DEPARTMENT OF ECOLOGY
State of Washington

Water Quality Program

Permit Submittal Electronic Certification

Permittee: MOUNT VERNON CITY

Permit Number: WAR045553 **Site Address:** 1024 CLEVELAND AVE
Mount Vernon, WA 98273

Submittal Name: MS4 Annual Report Phase II Western

Version: 1 **Due Date:** 3/31/2021

Questionnaire

Number	Permit Section	Question	Answer
1	S5.A	Attach 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 per S9.D.6.	Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)	Mount Vernon_SWMP2021_FINAL_Co_2_03292021151510
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b).	Internal Coordination_4a_03292021152523
5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020	Yes
6	S5.C.1.b.i(a)	List the relevant land use planning efforts that have taken place in your jurisdiction (land use plans that are used to accommodate growth, stormwater management, or transportation). (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	City Comprehensive Plan which includes Land Use, Housing, Parks and Rec., Economic, Transportation, Capital Facilities, and Health and Wellness elements; Shoreline Master Program update, Downtown and Waterfront Master Plan, Critical Areas and Wetlands Master Plan, South Kincaid Sub-Area Plan, Comprehensive Surface Water plan (1995, updated 2004 and 2009), Stormwater Management Plan.

7	S5.C.1.b.i(a)	List of stormwater capital projects (currently in or slated for future design and construction) that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	Stormwater Capital Projects_7_032920211526 09
8	S5.C.1.b.i(a)	Describe watershed protection measures associated with stormwater management and land use planning actions that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	As a result of requiring and encouraging LID measures both public and private projects utilizing LID have been implemented. Among these are pervious sidewalks along College Way, pervious sidewalks along Martin Road, as well as a nationally recognized green infrastructure award for the Downtown Riverfront Flood Protection and Revitalization Project.
9	S5.C.1.b.i(a)	Were land acquisitions identified (or are planning ahead for) that are useful for stormwater facilities to accommodate growth or to better serve an existing developed area? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
10	S5.C.1.b.i(a)	Identified corrective actions, in addition to the minimum requirements of the Municipal Stormwater Permits, to control or treat municipal stormwater discharges that pollute waters of the State (e.g. Limits to impervious cover added to any zoning districts, regional facility planning, minimization of vegetation loss, etc.)? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
11	S5.C.1.b.i(a)	Updates to goals and policies related to investment in stormwater management facilities/BMPs? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
12	S5.C.1.b.i(a)	Does the long-range plan identify the location and existing capacity of the stormwater facilities owned or operated by the permittee and show which of those stormwater facilities have unused capacity? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
12a	S5.C.1.b.i(a)	Do these stormwater facility locations impact where housing, or other types of development, are projected to be located or influence the acquisition of land? (if yes, how?)	No
12b	S5.C.1.b.i(a)	Does the long-range plan identify a lack of facilities and the potential impacts of existing or new development to those areas and receiving waters?	No
12c	S5.C.1.b.i(a)	Any new proposed locations and capacities of stormwater facilities needed for the timeframe of the plan?	No

13	S5.C.1.b.i(a)	Based on the projected population densities and distribution of growth over the planning period, describe how stormwater runoff impacts are forecasted. Does stormwater management information (including water quality) direct where growth is directed? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	Most growth is expected in urban areas. Urban areas, through permit implementation, are likely to provide more opportunities to improve water quality and flood control through retrofits and redevelopment, as opposed to rural areas, which provide an opportunity to protect water resources. Mount Vernon currently directs growth to protect water quality using its Critical Areas Regulations.
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes
16	S5.C.1.c	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes
20a	S5.C.2	If yes, list the elements, and the regional program.	The City of Mount Vernon is part of the Skagit Conservation District Stormwater Education Program. The regional group continues to expand on program elements as needed. This program includes the Skagit Conservation District Stream Team, Watershed Masters Volunteer Training Program, Storm Drain Labeling Program, Private Stormwater Facility Maintenance Workshop, Backyard Conservation Stewardship Program, and a pet waste social marketing campaign.
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	Education&Outreach_annual repo_21_03292021152731
22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020)	Yes

24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)	Yes
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided.	Stewardship Opportunities_26a_03292021152732
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)	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. Process includes posting SWMP on internet for public comment prior to presentation at Public Works committee meeting. Public will be informed via newspaper, internet, and public television. Committee meeting is open to public.
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
28a	S5.C.3.	List the website address in Comments field.	http://www.mountvernonwa.gov/index.aspx?NID=426
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?	Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	Yes
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).	OutfallReport20_30a_03292021152745
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	Not Applicable
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)	Yes
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)	Yes

33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.	Implemented an ongoing training program for employees. Implemented a pet waste education program in conjunction with Skagit Conservation District. When performing field screening, staff will also notify businesses adjacent to outfalls while requesting site access.
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5	Cite field screening methodology in Comments field.	Each year the streams of a specific drainage basin are walked during dry weather to check the outfalls for illicit connections or discharges. During a spill, the team traces through visual and olfactory means, and conducts further tests via samples if necessary to locate source of a discharge or connection. When visiting a site or facility for an investigation or inspection, the team is also on the lookout for visual signs of illicit discharges and illicit connections.
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	15
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.	Contributing area of basin compared to total MS4 area. To meet this requirement, a two-year average has been calculated using the area screened in 2019 and the area screened in 2020.
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)	30

38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	The IDDE hotline is listed on the City website, in the phonebook, and on several public service announcements on TV10.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.	Yes
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.	WAR045553-2020-ImportedIDDEs_03292021152752
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)	Not Applicable
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.	501
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?	Yes
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?	No

49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.	116
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii)	3
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.	Made Ecology’s Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)	Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?	Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022)	No
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes

59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?	Yes
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)	Yes
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)	Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	Yes
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	218
63b	S5.C.7.	Number of facilities inspected during the reporting period.	306
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.	448
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.	Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)	Yes
66a	S5.C.7.	Number of known catch basins?	6284
66b	S5.C.7.	Number of catch basins inspected during the reporting period?	3528
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?	3185
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c))	Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)	Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022)	Not Applicable

70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)	Yes
71	S5.C.7.	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 an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)	Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022.	Not Applicable
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022)	Not Applicable
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)	Not Applicable
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).	Not Applicable
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).	Not Applicable
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.	Not Applicable
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.	Not Applicable
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?	Not Applicable
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Not Applicable
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	Not Applicable
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9)	Not Applicable

87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)	Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Yes
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Not Applicable
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	Not Applicable

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 gather and evaluate 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 knowing violations.

Blaine Chesterfield — **Signature**

3/29/2021 4:51:47 PM — **Date**

SKAGIT CONSERVATION DISTRICT STORMWATER EDUCATION PROGRAM 2020 REPORT

Figure 1 The pet waste social marketing plan was initiated in 2020 with 290 signs posted in priority parks and neighborhoods as prompts to remind dog walkers to pick up and dispose of pet waste properly. Scoop it. Bag it. Trash it.

Submitted by: Kristi Carpenter, Skagit Conservation District
for:
City of Anacortes
City of Burlington
City of Mount Vernon
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 involvement and participation activities that were conducted by the Skagit Conservation District (SCD) over the period January 1, 2020 through December 31, 2020. The primary purpose of the Skagit Conservation District's Storm Water Education Program is to provide education and outreach programs in partnership with our local MS4 Permittees to educate the community about the impacts of stormwater discharges on water bodies and the steps that the community can take to reduce pollutants in stormwater runoff. The SCD's Stormwater Education partnership provides a multifaceted and site specific education plan designed to:

- Build general awareness about methods to address and reduce impacts from stormwater runoff;
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts; and to
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Skagit MS4 Partners: The SCD's Stormwater Education Program is a local partnership including the City of Mount Vernon, City of Burlington, City of Sedro-Woolley, City of Anacortes, and Skagit County. With the exception of the Skagit Conservation District, all partners are MS4 communities required to prepare Stormwater Pollution Prevention Plans (SWPPP) in accordance with Phase II of the Clean Water Act. The purpose of the partnership is to work together cooperatively, 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 and expertise.

Program Overview: An informed, knowledgeable, and engaged community is crucial to the success of a stormwater management program. Between 2011-2020, the Skagit Conservation District, in partnership with the Cities of Anacortes, Burlington, Mount Vernon, and Sedro-Woolley, and Skagit County, has provided a comprehensive and multifaceted series of programs and opportunities aimed at educating, engaging, and inspiring local stewardship so that the goal of reducing stormwater pollution impacts to our local waterways can be achieved.

2020 presented some unanticipated challenges due to the pandemic and social distancing requirements.

2020 Activities

1. PUBLIC PARTICIPATION AND INVOLVEMENT

Task 1.1 Host Private Stormwater Facility Maintenance Workshop

A **"Managing Stormwater Facilities Maintenance Workshop"** was coordinated and held virtually on July 29th with **35 attendees.** The agenda included a municipal overview provided by Diane Hennebert, City of Anacortes; Detention Pond Maintenance: Nuts and Bolts provided by Reid Armstrong, Kulshan Services, LLC; and Involving your Neighborhood Community provided by Kristi Carpenter, Skagit Conservation District. Handbooks were compiled by SCD staff and mailed to all attendees. Promotion of the event was conducted via direct mailing to HOA contact lists in each jurisdiction, press releases provided to all local media, two promotional ads in the local newspapers, promotional fliers distributed throughout the community and posted on websites and other social media.

