	New BMP	New Objective	Justification for Change
1	No changes				
2					
3					
4					
5					
6					
7					

**VII. Information Collection, BMP Evaluation, and Monitoring**

**D. Preparation for future, long-term monitoring**

Complete section D for the fourth annual report only.

Question	Y/N/NA	Comments (50 word limit)	Name of Attachment? Page Number?
1. Identified outfalls or conveyances for long-term stormwater monitoring? (S8.C.2.a)	Y	The City has developed a monitoring plan that includes both long term and effectiveness monitoring.	
1b. <b>Attach</b> site maps and descriptions. (S8.C.2.a)	y		Attachment #8 FutureMonitoringPlan_MountVernon_2011.docx
2. Identified at least two questions for SWMP effectiveness monitoring and developed monitoring plans? (S8.C.2.b)	Y		
2b. <b>Attach</b> the proposed questions and monitoring plans for SWMP effectiveness monitoring. (S8.C.2.a.ii)	y		Attachment #8 FutureMonitoringPlan_MountVernon_2011.docx
3. Monitoring plan developed for each question? (S8.C.1.b.iii)	Y		
3b. <b>Attach</b> a copy of the monitoring plan.	y		Attachment #8 FutureMonitoringPlan_MountVernon_2011.docx
4. Identified sites in preparation for future, long-term monitoring? (S8.C.1.a., and S8.C.2.b)	Y		
4b. <b>Attach</b> a summary of the status of site identification for long-term stormwater monitoring; proposed questions for SWMP effectiveness monitoring; and status of developing the SWMP effectiveness monitoring plans.	y		Attachment #8 FutureMonitoringPlan_MountVernon_2011.docx

City of



Mayor

910 Cleveland Avenue  
Post Office Box 809  
Mount Vernon, WA 98273

Phone (360) 336-6211  
FAX (360) 336-0623  
[www.ci.mount-vernon.wa.us](http://www.ci.mount-vernon.wa.us)

March 18, 2008

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

Attn: Dept. of Ecology, Water Quality Program

I, Bud Norris, the Mayor of Mount Vernon, acting as the principle executive officer for the City of Mount Vernon, hereby duly authorize the Public Works Engineering Manager for the City, to submit reporting information on behalf of the City of Mount Vernon for purposes of complying with the Western Washington Phase II Municipal Stormwater Permit as requested by the Department of Ecology.

Sincerely,

A handwritten signature in black ink, appearing to read "Bud Norris", is written over a horizontal line.

Bud Norris  
Mayor

**SECOND AMENDMENT TO INTERLOCAL COOPERATIVE AGREEMENT  
BETWEEN  
CITY OF MOUNT VERNON  
AND  
SKAGIT CONSERVATION DISTRICT**

THIS AMENDMENT, entered into this 4<sup>th</sup> day of March, 2010, by and between the CITY OF MOUNT VERNON, Washington, a municipal corporation (hereinafter referred to as the "City") and the Skagit Conservation District, a public body organized under RCW 89.08, (hereinafter referred to as the "District").

**WITNESSETH:**

WHEREAS the City entered into an Agreement with the District dated January 3, 2006; and

WHEREAS the parties entered into a first amendment to the Agreement dated March 5<sup>th</sup>, 2007 extending the timeline for the certain tasks; and

WHEREAS the parties hereto wish to amend the Agreement by extending the timeline for District performance for certain tasks past the end of the District's storm water grant which will be completed by the end of 2011. Such tasks are identified as Best Management Practices ("BMP's") within Exhibit "A"- Scope of Work and Appendix 1 of Exhibit "A" Scope of Work – Timeline for District Performance; and

WHEREAS the parties hereto wish to amend the Agreement by extending the budget identified for those BMP's which have been granted an extension for completion into the year 2011.

NOW, THEREFORE, the parties hereby amend said Agreement, as follows:

**1. Section 1.0 of the Exhibit "A"- Scope of Work of the Agreement is hereby amended to read as follows:**

**1.0 Public Participation and Involvement**

The District shall assist City staff with compliance efforts for the "Public Participation and Involvement" minimum control measure, one of six measures required to meet the conditions of the NPDES storm water permit. The essential goals include improving public knowledge of local stormwater issues, receiving public input on potential solutions, gaining public support for and compliance with the City's' Comprehensive Stormwater Management Plan (CSMP), and developing a volunteer workforce to help implement this plan.

### **Best Management Practice (BMP) 1.1 -Public Meetings/Steering Committee**

The EPA recommends that all cities and counties should consider including the public in developing, implementing, and reviewing their storm water management program. Examples provided in the EPA recommendations include; conducting public meetings, public hearings, town hall meetings, etc. to solicit input prior to developing the CSMP.

#### **Required Tasks:**

- The District shall assist City staff with two partial day or evening workshops.  
The workshops shall include:
  - An opportunity to allow citizens to discuss various viewpoints and provide input concerning appropriate storm water management policies and BMP's.
  - An assessment of public interest in the establishment of a citizen stormwater panel that would take part in the development, implementation, and review of the CSMP.

#### **Measurable Goals:**

- To provide notice of the public meetings in several different print media in bilingual format.
- To establish a citizen stormwater panel. Note: the City will be responsible for the performance of this goal.

### **BMP1.2 -Watershed Masters Volunteer Training Program**

The Skagit Conservation District has been conducting the Watershed Masters Volunteer Training Program in the Skagit Valley community since 1995. The primary goal of the program is to increase public awareness of water quality problems and solutions and to inspire community stewardship in regards to water quality. Participants receive 40 hours of training (8 weeks), provided by local experts, which covers an introduction to local geology & history, biology & habitat needs of local salmon, the effects of storm water runoff on water quality and fish & wildlife habitat (nonpoint sources of pollution), an overview of Low Impact Development, household hazardous waste, forest stewardship, marine ecology, soils & wetlands, etc. Participants learn practical tips for reducing water quality impacts at home. Individuals make a personal commitment to implementing a specific action(s) at home and also return 40 hours of volunteer service by undertaking projects designed to protect and/or restore water quality, or educating the public on these same topics (within 2 years of class completion is encouraged). Each session is taught by local experts, including representatives from SCD, NRCS, WDFW, Skagit County, WA Dept. of Natural Resources, WA Dept. of Ecology, Puget Sound Action Team, Padilla Bay Research Reserve~ Western Washington University, and more. Average class size: 23.

*Potential volunteer activities that could be undertaken by the program participants include storm drain labeling, stream clean ups, mapping outfalls, tree planting or other enhancement projects at City parks (or other private or public lands), water quality monitoring, etc. The District will coordinate with the City to determine priority projects.*

**Required Tasks:**

- The District will organize and conduct the Watershed Masters Volunteer Training program in partnership with the City of Mount Vernon. The terms of this partnership shall require, but not be limited to, targeting the Program to specific watersheds of the City's choosing that lie within the City, holding the program in specific watersheds for residents, and documenting the process in a manner sufficient to satisfy NPDES compliance.
- The program will target residents of all major drainage basins within the City including Kulshan, Maddox, Trumpeter, Carpenter, Britt Slough, West Mount Vernon, and Nookachamps.
- Forms of City assistance for implementation of the Watershed Masters programs may include: Providing presentations to the Watershed Masters (WSM) on city storm water program priorities during a classroom and/or field tour; providing technical assistance to District staff if needed (re: City priorities, storm water concerns, etc.); attending WSM "graduation" (held last night of training) to assist in presenting certificates of completion; and providing input for WSM training and volunteer opportunities.
- Volunteer hours will be tracked and tabulated and reported to the City following class completion.

**Measurable Goals:**

- Recruitment of interested city residents to participate in the annual Watershed Masters Volunteer Training Program will be tracked.
- Participation and volunteer activities conducted by the Watershed Masters will be documented.
- Volunteer hours contributed by participants will be tracked.
- Program evaluation forms will be completed by the participants to determine class effectiveness.
- Participants will report BMP's implemented at home based on education learned during training.

**BMP 1.3- Volunteer Water Quality Training Program**

The Skagit Conservation District has been conducting the Skagit Stream Team program since 1998 (in partnership with the Padilla Bay Research Reserve). The primary purposes of the program are: to inspire stewardship in regards to water quality by educating local citizens about land use and non-point source pollution and involving them in the process of water quality data gathering; to develop and implement a routine sampling program that can be used to assess water quality trends, characterize the existing water quality of priority freshwater drainages, and determine how water quality conditions compare to State Standards; and to document improvements in water quality as a result of the implementation of BMP's. A Quality Assurance/Quality Control (QA/QC) plan and lab plan for the Stream Team program have been approved by the Washington Department of Ecology. Water quality conditions sampled by volunteers currently include; fecal coliform bacteria, dissolved oxygen, water temperature, turbidity, and total depth. Forty volunteers are currently monitoring stations located in the Nookachamps, Padilla Bay, Samish, and Grandy Creek watersheds. Collection and lab tests are both conducted by volunteers. The annual fall training event provides education about the effects

of storm water runoff on water quality, streams, wetlands, and fish and wildlife habitat (in addition to teaching water quality monitoring techniques).

**Required Tasks:**

- The District shall coordinate with the City to determine stream priority. Four monitoring stations shall be located on each stream.
- The District shall promote the Skagit Stream Team program in partnership with the City of Mount Vernon and the Padilla Bay Research Reserve to recruit Mount Vernon citizen participation.
- The District shall coordinate with the City volunteer activities; maintain volunteer records, and data sheet~ and coordinate with the City volunteer recognition events.
- Forms of City assistance for implementation of the Stream Team program may include: providing guidance to District staff in identifying priority streams and identifying 8 -12 monitoring stations (overall) for water quality collection; providing a presentation to volunteers during the annual training event; providing lab and supplies for conducting fecal coliform and turbidity tests at the Waste Water Treatment Plant; provide training and technical assistance to lab volunteers in using Waste Water Treatment Plant lab equipment. Data analysis will also need to be discussed.

**Measurable Goals:**

- Annual recruitment of volunteers to participate in the Stream Team program will be conducted (recruitment efforts will target local residents age 18 and up, Watershed Masters, and Environmental Tech students attending Skagit Valley College).
- An annual 3-session training event will be conducted each fall.
- Each year, four to six teams of volunteers (2-3 volunteers on each team, which will include 2 field persons & 1 lab person) will make a commitment to collect water quality data at 4 assigned stations on a monthly basis for one year (overall, a total of 12 stations would be monitored twice a month).
- Volunteer hours contributed by participants will be tracked.

**BMP 1.4 -Storm Drain Labeling Program**

Storm drain labeling involves labeling storm drains with messages warning citizens not to dump pollutants in the streams. Based on previous experience, the District recommends the use of permanent marking methods, such as ceramic tiles, plastic markers, or metal markers (rather than painting with stencils). Permanent storm drain markers are more cost effective in the long term, more durable and aesthetic, and are environmentally friendly. Volunteer groups, such as the Watershed Masters and Boy Scouts/Girl Scouts can be trained to install the labels.

**Required Tasks:**

- The District shall recruit, organize, and train community volunteers to install permanent storm drain labels.
- The District shall promote the Storm Drain Labeling program at District events, including but not limited to Watershed Masters, Stream Team and Backyard Conservation trainings, annual mailing packets distributed to all local schools, quarterly mailings of "Calendar of Upcoming Events" to District volunteers, and in the District newsletter which is distributed

- twice a year.
- The District shall coordinate with the City to determine priority areas for storm drain label installation.
  - The District shall volunteer recruitment to install markers and inspect storm drain inlets in need of markers will continue on an ongoing basis for the duration of this Agreement.

**Measurable Goals:**

- Determine appropriate and priority locations for labeling by Summer 2006
- Recruit/train volunteers, such as the Watershed Masters, Skagit Stream Team, and local Boy Scout/Girl Scouts to begin installing storm drain labels by May 31, 2007; training/recruitment will be ongoing.

**2. Section 2.0 of the Exhibit "A"- Scope of Work of the Agreement is hereby amended to read as follows:**

**2.0 Public Education and Outreach**

The District shall assist City staff with compliance efforts for the "Public Education and Outreach" minimum control measure, one of six measures required to meet the conditions of the NPDES storm water permit. The goal of this minimum control measure is to facilitate greater public awareness of the sensitivity of local surface waters, their beneficial uses, the detrimental effects of polluted storm water and illicit discharges, and measures that can be taken to reduce storm water pollution.

**BMP 2.1 -Backyard Conservation Stewardship Program**

This annual 6 week short-course features tips for native plant landscaping, environmentally friendly gardening practices, composting, mulching, nutrient management, pest management, landscaping for wildlife, water conservation tips, and more! Training will be provided by local experts. Participants will attend 6 evening sessions (once a week) and two Saturday field excursions. The following topics will be included in the training: Proper use and disposal of pesticides, herbicides, and fertilizers, and use of non-toxic alternatives; use of native plants in landscaping rather than lawns, and retention of native vegetation; preventive car maintenance, including proper disposal of used oil, coolant, and other toxic materials; use of permeable pavement for driveways and patios; proper disposal of pet waste and livestock waste.

**Required Tasks:**

- The District shall organize, initiate and conduct the Backyard Conservation Stewardship program and administer this program on behalf of the City of Mount Vernon.
- Forms of City assistance for implementation may include providing presentations to class participants on city storm water program priorities and attending "graduation" to assist in presenting certificates of completion to class participants.
- The District shall conduct follow up surveys on an annual basis to determine whether or not class participants have taken steps to reduce storm water impacts based on what was learned in program.

**Measurable Goals:**

- Recruitment of interested city residents to participate in the annual Backyard Conservation Stewardship program will be conducted.
- Participation of class participants will be tracked.
- Program evaluation forms will be completed by the participants to determine class effectiveness.

**BMP 2.2 - Resource Materials/Education for Local Schools**

The District currently maintains a resource library for local teachers. The library includes numerous text books, supplemental curricula, and videos on a variety of natural resource topics (including water quality and storm water runoff). An enviroscape watershed model is also available for presentations or available for teachers (or other agency personnel) to borrow. An information packet, which contains a brief description of all materials available at the District library is compiled and mailed to all elementary schools located throughout Skagit County (urban and rural areas) each September, to all science and agriculture teachers at the middle school and high school levels, home schools and other groups. Information about other District educational programs, such as Envirothon, 6th Grade Conservation Tour, the Annual Natural Resource Poster Contest, and live presentations available by District staff are included in the packet.

**Required Tasks:**

- The District shall incorporate a special section in the annual teacher's packet that will specifically highlight storm water education materials and presentations available.
- The District shall provide presentations on storm water and water resources to local schools (and after school groups) as requested by the City. The enviroscape model and the "Raindrop Walk" are both useful tools in teaching youth about storm water and water quality.

**Measurable Goals:**

- The number of packets mailed to local teachers will be tracked each year.
- The number of presentations given to local schools or other youth groups will be tracked.
- The number of teachers using the resource library will be tracked.

**BMP 2.3 - CSMP Logo/Theme/Poster Contest for Local Youth**

Creating a contest for youth in our community will provide an opportunity to directly involve them in learning/teaching about storm water impacts with the added benefit of generating parent participation and gaining their awareness. The contest will directly involve local school age youth in designing a logo, theme, or poster for storm water awareness in Skagit County. The winning entry(s) may be used on various storm water educational materials, such as brochures, posters, fliers (which could be placed in the library, schools, City offices, etc), bookmarks, newspaper ads, and more.

**Required Tasks:**

- The District shall coordinate with the City to design the logistics for hosting a logo, theme, and/or poster contest for local youth.
- The District shall promote the contest theme and rules to all City schools (approved methods of promotion include promotion with the annual teachers packets discussed above and

during classroom presentations). After mailing information, the District shall follow up with phone calls to interested teachers/classrooms.

- Classroom presentations to promote the contest and to provide background education about storm water issues will be conducted by District staff.
- The District shall coordinate with participants to collect and maintain all entries- .The District shall coordinate with the City to arrange judging.
- The District shall coordinate with the City to arrange a recognition event for winner(s).

**Measurable Goals:**

- Design logistics of contest by June 1, 2007.
- Information packets promoting contest mailed to local teachers & media press releases by September 30, 2007.
- Contest winner(s) announced by December 31, 2007.

**BMP 2.4 - Stormwater Educational Brochures and Fact Sheets**

The District shall coordinate with the City to develop a series of educational brochures and/or fact sheets for the general public. These will be developed for the general public and specific audiences on various topics that could range from landscaping, recycling, disposing of motor oil and other hazardous materials, water conservation, pet waste management, etc. Handout materials could be modified from existing materials to reduce costs. In addition, they could be designed over a period of time (for example two brochures could be designed/printed the first year, two over the 2nd year, etc). The District shall make efforts to provide this information in Spanish. Suggested methods of promotion include a carrier route mailing conducted twice a year to residents of Mount Vernon (each mailing would focus on a particular topic storm water related topic) or information included in City utility billings.

**Required Tasks:**

The District shall coordinate with the City to determine priority audiences and storm water education topics that will be used to generate a series of brochures and/or fact sheets.

- The District shall coordinate with City staff to determine topic priorities.
- The District shall research existing materials and coordinate with City staff to review/revise to meet City of Mount Vernon priorities.
- The District shall print and distribute of these materials.

**Measurable Goals:**

- Development of 2 educational brochures/flyers by Fa11 2010.
- Development of 2 additional educational brochures/flyers by Spring 2011.
- Distribution methods to be determined with City approval.

**BMP 2.5 -Stormwater Education Program for Local Business**

The District shall assist the City in educating local contractors and businesses on stormwater education. Such assistance shall include but not be limited to the following:

- The District shall coordinate a workshop in partnership with the City for local contractors and businesses on Low Impact Development practices.
- The District shall coordinate with the City to develop educational brochures/Flyers that

- target local contractors and businesses.
- The Skagit Conservation Education Alliance (SCEA), a local 501(c) 3 non-profit organization is currently researching potential grant sources to coordinate an "Envirostar" program in our community. The program would involve local businesses in storm water education, as well as providing recognition for local businesses who implement BMP's. If funded, this project would provide an opportunity for collaborations and partnerships. If such a program comes into being during the duration of this agreement, the District shall include such a program within the Stormwater Education Program for Local Business.

The District shall complete those required tasks and measurable goals included within the scope of work identified above according to the schedule attached to this Scope of Work and identified as "Appendix 1 of Scope of Work- Timeline for District Performance" BMP's identified above shall be completed in compliance with the following schedule:

BMP 1.1 - Completed by fall 2007

BMP 1.2 - Program begins in 2006 and repeats annually through fall 2011; 2011 training program tentatively based on available funding through December 2011.