Task 1.2 Watershed Masters Volunteer Training Program

Figure 2 Maybe there really is a "Poop Fairy?" WSM volunteer, Charlie Wilson, cleaned up the trail while walking his dog at Sharpe Park (no, all those bags weren't from his own dog).

Due to covid restrictions we did not host a Watershed Masters training in 2020. However, staff maintained regular correspondence with our Watershed Master volunteers via email and phone correspondence, including providing educational resources, volunteer opportunities and responding to requests for technical assistance. It is anticipated that we will hold a virtual training in the Fall of 2021.

However, despite restrictions, our community volunteers were seeking "covid friendly" volunteer opportunities throughout the year, particularly outdoor activities, that would allow for social distancing**. <u>Over 2,600 volunteer hours were reported in 2020</u>**. Watershed Masters continue to play a key role in protecting water quality in our community and sharing what they have learned with friends, neighbors, and family. While some activities were limited this year, some examples of the activities conducted by Watershed Masters in 2020 include the following:

- Conducting "poop surveys" at priority parks and trails as part of the new "Poop Fairy" campaign;
- Posted "Poop Fairy" signs in HOA neighborhoods;

- Assisted with stream restoration projects;
- Eradicating noxious weeds;
- Participating in the Stream Team program;
- Participating in the Storm Team program;
- Participating in the Marine Biotoxin monitoring program;
- Conducting salmon surveys;
- Storm drain labeling;
- Conducting surf smelt surveys;
- Provided volunteer support to the Maddox Creek culvert replacement project;
- Implementing water conservation projects at the Montreaux HOA

Task 1.3 Skagit Stream Team

The 2019-2020 Stream Team program was cut short this year due to covid restrictions, thus, the 2019-2020 monitoring season was Oct. 2019 through March 15th, 2020 (monitoring year typically continues through June or July depending on stream flow in the summer). However, over the summer, new covid protocols were established and put into place with support from the Waste Water Treatment plants and the Padilla Bay Research Reserve , and we were able to resume the program in the Fall of 2020 for the 2020-21 monitoring season.

Figure 3 Skagit Stream Team was resumed in the Fall of 2020 with new safety protocols after breaking in early March 2020 due to covid restrictions.

Priority streams currently being monitored by Stream Team volunteers include Trumpeter Basin, Kulshan Creek, Gages Slough, Ace of Hearts Creek, Nookachamps Creek, No Name Slough, Joe Leary Slough, Bay View drainage, and upper and lower Samish. All streams are monitored twice a month with the exception of Gages Slough, which is monitored monthly.

The goals of the Skagit Stream Team program are to: *1) Inspire community stewardship of water resources by educating local citizens about land use and non-point sources of pollution and involving them in the process of water quality data gathering; 2) 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; 3) to document improvements to water quality as a result of the implementation of Best Management Practices and storm water prevention measures; and 4) to teach community volunteers the sampling and analytical techniques used by environmental professionals, how to manage the data collected and create a database, and the importance of establishing a long-term water quality monitoring program.*

Parameters measured by Stream Team volunteers include fecal coliform (FC) bacteria, dissolved oxygen (DO), water temperature, turbidity and total depth.

2020 Stream Team accomplishments are highlighted below:

- 7 Stream Team volunteers monitored the water quality of Ace of Hearts Creek in Anacortes over the 2019/20 monitoring season. The Anacortes Waste Water Treatment Plant conducts lab analysis for this program.
- 12 Stream Team volunteers monitored Kulshan Creek and Trumpeter Basin in Mount Vernon. Mount Vernon Waste Water Treatment Plant conducts lab analysis for Kulshan and Trumpeter.
- 2 Stream Team volunteers monitored Gages Slough through the 2019/20 sampling season. Burlington Waste Water Treatment Plant conducted lab analysis for the Gages Slough Stream Team.
- **64** Stream Team volunteers participated in the 2019/20 Stream Team program overall.
- 11 volunteers conducted storm event sampling in the Padilla Bay watershed during the 2019/20 season in support of the Padilla Bay TMDL and Skagit County PIC program (Storm Team).
- A Total of 50 monitoring stations were monitored twice a month by Stream Team volunteers, with the exception of Gages Slough which is monitored monthly Oct. 1st through early March when we had to pull them due to covid restrictions.
- The Annual Year-End Stream Team Celebration and Recognition event was coordinated and held virtually on Nov. 18th, 2020. **64 Stream Team/Storm Team volunteers were recognized.**
- **695 Stream Team volunteer hours** reported for the 2019/20 Stream Team program.
- The Stream Team program was resumed in the Fall of 2020 for the 2020-21 monitoring season with new covid protocols that were established.
- The Annual Stream Team training (for 2020-21 monitoring season) was coordinated and held Sept. 8th (virtual), 9th (in field), and 10th (virtual).
- Data was entered on excel spreadsheet.
- The 2018/19 Annual Stream Team Report was completed.
- The 2019-20 Annual Stream Team Report was initiated.

Task 1.4 Storm Drain Labeling Program

Storm drain marking kits are available at the Skagit Conservation District. Community groups and residents are encouraged to participate in the protection of water quality by marking storm drains in their neighborhoods and throughout the community. The Cities of Anacortes and Sedro-Woolley organize this program separately.

Due to covid restrictions this year, work completed on this task was limited this year. We will be able to resume in 2021 with covid protocols in place.

- 126 storm drains were installed by 3 volunteers in several Mount Vernon, Burlington and Skagit County neighborhoods..
- Inventory for Mount Vernon and Burlington markers were replenished

- 50+ promotional fliers were distributed and included in the Detention Pond Maintenance and Skagit Stream Team handbooks that were mailed to attendees of those programs.

Task 1.5 Social Marketing Strategy

The Pet Waste Management Social Marketing Action Plan ("Poop Fairy"campaign) was drafted this year based on the recommendation from s5.c.2.a.ii (b) of the recently revised Western Washington Phase II Stormwater Permit, which was effective August 1, 2019. With consensus from the Skagit partners, option **S5.C.2.a.ii(c) 3 Public Education and Outreach** was selected with the goal of reducing fecal coliform bacteria levels in priority urban waterways by initiating a more focused pet waste management campaign. While our team has incorporated pet waste management education and strategies previously as a component of our Natural Yard Care and other stormwater education programs, we are expanding our efforts to develop an education and outreach campaign focused on fecal coliform reduction in urban and rural waterways by encouraging dog walkers to pick up after their pets when they are in public places, such as parks, walking trails, apartment complexes, or neighborhoods.

Staff time also included the following:

- Staff conducted research of successful pet waste campaigns conducted in other communities;
- Reviewed results of Skagit County's 2019 Poop Smart program survey;
- Coordinated with Skagit County, Anacortes, Burlington, Mount Vernon, and Sedro-Woolley Parks & Recreation Departments and the Port of Skagit County to identify priority parks/trails (significant number of dog walkers) to initiate priority areas to kick off the pet waste campaign (and to determine number of signs for initial printing);
- Recruited 14 volunteers to survey priority parks to determine amount of dog poo left behind;
- Conducted a review of our local municipalities Pet Waste codes.

Task 1.6 Rain Garden Program (City of Mount Vernon)

SCD Staff partnered with Snohomish Conservation District, Skagit Watershed Council and Jefferson Elementary School to install a pilot school raingarden project at Jefferson Elementary School in Mount Vernon. Funding for this pilot project was provided through a different funding source this year, however, we will continue to pursue raingarden partnerships with other local schools and neighborhoods and to seek additional funding in support of this program.

Figure 4 Rain Garden project at Jefferson Elementary School in Mount Vernon.

2. PUBLIC EDUCATION AND OUTREACH

Task 2.1 Backyard Conservation Stewardship Program

One of the priority behaviors targeted through the Skagit partnership outreach efforts has focused on yard care techniques protective of water quality. The Backyard Conservation Stewardship Short Course targets local homeowners and provides education on sustainable landscape practices as promoted by the Sustainable Sites Initiative. Program objectives:

- *Participants will learn practices that can be applied in their own backyards to help reduce storm water pollution and create a healthy and more sustainable environment.*
- *Participants will be provided with the tools and resources to design sustainable, natural, backyard landscapes.*
- *To encourage community participation in the Backyard Wildlife Habitat and/or Backyard Sanctuary Certification programs.*
- *To create a network of community residents willing to share their love of gardening and the outdoors to inspire others to create environmentally friendly gardening practices that will benefit our community.*

Topics included in the 6-week short course include proper use and disposal of pesticides, herbicides, and fertilizers (and use of non-toxic alternatives), use of native plants in landscaping, reducing size of lawn, gardening for wildlife, using bees as pollinators, applying low impact development/rain gardens, use of permeable pavement for driveways and patios, composting, managing non-native invasive plants, how to build healthy soils, proper disposal of pet waste, preventive car maintenance, and more. Sessions are taught by a knowledgeable and enthusiastic slate of local and state experts.

- The 2020 Backyard Conservation Stewardship Short Course was organized and scheduled to begin March 18th and running through April 22nd. However, due to the covid restrictions that were initiated in early March, the program had to be cancelled this year. **43 participants had registered for the program.**
- In lieu of hosting the class this year, staff maintained ongoing correspondence with individuals registered for this year's class (as well as past participants), including providing links to a variety of web resources, webinars, and other sustainable gardening related educational materials and also provided one-on-one assistance when requested.

Outcomes: The Backyard Conservation Stewardship Short Course has played a key role in our efforts to increase levels of voluntary implementation of conservation practices on private lands in both urban and rural areas of our community and to promote natural yard care principles. In addition to making sustainable changes in their own backyards, four grassroots community volunteer groups have now convened from this program, including the Fidalgo Backyard Wildlife Habitat Group in Anacortes, Skagit Valley Backyard Wildlife Habitat Team (Mount Vernon, Conway, LaConner, & Bow), the Friday Creek Habitat Stewards, which includes Burlington and Sedro-Woolley, and the "Backyard Eco Garden Club" emerged from the 2016 class. The Fidalgo, Skagit, and Friday Creek habitat teams have registered

our communities with the National Wildlife Federation's Community Wildlife Habitat Program (Fidalgo and Skagit have already received national recognition as a "Community Wildlife Habitat," and Friday Creek is in progress). Over 1,000 Skagit County residents, and including schools, parks, farms, & businesses, have certified their yards through this program.

Task 2.2 Resource Materials/Education for Local Schools

Skagit Conservation District provides support to local schools by providing educational resources and presentations throughout the year. Due to covid restrictions this year, opportunities for classroom presentations were limited, although staff did provide some "outdoor" presentations with the watershed model and also in partnership with local Girls and Boys Clubs and summer camps.

Figure 5 The Watershed EnviroScape model is an excellent hands on tool to teach our local youth about watersheds, stormwater pollution, and pollution prevention.

- Educational packets were prepared and distributed to 510 local teachers. The packets include information on stormwater, watersheds, and other resources and educational programs available for teachers and classrooms through the Skagit Conservation District.
- Promotion of the EnviroScape Model classroom presentations (stormwater runoff and non-point source pollution) was conducted.
- 24 storm water education presentations, using the EnviroScape watershed model, were conducted in 2020 at local elementary schools and summer camps reaching over 447 Skagit County students in the following jurisdictions:
  - Mount Vernon: 5 presentations to 120 students
  - Sedro-Woolley: 16 presentations to 367 students
  - Anacortes: 3 presentations to 40 students
- Virtual presentation planning with local teachers was conducted.
- Staff attended zoom trainings for educating virtually.
- In response to covid restrictions, staff participated in the Skagit Watershed Council's Citizen Engagement Committee (CEC) and worked with CEC partners to compile virtual and outdoor STEAM programs for local teachers and parents: www.skagitcd.org and www.skagitwatershed.org

Task 2.3 Miscellaneous

Work conducted under this task included project administration and tracking, preparation of the annual report, and meetings and project/contract planning with partners. Other activities conducted under this task in 2020 included:

- Participated in a virtual "social marketing during covid" webinar hosted by Nancy Lee on April 15th

- Correspondence and coordination with Parks and Recreation Departments regarding "Poop Fairy" campaign and signage installation
- Correspondence with volunteers and HOA's regarding Poop Fairy campaign - drop off signage to interested HOA's for installation.
- Provided "Poop Fairy" graphics and information to partners
- Participated in virtual Canva program training on Aug 25th

Task 2.4 Storm Water Educational Brochures and Fact Sheets.

To assist in kicking off the "Poop Fairy" campaign, educational signage was designed locally and printed on 12" x 18" 3mm aluminum composite to hold up in the great outdoors and to be used as prompts at priority parks, trails, and neighborhoods to remind dog walkers of the importance of picking up pet waste and disposing of it properly. Staff worked with all our local Parks and Recreation Departments to determine priority dog walking areas and to determine the number of signs needed to get us started. HOA's who had attended our Detention Pond Workshops were also contacted. The Port of Skagit County , City of Oak Harbor and Skagit Valley College also joined in the "Poop Fairy" partnership.

In 2020, 290 "Poop Fairy" signs were installed in our community with support from all Parks Departments, the Port, SV College, and 14 HOA neighborhoods.

Figure 6 "Poop Fairy" signs were designed and 290 outdoor signs were installed at priority local parks, trails, and HOA neighborhoods.

Task 2.5 Workshops for Local Contractors and Businesses

A "Water Smart Gardening" webinar was coordinated and hosted on June 17th, 2020 with **99 participants.**

The workshop featured information on dealing with water related challenges in our region, from too much stormwater and drainage problems to several months of drought. The basics of rain gardens, rain collection, drainage solutions and great plants were covered. Bestselling author and award winning ecological designer, Jessi Bloom, was key note speaker.

We also partnered with Stewardship Partners as co-sponsors for the Annual Green Infrastructure Summit, which is scheduled for March 25th and 26th, 2021. SCD staff is participating on the "Host" subcommittee to assist with agenda planning, in gathering speaker proposals and recruiting presenters and will be facilitating the "Watershed Wide" break out session during the summit.

Figure 7 Water Smart Gardening Webinar Promotional Flier

Task 2.6 PSSH Community Event Display Board

Due to covid restrictions, all local events were either cancelled or held virtually throughout 2020. However, staff time included researching incentive ideas for the pet waste campaign and pricing for a "poop fairy" display that could be utilized once covid restrictions are lifted. "Only Rain Down the Drain" magnets and "Spotlight on Stormwater" booklets were purchased as educational tools.

Task 2.7 Produce Media Advertisements

- The "Poop Fairy" ad was featured 4 x in the SV Herald (distribution 21,000 each)
- The "Poop Fairy" ad was featured in the Concrete Herald 2 x (distribution 5,000 each)
- The "Poop Fairy" ad was featured in the LaConner Weekly 2 x (1,200 each)
- A press release was sent to all local media; information about the Poop Fairy campaign was included in an article published by the SV Herald on July 31, 2020
- "Poop Fairy" tips for dog walkers were posted on social media July 20th, Oct. 15th, and Jan. 12th

- "Water Smart Tips" (Conserve Water Outdoors) tips was designed and posted on social media on Aug. 14th
- "Drainscaping" tips were published on social media on Oct. 5th
- A "Poop Fairy" article was published in the Skagit Conservation News - Summer/Fall 2020 edition
- The "Poop Fairy" ad was published in the Skagit Conservation News - Winter 2021 edition
- The "Poop Fairy," Drainscaping, and Smart Water Tips advertisements were also emailed to all SCD volunteers and partners

EDUCATIONAL MATERIALS DISTRIBUTED (Due to covid restrictions opportunities to distribute educational materials was very limited - however, we were able to email links to educational resources to our volunteers and others who expressed interest):

- 290 "Poop Fairy" Pet waste educational outdoor signs posted
- 45 Detention Pond Maintenance Handbooks distributed
- 50 Spotlight on Stormwater Booklets distributed.
- 100 Don't Just Landscape: Rainscape fliers distributed
- 250 Soil & Mulch: The Foundation of a Healthy Yard brochures distributed.
- 250 Planning & Planting a Sustainable Landscape brochures distributed.
- 250 Watering Wisely brochures distributed.
- 250 Think Twice Before Using Pesticides brochures distributed.
- 250 Natural Lawn Care brochures distributed.
- 10 Best Management Practices for Power Washing fact sheets distributed.
- 10 Best Management Practices for Mobile Carpet Cleaners distributed.
- 50 copies of the 2018/19 Skagit Stream Team Reports distributed (the report is also on the SCD and Padilla Bay Reserve websites).
- 45+ Storm Drain marking volunteer program promotional fliers distributed.
- 50 Native plants of the Pacific Northwest distributed.

ACTIVITIES PLANNED FOR 2021

- Priority for 2021 will be coordinating and implementing a successful pet waste campaign ("Poop Fairy"), including a new pledge program and cute doggy photo contest. We will also be looking into initiating a Mutt Mitt program and providing incentives as well as tools to encourage behavior change.
- The Backyard Conservation Stewardship Short Course will be conducted virtually.
- The annual Stormwater Detention Pond Maintenance Workshop to be scheduled.(virtual).
- Co-sponsor the Annual Green Infrastructure Summit, scheduled for March 25th and 26th.

- Storm drain labeling will continue.
- Skagit Stream Team program will continue
- Work in kicking off a Rain Garden program will continue, including seeking funding to provide incentives for local homeowners and partnerships with local schools.
- The Annual Stream Team Water Quality Report will be published.
- Stormwater education media ads will be published in local media (and continue throughout the year).
- 2 new educational brochures/tip sheets and/or additional "Poop Fairy" signage will be published.
- Informational packets highlighting storm water and water quality education will once again be distributed to local school**s when back in session.**
- Staff will continue to provide presentations on storm water education with the watershed EnviroScape model to local school groups depending on covid status.
- An educational video of the stormwater Enviroscape model will be developed.
- Watershed Masters Volunteer training will be held virtually in the fall of 2021.
- The storm water education display will be updated and hands on activities designed to promote the "Poop Fairy" program.
- The SCD website will continue to 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.
- Staff will continue to provide support to the Watershed Masters, backyard wildlife habitat volunteers, and Skagit Stream Team volunteers.
- All projects will be tracked, evaluation surveys conducted when appropriate, and reporting will continue.