BMP 1.3 - Program begins in 2006 and repeats annually through spring 2011

BMP 1.4 - Program begins in 2007 and will be completed by spring 2011

BMP 2.1 - Program begins in 2006 and repeats annually through 2009; ongoing program with workshops in 2010; short course repeats again in 2011

BMP 2.2 - Program begins in 2007 and will be completed by spring 2011

BMP 2.3 - Completed by Dec. 31, 2007

BMP 2.4 - Program begins in 2006 and will be completed by spring 2011

BMP 2.5 - Completed by spring 2011

Time is of the essence of this contract, and it is agreed that in case the District shall fail to comply with or perform any condition or agreement hereof promptly at the time and in the manner herein required, the City may elect to declare all the District's rights hereunder terminated, and upon doing so, all payments made by the City hereunder and all Work performed to date shall be forfeited to the City as liquidated damages and the City shall be able to immediately rescind the Agreement.

This Scope of Work and included Schedule for Performance shall be reevaluated by the City annually and modifications to the scope of work and/or schedule may be made by agreement of both parties.

**Meaning of terms.**

Whenever the term "measurable goals" is used in any section of this scope of work the term shall be deemed to have the same meaning as the term "required task". It shall be the mutual intent of the parties to interpret both terms as contractual obligations of the District requiring performance.

3. Appendix 1 of Scope of Work- Timeline for District Performance is hereby amended to read as follows:

***New Appendix which reflects new 2010 budget for those tasks remaining for BMP's 1-2, 1-3, 1-4, 2-1, 2-2, 2-4, and 2-5 attached.***

4. All other terms and conditions of the original Agreement remain the same.

\*\*IN WITNESS WHEREOF the parties hereto have executed this document as of the day and year first written above.

**CITY OF MOUNT VERNON**

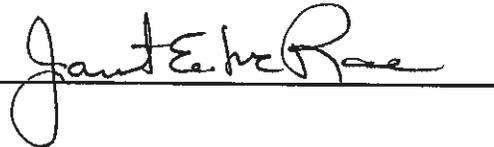
**SKAGIT CONSERVATION DISTRICT**

APPROVED:

By

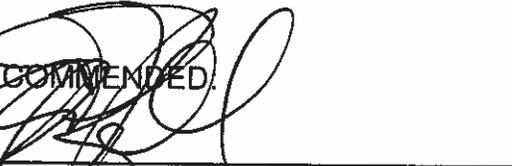
  
\_\_\_\_\_  
Bud Norris, Mayor

By

  
\_\_\_\_\_

RECOMMENDED:

By

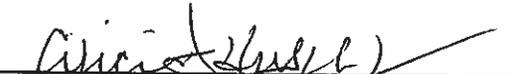
  
\_\_\_\_\_  
Esco Bell, Public Works Director

Agency Contact:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ATTEST:

By

  
\_\_\_\_\_  
Alicia Huschka, Finance Director

Tax ID #: \_\_\_\_\_

APPROVED AS TO FORM:

By

  
\_\_\_\_\_  
Kevin Rogerson, City Attorney

City of



Public Works Department

1024 Cleveland Avenue  
Post Office Box 809  
Mount Vernon, WA 98273

Phone (360) 336-6204  
FAX (360) 336-6299  
E-Mail mvengineering@mountvernonwa.gov  
www.ci.mount-vernon.wa.us

## LETTER OF TRANSMITTAL

To: Skagit Conservation District  
2021 E College Way, Ste 203  
Mount Vernon, WA 98273

From: Blaine Chesterfield by Sherri Pritchard  
Project: NPDES  
Date: March 16, 2010

### WE ARE SENDING YOU:

Enclosed     Via Fax     Hard Copy to follow via:     Under separate cover via:

### THE FOLLOWING ITEMS:

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Description

**Original fully executed "Second Amendment to Interlocal Cooperative Agreement between City of Mount Vernon and Skagit Conservation District"**

### THESE ARE TRANSMITTED AS CHECKED BELOW:

For Signature     Approved as submitted     Submit    copies for distribution  
 For your use     Approved as noted     Return    corrected prints  
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2nd Original: City of Mount Vernon Finance Dept  
Copy to: File

Signed:

Sherri Pritchard, Office Assistant

*(If enclosures are not as noted, please notify us at once)*



# City of Mount Vernon

## 2011 Stormwater Management Program



**Good Cleaning Practices**  
For The Food & Restaurant Industry

**CLEAN WATER STARTS HERE ...**

*Be S.M.A.R.T.*

The actions we take within our watersheds have a direct impact on our lakes, streams, wetlands, and the Puget Sound. These Best Management Practices help prevent pollution from going down the storm drain and into our water bodies.

**FOR MORE INFORMATION CONTACT:** Skagit County Health Department at 336-6380  
Skagit Conservation District

FOR MORE INFORMATION CONTACT: Skagit Conservation District  
Skagit Conservation District • 360-426-6122 • 6122 8c.1201 • www.skagitcd.org

*Clean Water Begins With You and Me.*  
**LEAVE ONLY PAW PRINTS!**

**NO POOP LEFT BEHIND**

*Be S.M.A.R.T.*

**4 Easy Steps:**  
1) Scoop It;  
2) Bag It;  
3) Put it in the trash;  
4) Wash your hands.

**FOR MORE INFORMATION CONTACT:**  
Skagit Conservation District • 360-426-6122 8c.1201 • www.skagitcd.org

**Good Cleaning Practices**  
For The Automotive Industry

**CLEAN WATER STARTS HERE ...**

*Be S.M.A.R.T.*

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**March 2011**

**Brown AND Caldwell**



CITY OF MOUNT VERNON  
2011 STORMWATER  
MANAGEMENT PROGRAM

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Prepared for  
City of Mount Vernon, Washington  
February 2011



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# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 1. INTRODUCTION

### 1.1 Overview

This document presents the City of Mount Vernon's Stormwater Management Program (SWMP). Preparation and maintenance of this SWMP is required by the Washington State Department of Ecology (Ecology) as a condition of the Western Washington Phase II Municipal Stormwater Permit (the Phase II Permit). The Phase II Permit covers discharges from regulated small municipal separate storm sewer systems (MS4s). Based on criteria outlined in the Phase II Permit, Ecology considers the City of Mount Vernon to be an operator of a small MS4, and therefore required to obtain Permit coverage.

Each municipality's permit for discharging stormwater is designed to reduce the discharge of pollutants, protect water quality, and meet the requirements of the federal Clean Water Act. Phase II Permit requirements include programmatic additions over time and this Stormwater Management Program document has been accordingly revised.

Appendix A includes abbreviations and definitions from the Permit to help the reader understand the City's SWMP.

### 1.2 The Stormwater Problem

“Stormwater is one of the leading contributor to water quality pollution in our urban waterways. As urban areas grow, stormwater is also Washington's fastest-growing water quality problem. Pollutants in or resulting from stormwater can cause a wide range of impacts. Untreated stormwater is not safe for people to drink and is not recommended for swimming because it contains toxic metals, organic compounds, and bacteria. Some pollutants such as metals, oil and grease, and organic toxins are toxic to aquatic organisms if concentrations are high enough. Sediments cause tissue abrasion and gill clogging in fish, reduce light and impair algal growth, smother fish spawning habitat, and are transporters of other pollutants. Nutrients accelerate eutrophication, a process in which water bodies receive excess nutrients that stimulate excessive plant growth of lakes and ponds resulting in nuisance algal blooms, reduced clarity, odors, and reduced water quality. Temperature-sensitive fish and invertebrates cannot survive in overly warm water bodies” (Ecology, “NPDES General Permit Fact Sheet,” 2006).

In addition, the large impervious surfaces in urban areas increase the quantity and peak flows of runoff, which in turn cause hydrologic impacts such as scoured streambed channels, in-stream sedimentation, and loss of habitat. Furthermore, because of the increased volume of runoff discharges, loads of pollutants in stormwater can be significant, causing water quality problems such as disease and mortality in fish and other aquatic organisms, swimming beach and shellfish bed closures, and contamination of wells (Ecology, “NPDES General Permit Fact Sheet,” 2006).

A number of pollution sources contaminate stormwater, including land use activities, operation and maintenance (O&M) activities, illicit discharges and spills, atmospheric deposition, and vehicular traffic conditions. Many of these sources are not under the direct control of the Permittees that own or operate the storm sewers.

The City of Mount Vernon manages a number of complex systems potentially affecting stormwater. The City is involved in efforts that go beyond the scope of many larger municipalities including, but not limited to, river flood control operations, managing the city storm drain system and operating sewage treatment facilities. While the City has long had a commitment to clean water and, as a result, is currently in compliance with state and federal requirements, it must now look toward meeting the demands of the new Phase II Permit, described in detail in Section 1.3 below.

### **1.3 Regulatory Background**

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for “fishable, swimmable” uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies, and these agencies can set permit conditions in accordance with and in addition to the minimum federal requirements. In Washington, Ecology is the NPDES-delegated permit authority.

Municipalities with a population of over 100,000 (as of the 1990 census) have been designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit. With Mount Vernon’s 1990 census falling below the 100,000 threshold, the City must comply with the Phase II Municipal Stormwater Permit. About 100 other municipalities in Washington must also now comply with the Phase II Permit, as operators of small “municipal separate storm sewer systems” (MS4s). Ecology’s Phase II Permit is available on Ecology’s Web site at <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/index.html>

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the state’s water bodies (i.e., streams, rivers, lakes, and wetlands) as long as municipalities implement programs to protect water quality by reducing the discharge of “nonpoint source” pollutants to the “maximum extent practicable” (MEP) through application of Permit-specified “best management practices” (BMPs). The BMPs specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following SWMP components:

- Public Education and Outreach (E&O)
- Public Involvement
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Pollution Prevention and Municipal Operation and Maintenance (O&M)
- Monitoring

The Permit issued by Ecology became effective on February 16, 2007, and expires on February 15, 2012. On June 17, 2009, Ecology released a modified version of the Permit, which changed some of the requirement deadlines. The Permit requires the City to report annually (March 31 of each year) on progress in SWMP implementation for the prior year. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. Implementation of various Permit conditions is phased in over the 5-year Permit cycle. The Permit will be revised and reissued at the end of the current Permit cycle.

### **1.4 City of Mount Vernon Regulated Area**

The Phase II Permit applies to operators of regulated small MS4s that discharge stormwater to waters of Washington State located west of the crest of the Cascade Range (west of the eastern boundaries of Whatcom, Skagit, Snohomish, King, Pierce, Lewis, and Skamania Counties). For cities, the Permit requirements extend only to those areas of each city that drain to MS4s. In Mount Vernon, much of the downtown area drains to a combined sewer overflow (CSO) system, which sends runoff to the wastewater

treatment plant before entering the Skagit River. The CSO discharge area is covered under a permit separate from the Phase II Permit.

## 1.5 Total Maximum Daily Load Compliance

Stormwater discharges covered under this Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable total maximum daily loads (TMDLs). Applicable TMDLs are those that have been approved by the EPA before the issuance date of the Permit or have been approved by the EPA prior to the date the Permittee's application is received by Ecology. Information on Ecology's TMDL program is available on Ecology's Web site at [www.ecy.wa.gov/programs/wq/tmdl](http://www.ecy.wa.gov/programs/wq/tmdl).

Ecology has reviewed all TMDLs approved by EPA before February 15, 2006, to determine whether municipal stormwater sources were identified in the TMDL. When most of these TMDLs were developed, municipal stormwater was considered a subset of nonpoint discharges, rather than a permitted discharge. As a result, very few TMDLs statewide contain requirements for municipal stormwater sources. Few TMDLs completed to date have established load allocations (LAs) or waste load allocations (WLAs) for municipal stormwater discharges covered under this Permit.

Appendix 2 of the Permit lists the cities and counties affected by TMDLs that were approved by EPA prior to February 15, 2006. While the City of Mount Vernon has not been listed in Appendix 2, there are water quality impairments (Clean Water Act section 303[d] "listings") within the City that may trigger TMDLs for the next Permit cycle (2012–2017).

## 1.6 SWMP Implementation Responsibilities

The Public Works Department will be coordinating the overall administration of efforts to comply with Permit requirements. The Community and Economic Development (CED) Department will play a large role in the implementation of Permit program activities such as inspections, Permit review, code revisions, etc. The City has contracted with the Skagit Conservation District (SCD) for implementing the Education & Outreach requirements of the Permit. The Skagit County Health Department conducts septic system inspections and a local source control program that help to educate citizens and businesses on stormwater pollution. Table 1-1 summarizes participant responsibilities for ensuring future Permit compliance. Sections 2 through 8 will highlight the planned efforts of these departments and entities in more detail.

Program Component	City Departments	Outside Entities
Stormwater Management Program	Public Works Finance Information Services (IS) City Attorney's Office (CAO)	
Public education and outreach	Public Works	SCD Skagit County Health Department
Public involvement	Public Works	SCD
Illicit discharge detection and elimination	Public Works CED Fire Department	

Table 1-1. SWMP Implementation Responsibilities		
Program Component	City Departments	Outside Entities
Runoff controls	Public Works CED	
Pollution prevention and municipal operation and maintenance	Public Works CED	
Water quality monitoring	Public Works	SCD

## 1.7 Document Organization

The contents of this document are based upon Permit requirements and Ecology’s “Draft Guidance for City and County Annual Reports for Western Washington, Phase II Municipal Stormwater Permits.” The organization of the remainder of this SWMP is modeled after that of the Permit:

- **Section 2.0** addresses Permit requirements for administering the City’s SWMP for 2011.
- **Section 3.0** addresses Permit requirements for public E&O for 2011.
- **Section 4.0** addresses Permit requirements for public involvement and participation for 2011.
- **Section 5.0** addresses Permit requirements for Illicit Discharge Detection and Elimination for 2011.
- **Section 6.0** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2011.
- **Section 7.0** addresses Permit requirements for pollution prevention and municipal operations and maintenance for 2011.
- **Section 8.0** addresses Permit requirements for the water quality monitoring section of the Permit for 2011.
- **Section 9.0** summarizes the City’s compliance activities.
- **Appendix A:** Abbreviations and definitions from the Permit.

Each section includes a summary of the relevant Permit requirements and a description of current and planned compliance activities.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

This section of the SWMP provides a description of Permit requirements related to overall SWMP administration, including descriptions of the City's current and planned compliance activities for 2011.

### 2.1 Permit Requirements

The Permit (Section S5.A) requires the City to perform the following tasks:

- Develop and implement a Storm Water Management Program and prepare written documentation (SWMP document) for submittal to Ecology on March 31, 2011, and update the SWMP annually thereafter. The purpose of the SWMP is to reduce pollutant discharge from the municipal stormwater system to the maximum extent practicable and thereby protect water quality.
- Submit annual compliance reports (for the previous calendar year) to Ecology by March 31, beginning in 2008, summarizing implementation status and provide information from assessment and evaluation procedures collected during the reporting period.
- Starting in 2011, submit a report summarizing any barriers to low impact development (LID) within the area covered by the Permit and measures to address the barriers.
- Coordinate with other Permittees on stormwater-related policies, programs, and projects within adjacent or shared areas.

### 2.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has defined roles and responsibilities and developed standard operating procedures (SOPs) for completing updates to future SWMP documents and the Annual Compliance Report annually.
- The City maintains a cost accounting database for tracking annual Permit costs.
- The City maintains a training database for tracking and documenting compliance with all NPDES related training.
- The City is on track to comply with Ecology's requirements for submittal of the fourth Annual Compliance Report by March 31, 2011 including the LID and monitoring submittals.
- The City continues to coordinate with external entities such as the SCD, Sedro-Woolley, Burlington, Anacortes, and Skagit County.
- The City meets quarterly with The North Sound NPDES Municipal Stormwater Permit Phase I/II Forum to discuss stormwater policies and projects in the area.
- The City participates in the regional forums under Stormwater Outreach for Regional Municipalities (STORM), NPDES Permit coordinators, and Operations and Maintenance Regional Coordination Program (Road Map).

### 2.3 Planned 2011 Compliance Activities

The City has positioned itself well to maintain compliance as Ecology phases in the future Permit requirements. Actions recommended for continued compliance are included in Table 2-1, which presents the work plan for the 2011 SWMP administration activities.

Table 2-1. 2011 Stormwater Management Program Administration Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
SWMP-1	Implement NPDES SWMP cost accounting strategy and tracking system. Train staff on new system.	Public Works, Finance		City maintains cost-tracking database.
SWMP-2	Implement NPDES training management structure and tracking system.	Public Works, IS	All	City maintains NPDES training database.
SWMP-3	Define and implement strategy/system for managing SOPs that are used among multiple departments.	Public Works, Finance	CAO	SOPs are maintained and implemented throughout all City departments.
SWMP-4	Summarize annual activities for "Stormwater Management Program" component of Annual Report; identify any updates to SWMP document.	Public Works, Finance	All	The SWMP and Annual Compliance Report submittal for the previous year is due on or before March 31 <sup>st</sup> of each year.
SWMP-5	Coordinate with other Permittees on stormwater-related policies, programs, and projects within adjacent or shared areas.	Public Works	All	Local jurisdiction staff meet quarterly to discuss stormwater-related policies and programs. Continue to follow STORM, APWA NPDES Permit coordinators, and Road Map forums. Monitor the State Stormwater Work Group.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 3. PUBLIC EDUCATION AND OUTREACH

This section provides a description of the Permit requirements related to public education and outreach (E&O), including descriptions of the City's current and planned compliance activities for 2011.

### 3.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to perform the following tasks:

- Prioritize and target E&O activities to specified audiences, including the general public, businesses, residents/homeowners, landscapers, property managers, engineers, contractors, developers, review staff and land use planners, and other City employees to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Measure the understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area.
- Track and maintain records of public E&O activities.