City of Mount Vernon SWMP Implementation Responsibilities & Internal Coordination

The Public Works Department will be coordinating the overall administration of efforts to comply with Permit requirements. The Community and Economic Development (within Development Services) 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) to implement the Public Education and Outreach requirements of the Permit. The Skagit County Public Health Department conducts septic system inspections and a local source control program that help to educate citizens and businesses about stormwater pollution. Table 1 summarizes participant responsibilities for ensuring future Permit compliance. Sections 2 through 11 of the Stormwater Management Program Plan highlight the planned efforts of these departments and entities in more detail.

Table 1. SWMP Implementation Responsibilities

Program component	City departments	Outside entities [a]
Stormwater Planning	• Public Works • Finance • Information Services (IS) • City Attorney's Office • Human Resources (HR)	
Public education and outreach	• Public Works • IS	SCD Skagit County Public Health Department
Public involvement and participation	• Public Works • IS	SCD
MS4 Mapping and Documentation	• Public Works	
Illicit discharge detection and elimination	• Public Works • DS • Fire Department • IS • Police • Parks & Recreation	
Controlling Runoff from new and re-development and construction sites	• Public Works • DS • City Attorney's Office	
Pollution prevention and municipal operation and maintenance	• Public Works • DS • City Attorney's Office • Parks and Recreation • Facilities	
Source Control Program for Existing Development	• Public Works	
Water quality monitoring and assessment	• Public Works • DS	SCD

[a] *The Stormwater Outreach for Regional Municipalities (STORM) and Stormwater Work Group are outside entities that the City participates in and are resources for compliance assistance.*

Brown AND Caldwell

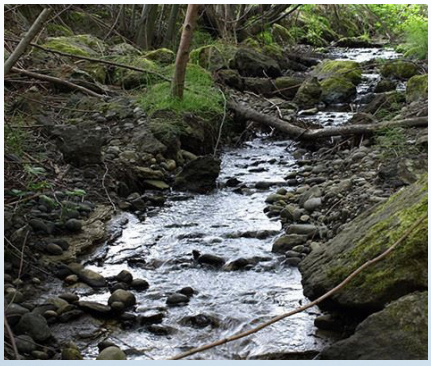
City of MOUNT VERNON

City of Mount Vernon

2021 Stormwater Management Program

March 2021

Puget Sound Starts Here



City of Mount Vernon 2021 Stormwater Management Program

Prepared for
City of Mount Vernon, Washington
March 2021

City of Mount Vernon
2021 Stormwater Management Program

Prepared for
City of Mount Vernon, Washington
March 2021

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Seattle, Washington 98101

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List of Abbreviations

2019 Ecology Manual	Stormwater Management Manual for Western Washington (2019)
BMP	best management practice
CAD	computer assisted design
City	City of Mount Vernon
CSO	combined sewer overflow
CWA	Clean Water Act
DS	Development Services (Department)
E&O	education and outreach
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
GIS	geographic information system
IDDE	illicit connections and discharge detection and elimination
IPM	Integrated Pest Management Plan
IS	Information Services
LA	load allocation
LID	low-impact development
LID BMP	low-impact development best management practice
MEP	maximum extent practicable
MS4	municipal separate storm sewer system
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	operation and maintenance
PCHB	Pollution Control Hearings Board
Phase II Permit	Western Washington Phase II Municipal Stormwater Permit
PSSH	Puget Sound Starts Here
QAPP	Quality Assurance Project Plan
Road Map	Roads Operations and Maintenance Regional Coordination Program
RSMP	Regional Stormwater Monitoring Program
SAM	Stormwater Action Monitoring
SCD	Skagit Conservation District
SIC	Standard Industrial Classification
SCPHD	Skagit County Public Health Department
SIDIR	Source Identification Information Repository
SMAP	Stormwater Management Action Planning
SOG	Stormwater Outreach Group
SOP	standard operating procedure
STORM	Stormwater Outreach for Regional Municipalities
SWMP	Stormwater Management Program
SWMP Plan	written documentation of the SWMP
SWPPP	stormwater pollution prevention plan
TMDL	total maximum daily load
UGA	urban growth area
WLA	waste load allocation
WWCPA	Washington Wastewater Collection Personnel Association

Section 1

Introduction

This document presents the City of Mount Vernon's Stormwater Management Program (SWMP). Preparation and maintenance of this SWMP Plan is required by the Washington State Department of Ecology (Ecology) as a condition of the Western Washington Phase II Municipal Stormwater Permit (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 (City) to be an operator of a small MS4, and the City is therefore required to comply with the Permit.

The Phase II Permit is a requirement of the federal Clean Water Act (CWA), which is intended to protect water quality and restore waters for "fishable, swimmable" uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to Ecology and the Permit has the force of both state and federal law.

Each municipality's permit for discharging stormwater is designed to reduce the discharge of pollutants, protect water quality, and meet the requirements of the CWA. Phase II Permit requirements include making programmatic updates over time and this SWMP Plan has been revised accordingly.

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

1.1 The Stormwater Problem

Stormwater is an identified problem for receiving water quality. The following section from the Ecology's Fact Sheet for the Phase II Permit describes some of the relevant issues.

> Stormwater runoff is the leading pollution threat to lakes, rivers, streams, and marine water bodies in urbanized areas of Washington State. The stormwater problem was well defined decades ago, and we continue to learn about both the impacts of stormwater on receiving waters and aquatic life across the State, as well as the effectiveness of stormwater management approaches to prevent, reduce, and correct these impacts.
>
> The following is a list of typical impacts caused by stormwater discharges:
>
> - **Human health**: Untreated stormwater may contain bacteria, trash, excessive nutrients, toxic metals, and harmful organic compounds. Untreated stormwater is not safe for people to drink and is not recommended for swimming or contact recreation.
> - **Drinking water**: In some areas of Washington, most notably Spokane County and parts of Pierce and Clark counties, gravelly soils allow rapid infiltration of stormwater. Untreated stormwater discharging to the ground could contaminate aquifers that are used for drinking water.
> - **Shellfish industry**: Washington State's multimillion-dollar shellfish industry is increasingly threatened by closures due to stormwater contamination.
> - **Degraded water bodies:** In urban and urbanizing areas across Washington State, residential, commercial, and industrial land development continues to change land cover and drastically alter stream channels. Unmanaged stormwater from urban areas has severely degraded beneficial uses of Washington's waters.
> - **Salmon habitat**: Urban stormwater degrades salmon habitat in streams through effects on hydrologic flows and toxicity. Paved surfaces cause greater and more frequent winter

stormwater flows that erode stream channels and damage fish spawning beds. Toxic chemicals in stormwater harm beneficial aquatic insects, salmon embryos, immature fish, and adults returning to spawn.

- **Pollution**: Urban stormwater is known to contain a fairly consistent suite of pollutants from common land use activities.

—Ecology, "Fact Sheet for the Phase I, Western Washington Phase II, and Eastern Washington Phase II Municipal Stormwater Permits," August, 2018

Mount Vernon manages several 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 1.2 below.

1.2 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 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 populations of more than 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 population below the 100,000-person 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. Ecology's Phase II Permit is available on Ecology's Web site at https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits.

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:

- Stormwater Planning
- Public Education and Outreach (E&O)
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operation and Maintenance (O&M)
- Source Control Program for Existing Development
- Compliance with Total Maximum Daily Load Requirements
- Monitoring and Assessment

The original Phase II Permit issued by Ecology became effective on February 16, 2007, with an expiration date of February 15, 2012. On June 17, 2009, Ecology released a modified version of the 2007 Permit, which changed some of the requirement deadlines. In 2011 the Washington State Legislature passed, and the governor signed ESHB 1478, authorizing Ecology to issue a new Permit, unchanged from the existing permit with effective dates from August 2012 to August 2013. Despite a gap between the Permit effective dates, the Permittees were required to continue to meet all requirements of the 2007 Permit through August 2013. An updated Permit was issued in August 2012 effective from August 2013 to August 2018; it was subsequently modified in January 2015 to reflect the outcomes of appeals made to the Pollution Control Hearings Board (PCHB). The Permit was originally set to expire on July 31, 2018, but Ecology administratively extended the Permit for one year, and subsequently issued the current Permit on July 1, 2019 with an effective date of August 1, 2019, and an expiration date of July 31, 2024. The 2021 SWMP incorporates requirements under the 2019-2024 Permit.

A summary schedule of requirements and deadlines contained in the 2019–24 Permit was developed by Ecology and is included as a reference in Appendix B to this SWMP Plan. 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.

Ecology has published an updated 2019 Stormwater Management Manual for Western Washington (2019 Ecology Manual) to correspond with new requirements in the Permit. The 2019 Ecology Manual is available primarily in a digital format, on Ecology's website. Mount Vernon adopted the 2012 Ecology Manual, which will remain in effect until the City elects or is required to adopt an updated manual.

https://fortress.wa.gov/ecy/publications/documents/1210030.pdf

1.3 City of Mount Vernon Regulated Area

The Phase II Permit for Western Washington 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.

1.4 Total Maximum Daily Load Compliance

For stormwater discharges covered under this Permit, Permittees are required to implement actions necessary to achieve the pollutant reductions called for in applicable total maximum daily loads (TMDLs). A TMDL is based on calculations of the maximum amount of a pollutant a water body can receive and still meet water quality standards. 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 https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Total-Maximum-Daily-Load-process.

Ecology reviewed all TMDLs approved by EPA prior to Permit issuance, 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 Permit issuance. While the City of Mount Vernon has not been listed in Appendix 2, there are water quality impairments (CWA section 303[d] "listings") within the City that could potentially trigger TMDLs within a future Permit cycle.

The Lower Skagit River Fecal Coliform TMDL (Ecology 2007) is not listed in Appendix 2 but does have requirements for the City of Mount Vernon. The TMDL does not add any special requirements to the City's Permit, but states that compliances with the Permit constitutes compliance with the TMDL. Implementation of the SWMP assures the City to be in full compliance with its obligation under the TMDL.

1.5 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 (within Development Services) 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) to implement the Public Education and Outreach requirements of the Permit. The Skagit County Public Health Department conducts septic system inspections and a local source control program that help to educate citizens and businesses about stormwater pollution. Table 1-1 summarizes participant responsibilities for ensuring future Permit compliance. Sections 2 through 11 highlight the planned efforts of these departments and entities in more detail.

Table 1-1. SWMP Implementation Responsibilities

Program component	City departments	Outside entities [a]
Stormwater Planning	• Public Works • Development Services (DS) • Finance • Information Services (IS) • City Attorney's Office • Human Resources (HR)	Neighboring Municipalities (potential for coordination)
Public education and outreach	• Public Works • IS	SCD Skagit County Public Health Department
Public involvement and participation	• Public Works • IS	SCD
MS4 Mapping and Documentation	• Public Works	
Illicit discharge detection and elimination	• Public Works • DS • Fire Department • IS • Police • Parks & Recreation	

Table 1-1. SWMP Implementation Responsibilities		
Program component	**City departments**	**Outside entities [a]**
Controlling Runoff from new and re-development and construction sites	• Public Works • DS • City Attorney's Office	
Pollution prevention and municipal operation and maintenance	• Public Works • DS • City Attorney's Office • Parks and Recreation • Facilities	
Source Control Program for Existing Development	• Public Works	
Water quality monitoring and assessment	• Public Works • DS	SCD

[a] *The Stormwater Outreach for Regional Municipalities (STORM) and Stormwater Work Group are outside entities that the City participates in and are resources for compliance assistance.*

1.6 Document Organization

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

- **Section 2** addresses Permit requirements for administering the City's SWMP for 2021.
- **Section 3** addresses Permit requirements for stormwater planning for 2021.
- **Section 4** addresses Permit requirements for public education and outreach (E&O) for 2021.
- **Section 5** addresses Permit requirements for public involvement and participation (I&P) for 2021.
- **Section 6** addresses Permit requirements for MS4 mapping and documentation for 2021.
- **Section 7** addresses Permit requirements for IDDE for 2021.
- **Section 8** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2021.
- **Section 9** addresses Permit requirements for municipal O&M for 2021.
- **Section 10** addresses Permit requirements for a source control program for existing development for 2021.
- **Section 11** addresses Permit requirements for water quality monitoring and assessment for 2021.
- **Section 12** summarizes the City's compliance activities.
- **Appendix A** provides abbreviations and definitions from the Permit.
- **Appendix B** provides a schedule of requirements and deadlines for the 2019–24 Western Washington Phase II Municipal Stormwater Permit (published by Ecology).
- **Appendix C** provides the current City stormwater system map.

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

Section 2

Stormwater Management Program Administration

This section of the SWMP Plan provides a description of Permit requirements related to overall SWMP administration, including descriptions of the City's current and planned compliance activities for 2021.

2.1 Permit Requirements

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

- Implement a SWMP and prepare written documentation (SWMP Plan) for submittal to Ecology on March 31 of each year, including annual updates to the SWMP. 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 the SWMP Plan for the new calendar year with annual compliance reports for the previous calendar year to Ecology by March 31, summarizing implementation status and providing information from assessment and evaluation procedures collected during the reporting period. Annual compliance reporting commenced in March 2015 (for the 2014 reporting year). The SWMP Plan for 2021 will be submitted to Ecology by March 31, 2021.
- Include in SWMP an on-going program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation, and permit compliance and to set priorities.
- Coordinate with other Permittees on stormwater-related policies, programs, and projects within adjacent or shared areas, and internal coordination among departments of each jurisdiction.

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.
- 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 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, Operations and Maintenance Regional Coordination Program (Road Map), as well as the NPDES Municipal Environmental Justice Work Group.

2.3 Planned 2021 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 2021 SWMP administration activities.

Table 2-1. 2021 Stormwater Management Program Administration Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
SWMP-1	Continue development of existing NPDES SWMP cost accounting strategy and tracking system. Train staff on new system.	Public Works, Finance		City maintains cost-tracking database.
SWMP-2	Continue use and updates for NPDES training management structure and tracking system.	Public Works, IS, HR	All	City maintains NPDES training database.
SWMP-3	Maintain system for managing SOPs that are used among multiple departments.	Public Works, Finance	City Attorney's Office	Ongoing.
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 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 jurisdictions 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.

Section 3

Stormwater Planning

This section provides a description of the Permit requirements related to Stormwater Planning and compliance activities for 2021.

3.1 Permit Requirements

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

- By August 1, 2020, convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies within the City by:
  - Respond to a series of Stormwater Planning Annual Report questions on or before March 31, 2021 and
  - Submit a report responding to the same questions on or before January 1, 2023.
- Continue to require LID principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.
- Conduct Stormwater Management Action Planning, which consists of:
  - Performing a "Receiving Water Assessment" documenting which receiving waters are most likely to benefit from stormwater management planning and submit a watershed inventory by March 31, 2022.
  - Develop a "Receiving Water Prioritization" and document prioritized and ranked list of receiving waters by June 30, 2022.
  - Develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area by March 31, 2023.

3.2 Current Compliance Activities

The city is currently undertaking the following activities to ensure compliance with the Permit:

- The City has convened an "Interdisciplinary Team" comprised of employees from the Public Works, Development Services and Streets departments, as well as consultants that will continue stormwater planning activities.
- The City has begun to compile background information on watersheds and waterbodies that will inform future stormwater planning activities.

3.3 Planned 2021 Compliance Activities

The City plans to undertake the compliance activities listed in Table 3-1 in 2021.

Table 3-1. 2021 Stormwater Planning and Compliance Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
SWP-1	Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.	Public Works		Ongoing
SWP-2	Continue inter-departmental coordination to ensure stormwater impacts are addressed in long-term planning efforts.	Public Works	DS	Ongoing
SWP-3	Begin work on Receiving Water Assessment.	Public Works		Final assessment by March 31, 2022

Section 4

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 2021.

4.1 Permit Requirements

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

- Implement an E&O program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The program shall be designed to educate target audiences (e.g., the general public, businesses, homeowners, students, developers, City employees, etc.) about the stormwater problem and actions they can take to minimize the problem.
- Create stewardship opportunities to encourage participation in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area. Use the resulting measurements to direct E&O resources no later than July 1, 2020. This requirement can be met individually or as a member of a regional group.
- Based on the measured understanding of the selected target audience, no later than February 1, 2021, each permittee shall follow community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan.
- No later than April 1, 2021, Permittee shall implement the campaign strategy developed to reach said target audience.
- No later than March 31, 2024 Permittee shall evaluate and report on the effectiveness of the implemented strategies, including the changes in understanding and adoption of targeted behaviors, as well as any planned or recommended changes to the campaign in order to be more effective.
- Track and maintain records of public E&O activities.

4.2 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 its "On Site Sewage Program" that informs citizens and businesses 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.

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

4.3 Planned 2021 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 2021 to carry on similar activities as those listed in Section 4.2. Actions recommended for continued compliance are included in Table 4-1, which presents the work plan for the 2021 Public Education and Outreach activities.

Table 4-1. 2021 Public Education and Outreach Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
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 of each year.
EDUC-6	Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.	Public Works	SCD and STORM	Ongoing.
EDUC-7	Begin implementing strategies developed as a result from previous program effectiveness evaluation.	Public Works	SCD and STORM	April 1, 2020

Section 5

Public Involvement and Participation

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 2021.

5.1 Permit Requirements

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

- Provide ongoing opportunities for public involvement through advisory boards or commissions, public hearings, watershed committees, and public participation in developing rate structures and budgets, 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 by May 31 of each year. Make any other documents required by the Permit to be submitted to Ecology available to the public.

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 has defined a series of public involvement activities intended to meet the Permit requirements for public involvement in development of the 2021 SWMP Plan. This process involves a presentation of the proposed SWMP elements at a public meeting before the City Council Public Works Committee.
- The City posted the Draft SWMP Plan on the City's Web site, made announcements on the City cable TV channel (TV10), and sent announcements to the Skagit Valley Herald for public comments prior to the public meeting.
- The City will make the 2021 Final SWMP Plan available to the public on the City's Web site, at the public library, and in the Public Works Department main office building.

5.3 Planned 2021 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 5-1, which presents the work plan for the 2021 public involvement activities.