### 3.2 Current Compliance Activities

The City currently contracts with the SCD to conduct numerous E&O activities that address stormwater management. Skagit County also assists the City with stormwater education and outreach through their "On Site Sewage Program" that informs citizens and business on septic system operation and maintenance. Skagit County and SCD's current activities and programs address the Permit requirements. These programs address the general public, residents/homeowners, developers, City staff, contractors, businesses, engineers, and schoolchildren. The City has also been using the City cable TV channel to broadcast information about Stormwater. The current compliance activities associated with the Permit include the following:

- 29 citizens completed the Watershed Masters Volunteer Training Program
- 71 citizens volunteered for the Skagit Stream Team (Kulshan and Trumpeter Creeks)
- 400 Storm Drains were labeled
- 1,200 Educational Door Hangers distributed
- 2 stormwater educational posters designed and distributed
- 2 rain garden designs completed and approved
- 30 stormwater education presentations provided to 950 county students
- 25 citizens completed the Backyard Conservation Stewardship Short Course
- 35 Clean and Green car wash events
- 225 individuals attended one of nine events hosted by SCD on Low Impact Development (LID)
- 12 pet waste posters placed along trails and in parks with mutt mitts

SCD tracks all of its E&O efforts and attendees to workshops in Excel databases and Word documents. Skagit County also documents all inspections and businesses visited in spreadsheets. These documents are

submitted to the City annually. The City Information Services Department tracks the number of times videos and commercials are played relating to Stormwater. The following were played during 2010:

- 100 showings of “After the Storm” video developed by the EPA
- 900 announcements from the Puget Sound Starts Here (PSSH)

The City is participating in the STORM group to help identify appropriate program evaluation techniques to measure improvements in stormwater quality from E&O efforts.

### 3.3 Planned 2011 Compliance Activities

The City has an existing stormwater public E&O program that meets the requirements of the Permit. The City will continue to partner with SCD in 2011 to carry on similar activities as those listed in section 3.2, with the addition of a pet waste campaign. Actions recommended for continued compliance are included in Table 3-1, which presents the work plan for the 2011 public education and outreach activities.

Table 3-1. 2011 Public Education and Outreach Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
EDUC-1	Coordinate with SCD, APWA, STORM, and other regional efforts to implement the E&O Plan.	Public Works	SCD	Ongoing
EDUC-2	Continue collaboration with other NPDES municipalities and the STORM group to identify appropriate program evaluation techniques.	Public Works	SCD and STORM	Ongoing
EDUC-3	Continue to Implement E&O strategy with SCD to supplement existing activities.	Public Works	SCD IS	Ongoing
EDUC-4	Continue developing the process to evaluate understanding and adoption of target behaviors.	Public Works	SCD and STORM	Ongoing
EDUC-5	Summarize annual activities for “Public Education and Outreach” component of Annual Report; identify any updates to SWMP document.	Public Works	SCD	The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 4. PUBLIC INVOLVEMENT

This section provides a description of the Permit requirements related to public involvement, including descriptions of the City's current and planned compliance activities for 2011.

### 4.1 Permit Requirements

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

- Provide ongoing opportunities for public involvement through advisory boards or commissions and watershed committees, and public participation in developing rate structures and budgets, stewardship programs, environmental actions, or other similar activities. The public must be able to participate in the decision-making processes, including development, implementation, and updates of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, including posting it on the City's Web site and in the newspaper. Make any other documents required to be submitted to Ecology in response to Permit conditions available to the public.

### 4.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has defined a series of public involvement activities intended to meet the Permit requirements for public involvement in development of the 2011 SWMP documents. This process involves a presentation of the proposed SWMP elements at a public meeting of before the City Council Public Works Committee.
- The City posted the Draft SWMP on the City's Web site, made announcements on the City cable TV channel, and sent announcements in the newspaper and City's Web site for public comments prior to the public hearing.
- The City will make the 2011 Final SWMP and Annual Compliance Report available to the public on the City's Web site, at the public library, and in the Public Works Department main office building.
- A LID presentation was delivered to at the City Council meeting in June 2010.

### 4.3 Planned 2011 Compliance Activities

The City has an existing stormwater public involvement program that meets the Permit requirements. Actions recommended for continued compliance are included in Table 4-1, which presents the work plan for the 2011 public involvement activities.

<b>Table 4-1. 2011 Public Involvement Work Plan</b>				
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Support</b>	<b>Compliance Timeframe</b>
<b>PI-1</b>	Implement public involvement opportunities for annual SWMP update and reporting process.	Public Works		Complete by 3/31/2011.
<b>PI-2</b>	Make SWMP and Annual Compliance Report available to the public by posting it on the City Web site, public library, and in the Public Works Department building. Post announcements on Web site and in newspaper.	Public Works	IS	Complete by 3/31/2011.
<b>PI-3</b>	Summarize annual activities for the "Public Involvement and Participation" component of the Annual Report; identify any updates to the SWMP document.	Public Works	SCD	The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 5. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section provides a description of the Permit requirements related to IDDE, including descriptions of the City's current and planned compliance activities for 2011.

### 5.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to perform the following tasks:

- Implement an ongoing program to detect and remove illicit discharges, connections, and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City. An illicit discharge means “any discharge to a municipal storm system that is not composed entirely of stormwater...” and illicit connection means “any manmade conveyance that is connected to a municipal storm system without a permit (excluding roof drains and other similar type connections) such as sanitary sewer connections, floor drains, etc.”
- Develop a storm sewer system map, enact ordinances that prohibit illicit discharges, and create a program to detect and address illicit discharges.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track through closeout any illicit discharge reports and actions taken in response, including enforcement actions.
- Train SWMP staff on proper IDDE response procedures and processes and municipal field staff to recognize and report illicit discharges.
- Prioritize three water bodies for visual inspection.
- Summarize all illicit discharges and connections reported to the City and response actions taken, including enforcement actions, in the Annual Compliance Report; identify any IDDE updates to the SWMP.

### 5.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City maintains much of its storm sewer information system in an electronic format and has produced a draft storm sewer system map that is updated when more recent data becomes available.
- The City added 1,000 features into its GIS database in 2010.
- City codes were updated in 2009 and became effective in February 2010 to meet the requirements of the Permit.
- The City's Web site lists the public hotline to report illicit discharges and/or spills.
- The City records all phone calls received to the Public Works Department. The calls reporting illicit discharges are then distributed to the appropriate response authority. Follow-up actions are recorded in the same database.
- The City's IDDE Plan was updated in 2010 to reflect visual inspections that were performed on Kulshan, Trumpeter and Maddox Creeks.

- IDDE awareness training was given to municipal employees who are in the field.
- City has self-administered IDDE training for new employees.
- The City maintains a database to track all staff training to ensure that all City staff have the appropriate training.
- IDDE field investigation training was conducted for employees in charge of and performing IDDE investigations.
- The City summarizes all illicit discharges and connections, response actions taken, and enforcement actions in its Annual Compliance Reports.

### 5.3 Planned 2011 Compliance Activities

The City has an existing IDDE program, but will need to update the program to maintain compliance as Ecology phases in additional Permit requirements. Actions recommended for continued compliance are included in Table 5-1, which presents the work plan for the 2011 IDDE activities.

Table 5-1. 2011 Illicit Discharge Detection and Elimination Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
IDDE-1	Revise current IDDE response process into a standard, citywide IDDE response and enforcement SOPs.	Public Works	CED	City maintains Spill Reporting Matrix for IDDE response process.
IDDE-2	Implement citywide IDDE Program.	Public Works		To be developed by 2011 and then ongoing.
IDDE-3	Continue updating storm system map to address data gaps and Permit conditions.	Public Works		Ongoing.
IDDE-4	Review and update codes as needed to address IDDE Permit requirements.	Public Works		Ordinance and code updates were adopted by Council in August 2009.
IDDE-5	Develop SOPs for minimizing pollutant releases from permitted non-stormwater discharges (e.g., fire hydrant system flushing, water line flushing, and dechlorinated swimming pools).	Public Works	CED	City adopted new codes and developed SOPs in August 2009
IDDE-6	Continue to use issue-tracking and resolution system that includes enforcement actions. Capture feedback from public E&O efforts.	Public Works	IS	Ongoing.
IDDE-7	Develop and implement field IDDE training. Coordinate with regional efforts.	Public Works		Two field trainings were held for City staff responsible for IDDE investigations.
IDDE-8	Develop and implement IDDE awareness training for all municipal staff in the field.	Public Works	IS	City has conducted three training sessions and maintains self-administered training for new employees.
IDDE-9	Publicize hotline for public reporting of spills and other illicit discharges. Create record-keeping system for all calls received and actions taken to report in annual report each year.	Public Works	CED	Ongoing.
IDDE-10	Tracked the number of illicit connection inspections.	Public Works	CED	Start in 2011.

<b>IDDE-11</b>	Maintain map that shows the location of all known municipal separate storm sewer outfalls, receiving waters, and structural stormwater BMPs.	Public Works	CED	Complete by February 2011
<b>IDDE-12</b>	Prioritize three receiving water bodies for visual inspection.	Public Works		Prioritization is done in the City's IDDE Plan. Visual inspections were completed by WSP Environment and Energy in 2008.
<b>IDDE-13</b>	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 6. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

This section provides a description of the Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including descriptions of the City's current and planned compliance activities for 2011. The modifications made by Ecology in June 2009 to the Permit included delaying the deadlines for several of the activities under this requirement.

### 6.1 Permit Requirements

The Permit (Section S5.C.4) requires the City to perform the following tasks:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff (i.e., illicit discharges) to the MS4 from new development, redevelopment, and construction site activities. The program must apply to both private and public projects, including roads, and address all construction/development-associated pollutant sources.
- Adopt regulations (codes and standards) and implement plan review, inspection, and escalating enforcement SOPs necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in Appendix 1 of the Permit.
- Provide provisions (plan review, inspection, and enforcement) and SOPs to allow nonstructural preventive actions and source reduction approaches such as LID techniques, measures to minimize the creation of impervious surfaces, and measures to minimize the disturbance of native soils and vegetation.
- Adopt regulations (codes and standards) and provide provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and BMPs in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter IV of the 2005 Ecology *Stormwater Management Manual for Western Washington* (Ecology 2005 Manual).
- Provide copies of the Notice of Intent (NOI) for construction or industrial activities to representatives of the proposed new development and redevelopment.
- Provide training to staff on the new codes, standards, and SOPs, and create public E&O materials.
- Develop and define a process to record and maintain all inspections and enforcement actions by staff for inclusion in the Annual Compliance Report.
- Summarize annual activities for the "Controlling Runoff" component of the Annual Compliance Report; identify any updates to the SWMP.

### 6.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has developed and implemented SOPs to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The City enforces this program through the

Municipal Code. The City currently addresses the minimum requirements, technical thresholds, and definitions requirements of the Permit and has adopted a new code that became effective February 2010.

- The City has existing programs, codes, standards, SOPs, and data management systems (City View and Dockstar) addressing many of the Permit requirements. The plan review, inspection, and enforcement SOPs will be refined and updated.
- The City adopted the 2005 Ecology manual effective February of 2010
- The City Code has provisions to allow for LID in the Critical Areas Ordinance. The City also encourages the use of LID at the pre-permit application meeting.
- The City completes the required inspections, including development sites prior to construction, future City infrastructure sites during construction, and future City infrastructure sites post-construction.
- The City completes the require inspections for private infrastructure.
- The City records and maintains inspections results in log books.
- The City inspects new flow control and water quality treatment facilities at the required times and frequency.
- NOI forms are available at the customer service desk and are also mentioned in the Pre-permit application meetings for applicable developments.
- The City will summarize all associated runoff control activities in its Annual Compliance Report submitted annually on March 31<sup>st</sup>.

### 6.3 Planned 2011 Compliance Activities

The City has a program to help reduce stormwater runoff from new development and construction sites, but updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Table 6-1 presents the work plan for 2011 SWMP activities related to runoff control for new development, redevelopment, and construction sites.

Table 6-1. 2011 Controlling Runoff from New Development, Redevelopment, & Construction Sites Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
CTRL-1	Select new Stormwater Manual and implement new Stormwater Manual, codes, standards, and SOPs.	Public Works	CED	Adopted new codes effective February 2010.
CTRL-2	Apply technical thresholds in Appendix 1 to all sites 1 acre or greater.	Public Works	CED	Adopted new codes effective February 2010.
CTRL-3	Create SOPs defining the City's stormwater permitting, plan review, inspection, enforcement, and record-keeping processes.	Public Works, CED	CAO	Ongoing.
CTRL-4	Implement stormwater permitting, plan review, inspection, and enforcement SOPs (including enhanced inspection/enforcement documentation in Permits Plus).	CED	Public Works	Ongoing.
CTRL-5	Track number of inspections, plan reviews, and enforcement.	Public Works	CED	Started in March 31, 2010 Annual Report.

<b>Table 6-1. 2011 Controlling Runoff from New Development, Redevelopment, &amp; Construction Sites Work Plan</b>				
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Support</b>	<b>Compliance Timeframe</b>
<b>CRTL-6</b>	Establish program to annually inspect all stormwater treatment flow control facilities (other than catch basins) permitted by the Permittee.	Public Works		Ongoing.
<b>CTRL-7</b>	Conduct staff training and public E&O on implementing new Stormwater Manual and new Permit requirements.	Public Works	SCD	Ongoing.
<b>CTRL-8</b>	Create and implement SOP for long-term stormwater system operation and maintenance verification.	Public Works	CED	Ongoing.
<b>CTRL-9</b>	Summarize annual activities for "Controlling Runoff from New Development, Redevelopment, and Construction Sites" component of Annual Report; identify any updates to SWMP.	Public Works	CED	The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 7. POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This section provides a description of the Permit requirements related to pollution prevention and O&M for municipal operations, including descriptions of the City's current and planned compliance activities for 2011.

### 7.1 Permit Requirements

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

- Develop and implement an O&M program, with the ultimate goal of preventing or reducing pollutant runoff from MS4 and municipal O&M activities.
- Establish maintenance standards for the MS4 that are at least as protective as those specified in the 2005 *Stormwater Management Manual for Western Washington*.
- Perform required inspection frequency of stormwater flow control and treatment facilities and catch basins, unless previous inspection data show that a reduced frequency is justified.
- Have SOPs in place to reduce stormwater impacts associated with runoff from municipal O&M activities, including but not limited to streets, parking lots, roads, or highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- Train staff to implement the modified SOPs and document that training.
- Prepare stormwater pollution prevention plans (SWPPPs) for all heavy equipment maintenance or storage yards identified for year-round facilities or yards, and material storage facilities owned or operated by the City.
- Summarize annual activities for the "Pollution Prevention and Operations and Maintenance for Municipal Operations" component of the Annual Compliance Report; identify any updates to the SWMP.

### 7.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the above Permit requirements include the following:

- The City operates an O&M program, with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- The City is currently on track to comply with required municipal stormwater facility inspection frequencies. The City also conducts spot checks of potentially damaged treatment and control facilities. All inspections are recorded in inspection logs.
- The City conducts numerous activities to reduce stormwater impacts associated with runoff from municipal O&M activities, including but not limited to streets, parking lots, and roads owned or maintained by the City. Some of the activities include street sweeping, ditch maintenance, dust control, and pond maintenance.
- Sewer and drainage crews receive training from the Washington Wastewater Collection Personnel Association (WWCPA) biennially.

- The City has developed a SWPPP for the maintenance yard.
- The City conducted trainings for all maintenance yard staff in 2010.
- City staff from the Public Works Department, Roads Department, and Parks Department has received training on pollution prevention.
- The City has adopted administrative operating policies and procedures in the form of an Integrated Pest Management Plan (IPM) and a Property and Facility Management Plan for Pollution Reduction in accordance with Section S5.C4.g. of the Permit.
- The City will summarize all associated activities in its Annual Compliance Report on March 31, 2011. All subsequent Annual Compliance Reports will also include SWMP updates.

### 7.3 Planned 2011 Compliance Activities

The City conducts many of the Permit-required activities to limit stormwater pollution potential related to its O&M program. However, updates will be necessary to maintain compliance as Ecology phases in additional Permit requirements. Table 7-1 presents the work plan for 2011 SWMP activities related to pollution prevention and O&M activities.

Table 7-1. 2011 Pollution Prevention and Operations Maintenance Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
PPOM-1	Maintain records of inspections and maintenance or repair activities conducted. Designate responsibilities for maintaining records.	Public Works		Ongoing.
PPOM-2	Adopt Ecology 2005 maintenance standards for City-performed maintenance activities.	CAO	Public Works	Adopted Manual February 2010.
PPOM-3	Establish annual inspection program for City-owned or operated stormwater catch basins and flow control and runoff treatment facilities.	Public Works		Ongoing.
PPOM-4	Develop and establish policies and procedures for O&M activities to reduce pollutants in stormwater discharges from lands owned or maintained by the City.	Public Works	Parks and Recreation, Facilities, CED	Ongoing.
PPOM-5	Summarize annual activities for "Pollution Prevention and Operation and Maintenance" component of Annual Report; identify any updates to SWPPP.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 8. MONITORING

This section provides a description of the Permit requirements related to water quality monitoring, including descriptions of the City's current and planned compliance activities for 2011.

### 8.1 Permit Requirements

The Permit (Section S8) does not require municipalities to conduct water quality sampling or other testing during this Permit cycle, with the following exceptions:

- Sampling or testing required for characterizing illicit discharges pursuant to the SWMP's IDDE conditions.
- Water quality monitoring required for compliance with TMDL conditions (water quality cleanup plans). Mount Vernon is currently not required to conduct TMDL monitoring as part of this Permit because Ecology has not yet developed TMDLs for those water bodies within the Mount Vernon city limits.
- Preparing a future comprehensive, long-term water quality monitoring plan including two components: (1) stormwater monitoring and (2) targeted SWMP effectiveness monitoring.
- By the fourth Annual Compliance Report (March 31, 2011), Mount Vernon is required to identify two outfalls where permanent stormwater sampling stations can be installed and operated for future monitoring. The City is also required to develop plans to monitor stormwater, sediment, and receiving water for physical, chemical, and/or biological characteristics. One outfall must represent high-density residential land use and the other represent commercial land use.
- To monitor SWMP effectiveness, the City will need to identify two suitable SWMP questions and sites where targeted SWMP effectiveness monitoring can be conducted and develop a monitoring plan for these questions and sites. The proposed effectiveness monitoring is required to answer the following types of questions:
  - How effective is a specific targeted action or a narrow suite of actions?
  - Is the SWMP achieving a targeted environmental outcome?

In addition, the City is required to provide the following monitoring and/or assessment data in each annual report:

- A description of any stormwater monitoring or studies conducted by the City during the reporting period. If stormwater monitoring was conducted on behalf of the City, or if studies or investigations conducted by other entities were reported to the City, a brief description of the type of information gathered or received shall be included in the annual report.
- An assessment of the appropriateness of the BMPs identified by the City for each component of the SWMP; and any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP and why.

## 8.2 Current Compliance Activities

Beyond the activities associated with implementing the City Stormwater Pollution Prevention Plan and performing Illicit Discharge Detection and Elimination field investigations, the City currently does not conduct any water quality monitoring intended to facilitate stormwater management decisions, evaluate or assist in pollutant spill response, or otherwise investigate stormwater quality. The City contracts with the SCD conducts monthly water quality sampling on Kulshan and Trumpeter Creeks as part of its Citizen Volunteer Water Quality Monitoring Program.