Table 5-1. 2021 Public Involvement Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
PI-1	Implement public involvement opportunities for annual SWMP update and reporting process.	Public Works		Prior to finalizing SWMP.
PI-2	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	The SWMP and Annual Compliance Report public posting is due on or before May 31 of each year.
PI-3	Summarize annual activities for the "Public Involvement and Participation" component of the Annual Report; identify any updates to the SWMP document.	Public Works	SCD	Due on or before March 31 of each year.

Section 6

MS4 Mapping and Documentation

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 2021.

6.1 Permit Requirements

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

- Continue to maintain mapping data for known MS4 outfalls and discharge points, receiving waters (other than groundwater), stormwater treatment and flow control BMPs/facilities owned or operated by the City, geographic areas served by the City's MS4 that do not discharge stormwater to surface waters, tributary conveyances to all known outfalls and discharge points with a nominal diameter of 24 inches or larger, connections between the MS4 and other public entities, and connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- By January 1 2020, begin to collect data for size and material for all known MS4 outfalls and update records.
- By August 1, 2023, complete mapping of all known connections from MS4 to privately owned stormwater systems.
- By August 1, 2021, have all mapping data stored electronically using GIS, CAD drawings, or other asset management software.

6.2 Current Compliance Activities

The City of Mount Vernon has undertaken the following compliance activities:

- The City maintains much of its storm sewer information system in an electronic format and has produced a storm sewer system map that is updated as new data becomes available. See Appendix C for a recent version of the City storm sewer system map. The City is continuing to field-verify the City stormwater system to validate the City's GIS network model.
- Keeps data regarding outfall size and material for known MS4 outfalls.

6.3 Planned 2021 Compliance Activities

The city's mapping and documentation program is in progress and is currently compliant with the Permit. Efforts to map and update records of outfalls, discharge points, and BMPs will continue in 2021.

Table 6-1. 2021 Illicit Discharge Detection and Elimination Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
MAP-1	Continue updating storm system map to address data gaps and Permit conditions.	Public Works		Ongoing.
MAP-2	Continue collecting information on the size and material for all known MS4 outfalls.	Public Works		Ongoing.

Section 7

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 2021.

7.1 Permit Requirements

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

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections and discharges into the MS4.
- Continue to enforce ordinances that prohibit illicit discharges, and a compliance strategy that ensures maintenance standards necessary to detect and address illicit discharges.
- Maintain an ongoing program to detect and identify non-stormwater discharges and illicit connections and to address illicit discharges to the MS4.
- Continue to perform field screening for an average of 12 percent of the MS4 each year.
- 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.
- Maintain an ongoing training program for City staff that may come into contact with or respond to illicit connections or discharges. Train field staff on proper IDDE response procedures and processes and municipal field staff to recognize and report illicit discharges.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- 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.

7.2 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's Web site and phonebook list the public hotline to report illicit discharges and/or spills, and hotline is also publicized on public service announcements on television.
- 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.
- City has self-administered IDDE training for new employees, and updated training software.
- Regular online refresher trainings are conducted for City departments.

- The City conducted inspections of portions of the storm sewer system, including screening for illicit discharges and connections.
- The City conducted dry weather visual inspection of outfalls from the Skagit River drainage area.
- The City responded to reports of illicit discharges and took appropriate actions to eliminate discharges, including following proper reporting procedures.
- The City updated its in-house training software and continues to track all staff training to ensure that all City staff have the appropriate training.
- The City updated its asset management software Asset Essentials.
- The City summarizes all illicit discharges and connections, response actions taken, and enforcement actions in its Annual Compliance Reports.

7.3 Planned 2021 Compliance Activities

The City has an existing IDDE program and has progressively updated the program to maintain compliance as additional Permit requirements have phased in. Actions recommended for continued compliance are included in Table 7-1, which presents the work plan for the 2021 IDDE activities.

Table 7-1. 2021 Illicit Discharge Detection and Elimination Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
IDDE-1	Maintain IDDE response process including a standard, citywide IDDE response and enforcement SOPs, enhanced by 2020 asset management system upgrade.	Public Works	DS	Ongoing.
IDDE-2	Continue to implement citywide IDDE Program.	Public Works		Ongoing.
IDDE-3	Continue updating storm system map to address data gaps and Permit conditions. (See Mapping requirements, task MAP-1 in previous section)	Public Works		Ongoing.
IDDE-4	Implement 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	DS Fire Department	Ongoing.
IDDE-5	Continue to use issue-tracking and resolution system that includes enforcement actions, enhanced by 2020 asset management system upgrade. Capture feedback from public E&O efforts.	Public Works	IS	Ongoing.
IDDE-6	Refresh self-administered intranet IDDE awareness training for all municipal staff in the field.	Public Works	IS	City maintains self-administered training available for new employees and to periodically refresh previously trained employees.
IDDE-7	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	DS	Ongoing.
IDDE-8	Tracked the number of illicit connection inspections.	Public Works	DS	Ongoing, City planning to continue conducting TV sewer inspections of storm sewers for condition and illicit connection assessment.
IDDE-9	Maintain map that shows the location of all known municipal separate storm sewer outfalls, receiving waters, and structural stormwater BMPs.	Public Works	DS	Ongoing.
IDDE-10	Perform visual inspection of prioritized receiving water bodies. Trumpeter Creek outfalls are targeted for 2021.	Public Works		Complete in summer 2021.

Table 7-1. 2021 Illicit Discharge Detection and Elimination Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
IDDE-11	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 of each year.
IDDE-12	Perform field screening (outfalls) of, on average, 12 percent each year and document field screening methodology in Annual Compliance Report.	Public Works		Screening of 12 percent on average each year is ongoing.

Section 8

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 2021.

8.1 Permit Requirements

The Permit (Section S5.C.6) requires the City to perform the following tasks over the course of the Permit cycle:

- Continue to implement existing Municipal Code regulations aimed at reducing pollutants in stormwater runoff (i.e., illicit discharges) to the MS4 from new development, redevelopment, and construction site activities.
- Ensure that Municipal Code (or other enforceable mechanisms chosen to meet this requirement) adhere to, at a minimum, the thresholds and definitions outlined in Appendix 1 of the Permit as well as the State requirements under Chapter 90.48 RCW, and grant the City legal authority through the approval process for new and re-development to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this section that discharge to the City's MS4.
- Implement a permitting process with qualified personnel to perform stormwater site plan reviews, inspections prior to clearing and construction of sites that have a high potential for sediment transport, inspections of all permitted development sites during construction, management of maintenance activities of all stormwater treatment and flow control facilities, and inspection of all permitted development sites upon completion of construction, as well as a procedure for keeping records of inspections and enforcement actions.
- Perform annual inspections of all permanent stormwater treatment and flow control BMPs/facilities discharging to the MS4 that were constructed in accordance with the Permit requirements – compliance during this permit term shall be determined by achieving at least 80 percent of the required inspections.
- Provide copies of the *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction or industrial activities to representatives of the proposed new development and redevelopment.
- Provide training to staff on updated 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.

8.2 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 in December 2016.
- The City has existing programs, codes, standards, SOPs, and data management systems (SmartGov and Eclipse) addressing many of the Permit requirements. The plan review, inspection, and enforcement SOPs will be refined and updated.
- The City adopted the 2012 Ecology Manual effective December 2016. The adoption of the 2012 Ecology Manual will remain in effect until the City elects or is required to adopt a newer version. The first requirement deadline to reference the newest Ecology manual is June 30th, 2022.
- 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 required 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.

8.3 Planned 2021 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 8-1 presents the work plan for 2021 SWMP activities related to runoff control for new development, redevelopment, and construction sites.

Table 8-1. 2021 Controlling Runoff from New Development, Redevelopment, and Construction Sites Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
CTRL-1	Continue to implement adopted codes, standards, SOPs, and the 2012 Ecology Manual.	Public Works	DS	Ongoing.
CTRL-2	Apply technical thresholds in Appendix 1 to all sites 1 acre or greater.	Public Works	DS	Ongoing.
CTRL-3	Continue evaluating and implementing the City's stormwater permitting, plan review, inspection, enforcement, and record-keeping processes.	Public Works, DS	City Attorney's Office	Ongoing.
CTRL-4	Track number of inspections, plan reviews, and enforcement.	Public Works	DS	Ongoing.
CRTL-5	Establish program to annually inspect all stormwater treatment flow control facilities (other than catch basins) permitted by the Permittee.	Public Works		Ongoing.
CTRL-6	Conduct staff training and public E&O on implementing Stormwater Manual and Permit requirements.	Public Works	SCD	Ongoing.

Table 8-1. 2021 Controlling Runoff from New Development, Redevelopment, and Construction Sites Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
CTRL-7	Continue implementing long-term stormwater system operation and maintenance plans for stormwater facilities.	Public Works	DS	Ongoing.
CTRL-8	Summarize annual activities for "Controlling Runoff from New Development, Redevelopment, and Construction Sites" component of Annual Report; identify any updates to SWMP.	Public Works	DS	The SWMP Plan and Annual Compliance Report submittal is due on or before March 31 of each year.

Section 9

Municipal Operations and Maintenance

This section provides a description of the Permit requirements related to municipal operations and maintenance, including descriptions of the City's current and planned compliance activities for 2021.