In 2010 the City developed a monitoring plan using the outfall map created for the City's IDDE plan. The City's monitoring plan includes future long term monitoring at two selected outfalls to be monitored and two effectiveness questions to be answered over time.

## 8.3 Planned 2011 Compliance Activities

The City created a Water Quality Monitoring Program to maintain compliance as Ecology phases in current and future Permit requirements. Table 8-1 presents the work plan for 2011 SWMP monitoring activities.

Table 8-1. 2011 Monitoring Work Plan				
Task ID	Task Description	Lead	Support	Compliance Timeframe
MNTR-1	Report potential violations of water quality standards per Permit S4F requirements. Educate department staff on obligations under S4F of Permit's Compliance with Standards section.	Public Works	CED	Ongoing.
MNTR-2	Participate in or monitor regional and state monitoring forums (Stormwater Work Group) and future legislative actions in order to influence development of feasible and effective alternative future monitoring requirements.	Public Works	Stormwater Work Group	Ongoing.
MNTR-3	Preparing a future comprehensive, long-term water quality monitoring plan including two components: (1) stormwater monitoring and (2) targeted SWMP effectiveness monitoring.	Public Works	Road Map, Stormwater Work Group	Completed in 2010.
MNTR-4	Identify two outfalls where permanent stormwater sampling stations can be installed and operated for future monitoring.	Public Works		Completed in 2010.
MNTR-5	Summarize annual monitoring activities for the Annual Report conducted by any other entities; identify SWMP updates.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 <sup>st</sup> of each year.

# CITY OF MOUNT VERNON 2011 STORMWATER MANAGEMENT PROGRAM

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## 9. SUMMARY

The City of Mount Vernon is currently in compliance with the Phase II Permit and has planned activities for 2011 to ensure continued compliance. There are multiple tasks that the City has completed and several that the City is planning to align itself with the Permit requirements.

The Public Education and Outreach Program has been implemented through the City's contract with the Skagit Conservation District (SCD) who has reached out with useful information to the general public, school districts, business owners, commercial property owners, the agricultural community, and the industrial community. In addition, the City works with the Northern Stormwater Outreach Group (SOG) and the Skagit County Public Health Department through the source control inspection program.

The City has developed a system for notifying the public and allowing for comment on the SWMP document each year and presenting the document to the City council. This allows the public to be involved in the City's stormwater management program.

The City has an ongoing Illicit Discharge Detection and Elimination Program that includes a spill hotline. Each year the hotline has received more and more calls of educated citizens who are interested in protecting stormwater quality. The City plans to work with SCD to distribute additional educational materials that are directed at IDDE.

The City has adopted and is currently implementing the Ecology 2005 Manual for controlling runoff from new development, redevelopment, and construction sites. The City encourages the use of LID where applicable,

The City has developed a SWPPP for the Fir Street Maintenance Facility and has conducted two training sessions for the maintenance crews. This plan helps the City meet the obligations of pollution prevention for municipal operations requirements in the Phase II Permit.

This year, the City has developed a plan for future monitoring and a report on LID barriers within the City. These two documents were submitted to Ecology with the Annual Report on March 31, 2011.

In 2012, the Phase II Permit will be reissued. It is anticipated that LID and monitoring requirements will be the most significant changes in the Permit. The City has created two documents in attempt to meet the LID and monitoring requirements of the next Permit cycle, but may need to modify these documents once the new Permit is issued. It is also anticipated that Ecology will be updating the Ecology 2005 Manual and the Puget Sound Partnership will be updating the *LID Guidance Manual for Puget Sound*. Both these documents will need to be reviewed by the City before they are adopted into code.

Additional information on the City's NPDES program can be found online at

[http://www.ci.mount-vernon.wa.us/page.asp?Q\\_navigationid=E\\_739](http://www.ci.mount-vernon.wa.us/page.asp?Q_navigationid=E_739).

**Abbreviations and Definitions from Permit**



The following definitions and abbreviations are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

**AKART** means all known, available, and reasonable methods of prevention, control and treatment. **All known, available and reasonable methods of prevention, control, and treatment** refers to the State Water Pollution Control Act, Chapter 90.48.010 and 90.48.520 RCW.

**APWA** is the American Public Works Association.

**Basin plan** is a surface water management process consisting of three parts: a scientific study of the basin's drainage features and their quality; developing actions and recommendations for resolving any deficiencies discovered during the study; and implementing the recommendations, followed by monitoring.

**Best management practices (BMPs)** are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Department that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

**BMP** means best management practice.

**CAO** means the City Attorney's Office.

**CED** means the Community and Economic Development Department.

**CFR** means Code of Federal Regulations.

**Component** or **Program component** means an element of the SWMP listed in S5 SWMP for Cities, Towns, and Counties or S6 SWMP for Secondary Permittees of this Permit.

**CWA** means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et seq.)

**Discharge** for the purpose of this permit means, unless indicated otherwise, any discharge from an MS4 owned or operated by the Permittee.

**Ecology's Western Washington Phase I Municipal Stormwater Permit** regulates discharges from municipal separate storm sewers owned or operated by Clark, King, Pierce and Snohomish Counties, and the cities of Seattle and Tacoma.

**Ecology's Western Washington Phase II Municipal Stormwater Permit** covers certain "small" MS4s.

**Entity** means another governmental body, or public or private organization, such as another Permittee, a conservation district, or volunteer organization.

**EPA** means the U.S. Environmental Protection Agency.

**Equivalent document** means a technical stormwater management manual developed by a state agency, local government, or other entity that includes the Minimum Technical Requirements in Appendix 1 of this Permit. The Department may conditionally approve manuals that do not include the Minimum Technical Requirements in Appendix 1; in general, the BMPs included in those documents may be applied at new development and redevelopment sites, but the Minimum Technical Requirements in Appendix 1 must still be met.

**Heavy equipment maintenance or storage yard** means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored.

**Illicit connection** means any manmade conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.

**Illicit discharge** means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to an NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

**IDDE** means illicit discharge detection and elimination.

**IS** means the Information Services department.

**Low impact development (LID)** means a stormwater management and land development strategy applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions.

**Major municipal separate storm sewer outfall** means a municipal separate storm sewer outfall from a single pipe with an inside diameter of 36 inches or more, or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive stormwater from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 12 acres or more).

\*Note: The IDDE program requires mapping of outfalls that are 24 inches or greater in diameter.

**Material storage facilities** means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

**Maximum extent practicable (MEP)** refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

**MEP** means maximum extent practicable.

**MS4**: see **Municipal separate storm sewer system**.

**MTRs** means minimum technical requirements.

**Municipal separate storm sewer system (MS4)** means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

(i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or

similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;

(ii) designed or used for collecting or conveying stormwater;

(iii) which is not a combined sewer; and

(iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

**National Pollutant Discharge Elimination System (NPDES)** means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington Department of Ecology.

**Notice of Intent (NOI)** means the application for, or a request for coverage under, this General Permit pursuant to WAC 173-226-200.

**Outfall** means point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two MS4s, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

**O&E** means outreach and education.

**O&M** means operations and maintenance.

**Permittee:** Unless otherwise noted, the term “Permittee” includes Permittee, Co-Permittee, and Secondary Permittee, as defined below:

(i) A “Permittee” is a city, town, or county owning or operating a regulated small MS4 applying and receiving a permit as a single entity.

(ii) A “Co-Permittee” is any operator of a regulated small MS4 that is applying jointly with another applicant for coverage under this Permit. Co-Permittees own or operate a regulated small MS4 located within or adjacent to another regulated small MS4.

(iii) A “Secondary Permittee” is an operator of regulated small MS4 that is not a city, town, or county.

**RCW** means the Revised Code of Washington.

**SCD** means the Skagit Conservation District.

**Small municipal separate storm sewer system** or **small MS4** is a conveyance or system of conveyances for municipalities having populations of less than 100,000 according to the 1990 U.S. census. Such systems include road drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and/or storm drains that are:

a. Owned or operated by a city, town, county, district, association or other public body created pursuant to State law having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer districts, flood control districts or drainage districts, or similar entity.

b. Designed or used for collecting or conveying stormwater.

c. Not a combined sewer system,

- d. Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.
- e. Not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Small MS4s include systems similar to separate storm sewer systems in municipalities such as universities, large publicly owned hospitals, prison complexes, and highways and other thoroughfares. Storm sewer systems in very discrete areas such as individual buildings do not require coverage under this Permit.

Small MS4s do *not* include storm drain systems operated by non-governmental entities such as: individual buildings, private schools, private colleges, private universities, and industrial and commercial entities.

**SOPs**, or standard operating procedures, are the best practice approach to executing tasks or activities. In this document, they primarily pertain to the activities that will be implemented to protect stormwater quality.

**Stormwater** means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

**Stormwater associated with industrial and construction activity** means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, or associated with clearing grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

**Stormwater Management Manual for Western Washington** means the five-volume technical manual (Publication Nos. 99-11 through 15 for the 2001 version and Publication Nos. 05-10-029-033 for the 2005 version [the 2005 version replaces the 2001 version]) prepared by Ecology for use by local governments that contains BMPs to prevent, control, or treat pollution in stormwater.

**Stormwater Management Program (SWMP)** means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 or S6 of this Permit and any additional actions necessary to meet the requirements of applicable.

**Stormwater pollution prevention plan (SWPPP)** means a document that describes measures a municipality takes to prevent or mitigate stormwater pollution.

**Total maximum daily load (TMDL)** means a regulatory term in the U.S. Clean Water Act (CWA), describing a value of the maximum amount of a pollutant, or total maximum daily load.

**WAC** means the Washington Administrative Code.

**WWCBA** means the Washington Wastewater Collection Personnel Association.



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Prepared by:

**Brown** AND  
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# SKAGIT CONSERVATION DISTRICT STORM WATER EDUCATION PROGRAM 2010 REPORT



**Prepared by: Kristi Carpenter**

**For:**

**City of Mount Vernon**

**City of Burlington**

**City of Sedro-Woolley**

**Skagit County**

## **Storm Water Education Program Summary**

This progress report summarizes the storm water public education and outreach and the public participation and involvement activities that were completed by the Skagit Conservation District over the period January 1, 2010 through December 31, 2010. The primary purpose of the Skagit Conservation District's Storm Water Education Program is to assist local jurisdictions with compliance efforts for the "Public Education and Outreach" and the "Public Participation and Involvement" requirements of the NPDES storm water permit by facilitating greater public awareness of the sensitivity of local surface waters, their beneficial uses, the detrimental effects of polluted storm water and illicit discharges, and measures that can be taken to reduce storm water pollution.

**Skagit MS4 Partners:** The Skagit Conservation District's Storm Water Education Program is a local partnership formed to develop and implement a comprehensive water resource education, outreach, and public involvement program. The Skagit Conservation District has formed partnerships with the City of Mount Vernon, City of Burlington, City of Sedro-Woolley, and Skagit County. With the exception of the Skagit Conservation District, all partners are MS4 communities required to prepare Storm Water Pollution Prevention Plans (SWPPP) in accordance with Phase II of the Clean Water Act. The purpose of the partnership is to work together cooperatively and share a common message, avoid duplication of efforts (which in turn will save money and resources), utilize existing programs when possible and to share resources.

**Program Funding:** In 2008 the Skagit Conservation District applied for, and received grant funding through the WA Dept. of Ecology's Storm Water Grants Program. The scope of work outlined in the Storm Water Education Grant has guided the components of the Storm Water Education Program since the grant was received in 2008 and will continue through July 2011. The grant is also supported by partnering municipalities through direct and in kind matching funds.

## **2010 Activities**

### **1. PUBLIC PARTICIPATION AND INVOLVEMENT**

#### **Watershed Masters Volunteer Training Program**

- The Watershed Masters Volunteer Training program was conducted September 28<sup>th</sup> through November 16<sup>th</sup>, 2010 (8-week training) with 28 individuals completing the training.
- Over 130 sustainable backyard practices employed and reported by fall 2010 Watershed Master graduates.
- 4,126 volunteer hours reported from Watershed Master participants in 2010.
- Program evaluation forms were completed by program participants and included a survey of behavior changes of participants based on information received in class.
- Over 130 sustainable backyard practices employed and reported by Fall 2010 Watershed Master graduates.



### Skagit Stream Team

- 11 Stream Team volunteers for Kulshan Creek and Trumpeter Basin for 2010/11 season (Stream Team year is September through August).
- 6 Stream Team volunteers for Brickyard Creek for 2010/11 sampling season.
- 3 Stream Team volunteers for Gages Slough for 2010/11 sampling season.
- Other streams monitored by Stream Team volunteers in 2010/11 include Joe Leary Slough (7 volunteers); Bay View (3 volunteers); Samish (13 volunteers); Nookachamps (14 volunteers); No Name Slough (7 volunteers); and Fisher Creek (8 volunteers). In addition, 8 volunteers are monitoring during rain events in the Bay View drainage and No Name Slough (Storm Team).
- Total of 54 monitoring stations monitored twice a month by Stream Team volunteers, with the exception of Gages Slough which is monitored monthly.
- Total of 72 Stream Team volunteers for 2010/11.
- 63 2009/10 Stream Team volunteers were recognized at the Annual Year-End Stream Team Celebration, which was held on June 12, 2010.
- 1,192 Stream Team volunteer hours reported for the 2009/10 Stream Team program.
- Annual Stream Team training was held Sept. 8<sup>th</sup> and 9<sup>th</sup>, 2010.
- Parameters monitored by Stream Team volunteers include fecal coliform, temperature, dissolved oxygen, turbidity and total depth.
- Data is entered on excel spreadsheet.
- 2009/10 Annual Stream Team Report was completed.



### Storm Drain Labeling Program

- 300 storm markers installed in Mount Vernon; 725 educational door knob hangars distributed.
- 23 Kulshan Creek neighborhood kids and adults conducted storm drain marking in the Kulshan neighborhood (8 markers installed) and distributed over 450 door knob hangars to neighborhood apartment complexes.
- 60 storm markers installed in Burlington; 100 educational door knob hangars distributed.
- Staff provided support to the City of Burlington Parks & Recreation “Girl Power” workshop by leading approximately 38 youth participants in marking 37 storm drains and distributing 136 door hangars in down town Burlington and the Parks & Recreation office neighborhood.
- The Storm Drain labeling program was promoted through both editions of the Skagit Conservation News and approximately 75 promotional fliers were distributed at local events.



### Low Impact Development

- 1 interpretive sign was installed at the Skagit County rain garden demonstration project located at their administration building on Continental.
- 1 rain garden/bioswale plan for a parking lot retrofit project in partnership with the City of Sedro-Woolley was designed by SCD's engineer. The plan was reviewed and approved by the Dept. of Ecology.
- 1 rain garden plan for the City of Burlington was designed by SCD's engineer. The plan was reviewed and approved by the Dept. of Ecology.



## **2. PUBLIC EDUCATION AND OUTREACH**

### Backyard Conservation Stewardship Program

- Provided ongoing support and assistance to Backyard Conservation Stewardship program volunteers.
- Hosted monthly meetings with the Skagit Valley Backyard Wildlife Habitat Team.
- Coordinated work parties and constructed a community bird and butterfly demonstration garden in the Kulshan Neighborhood in partnership with the Backyard Conservation volunteers, City of Mount Vernon Police Department, Boy Scout Troop 461, and the Kulshan Creek neighborhood kids and families. The demonstration garden features an array of drought resistance plantings. Signage for the project is in progress and will include information on stormwater runoff, how incorporating native plants and healthy soils in place of lawn can help reduce stormwater runoff in our own backyards.



- With support from Backyard Conservation volunteers, the requirements to receive national designation as a “Wildlife Habitat Community,” were completed. Designated areas include all of the following zip codes: 98273, 98274, 98232, 98238, 98235. A celebration was held at the Kulshan Station on August 26<sup>th</sup> with over 50 people attending.
- Staff provided support to the City of Burlington Parks & Recreation Department's summer youth program by leading a field day at Pomona Grange Park to teach

youth participants about stormwater, backyard conservation, wildlife habitat, etc. Approximately 12 youth participated.

#### Puget Sound Starts Here Stormwater Educational Commercial Ads

- The Skagit EcoNet received grant funds from the Puget Sound Partnership to run the Puget Sound Starts Here Stormwater educational commercial ads at the Cascade Mall cinema from May 7<sup>th</sup>, 2010 through August 5, 2010.

#### Resource Materials/Education for Local Schools

- Educational packets were prepared and distributed to 420 local teachers. The packets include information on storm water, a list of videos and other supplemental educational materials available for teachers through the Skagit Conservation District, and promote available presentations (including the enviroscape model).
- 30 storm water education presentations, using the enviroscape watershed model, were conducted at Mount Vernon, Burlington/Edison and Sedro-Woolley schools – reaching 950 students.
- A ‘storm water savvy’ scavenger hunt was conducted at the Family Night on Samish Bay workshop, which was held on June 17<sup>th</sup>, and at the Skagit Letterbox Trail Celebration on Oct. 21<sup>st</sup> – 35 students/youth participated..



#### CSMP Logo/Theme/Poster Contest for Youth

- This program completed with City of Mount Vernon in 2008.
- This program completed with City of Burlington, City of Sedro-Woolley, and Skagit County in 2009.
- Framed copies of winning stormwater education posters are displayed at local jurisdictions.

#### Stormwater Educational Brochures and Fact Sheets.

- A “stormwater savvy” educational pet waste poster was designed and printed. Approximately 311 posters were distributed over the last year
- A series of tip sheets are currently in progress.

#### Stormwater Education Program for Local Business

- A “stormwater savvy” educational poster for the Food and Restaurant Industry was designed and published. Approximately 133 posters were distributed to date. The Skagit County Health Department is providing support with distribution.
- A “stormwater savvy” educational poster for the Auto Industry was designed and published. The Skagit County Health Department will provide support with distribution of the posters during regular visits to local auto related businesses.

#### Stormwater Systems Maintenance Workshop and Field Tour

- Initial planning and coordination of a “Stormwater Systems Maintenance Workshop and Field Tour” for homeowner association and private stormwater system facilities was conducted and scheduled for January 22, 2011 in partnership with Skagit County. The workshop will provide detailed instruction on how to maintain and inspect neighborhood detention ponds.