9.1 Permit Requirements

The Permit (Section S5.C.7) requires the City to perform the following tasks over the course of the Permit cycle:

- Continue to implement maintenance standards for the MS4 that are at least as protective as those specified in the 2019 Stormwater Management Manual for Western Washington, and for facilities that do not have a maintenance standard, the permittee shall develop one. No later than June 30th 2022, the City shall update their maintenance standards as necessary to meet the requirements of this Section.
- Perform inspections of all stormwater flow control and treatment facilities and catch basins in accordance with Permit requirements, unless previous inspection data show that a reduced frequency is justified. Compliance with this inspection requirement shall be determined by the presence of records of an established inspection program designed to inspect all facilities and achieving at least 80 percent of required inspections. Have processes in place to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and from municipal O&M activities, including but not limited to those involving streets, parking lots, roads, or highways owned or maintained by the City. Perform inspection of all catch basins and inlets owned and operated by the Permittee once every 2 years.
- Train staff to implement updated processes and document that training.
- Maintain 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. As necessary, update SWPPPs no later than December 31, 2022.
- Summarize annual activities for the "Municipal Operations and Maintenance" component of the Annual Compliance Report; identify any updates to the SWMP.

9.2 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, updated as of December 2017.
- The City conducts regular refresher trainings for City staff.
- 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.C.5.f of the Permit.
- The City summarizes all associated activities in its Annual Compliance Report, due on March 31 of each year.
- The City updated its asset management software Asset Essentials and will continue to utilize this in O&M compliance.

9.3 Planned 2021 Compliance Activities

The City conducts the Permit-required activities to limit stormwater pollution potential related to its O&M program and has made necessary program updates to maintain compliance as additional Permit requirements have phased in. Table 9-1 presents the work plan for 2021 SWMP activities related to pollution prevention and O&M activities.

Table 9-1. 2021 Pollution Prevention and Operations Maintenance Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
PPOM-1	Maintain records of inspections and maintenance or repair activities conducted, incorporating 2020 asset management system upgrade.	Public Works		Ongoing.
PPOM-2	Continue to implement City maintenance standards in accordance with Ecology 2012 Manual for City-performed maintenance activities.	City Attorney's Office	Public Works	Ongoing.
PPOM-3	Maintain inspection program for City-owned or operated stormwater catch basins and for public and private flow control, runoff treatment, and low impact development facilities, where required by and consistent with the schedules identified in the Permit.	Public Works		Ongoing.
PPOM-4	Continue implementing 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, DS	Ongoing.
PPOM-5	Summarize annual activities for "Municipal Operations and Maintenance" component of Annual Report; identify any updates to SWPPP.	Public Works		The SWMP Plan and Annual Compliance Report submittal is due on or before March 31 of each year.
PPOM-6	Inspect all catch basins and inlets owned or operated by the City at least once every two years.	Public Works		Ongoing.
PPOM-7	Refresh staff training on SWPPP.	Public Works		Ongoing.

Section 10

Source Control Program for Existing Development

10.1 Permit Requirements

The Permit (Section S5.C.8) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement a program to prevent and reduce pollutants in runoff from existing development by applying operational and if necessary structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land use and activities.
- Program should include inspections of pollutant generating sources from both public and privately owned sites and should also be applied to sites that have previously been authorized to discharge to the MS4.
- No later than August 1, 2022, the City shall adopt and make effective an ordinance (or other enforceable mechanism) requiring the application of source control BMPs for pollutant generating sources.
- No later than August 1, 2022, the City shall establish an inventory that identified publicly and privately owned sites which have the potential to generate pollutants to the MS4. This inventory shall include businesses and/or sites identified based on the presence of activities that are pollutant generating (as laid out in Appendix 8 of the Permit), and other pollutant generating sources based on complaint response, such as home-based businesses and multi-family sites.
- No later than January 1, 2023, the City shall implement an inspection program for sites identified in the aforementioned inventory and annually complete inspections equal to 20 percent of the businesses and/or sites listed in their source control inventory.
- No later than January 1, 2023, the City shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- The City shall train staff who are responsible for the implementation of this program.

10.2 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 is currently partnered with Skagit County Public Health Department (SCPHD) to address existing development. As a part of this effort the City has already identified all businesses that are of the Standard Industrial Classification (SIC).

10.3 Planned 2021 Compliance Activities

The city plans to address requirements in Section S5.C.8 in 2021 by performing the following compliance activities:

Table 10-1. 2021 Pollution Prevention and Operations Maintenance Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
CTRL-EX-1	Continue coordination with SCPHD to develop and implement a program to prevent and reduce pollutants in runoff from existing development.	Public Works	SCPHD	Ongoing
CTRL-EX-2	Continue to coordinate with other Skagit County jurisdictions to develop strategies and a timeline for implementation of these requirements.	Public Works		Ongoing

Section 11

Monitoring and Assessment

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 2021.

11.1 Permit Requirements

The Permit (Section S8) requires municipalities to conduct water quality sampling and program assessments during this Permit cycle, or to participate in State-conducted programs to meet these requirements:

- For monitoring and assessment requirements, the City selected Option 1, requiring the City to pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP). The city is required to contribute $5,683 to an RSMP dedicated to the status and trends regarding small streams and marine nearshore areas, and $10,387 to an RSMP dedicated to effectiveness and source identification studies. Annual payments are due to Ecology on or before August 15th, each year.
- The City shall provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects. Up to three requests maximum can be made a year, and the City will have 90 days to provide the requested information.

11.2 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 is continuing to summarize monitoring activities in the Annual Report.
- The City is continuing to make payments to Regional Stormwater Monitoring Programs.

11.3 Planned 2021 Compliance Activities

The City created a Water Quality Monitoring Program to maintain compliance as Ecology phases in current and future Permit requirements. Table 11-1 presents the work plan for 2021 SWMP monitoring activities.

Table 11-1. 2021 Monitoring Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
MNTR-1	Summarize annual monitoring activities for the Annual Report.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.
MNTR-2	Continue annual payment into RSMP for small streams and marine nearshore status trends.	Public Works		Annual payment of $5,683 to Ecology to be made on or before August 15, 2020 each year.
MNTR-3	Continue annual payment into RSMP for effectiveness studies and Source Identification studies.	Public Works		Annual payments of $10,387 to Ecology to be made on or before August 15, 2020 each year.

Section 12

Summary

The City of Mount Vernon is currently in compliance with the Phase II Permit and has planned activities for 2021 to ensure continued compliance. There are multiple tasks that the City has completed and multiple ongoing tasks that the City is conducting to ensure continuing compliance with the Permit requirements.

On July 1, 2019, a 5-year Permit cycle began for August 1, 2019 to July 31, 2024. The permit is largely the same as the previous Permit and focuses on continuing on-going compliance efforts. The following changes represent the most significant efforts needed to be undertaken by Phase II permittees in the coming permit cycle:

- Some existing sections have been split up, such as the new Mapping section (S5.C.4) which is derived from the previous permits' IDDE section (S5.C.5).
- New permit sections have been added for Stormwater Planning (S5.C.1) and Source Control Program for Existing Development (S5.C.8).
- The new Stormwater Planning section focuses on implementing planning efforts to enable municipalities to think strategically about which of their watersheds are most in need of pollution control efforts and would most benefit from a stormwater management action program.
- The new source control section of the Permit empowers municipalities to monitor existing development, a previously overlooked source of potentially polluted runoff.

The City administers its SWMP through annual updates and reports progress to Ecology in an Annual Report. Some of the key on-going Permit compliance efforts of the City include:

- Implementing a Public Education and Outreach Program through the City's contract with the Skagit Conservation District (SCD), which has reached out with useful information for and offered participatory activities to the general public, school districts, business owners, commercial property owners, the agricultural community, and the industrial community. In addition, the City
- Working with the Northern Stormwater Outreach Group (SOG) and the Skagit County Public Health Department to ensure pollution controls are implemented at the source through the source control inspection program, notifying the public, providing opportunities for the public to comment on the SWMP document, and each year presenting the document to the City Council. These opportunities allow the public to be involved in developing the City's SWMP, Providing an ongoing IDDE Program which includes a spill reporting hotline available to the public. Each year the hotline receives calls from educated citizens who are interested in protecting stormwater quality. City staff have been trained to identify and respond to illicit discharges and connections. The City tracks inspections and field responses and conducts appropriate reporting for IDDE activities. Mount Vernon works with the SCD to distribute additional educational materials directed at IDDE, implementing the 2012 Ecology Manual for controlling runoff from new development, redevelopment, and construction sites and continuing to do so until the City elects, or the Permit requires, the City to adopt the latest edition of the Manual.
- Updating the Mount Vernon LID codes and standards by December 31, 2016; the City is now requiring the use of LID techniques where feasible for new development and redevelopment, to mimic natural runoff patterns, to reduce flood and storm damage as well as further protect water quality, operating and maintaining the MS4 to comply with Phase II Permit requirements, including

required O&M practices (e.g., inspection, cleaning, and other maintenance).Participating in state-wide monitoring activities by making payments to Ecology.

Additional information on the City's NPDES program can be found online at https://www.mountvernonwa.gov/426/NPDES-Stormwater-Permit

Additional information on the current Ecology Stormwater Permit can be found online at

https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater

Appendix A:

Abbreviations and Definitions from Permit

Appendix A

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.