#### Clean and Green Car Wash Kits

Staff has attempted to track the number of times car wash kits have been checked out using an excel spreadsheet. However, it is possible that not all numbers from each partnering jurisdiction has been reported and, thus, may not be included in the widgets reported below:



- Mount Vernon – 306 cars were washed using a “Clean and Green” car wash kit, keeping 19,890 gallons of untreated car wash from entering the Mount Vernon storm drain system.
- Sedro-Woolley – 112 cars were washed using a “Clean and Green” car wash kit, keeping 7,280 gallons of untreated car wash from entering the Sedro-Woolley storm drain system.
- Burlington – 3 cars were washed using a “Clean and Green” car wash kit, keeping 195 gallons of untreated car wash from entering the Burlington storm drain system.
- Other – 886 cars were washed using a “Clean and Green” car wash kit, keeping 57,590 gallons of untreated car wash from entering Skagit County storm drain systems.
- Approximately 1,200 “Clean and Green” informational promotional flyers were distributed.
- The seven minute informational DVD that was produced last year is included on several websites, including Skagit Conservation District, Skagit County, and WA Dept. of Ecology.

#### Storm Water/Low Impact Development Presentations

- In 2010 staff provided a power point presentation on storm water and an introduction to low impact development at nine events, representing approximately 295 people.

#### Educational Displays

- Staff hosted educational displays, providing information on storm water and low impact development at numerous community events, including the Clean Samish Public Meetings and workshops (12 workshops overall), Washington Elementary School Science Fair, Family Festival of Farms, Samish Bay Bivalve Bash and Mud Run, the Skagit Letterbox Celebration, etc.

#### Educational Materials Distributed

- 311 Pet Waste educational posters distributed.

- 133 “Good Cleaning Practices for the Food and Restaurant Industry” posters distributed.
- 70 copies of the 2009/10 Skagit Stream Team Reports distributed (the report is also on the SCD and Padilla Bay Reserve websites).
- 210 Rain Garden Manuals distributed.
- 851 “Discover Stormwater” educational booklets distributed.
- 24 Pesticide Free Zone pledges received (and 24 Pesticide Free signs distributed).
- 48 Storm Drain Ranger badges distributed (to youth participating in the Stormwater Savvy Scavenger Hunt and the Kulshan youth who helped label storm drains and distribute educational door knob hangers in their neighborhood).
- 250 Storm Drain Labeling promotional fliers distributed.
- 250 Clean and Green Car Wash Kit promotional fliers distributed.
- 237 “Home Tips for Healthy Streams” brochures distributed.
- 233 “10 Essentials Checklist for Rural Landowners” distributed.
- 50 “Turning the Tide on Toxics” publications distributed.
- 225 Natural Yard Care Booklets distributed.
- 75 LID educational pamphlets distributed (Puget Sound Action Team publication)
- 145 SCD Best Management Practices for Skagit Livestock Owners distributed.
- 28 On-Site Septic System maintenance informational packets distributed.
- 28 “Poisoned Waters” discussion guides distributed.

#### Other

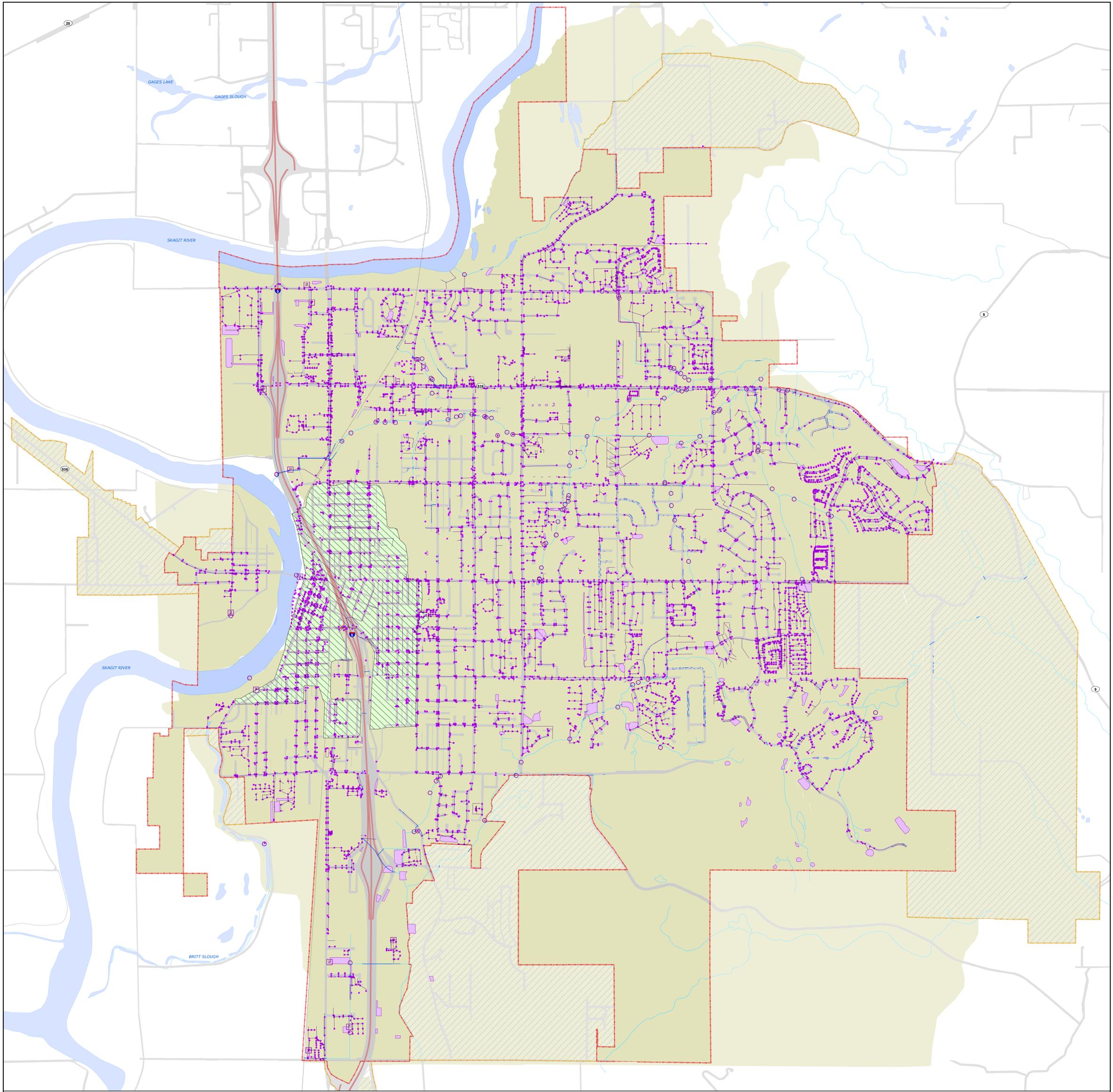
- Staff is participating on the Skagit EcoNet committee. The local group of educators was initially formed under the guidance of the Puget Sound Partnership, with SCEA now serving as the local lead. Promoting storm water education is a priority focus of the EcoNet groups, which have been formed in communities throughout Puget Sound.
- Staff attended quarterly meetings with our local NPDES partners.
- Staff participated in the Regional STORM group.
- Staff published several storm water related articles for the two 2010 publications of the Skagit Conservation News. Topics included: LID examples in Skagit County; Benefits of Low Impact Development; “Scoop the Poop”; Puget Sound Starts Here campaign; Car Wash Tips to Keep our Streams Clean; Promotion of the Pet Waste, Auto Industry and Food and Restaurant Industry posters now available; Enviroscape watershed model presentations with local schools; Promotion of the car wash kits; Stream Team and Watershed Masters recognition, etc.

#### **ACTIVITIES PLANNED FOR 2011**

The Ecology Stormwater grant will terminate on June 30, 2011. Staff will coordinate with NPDES partners to discuss funding and priority projects for the remainder of 2011.

Tasks that will be completed between January 1, 2011 and June 30, 2011 are outlined below:

- Staff will work with local NPDES partners to begin planning priorities beyond the scope of the Storm Water Education grant and begin pursuing additional funding.
- Educational “Stormwater Systems Maintenance Workshop and Field Tour” scheduled for Saturday, January 22, 2011 in partnership with Skagit County.
- Storm drain labeling will continue in all jurisdictions.
- The Backyard Conservation Stewardship Short Course will be conducted this spring.
- Skagit Stream Team program will continue with the annual training scheduled for September. Staff will work with local jurisdictions to determine Stream Team needs beyond June 30, 2011 (grant expiration date).
- A minimum of 1 educational brochures/tip sheets will be published.
- Staff will continue to provide support to the Skagit Valley Backyard Wildlife Habitat Team volunteers.
- Informational packets highlighting stormwater and water quality education will once again be distributed to local schools.
- Staff will continue to provide presentations on storm water education with the watershed enviroscape model to local school groups.
- The SCD website will be updated to include relevant storm water and LID information.
- News articles highlighting storm water education, LID practices, and volunteer opportunities will be included in each of the Skagit Conservation District’s newsletters.
- Staff will continue to provide presentations to local groups on storm water and LID as requested.
- Stream Team data will be reviewed and will be used to target priority neighborhoods for follow-up education.
- All projects will be tracked, evaluation surveys conducted when appropriate, and reporting will continue.



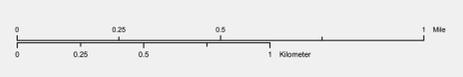
Map Revised: January 18, 2011

City of Mount Vernon Disclaimer: The information included on this map has been compiled by City of Mount Vernon staff from a variety of sources. The City of Mount Vernon makes no representations or warranties, expressed or implied, as to the accuracy, completeness, timeliness, or rights to the use of such information. The City of Mount Vernon shall not be liable for any general, special, indirect, incidental, or consequential damages including, but not limited to, lost revenues or lost profits resulting from the use or misuse of the information contained in this map.

City of Mount Vernon Public Works Department

- STORM LINE
- CULVERT
- Stormwater Feature
- P Pump Station
- ⊗ Outfall
- Detention Facility
- Basin
- MS4 Area
- Combined Sewer Area
- CITY
- UCA
- Railroad
- Right of Way
- Stream

# City of Mount Vernon Stormwater System



City of Mount Vernon  
910 Cleveland Avenue  
Mount Vernon, WA 98273  
Phone: (360) 336-6214

Report Date 01/14/2011 10:26 AM Submitted By Page 1

**Service #** 5921  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 111 N 17TH ST  
MOUNT VERNON WA 98273-

**Call Date** 01/08/2010 15:20 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** BLAINEC CHESTERFIELD, BLAINE **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** PHONE **Project** ILL DIS  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**  
**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 01/08/2010 03:45 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name**  
**First,MI** **Title**  
**Address** MOUNT VERNON WOMENS CLINIC  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail**  
**Day Phone** (360)424-4627 x **Evening Phone**  
**Call Date** 01/08/2010 15:20 **Taken By** BLAINEC  
**Comments**  
Callers car radiator just blew up; she wanted to notify City of mess on side of road; west side of street at 111 N 17th

**Call List**

There are no additional callers for this service number

**Comments**

3:20 - info to JD

3:45 - per JD: Kitty litter placed on oil; he will then have the street sweeper sweep it up. Also placed absorbent cloths in the catch basins in the vicinity and will vector out the system in the area.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

**Employee ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.

**Equipment ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.



Report Date 01/14/2011 10:26 AM Submitted By Page 1

**Service #** 5922  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 3228 MARTIN RD  
MOUNT VERNON WA 98273-

**Call Date** 01/13/2010 13:43 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** PHONE **Project**  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**  
**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 01/13/2010 03:50 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** ANONYMOUS  
**First,MI** , **Title**  
**Address**  
**City**  
**State/Province** **ZIP/PC**  
**Country**  Foreign **Reference #**  
**E-Mail**  
**Day Phone** **Evening Phone**  
**Call Date** 01/13/2010 13:43 **Taken By** SHERRIP  
**Comments**

Caller states ever since Thanksgiving his neighbor has been extending a hose out of their house window which drains directly into the storm drain. Caller is concerned as he does not know what is being drained from the house into the system. If it turned out to be something bad (drug cooking stuff) - it is awfully close to an elementary school. Caller does NOT want it to be known that he called as he fears retaliation (has already had several bad incidents happen to him in this area). Caller was not sure if he should contact police (for fear of drug making materials) or surface water, maybe it is something innocent going straight into the system. The hose is usually duck taped to the window; however, when it was freezing cold outside the hose disappeared for a while - but is back now that it has warmed up.

**Call List**

There are no additional callers for this service number

**Comments**  
1/13/10 At 3:50 pm - Ken Lee investigated site  
The hose is hooked up to a sump pump which is draining into the storm drain. Nothing illegal going on.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

**Employee ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.

**Equipment ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.



Report Date 01/14/2011 10:26 AM Submitted By Page 1

**Service #** 5928  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 903 S 27TH ST  
MOUNT VERNON WA 98273-

**Call Date** 01/28/2010 13:42 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** INTERN **Project**  
 **Customer Contact Requested** **Budget #**

Service Request Progress  
**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 01/28/2010 02:30 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** GILBERT  
**First,MI** DEAN, **Title**  
**Address** CITY OF MOUNT VERNON  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail**  
**Day Phone** **Evening Phone**  
**Call Date** 01/28/2010 13:42 **Taken By** SHERRIP  
**Comments**  
Dean called because he noticed substance pouring out of a vehicle on S 27th between Section and Division.

**Call List**

There are no additional callers for this service number

**Comments**

1/28 @ 2:30 pm Ken Lee reported that John Dillely was onsite and placed absorbent pads on the spill and in the catch basin. Ken Lee is familiar with this residence and their working on vehicles. This incident was a matter of a transmission blowing out and leaking before they could get the car moved.

1/28 @ 2:35 pm John Dillely reported that nothing got into the catch basin; however, he placed spill-sorb powder on the 3 oily spots in the road (less than a 2 x 2 area with tire tracks thru it). John will request a street sweeper to sweep up the powder tomorrow. John also placed an absorbent pad in the catch basin just in case it were to rain.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

Employee ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			

Report Date 01/14/2011 01:06 PM Submitted By Page 1

**Service #** 5941  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 219 E TAYLOR AVE  
 MOUNT VERNON WA 98273-

**Call Date** 02/18/2010 08:57 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** EMAIL **Project** SPILLS  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 03/11/2010 02:09 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** SACAYANAN  
**First,MI** TAMARA,  
**Address** **Title**  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail** TSAC461@ECY.WA.GOV  
**Day Phone** **Evening Phone**  
**Call Date** 02/18/2010 08:57 **Taken By** SHERRIP

**Comments**

From: Sacayanan, Tamara L. (ECY) [mailto:TSAC461@ECY.WA.GOV]  
 Sent: Thursday, February 18, 2010 8:57 AM  
 To: MVengineering  
 Subject: You've got ERTS!-618188  
 Importance: High

The incident number 618188 has been referred to you. Please follow up. (ERTS filed in Taylor "street" file):

Business Name: Diversified Mfg  
 Incident Type: Oil spill  
 Impact: Water pollution

Report received via EPA:

Company has white oil substance draining off of parking lot into storm drains from a big steel bin every day that it rains. This has been happening for over five years.

Report Date 01/14/2011 01:06 PM

Submitted By

Page 2

**Call List**

There are no additional callers for this service number

**Comments**

From: Pritchard, Sherri  
Sent: Thursday, February 18, 2010 9:30 AM  
To: Lee, Ken  
Subject: DOE Incident  
Importance: High

Ken - can you please check out the attached "ERTS"? (You've got ERTS!-618188)  
Please let me know what you find out so I can update the computer system.

---

From: Lee, Ken  
Sent: Thursday, February 18, 2010 4:13 PM  
To: 'Sacayanan, Tamara L. (ECY)'  
Cc: Pritchard, Sherri  
Subject: ERTS 618188

Tamara,

I checked this site today and saw no indication of anything from the site entering the storm drain system. The manager on site allowed me to look around and I saw no leaking metal container or signs of previous leaks. I have included a couple of photos of the parking lot and bins. The bins contain mostly aluminum and some steal shavings. They are going to install a cover over the large container of steal shavings.  
The sidewalks along the front of the site and the storm drain were all clean. I'll check the area next time it rains to see if there is anything coming off the site at that time.

---

From: Lee, Ken  
Sent: Thursday, March 11, 2010 2:09 PM  
To: Pritchard, Sherri  
Subject: RE: ERTS 618188

I checked the site today after it had rained and saw nothing coming off the site, or on it.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

Employee ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			
Equipment ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			
Vehicle ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			



Report Date 01/14/2011 10:27 AM Submitted By Page 1

Service # 5949  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 02/26/2010 13:10 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project SPILLS  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 02/26/2010 01:39 PM with code RESOL RESOLVED. No work orders are required.

Location 2ND STREET; ON THE NORTH SIDE OF PINE

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name GREENBERG  
First,MI JOSH, Title  
Address SKAGIT COUNTY  
700 S 2ND STREET  
City MOUNT VERNON  
State/Province WA ZIP/PC 98273  
Country  Foreign Reference #  
E-Mail joshg@co.skagit.wa.us  
Day Phone (360)336-9368 x16 Evening Phone  
Call Date 02/26/2010 13:10 Taken By SHERRIP  
Comments

Caller noticed an oil leak on the side of the road; a pool of oil from a parked car that left the scene.

Call List

There are no additional callers for this service number

Comments

1:22 pm:  
Street Dept Crew arrived and placed absorbing material down on spill  
  
1:39 pm  
Street Dept sweeper swept up oil and absorbant.  
  
No oil entered the City's drainage system

Inspected				Resolution			
By	Date	Time	Code	Date	Time		

Scheduled Resources

Employee ID Scheduled Start Scheduled End Work Description  
No resources scheduled.

Report Date 01/14/2011 10:27 AM Submitted By Page 1

Service # 5950  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
Address

Call Date 02/26/2010 08:10 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project SPILLS  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 02/26/2010 11:49 AM with code RESOL RESOLVED. Additional work orders are required.

Location 1400 BLOCK OF N 30TH AT KULSHAN TRAIL

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name MVFD  
First,MI BRIAN HARRIS, Title  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone Evening Phone  
Call Date 02/26/2010 08:10 Taken By SHERRIP

Comments  
Brian Harris (MVFD) called to state he had a car accident last night in the 1400 block of N 30th at Kulshan Trail (the car drove up onto the posts blocking entrance to the trail). The oil reservoir was punctured and about 4 to 6 quarts of oil spilled. The Fire Department put 10 gallons of absorbent onto the oil; however, it was so cold that it wasn't absorbing very fast so they left it overnight. He called this morning to request somebody to clean it up.

MVPD Case #10-M03053

2/26/10 @ 11:49 am per Dean Gilbert:

The oil was contained in a small ditch on the north side of the trail. The Parks Department used absorbent material to soak up the oil/water and disposed of it. No oil made it into the City's drainage system.

Call List

There are no additional callers for this service number

Inspected				Resolution			
By	Date	Time	Code	Date	Time		

Scheduled Resources

Employee ID Scheduled Start Scheduled End Work Description  
No resources scheduled.

Report Date 01/14/2011 01:09 PM

Submitted By

Page 1

Service # 5964  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 04/05/2010 13:01  
Taken By BLAINEC CHESTERFIELD, BLAINE  
Source EMAIL  
 Customer Contact Requested

Priority 3 MAJOR  
Responsibility SWM SURFACE WATER MANAGER  
Project ILL DUMP  
Duration of Call 00:00  
# of Calls 1  
Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 04/09/2010 12:00 PM with code RESOL RESOLVED. No work orders are required.

Location CAR WASH ON COLLEGE WAY - EAST OF THE RAILROAD TRACKS, NORTH SIDE

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name SKAGIT COUNTY PUBLIC HEALTH DEPARTMENT  
First,MI JOANNE LYNN, Title  
Address ENVIRONMENTAL HEALTH SPECIALIST  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail joannel@co.skagit.wa.us  
Day Phone 360-336-9380 x3402 Evening Phone  
Call Date 05/04/2010 13:01 Taken By BLAINEC

Comments  
From: JoanneLynn [mailto:joannel@co.skagit.wa.us]  
Sent: Monday, April 05, 2010 1:01 PM  
To: Chesterfield, Blaine; Lee, Ken  
Subject: complaint at a car wash

Hi, I received a complaint today about improper disposal of antifreeze. The complainant stated they had been at the car wash on College Way - east of the railroad tracks, north side. She did not have the name of it, but she said it is the "newer one, closer to the tracks". (I looked in the phone book and online, but can't find a name or address.) Anyway, yesterday her husband and daughter witnessed numerous men changing antifreeze on several cars at that car wash and washing it down the storm drain. I don't know if it was truly the storm drain or the drain to the collection system at the car wash. There are no attendants there, it is a DIY operation. That is all the information I have, but wanted you to know.

Call List

There are no additional callers for this service number

Comments  
Same complaint as CSR #5968  
See #5968 for resolution

Inspected			Resolution		
By	Date	Time	Code	Date	Time



Report Date 01/14/2011 10:27 AM Submitted By Page 1

**Service #** 5968  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 909 E COLLEGE WAY  
MOUNT VERNON WA 98273-

**Call Date** 04/05/2010 14:43 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** EMAIL **Project** ILL DUMP  
 **Customer Contact Requested** **Budget #**

Service Request Progress

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 04/09/2010 12:00 PM with code RESOL RESOLVED. Additional work orders are required

**Location** CAR WASH ON COLLEGE WAY - EAST OF THE RAILROAD TRACKS, NORTH SIDE

**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** SKAGIT COUNTY PUBLIC HEALTH DEPARTMENT  
**First,MI** JOANNE LYNN, **Title**  
**Address** ENVIRONMENTAL HEALTH SPECIALIST  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail** joannel@co.skagit.wa.us  
**Day Phone** 360-336-9380 x3402 **Evening Phone**  
**Call Date** 04/09/2010 14:43 **Taken By** BLAINEC

**Comments**

From: JoanneLynn [mailto:joannel@co.skagit.wa.us]  
Sent: Monday, April 05, 2010 1:01 PM  
To: Chesterfield, Blaine; Lee, Ken  
Subject: complaint at a car wash

Hi, I received a complaint today about improper disposal of antifreeze. The complainant stated they had been at the car wash on College Way - east of the railroad tracks, north side. She did not have the name of it, but she said it is the "newer one, closer to the tracks". (I looked in the phone book and online, but can't find a name or address.) Anyway, yesterday her husband and daughter witnessed numerous men changing antifreeze on several cars at that car wash and washing it down the storm drain. I don't know if it was truly the storm drain or the drain to the collection system at the car wash. There are no attendants there, it is a DIY operation. That is all the information I have, but wanted you to know.

**Call List**

There are no additional callers for this service number

**Comments**

4/9/2010: See College Way "Street" file (Citizen Contacts) for copy of code violation letter sent to owner by Ken Lee, Code Enforcement Officer CEDD.

Inspected			Resolution		
By	Date	Time	Code	Date	Time



Report Date 01/14/2011 10:27 AM

Submitted By

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Service # 5973  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 04/13/2010 09:57 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source INTERN Project NON STRM  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 04/13/2010 12:00 PM with code RESOL RESOLVED. No work orders are required.

Location KICAID - I-5 TO SKAT

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name MVFD  
First,MI Title  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone Evening Phone  
Call Date 04/13/2010 09:57 Taken By SHERRIP

Comments

From: Scally, Tom  
Sent: Tuesday, April 13, 2010 1:51 PM  
To: Pritchard, Sherri  
Cc: Hari, Roy; Love - Johnson, Christine; ODell, Mike  
Subject: FW: Illicit Discharge this morning

MVFD E111 was dispatched at 0957 this morning to a reported fuel spill on Kincaid St. near I-5. Upon arrival they found a widespread area of oil that appeared to extend from I-5 to the Skagit Station parking lot.

Call List

There are no additional callers for this service number



Report Date 01/14/2011 10:27 AM

Submitted By

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**Comments**

From: Scally, Tom  
Sent: Tuesday, April 13, 2010 1:51 PM  
To: Pritchard, Sherri  
Cc: Hari, Roy; Love - Johnson, Christine; ODell, Mike  
Subject: FW: Illicit Discharge this morning

Capt. Mike O'Dell investigated and was able to locate a truck which had a broken line on the transmission housing that had resulted in the leak. Capt. O'Dell's crew placed absorbent pads and floor sweep under the truck to catch as much of the leaking material as possible and had our dispatch center contact MV Public Works and MVPD.

Charlie Tewalt responded and advised that he would take whatever mitigation steps he could. With a widespread oil leak such as this which has been diluted with rainwater our options are limited. Capt. O'Dell discussed having a street sweeper respond, but Charlie apparently didn't think that was appropriate. Charlie discussed having the vacuum truck respond, but I am not sure what the final disposition on that was.

Additional information, including the name of the vehicle owner will be noted in MVFD incident #2010-1121, which will be completed later today. You should be able to get a copy of that report from Christine by tomorrow morning.

4/13/10 Charlie Tewalt reported that he had the street sweeper go over teh area and all was cleaned up.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

Employee ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			
Equipment ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			
Vehicle ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			



Report Date 01/14/2011 10:27 AM Submitted By Page 1

Service # 5983  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
Address

Call Date 04/27/2010 13:35 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project NON STRM  
 Customer Contact Requested Budget #  
Service Request Progress  
Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 04/27/2010 01:45 PM with code REFER REFERRAL TO OTHER AGENCY. No work orders are required

Location MADDOX CREEK CONDOMINIUMS - 1508 LINDSEY LOOP  
Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller  
Name SNOW  
First,MI WILLIAM, Title  
Address 1508 LINDSEY LOOP, #105  
City MOUNT VERNON  
State/Province WA ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone (360)424-4387 x Evening Phone (360)540-0505 x  
Call Date 04/27/2010 13:35 Taken By SHERRIP  
Comments  
Caller states last Thursday a tow truck dropped off a car in the area near the mailboxes. When he returned to move the car a hydraulic line broke, leaking all over the roadway. The tow truck driver spread something over the spill to absorb the spill; however, the stain needs to be cleaned from the roadway. Caller believes none of the spill made it into the storm drain system.

Call List  
There are no additional callers for this service number  
Comments  
This is privately owned road and the City cannot clean the stain on the road. If the fluid would have reached the storm drain, the City would have had to investigate further down the line.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

Scheduled Resources  
Employee ID Scheduled Start Scheduled End Work Description  
No resources scheduled.  
Equipment ID Scheduled Start Scheduled End Work Description  
No resources scheduled.



Report Date 01/14/2011 10:27 AM Submitted By Page 1

Service # 5998  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 05/11/2010 09:45 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project NON STRM  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 05/11/2010 12:46 PM with code RESOL RESOLVED. No work orders are required.

Location SECTION AT 27TH

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name JOHN  
First,MI  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone Evening Phone  
Call Date 05/11/2010 09:45 Taken By SHERRIP  
Comments  
Caller states he just drove thru the intersection of 27th and Section; the manhole cover on Section has water bubbling up out of it. Caller states their must be some large leak or something somewhere.

Call List

There are no additional callers for this service number  
Comments  
5/11/10 Ken S. & Ken B. responded and jetted and cleared stoppage in sanitary sewer line on So. 27th. St. ks.  
See "27th" Street file for DOE Environmental Incident Initial Report Form - Sanitary Sewer Overflows (SSOs)

Inspected			Resolution		
By	Date	Time	Code	Date	Time

Scheduled Resources

Employee ID Scheduled Start Scheduled End Work Description  
No resources scheduled.

Equipment ID Scheduled Start Scheduled End Work Description  
No resources scheduled.



Report Date 01/14/2011 01:10 PM Submitted By Page 1

Service # 6012  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
Address 1021 N LAVENTURE RD  
MOUNT VERNON WA 98273-

Call Date 06/01/2010 11:00 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project SPILLS  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 06/01/2010 12:00 PM with code RESOL RESOLVED. No work orders are required.

Location  
Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name MVFD  
First,MI MIKE BOURGEOIS, Title  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone Evening Phone  
Call Date 06/01/2010 11:00 Taken By SHERRIP  
Comments  
Fire Department responded to a blue chevy truck parked on the side of the road at 1021 N LaVenture; the truck is leaking a small amount of antifreeze. The MVFD cleaned up the spill by placing absorbant material; the spill did not get into the drain system. MVPD, Tom Wenzl, is working to have the truck removed. The Street Department will need to come by after the truck is removed and sweep up the absorbant material

Call List

There are no additional callers for this service number

Inspected			Resolution		
By	Date	Time	Code	Date	Time

Scheduled Resources

Employee ID Scheduled Start Scheduled End Work Description  
No resources scheduled.

Equipment ID Scheduled Start Scheduled End Work Description  
No resources scheduled.

Vehicle ID Scheduled Start Scheduled End Work Description  
No resources scheduled.



Report Date 01/14/2011 10:28 AM

Submitted By

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**Service #** 6020  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 1024 CLEVELAND DR  
MOUNT VERNON WA 98273-

**Call Date** 06/07/2010 14:50 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** WALKIN **Project** SPILLS  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 06/07/2010 03:30 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** PW STAFF  
**First,MI** , **Title**  
**Address**  
**City**  
**State/Province**  
**Country**  Foreign **ZIP/PC**  
**E-Mail** **Reference #**  
**Day Phone** **Evening Phone**  
**Call Date** 06/07/2010 14:50 **Taken By** SHERRIP

**Comments**  
Car accident in front of 1024 Cleveland. Vehicle rear-ended a parked car. Antifreeze and fluids leaked from vehicle onto ground. Fire Department placed "kitty litter" and swept mess; tow truck driver finished cleanup. No liquids actually entered the drain system.

**Call List**

There are no additional callers for this service number

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

**Employee ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.

**Equipment ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.

**Vehicle ID** **Scheduled Start** **Scheduled End** **Work Description**  
No resources scheduled.



Report Date 01/14/2011 10:28 AM

Submitted By

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**Service #** 6029  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 242 E COLLEGE WAY  
MOUNT VERNON WA 98273-

**Call Date** 06/15/2010 14:25  
**Taken By** BLAINEC CHESTERFIELD, BLAINE  
**Source** EMAIL  
 **Customer Contact Requested**

**Priority** 3 MAJOR  
**Responsibility** SWM SURFACE WATER MANAGER  
**Project** SPILLS  
**Duration of Call** 00:00  
**# of Calls** 1  
**Budget #**

**Service Request Progress**

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 06/15/2010 04:50 PM with code REFER REFERRAL TO OTHER AGENCY. No work orders are required.

**Location** RITE AID PARKING LOT

**Area**  
**District**  
**Parcel**  
**Template Type**  
**Asset**

**Sub-Area**  
**Map #**  
**A/P #**

**Primary Caller**

**Name** HALEY  
**First,MI** RICK,  
**Address** SKAGIT COUNTY PUBLIC WORKS  
**City**  
**State/Province**  
**Country**  **Foreign**  
**E-Mail**  
**Day Phone** (360)419-3424 x  
**Call Date** 06/15/2010 14:25

**Title**  
**ZIP/PC**  
**Reference #**  
**Evening Phone**  
**Taken By** BLAINEC

Report Date 01/14/2011 10:28 AM

Submitted By

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**Primary Caller**

**Comments**

From: RickHaley [mailto:rickh@co.skagit.wa.us]  
Sent: Tuesday, June 15, 2010 2:25 PM  
To: Michael See; Lori Wight  
Cc: Chesterfield, Blaine  
Subject: Spill report

Hi guys,

Dan Cain from EMS called to report that he had gone to the scene of an oil spill in the Mount Vernon Rite Aid parking lot. The fire department had responded with pads and other absorbent devices. Locals reported a very ancient vehicle had been recently spotted in the area. Most of the oil was in the vicinity of a catch basin near the lower (north) end of the parking lot. I asked Dan to call Ecology and gave him the spill number, then left a voice mail for Blaine. I went for a look but didn't find it as I didn't have the "close to the north edge" part of the location. Dan reported that it wasn't a large amount of oil, and it looked to be all dried up by the time he left, but when it was wet he said it was the brightest sheen he's seen.

Let me know if there's something more I need to do.

Rick Haley  
Water Quality Analyst  
Skagit County Public Works  
Water Resources Management  
1800 Continental Place  
Mt. Vernon, WA 98273  
rickh@co.skagit.wa.us  
360-419-3424  
360-336-9400

**Call List**

There are no additional callers for this service number

**Comments**

From: Chesterfield, Blaine  
Sent: Tuesday, June 15, 2010 4:50 PM  
To: Pritchard, Sherri  
Cc: 'RickHaley'; Michael See; Lori Wight  
Subject: RE: Spill report

Sherri,

Add this to our IDDE spill response log. See below for initial report information. I visited the site at 4 PM today and the Fire Department had done a great job of cleaning up the area with dry sweep. There was also absorbent pads placed over the catch basin. There was no evidence of oil in the downstream catch basins. There was still dry sweep and oil absorbent pads in the parking lot. At 4:15 PM I called Richard Taylor of Property Management Services which manages that retail area. Richard's contact information is cell (425) 280-8116. Richard was very cooperative and said he would have his sweeper out to clean the area as soon as possible. I mentioned that if it rained hard that he may have a large puddle and mess in the parking area. Richard indicated that he would try get the parking area cleaned up prior to the rain.

Inspected				Resolution			
By	Date	Time		Code	Date	Time	

**Scheduled Resources**

**Employee ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.

**Equipment ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.

**Vehicle ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.



Report Date 01/14/2011 12:57 PM Submitted By Page 1

Service # 6049  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 07/20/2010 13:34 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source OUTAGN Project  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 07/20/2010 05:00 PM with code RESOL RESOLVED. No work orders are required.

Location OLD HWY 99  
ELEANOR LANE  
Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name FRIZAE  
First,MI MICHAEL, Title  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone (360)789-5875 x Evening Phone  
Call Date 07/20/2010 13:34 Taken By SHERRIP

Comments

ERTS #621259  
From: Susanne Winter (ECY)  
Sent: Tuesday, July 20, 2010 at 1:34 pm  
To: Chris Wilkerson (ECY) Cc: Tamara Sacayanan (ECY)  
Subject: Spill Report Importance: High  
  
Michael Frizae 360-789-5875  
Called to report an oil sheen in an agricultural ditch by a medical diagnosis building at the dead end of an industrial park. Intersection of Old Hwy 99 and Eleanor Lane (at end of Eleanor Lane in south Mount Vernon).  
He tried 4 times to report to Tammy (never left a message) wouldn't leave the info at reception... reception transferred to me. I talked to him at 1:25 pm. They discovered it today

Call List

There are no additional callers for this service number

Comments

From: Chesterfield, Blaine  
To: Pritchard, Sherri  
Subject: CSR 6049

I investigated the report of an oil sheen on at the end of Eleanor Lane in south Mount Vernon on July 20, 2010. It turned out to be an iron rich algae sheen. Algae sheens are a common natural occurrence in this area and have the same look as an oil sheen. When you run a stick through them they tend to break apart with a modular appearance. Oil sheens will flow right back together when a stick is ran through them. Please close out and report as resolved.





Report Date 01/14/2011 10:28 AM Submitted By Page 1

Service # 6092  
Problem DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION

Address

Call Date 09/20/2010 12:00 Priority 3 MAJOR Duration of Call 00:00  
Taken By SHERRIP PRITCHARD, SHERRI Responsibility SWM SURFACE WATER MANAGER # of Calls 1  
Source PHONE Project  
 Customer Contact Requested Budget #

Service Request Progress

Schedule (resolved)  
Inspect Not inspected with no due date.  
Resolve Resolved at 09/21/2010 12:00 PM with code RESOL RESOLVED. Additional work orders are required

Location COUNTY OWNED PARKING LOT  
SE CORNER OF 2ND AND BROADWAY  
JUST EAST OF 910 CLEVELAND

Area Sub-Area  
District Map #  
Parcel  
Template Type A/P #  
Asset

Primary Caller

Name SKAGIT COUNTY GIS DEPT  
First,MI , Title  
Address  
City  
State/Province ZIP/PC  
Country  Foreign Reference #  
E-Mail  
Day Phone Evening Phone  
Call Date 09/20/2010 12:00 Taken By SHERRIP

Comments  
Skagit County employee called to report a county vehicle in their parking lot across from the Fire Station had leaked all of its gas out of its tank onto the ground.

Call List

There are no additional callers for this service number

Comments

From: Tewalt, Charlie  
Sent: Wednesday, September 22, 2010 9:31 AM  
To: Pritchard, Sherri  
Subject: RE: County vehicle spill that occurred

One of the County maintenance crew from the Courthouse called me on Monday to let me know that the spill may have gotten into the City storm line. I had Ken Bergsma respond and he put out some absorbent pads around the CB and he placed absorbent over the area that the gasoline was draining. The CB was on the City combined sewer system so the spillage was going to the Treatment Plant. The Parking lot is used for County vehicles and the CB is in the Center of the County lot.

There should have been a County response to this. I looked today and the pickup has not been moved and nothing has been cleaned up under or around it. The County's Emergency Management Department should have responded and cleaned up the mess. The City Collection crew cleaned out the County CB and removed the absorbent materials which Ken put down, on Tuesday.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

Report Date 01/14/2011 10:28 AM

Submitted By

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**Service #** 6120  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 4880 E DIVISION ST  
MOUNT VERNON WA 98273-

**Call Date** 11/08/2010 15:00 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** JOHNT TORGERSON, JOHN **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** INTERN **Project** ILL DUMP  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 11/10/2010 02:00 PM with code RESOL RESOLVED. No work orders are required.

**Location** 4800 BLOCK OF E DIVISION  
BRICK HOUSE ADJACENT TO THE ENTRANCE OF CEDAR HEIGHTS PHASE II  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** TORGERSON  
**First,MI** JOHN, **Title**  
**Address** CEDD  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail**  
**Day Phone** **Evening Phone**  
**Call Date** 11/08/2010 15:00 **Taken By** JOHNT

**Comments**

On Monday November 8th about 3:00 pm I saw two men that work for Joe Woodmansee's LLC pumping water from the drain field for the brick house adjacent to the entrance of Cedar heights Phase II. I smelled sewer and they were pumping it into the sites storm system because their storm water had flowed into the damaged drain field and filled it up.

Tuesday November 9th, talked with Ken Lee of code enforcement about pumping septic water into the storm water pond in the office then met him on site. He took a few photos and then called John Dilly who then sent out Ken Bergsma to take samples of the water. The first one was from the open septic drain pit. Second was from the CB they pumped into, third was from the pond outfall on the north side of east Division and the fourth one was the storm water going into the culvert that goes under the pond.

**Call List**

There are no additional callers for this service number

Report Date 01/14/2011 10:28 AM

Submitted By

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**Comments**

Affidavit and photos in street file (Division Street)

From: Lee, Ken  
Sent: Wednesday, November 10, 2010 4:39 PM  
To: Chesterfield, Blaine  
Subject: RE: Cedar Heights Phase II illicit discharge of septic water

I am working on the affidavit to send them a fine for the illegal discharge into the pond and creek.

---

From: Chesterfield, Blaine  
Sent: Tuesday, November 16, 2010 2:32 PM  
To: Pritchard, Sherri  
Cc: Torgerson, John  
Subject: RE: Cedar Heights Phase II illicit discharge of septic water

I just spoke with John Torgerson and he indicated that the latest tests revealed a Fecal count of 8000 colonies/100ml in the detention pond. The developer is working on chlorinating the pond to eliminate the fecal coliform and then will use vitamin C to remove the chlorine. Once the tests show the water is good they will allow the water to flow out of the pond.

Ken is still working on the fine for an illegal discharge into the creek.

---

Subject: FW: Fecal Results 4880 E. Division (Woodmansee Construction)  
From: Duranceau, Gary (11/22/10) To: Lee, Ken

Here are the latest fecal results.

November 18, 2010	CFU/100mL
Sample by House	<1
Sample of outfall	<1
Sample of inflow	200

November 19, 2010	CFU/100mL
Sample by House	10
Sample of outfall	53
Sample of inflow	20

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

Employee ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			

Equipment ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			

Vehicle ID	Scheduled Start	Scheduled End	Work Description
No resources scheduled.			

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**Service #** 6134  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 2220 TRUMPETER DR  
MOUNT VERNON WA 98273-

**Call Date** 11/28/2010 18:28 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** SHERRIP PRITCHARD, SHERRI **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 1  
**Source** EMAIL **Project** ILL DUMP  
 **Customer Contact Requested** **Budget #**

**Service Request Progress**

**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 11/29/2010 04:45 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** ROGERS  
**First,MI** DAVE, **Title**  
**Address**  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail** rogers.dave50@yahoo.com  
**Day Phone** **Evening Phone**  
**Call Date** 11/28/2010 18:28 **Taken By** SHERRIP

**Comments**

From: Dave Rogers [mailto:rogers.dave50@yahoo.com]  
Sent: Sunday, November 28, 2010 6:28 PM  
To: MVengineering  
Subject: Re: Have seen someone dumping oil

To Whom It May Concern:

Recently, I witnessed someone, dumping (what appeared to be motor oil) onto the bank behind their home. The address is 2220 North Trumpeter Dr.

I saw Mr. White with a wheelbarrow dumping something in the back on the bank. When I looked into this further I was pretty upset to see motor oil bottles in the wheelba

I am not sure who to contact with this but I would like it taken seriously.

**Call List**

There are no additional callers for this service number

Report Date 01/14/2011 10:29 AM

Submitted By

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**Comments**

From: Lee, Ken  
Sent: Monday, November 29, 2010 4:45 PM  
To: Pritchard, Sherri  
Subject: RE: Have seen someone dumping oil

Went to the property and contacted the property owner. There has been no oil dumping at the site ( I was allowed to look). There is a neighborhood dispute going on at this location. I had a case against the neighbor who was dumping yard waste onto the green belt behind the property. I think this complaint was in retaliation for that incident. Long story, short answer, no dumping.

Inspected			Resolution		
By	Date	Time	Code	Date	Time

**Scheduled Resources**

**Employee ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.

**Equipment ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.

**Vehicle ID**      **Scheduled Start**      **Scheduled End**      **Work Description**  
No resources scheduled.

Report Date 01/14/2011 10:29 AM Submitted By Page 1

**Service #** 6165  
**Problem** DIDDE ILLICIT DISCHARGE DETECTION & ELIMINATION  
**Address** 209 MILWAUKEE ST  
 MOUNT VERNON WA 98273-

**Call Date** 12/20/2010 13:06 **Priority** 3 MAJOR **Duration of Call** 00:00  
**Taken By** BLAINEC CHESTERFIELD, BLAINE **Responsibility** SWM SURFACE WATER MANAGER **# of Calls** 2  
**Source** EMAIL **Project** SPILLS  
 **Customer Contact Requested** **Budget #**  
**Service Request Progress**  
**Schedule** (resolved)  
**Inspect** Not inspected with no due date.  
**Resolve** Resolved at 12/23/2010 03:23 PM with code RESOL RESOLVED. No work orders are required.

**Location**  
**Area** **Sub-Area**  
**District** **Map #**  
**Parcel**  
**Template Type** **A/P #**  
**Asset**

**Primary Caller**

**Name** HALEY  
**First,MI** RICK, **Title**  
**Address** SKAGIT COUNTY  
**City**  
**State/Province** **ZIP/PC**  
**Country**  **Foreign** **Reference #**  
**E-Mail**  
**Day Phone** **Evening Phone**  
**Call Date** 12/20/2010 13:06 **Taken By** BLAINEC

**Comments**  
 From: ServiceRequest@co.skagit.wa.us [mailto:ServiceRequest@co.skagit.wa.us]  
 Sent: Monday, December 20, 2010 1:06 PM  
 To: Chesterfield, Blaine  
 Cc: michaels@co.skagit.wa.us  
 Subject: Illicit Discharge: \*ref#24-186  
  
 Blaine, I just wanted to confirm that Rick notified you of this.  
  
 Mt. Vernon Illicit Discharge. Caller indicated that there was an oil container left near a drain at 209 Milwaukee Street. He stated that the oil container had no lid and that every time it rained it would overflow into the nearby drain and into the stormwater system. Caller provided limited information.  
  
 Rick Haley took the call and notified Blaine Chesterfield at the City of Mt. Vernon of the incident. The City of Mt. Vernon will be responding.  
  
 Note: This email is sent with reference to Incident #186.  
 Please mention reference number 'ref#24-186' for further email communications.  
 ref#24-186

Report Date 01/14/2011 10:29 AM

Submitted By

Page 2

**Call List**

**Name**  
**First,MI** **Title**  
**Address**

**City**  
**State/Province**  
**Country**  **Foreign** **ZIP/PC**  
**E-Mail** **Reference #**

**Day Phone** (360)420-6682 x **Evening Phone**  
**Call Date** 12/21/2010 12:48 **Taken By** SHERRIP

**Comments**  
Caller states he called yesterday about an oil can on the ground but nothing was ever done about it. Caller would like this taken care of. The oil can is located in the fenced in dumpster area at 209 Milwaukee

**Comments**

-----Original Message-----

From: Chesterfield, Blaine  
Sent: Monday, December 20, 2010 1:55 PM  
To: 'Michael See'  
Cc: Rick Haley (rickh@co.skagit.wa.us); Pritchard, Sherri  
Subject: RE: Illicit Discharge: \*ref#24-186

Rick,

I walked completely around the site and saw no evidence of an oil can that was leaking near a catchbasin along the road. If the caller calls again ask for a more specific location on the property. I tried to get into the building to look for an office but all the doors into the building were locked. I also looked for a phone number to the Milwaukee Apartment complex but had no luck. There has been construction activity in the area recently so maybe they removed the can. I will continue to try to contact the property owners to determine if a problem exists.

Sherri can you put this in our IDDE database and I will keep you updated.

---

From: Pritchard, Sherri  
Sent: Tuesday, December 21, 2010 4:00 PM  
To: Chesterfield, Blaine  
Subject: Oil on Milwaukee

Charlie just drove by and told a man sitting there that the can needed to be picked up and disposed of. The guy got up to go tell the maintenance man. The can is sitting in a fenced in garbage area. Charlie said he will check again tomorrow to be sure it has been taken care of.

---

From: Chesterfield, Blaine  
Sent: Thursday, December 23, 2010 3:23 PM  
To: Pritchard, Sherri  
Subject: RE: Oil on Milwaukee

I looked in the garbage area and saw some evidence that an oil can was there at one time. There was a stain on a concrete block and slab. There was no oil can and the area looked to be cleaned up.

---

From: Chesterfield, Blaine  
Sent: Thursday, December 23, 2010 3:26 PM  
To: Pritchard, Sherri  
Subject: RE: Oil on Milwaukee

As a note you may want to mention that we identified this as in the CSO area that drains to the WWTP not a storm drain area.

# City of Mount Vernon Low Impact Development Barriers

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Prepared for  
City of Mount Vernon, Washington  
December 2010

## Section 1

# Introduction

The Western Washington Phase II Municipal Stormwater Permit (Phase II Permit) regulates stormwater discharges for small municipal separate storm sewer systems (MS4s) as established in Code of Federal Regulations (CFR) Title 40, Part 122.26. The Phase II Permit, issued in 2007 and modified in 2009, includes requirements (S9.E.4.a) for permittees to summarize identified barriers to the use of low-impact development (LID) in their MS4s and measures to address these barriers.

The Phase II Permit (S9.E.4.b) also requires the permittee to complete a report (either individually or in cooperation with other permittees) that describes currently available LID practices; potential or planned non-structural LID techniques, goals, and metrics; and schedules for implementation.

The City of Mount Vernon (City) prepared this document to meet the Phase II Permit S9.E.4.a and S9.E.4.b requirements. This document is divided into four sections as follows:

- Section 1 provides an introduction and background information.
- Section 2 discusses general barriers to LID implementation in the city of Mount Vernon.
- Section 3 identifies specific portions of the current City standards and codes that could present barriers to LID implementation.
- Section 4 describes the current and planned LID practices, as well as goals and schedules for implementation.

## 1.1 Purpose

Special Condition S9.E.4 of the Phase II Permit requires permittees to submit by March 31, 2011, the annual report that includes the following information:

- a summary of identified barriers to the use of LID within the area covered by the permit and measures to address the barriers
- a report describing:
  - currently available LID practices that can reasonably be implemented within this permit term
  - potential or planned non-structural actions and LID techniques to prevent stormwater impacts
  - goals and metrics to identify, promote, and measure LID use
  - potential or planned schedules for the permittee(s) to require and implement the non-structural and LID techniques on a broader scale in the future.

The Washington State Department of Ecology (Ecology) suggests that permittees focus this task on preparing to implement LID requirements expected in the next permit cycle.

## 1.2 Background

LID techniques can help sites mimic the hydrology and water quality of pre-developed conditions. However, due to site conditions or other obstacles, LID cannot be implemented everywhere. Ecology has required permittees to implement LID techniques “where feasible.” This document is the first step in helping the City determine where LID implementation appears feasible. Although the City cannot control

barriers such as soil infiltration, a high groundwater table, or steep slopes, it can manage codes and standards to allow for LID implementation where feasible.

## Limitations

This document is intended to meet the requirements of S9.E.4.a and S9.E.4.b in the current Phase II Permit (dated February 2007, modified June 2009). The current permit is due to expire in 2012, at which time Ecology will issue a new Phase II Permit. The new Phase II Permit could have different requirements with respect to LID. Therefore, the City may need to modify or change this document based on new permit requirements.

The rate of economic recovery may significantly affect the rate of LID implementation. During unfavorable economic conditions new land development and redevelopment projects that would result in LID facility construction may be significantly curtailed. City revenue reductions from taxes, utility service charges, permit fees, and other sources may limit available staff and other resources to facilitate LID implementation. Thus, time frames for LID implementation may be extended by circumstances beyond the control of the City.

## 1.4 References

The following sources may be useful in preparing submittals for S9.E.4.a and b:

- Survey of Local Governments that Participated in the 2005–2009 LID Local Regulation Assistance Project, Puget Sound Partnership, April 2010  
[http://www.psp.wa.gov/downloads/LID/PSPSurveyLIDRegulAsistance\\_23April2010.pdf](http://www.psp.wa.gov/downloads/LID/PSPSurveyLIDRegulAsistance_23April2010.pdf)
- Puget Sound Partnership's LID Local Regulation Assistance Project (2005, 2006, 2008, 2009)  
[http://www.psparchives.com/our\\_work/stormwater/lid/lid\\_regs.htm](http://www.psparchives.com/our_work/stormwater/lid/lid_regs.htm)
- Water Quality Scorecard, Incorporating Green Infrastructure Practices at the Municipal, Neighborhood, and Site Scales, USEPA  
[http://www.epa.gov/smartgrowth/pdf/2009\\_1208\\_wq\\_scorecard.pdf](http://www.epa.gov/smartgrowth/pdf/2009_1208_wq_scorecard.pdf)

## Section 2

# Potential LID Barriers and Measures to Address Them

This section discusses some of the general barriers that may apply to Mount Vernon as well as to other jurisdictions and may make LID implementation infeasible. This section also includes suggested actions to remove those barriers and includes potential actions by others (e.g., Ecology, contractors, developers, etc.) as well as the City.

**“Where feasible” is not clearly defined:** Ecology is working on defining where LID is feasible per a ruling of the Pollution Control Hearings Board (PCHB). Ecology completing the “where feasible” definition is necessary to remove the barrier.

**LID definitions:** Ecology is working on further defining LID; this definition is necessary to remove the barrier.

**Perceptions of compromised public safety and property damage:** Some people perceive certain LID techniques as potentially compromising public safety. Some concerns include reduced emergency vehicle access/response by using “skinny” streets to reduce impervious area, exacerbating landslide potential by using infiltration and dispersion, and causing water damage on adjacent properties by using infiltration and dispersion. Ecology and the Puget Sound Partnership should mount a public awareness campaign to inform the public about the benefits and risks of LID techniques.

**LID allowable credit calculation:** Ecology is working to refine LID credits to be used in reducing detention storage volume and for other potential LID incentives. Some LID credits may be available only on lots with an area greater than 1 acre; relatively few such lots are located in residential neighborhoods within the city. Ecology should complete its work to define allowable LID credit calculation. LID credits against local stormwater management fees could significantly reduce available funding for utility operation and maintenance activities.

**Insufficient areas on smaller lots:** Certain LID techniques may not be appropriate for application on smaller lots. The City should develop a strategy for assessing small lot feasibility.

**Poorly draining soils:** Many areas of the City have soils inappropriate for implementation of LID infiltration options. The City must develop a strategy for identifying such areas (perhaps involving definition of appropriate soil conditions, mapping areas of suitable soils, and/or defining how to perform onsite soil suitability analyses).

**Moderate and steep slopes:** Some areas of the city have slopes that might be too steep for certain infiltration and flow attenuation LID options. The City should develop a strategy for identifying such areas (perhaps involving definition of appropriate slope conditions, mapping areas of suitable slopes, and/or defining how to perform onsite slope suitability analyses).

**Unstable slopes:** Some areas of the city might be inappropriate for certain infiltration and flow attenuation LID options due to slope instability. The City should develop a strategy for identifying such areas (perhaps involving definition of appropriate slope stability conditions, mapping areas of suitable slope stability, and/or defining how to perform onsite slope suitability analyses).

**Aquifer and wellhead protection areas:** Some areas of the city require aquifer and wellhead protection, which ensures adequate supplies of safe drinking water. The City must develop a strategy for identifying

such areas and measures to protect them consistent with Code sections addressing critical areas building requirements.

**High groundwater and ground/surface interflow:** Some areas of the city have high groundwater and ground/surface interflow conditions that may preclude certain infiltration, flow attenuation, and flow reduction LID options. The City should develop a strategy for identifying such areas (perhaps involving definitions of appropriate groundwater conditions, mapping areas of suitable conditions, and/or defining how to perform onsite groundwater suitability analyses).

**Local LID designer and contractor expertise:** Local experience with LID design and construction is limited. The State should provide training to increase the pool of knowledgeable LID designers, installation and maintenance contractors, and local government permit reviewers.

**Performance, reliability, life-cycle cost, and unintended impacts:** Early stormwater management efforts using some LID techniques (such as infiltration) achieved limited success. Perceptions exist that LID technique performance may be difficult to predict and that LID facilities may be susceptible to failure, may have relatively high replacement costs over time, and may negatively affect groundwater quality. Moreover, failure of LID measures on private land could lead to public drainage and water quality problems that require expensive capital improvement projects to address. The State should provide monitoring to better understand LID performance and help with LID education efforts.

**Property owner education:** Many property owners do not clearly understand the maintenance requirements of LID facilities. Local governments need the resources to provide those property owners with necessary information on LID systems and local conditions affecting those systems.

**Assuring system performance:** With overall stormwater system planning, maintenance, and operations relying on properly functioning LID facilities, it will be necessary to ensure that those systems continue to function as designed. Over time there will be numerous such individual systems of many types that will be employed and widely dispersed across the landscape. Performance of public systems will rely on management of facilities within right-of-ways, easements and dedicated tracts with sufficient inspection and maintenance resources allocated to these efforts. Performance of privately owned and operated systems will rely on efforts of property owners, property management companies, homeowners associations and other entities and their ability to allocate resources for, and perform maintenance activities on, their own systems. Public resources will need to be allocated to ensure that sufficient inspection and enforcement actions can be taken to ensure proper functioning of the privately operated facilities. Funding mechanisms to provide all these necessary resources will need to be identified and implemented.

**International Building Code (IBC):** The IBC may have requirements and/or standards that inhibit the use of LID practices. The City has no authority to modify the IBC. To date, the City has not encountered any barriers from the IBC. If a barrier becomes apparent in the future, the City will consider exceptions to the IBC that will still protect public safety, and allow for LID techniques where feasible.



## Section 3

# City-Specific LID Barriers

Many current City codes and standards were written before current LID practices were developed. The City hired a consultant to review portions of the City's codes and related documents to identify challenges to implementing LID. The consultant reviewed the following documents:

- Mount Vernon Municipal Code (MVMC)
- Mount Vernon Engineering Standards (MVES)
- 2005 Stormwater Management Manual for Western Washington (2005 SWMMWW)
- International Building Code (IBC).

The consultant found several sections that may need to be revised to remove barriers to LID implementation. As the City moves forward with LID implementation, the identified barriers will be addressed by the timelines set forth in the 2012 Phase II Permit.

The identified codes, barriers, and potential measures to remove those barriers are summarized in Table 1.

**Table 1. LID Barriers and Potential Measures in Mount Vernon**

<b>Code Reference</b>	<b>Code Section Name</b>	<b>Barrier</b>	<b>Potential Measure</b>
MVMC 12.16.164	Trench restoration and street repair standards	Repaving/repairing trenches with impermeable pavement.	Should include permeable pavement as an option.
MVMC 12.16.168	Asphalt acceptance	Types of asphalt include only impermeable materials.	Should include permeable pavement as an option.
MVMC 12.16.280	Surface restoration	Restore to original condition.	Should include permeable pavement as an option.
MVMC 12.28.050 B	Tree planting on public property	Select trees from a list of recommended species.	Make sure that list includes native trees.
MVMC 12.28.050 C	Tree planting on public property	The purpose of trees is to enhance aesthetic continuity and minimize right-of-maintenance.	Should also include LID as a reason.
MVMC 13.33.060 A.5	General stormwater requirements: onsite stormwater management	Minimum Requirement #5: Onsite stormwater management where infiltration or dispersion is not feasible because of very small lot size (<8,000 square feet), impermeable soils, or where there is a potential for creating drainage problems on adjacent lots, downspouts shall be connected to the City storm system. If the storm system is not directly adjacent to the property, the system shall be extended at the proponent's expense.	Where roof runoff dispersal is impractical, the water should be captured (and stored if necessary) for other uses such as landscape irrigation or toilet flushing. Roof runoff from pollutant generating impervious surfaces (e.g., roofs with unisolated HVAC systems) should be directed to a biofiltration system.
MVMC 13.35.030	System of rates and charges	Same rate for all ESU.	There is little opportunity to provide worthwhile incentives for LID unless the City amends the existing stormwater utility fee system.
MVMC 15.28.030	Downspouts or drainpipes required	All water must flow through a pipe or conduit and not over or upon the surface of the sidewalk.	Allow to be connected to infiltration system.
MVMC 15.40.050	Aquifer recharge area regulations	Prohibits underground injection wells that meet the requirements of Chapters 173-218 and 173-200 WAC with the exceptions of 5B22, 5D2, 5G30, 5W12, 5W32, 5R21, and 5S23.	Determine if LID infiltration facilities are allowable under this code and map aquifer recharge areas.
MVMC 15.40.050	Allowed uses with performance standards	Code states "applicant may explore low-impact development site design alternatives and implement them where economically feasible."	Economic feasibility might add another layer of complexity/ambiguity/argument to implementation and be considered a barrier. Revise code to remove "economic" to remove potential ambiguity.
MVMC 15.40.050	Allowed uses with performance standards	Direct injection must be in accordance with the standards developed by authority of RCW 90.46.042.	Verify that RCW pertains to recharge of reclaimed water only and that Ecology and State Health Department have developed standards.

**Table 1. LID Barriers and Potential Measures in Mount Vernon**

<b>Code Reference</b>	<b>Code Section Name</b>	<b>Barrier</b>	<b>Potential Measure</b>
MVMC 15.40.070	Geologic hazard area and hillside development standards	Prohibits the use of infiltration systems in erosion and landslide hazard areas and their buffers unless a site assessment report indicates such facilities or systems will not affect slope stability and the systems are designed by a licensed civil engineer.	City will determine the areas of the city where LID is feasible and compare to the landslide hazard areas. City may require additional studies to demonstrate LID feasibility in critical areas including those of potential landslides and aquifer/wellhead protection areas.
MVMC 16.16	Design Standards for Non-Arterial Streets	Establishes standards for street geometry that may limit opportunities for LID.	Explore modifications to street geometry requirements that maintain public safety and at the same time may reduce effective impervious surface areas.
MVES 3-14	Curb Details	Require cement concrete barrier curb and gutter.	Without LID permitted this requirement would discourage LID techniques.
MVES 3-15	Sidewalks	Sidewalk widths range from 6 to 8 feet with greater widths for multiple use facilities.	Could be decreased to allow for LID. May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVES 3-16	Non-motorized bike/pedestrian paths	Minimum of 10 feet wide.	Could be decreased to allow for LID. May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVES 3-17	Public access easements	Minimum of 15 feet wide.	Could be decreased to allow for LID. May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVES 3-18	Surfacing requirements	No permeable pavement options.	May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVES 3-18.d	Surfacing requirements design life	Pavement shall be based on design life of 20 years.	Explore feasibility of 20 year permeable pavement installations. . May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVES 3-25	Asphalt acceptance	Types of asphalt only include impermeable materials.	May include permeable pavement as an option when maintenance resources become available (the City currently does not have the resources to maintain permeable pavement).
MVMC 17	Parking Requirements	Parking area requirements.	Could explore reducing parking area requirements and include opportunities for other LID measures (e.g., rain gardens) for each zoning type and/or encourage pervious surface parking/structured parking.
2005 SWMMWW Vol 1. 2.5.6	Minimum Requirement #6 Runoff Treatment	Does not address how LID techniques can be used to address this minimum requirement.	Ecology is addressing this issue with an update of the Stormwater Management Manual.
2005SWMMWW Vol 1. 2.5.7	Minimum Requirement #7 Flow Control	Does not address how LID techniques can be used to address this minimum requirement.	Ecology is addressing this issue with an update of the Stormwater Management Manual.

**Table 1. LID Barriers and Potential Measures in Mount Vernon**

<b>Code Reference</b>	<b>Code Section Name</b>	<b>Barrier</b>	<b>Potential Measure</b>
2005 SWMMWW Vol 1. 2.5.7	Minimum Requirement #8 Basin Planning	Does not address how LID techniques can be used to address this minimum requirement	Ecology is addressing this issue with an update of the Stormwater Management Manual.

## Section 4

# LID Practices, Goals, Planned Actions, and Timelines

This section addresses the requirements of Phase II Permit conditions S9.E.4.b.i through S9.E.4.b.iv: LID practices available now, potential future LID practices, goals and metrics, and schedules. The information contained in this section does not constitute commitments or requirements.

### 4.1 LID Practices Currently Available

The term “LID practices” broadly refers to LID as defined in the Phase II Permit. LID practices include both non-structural actions and LID techniques. The City of Mount Vernon is open to all LID where feasible as allowed by local codes and rules. This report section lists LID practices currently employed, allowed, or required, as well as those that are likely to be adopted or implemented before February 2012 (the permit expiration date).

Mount Vernon LID projects have included:

- parking lot permeable pavement
- sidewalk permeable pavement
- public project rain gardens
- private project rain gardens.

The City of Mount Vernon makes development project proponents aware of LID options at pre-application meetings and encourages the use of LID where feasible.

### 4.2 Potential or Planned Non-Structural Actions and LID Techniques

This section of the report looks beyond the current permit cycle and explores opportunities for actions and techniques that could be enhanced in the future or are not currently in use.

Potential for future enhancement of LID practices include:

- assessing lot coverage requirements for opportunities to take advantage of clustering and reducing impervious surfaces
- assessing the feasibility of reduced roadway widths
- encouraging native vegetation retention
- employing lot setbacks totaling 15 feet on both sides of the lot lines
- developing habitat corridors
- implementing a credit transfer program.

Through its project pre-application process, the City will continue to encourage small-scale engineered facilities and devices or installations that are built for the purpose of mimicking pre-development hydrologic functions. It is anticipated that Ecology will be revising the SWMMWW to update and bring more clarity to implementation of LID techniques.

### 4.3 Goals and Metrics

The City intends to report on the numbers of each LID technique installed. The City also intends to:

- encourage LID at 90 percent of pre-application meetings
- allow LID techniques to be constructed on 90 percent of sites that are requesting LID, where it is feasible
- track LID implementation as a percentage of sites developed/redeveloped and establish a baseline for future LID implementation goal development.

### 4.4 Planned Schedule

The City is already encouraging and implementing LID practices. A preliminary schedule to implement LID techniques on a broader scale in the future was developed, but may require modifications when the new Phase II Permit is issued in 2012. The City plans to align its schedule with the permit requirement deadlines. This schedule includes:

- establishing a baseline for LID implementation as a percentage of total development/redevelopment projects (2010)
- reviewing the MVMC for opportunities to further enhance LID practices (2011)
- revising the MVMC to take advantage of identified opportunities to enhance LID practices (2012)
- implementing LID requirements of the new Western Washington Phase II Permit (beginning 2012)
- adopting the revised SWMMWW (2013)
- revising City engineering standards to reflect and facilitate implementation of changes in the City Code, the Phase II Permit, and the State SWMMWW (2013)
- track LID implementation compared to baseline after codes and standards revisions and manual update (2014).

PRELIMINARY SCHEDULE	2010	2011	2012	2013	2014	2015	2016
Continue to encourage LID at pre-application meeting							
Continue allowing LID where feasible							
Establish baseline for LID implementation							
Review code for opportunities to further enhance LID							
Revise Code to enhance LID practices							
Implement LID requirements of new Permit							
Adopt stormwater manual							
Revise engineering standards							
Track LID compared to baseline							

The above actions and schedules will depend on future economic conditions and timeliness of actions by Ecology, allowing for local public involvement and legislative processes. The City will continue to facilitate LID practices where feasible.

December 2010

# Mount Vernon

## Stormwater Monitoring Plan

This monitoring plan has been prepared to comply with the requirements of section S8 of the Western Washington Phase II Municipal Stormwater Permit effective February 16, 2007 and modified June 17, 2009. The permit requires the City to be prepared for two types of monitoring (1) future long term monitoring and (2) SWMP effectiveness monitoring.

### Future, Long Term Monitoring

Permittees shall select outfalls or conveyances based on known water quality problems and/or targeted areas of interest for future monitoring. The Permittee shall document:

1. Why sites were selected;
2. Possible site constraints for installation of and access to monitoring equipment;
3. A brief description of the contributing drainage basin including size in acreage, dominant land use, and other contributing land uses;
4. Any water quality concerns in the receiving water of each selected outfall or conveyance.

### Effectiveness Monitoring

In addition, Permittees shall prepare to conduct monitoring to determine effectiveness of the Permittee's SWMP at controlling stormwater-related problems that are directly addressed by action in the SWMP. Permittees shall identify two suitable questions and select sites where monitoring will be conducted. For two questions, the Permittee shall develop a monitoring plan containing the following elements:

1. A statement of the question, an explanation of how and why the issue is significant to the Permittee and a discussion of whether and how the results of the monitoring may be significant to other MS4s.
2. A specific hypothesis about the issue or management actions that will be tested.
3. Specific parameters or attributes to be measured.
4. Expected modifications to management actions depending on the outcome of hypothesis testing.

## **Future Monitoring**

### **Site 1: Logan Headwaters Outfall (TC02)**

#### **Location**

East Division Street near South 24th Street, just east of Logan Creek Retirement Center.

#### **Brief Description**

This 48" outfall is at the headwaters of Logan Creek. Based on City infrastructure data, the outfall receives drainage from residential, roadway, and a detention pond that is across E Division Road.

#### **Reason for Selection**

This outfall was selected because it is a good representative outfall for high-density residential drainage and because it is located in the Trumpeter drainage basin, which is a high priority basin and has previous monitoring data collected by the volunteer stream teams.

#### **Constraints**

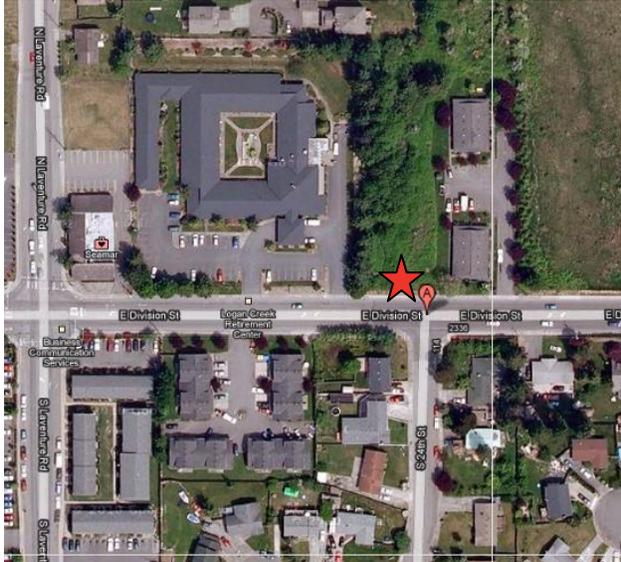
The site has no apparent constraints for installation of and access to monitoring equipment.

#### **Drainage Basin**

The drainage basin to this outfall is approximately 76 acres and the dominant land use is high-density residential.

#### **Water Quality Concerns**

Water quality samples from volunteer stream team monitoring on Trumpeter Creek have shown elevated levels of bacteria. Logan Creek is a tributary to Trumpeter Creek. Trumpeter Creek was also prioritized in the City's IDDE Plan based on its high potential for illicit discharges.



**Outfall to Creek**

**Outfall Location Near Logan Creek Retirement Center (red star)**

## **Site 2: Freeway Drive Outfall (KC01)**

### **Location**

Freeway Drive where Kulshan Creek daylights near Lions Park North.

### **Brief Description**

This 10-inch outfall is located near the confluence of Kulshan Creek with the Skagit River. The 10” outfall is located above where Kulshan Creek daylights.

### **Reason for Selection**

This outfall was selected because it is a good representative outfall for commercial drainage because it is only commercial drainage, with no residential. This outfall was selected because it is in the Kulshan Creek drainage basin, which is a high priority basin and has previous monitoring data collected by the volunteer stream teams.

### **Constraints**

The site has no apparent constraints for installation of and access to monitoring equipment.

### **Drainage Basin**

The drainage basin to this outfall is approximately 174 acres and is entirely commercial land use.

### **Water Quality Concerns**

Water quality samples from volunteer stream team monitoring on Kulshan Creek have shown elevated levels of bacteria. Due to the nature of the land use upstream of the outfall, gas, oil, nutrients, and heavy metals are also a potential concern. Kulshan Creek was also prioritized in the City’s IDDE Plan based on its high potential for illicit discharges.



Outfall Location Near Park (red star)



Outfall to Creek (circled in yellow)

## Limitations

Due to the current work of the Stormwater Workgroup (SWG), it is anticipated that the permit requirements will significantly change in the next permit cycle. This plan is intended to meet the requirements of the existing Permit (dated February 2007, modified June 2009), but the City may modify or change this plan based on new permit requirements.

The rate of economic recovery may significantly affect the City's ability to conduct stormwater monitoring. City revenue reductions from taxes, utility service charges, permit fees and other sources may limit available staff and other resources to conduct the stormwater monitoring described in this plan.

## Effectiveness Monitoring

### Question #1: Will a biennially cleaning of catch basins in residential land use areas and annual cleaning of catch basins in industrial and commercial land use areas results in increased sediment removal?

The City currently inspects all catch basins biennially throughout the City. The Permit requires that jurisdictions inspect all catch basins once throughout the permit cycle. Sediment removal is considered to provide significant water quality benefit given the extensive research results showing linkages between stormwater sediment and other pollutants. It is thought that catch basins in higher pollutant loading areas (e.g. industrial, commercial) may benefit from a more frequent cleaning schedule, while catch basins in lower loading areas (e.g. park, open space, residential) could have a more relaxed cleaning schedule without any significant negative impacts to water quality.

#### Hypothesis

This study may prove that the City can revise its maintenance schedules to improve overall water quality by focusing resources on cleaning the catch basins that are shown to have higher sediment loads each year.

#### Parameters or attributes to be measured

Mount Vernon maintains extensive maintenance records related to sediment removal. These maintenance records will serve as the basis for this study and be used to identify suitable monitoring locations. The selected subset of catch basins will be inspected monthly and after significant storm events. Inspections will include photographs and percent full of sump capacity for sediments.

#### Expected Outcomes

The City of Mount Vernon currently inspects and cleans City-owned catch basins biennially. Section S5.C4.C.iii. of the Western Washington Phase II Municipal Stormwater Permit states that jurisdictions may modify maintenance schedules if there are maintenance records to support a different schedule. It is anticipated that through this effectiveness monitoring program, Mount Vernon can re-allocate resources to improve their maintenance schedule for catch basin sediment removal to improve overall water quality.

### Question #2: Does the City's private drainage system inspection program make a difference in proper maintenance of and improved water quality from private stormwater facilities?

Most MS4s rely on private stormwater facilities to help protect water quality within their jurisdiction. Those facilities can rely on specific pollutant removal structures (e.g. oil/water separators, filters, etc.) as well as sediment removal to improve water quality. Sediment removal is considered to provide significant water quality benefit given the extensive research results showing linkages between stormwater sediment and other pollutants.

When these facilities do not function due to lack of or improper maintenance, additional resources may be required from the local jurisdictions to increase efforts downstream to properly maintain facilities or to install/improve public facilities to meet water quality objectives. In some cases, the poorly maintained private facilities may result in flooding as well as water quality issues.

#### Hypothesis

Once City staff inspects a private stormwater facility and provides property owners with proper educational materials to better understand their stormwater facility and the necessary maintenance, at least 80% of private facilities within the City will be properly maintained, thereby improving water quality.

**Parameters or attributes to be measured**

Visual inspections of privately maintained stormwater facilities and filled out inspection checklists.

**Expected Outcomes**

Private stormwater facility inspections results in 80% of private facilities being maintained to operate as intended, which reduced sediment loading and the City's O&M program efforts. Experience in other jurisdictions suggests that functionality of private systems is very low without private inspections.