40 CFR means Title 40 of the Code of Federal Regulations, which is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

AKART means all known, available, and reasonable methods of prevention, control and treatment. See also State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

All Known, Available and Reasonable Methods of Prevention, Control and Treatment refers to the State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

Applicable TMDL means a TMDL which has been approved by EPA on or before the issuance date of this Permit, or prior to the date that Ecology issues coverage under this Permit, whichever is later.

Beneficial Uses means uses of waters of the State, which include but are not limited to use for domestic, stock watering, industrial, commercial, agricultural, irrigation, mining, fish and wildlife maintenance and enhancement, recreation, generation of electric power and preservation of environmental and aesthetic values, and all other uses compatible with the enjoyment of the public waters of the State.

Best Management Practices are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by Ecology 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.

Bypass means the diversion of stormwater from any portion of a stormwater treatment facility.

Circuit means a portion of a MS4 discharging to a single point or serving a discrete area determined by traffic volumes, land use, topography or the configuration of the MS4.

Component or **Program Component** means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees, or S7 Compliance with Total Maximum Daily Load Requirements, or S8 Monitoring and Assessment, of this permit.

Community-based social marketing is a social marketing methodology. It employs a systematic approach intended to change the behavior of communities to reduce their impact on the environment. Realizing that providing information is usually not sufficient to initiate behavior change, community-based social marketing uses tools and findings from social psychology to discover the perceived barriers to behavior change and ways of overcoming these barriers.

Conveyance System means that portion of the municipal separate storm sewer system designed or used for conveying stormwater.

Co-Permittee means an owner or operator of an MS4 which is in a cooperative agreement with at least one other applicant for coverage under this Permit. A Co-Permittee is an owner or operator of a regulated MS4 located within or in proximity to another regulated MS4. A Co-Permittee is only responsible for permit conditions relating to discharges from the MS4 the Co-Permittee owns or operates. See also 40 CFR 122.26(b)(1).

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.).

Director means the Director of the Washington State Department of Ecology, or an authorized representative.

Discharge Point means the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate.

Entity means a governmental body, or a public or private organization.

EPA means the U.S. Environmental Protection Agency.

Fully Stabilized means the establishment of a permanent vegetative ground cover, or equivalent permanent stabilization measures (such as riprap, gabions or geotextiles) which prevents erosion.

General Permit means a permit which covers multiple dischargers of a point source category within a designated geographical area, in lieu of individual permits being issued to each discharger.

Groundwater means water in a saturated zone or stratum beneath the surface of the land or below a surface water body. Refer to Chapter 173-200 WAC.

Hazardous Substance means any liquid, solid, gas, or sludge, including any material, substance, product, commodity, or waste, regardless of quantity, that exhibits any of the physical, chemical, or biological properties described in WAC 173-303-090 or WAC 173-303-100.

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 on a long-term basis.

Highway means a main public road connecting towns and cities.

Hydraulically Near means runoff from the site discharges to the sensitive feature without significant natural attenuation of flows that allows for suspended solids removal. See Appendix 7 Determining Construction Site Sediment Damage Potential for a more detailed definition.

Hyperchlorinated means water that contains more than 10 mg/Liter chlorine.

Illicit Connection means any infrastructure connection to the MS4 that is not intended, permitted or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this Permit (S5.C.5 and S6.D.3). 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 MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this Permit (S5.C.5 and S6.D.3).

Impervious Surface means a non-vegetated surface area that either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. A nonvegetated surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to,

roof tops, walkways, patios, driveways, parking lots or stormwater areas, concrete or asphalt paving, gravel roads, packed earthen materials, and oiled, macadam or other surfaces which similarly impede the natural infiltration of stormwater.

Land Disturbing Activity means any activity that results in a change in the existing soil cover (both vegetative and non-vegetative) and/or the existing soil topography. Land disturbing activities include, but are not limited to clearing, grading, filling and excavation. Compaction that is associated with stabilization of structures and road construction shall also be considered land disturbing activity. Vegetation maintenance practices, including landscape maintenance and gardening, are not considered land disturbing activity. Stormwater facility maintenance is not considered land disturbing activity if conducted according to established standards and procedures.

LID means Low Impact Development.

LID BMP means low Impact Development Best Management Practices.

LID Principles means land use management strategies that emphasize conservation, use of onsite natural features, and site planning to minimize impervious surfaces, native vegetation loss, and stormwater runoff.

Low Impact Development (LID) means a stormwater and land use management strategy that strives to mimic pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration by emphasizing conservation, use of on-site natural features, site planning, and distributed stormwater management practices that are integrated into a project design.

Low Impact Development Best Management Practices (LID BMP) means distributed stormwater management practices, integrated into a project design, that emphasize pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration. LID BMPs include, but are not limited to, bioretention, rain gardens, permeable pavements, roof downspout controls, dispersion, soil quality and depth, vegetated roofs, minimum excavation foundations, and water re-use.

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 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 means Municipal Separate Storm Sewer System.

Municipal Separate Storm Sewer System 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 Washington State; (ii) designed or used for collecting or conveying stormwater; (iii) which is not a combined sewer; (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.; and (v) which is defined as “large” or “medium” or “small” or otherwise designated by Ecology pursuant to 40 CFR 122.26.

National Pollutant Discharge Elimination System 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 State Department of Ecology.

Native Vegetation means vegetation comprised of plant species, other than noxious weeds, that are indigenous to the coastal region of the Pacific Northwest and which reasonably could have been expected to naturally occur on the site. Examples include trees such as Douglas Fir, western hemlock, western red cedar, alder, big-leaf maple; shrubs such as willow, elderberry, salmonberry, and salal; and herbaceous plants such as sword fern, foam flower, and fireweed.

New Development means land disturbing activities, including Class IV General Forest Practices that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of hard surfaces; and subdivision, short subdivision and binding site plans, as defined and applied in Chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development. Refer to Appendix 1 for a definition of hard surfaces.

New Permittee means a city, town, or county that is subject to the *Western Washington Municipal Stormwater General Permit* and was not subject to the permit prior to July 1, 2019.

New Secondary Permittee means a Secondary Permittee that is covered under a municipal stormwater general permit and was not covered by the permit prior to July 1, 2019.

NOI means Notice of Intent.

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

Notice of Intent for Construction Activity means the application form for coverage under the *Construction Stormwater General Permit.*

Notice of Intent for Industrial Activity means the application form for coverage under the *Industrial Stormwater General Permit*

NPDES means National Pollutant Discharge Elimination System.

Outfall means a point source as defined by 40 CFR 122.2 at the point where a discharge leaves the Permittee's MS4 and enters a surface receiving water body or surface receiving waters. Outfall does not include pipes, tunnels, or other conveyances which connect segments of the same stream or other surface waters and are used to convey primarily surface waters (i.e., culverts).

Overburdened Community means minority, low-income, tribal, or indigenous populations or geographic locations in Washington State that potentially experience disproportionate environmental harms and risks. This disproportionality can be as a result of greater vulnerability to environmental hazards, lack of opportunity for public participation, or other factors. Increased vulnerability may be attributable to an accumulation of negative or lack of positive environmental, health, economic, or social conditions within these populations or places. The term describes situations where multiple factors, including both environmental and socio-economic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities.

Permittee unless otherwise noted, the term "Permittee" includes city, town, or county Permittee, Co-Permittee, New Permittee, Secondary Permittee, and New Secondary Permittee.

Physically Interconnected means that one MS4 is connected to another storm sewer system in such a way that it allows for direct discharges to the second system. For example, the roads with drainage systems and

municipal streets of one entity are physically connected directly to a storm sewer system belonging to another entity.

Project site means that portion of a property, properties, or right-of-ways subject to land disturbing activities, new hard surfaces, or replaced hard surfaces. Refer to Appendix 1 for a definition of hard surfaces.

QAPP means Quality Assurance Project Plan.

Qualified Personnel means someone who has had professional training in the aspects of stormwater management for which they are responsible and are under the functional control of the Permittee. Qualified Personnel may be staff members, contractors, or volunteers.

Quality Assurance Project Plan means a document that describes the objectives of an environmental study and the procedures to be followed to achieve those objectives.

RCW means the Revised Code of Washington State.

Receiving Waterbody or Receiving Waters means naturally and/or reconstructed naturally occurring surface water bodies, such as creeks, streams, rivers, lakes, wetlands, estuaries, and marine waters, or groundwater, to which a MS4 discharges.

Redevelopment means, on a site that is already substantially developed (i.e., has 35% or more of existing hard surface coverage), the creation or addition of hard surfaces; the expansion of a building footprint or addition or replacement of a structure; structural development including construction, installation or expansion of a building or other structure; replacement of hard surface that is not part of a routine maintenance activity; and land disturbing activities. Refer to Appendix 1 for a definition of hard surfaces.

Regulated Small Municipal Separate Storm Sewer System means a Municipal Separate Storm Sewer System which is automatically designated for inclusion in the Phase II stormwater permitting program by its location within an Urbanized Area, or by designation by Ecology and is not eligible for a waiver or exemption under S1.C.

Runoff is water that travels across the land surface and discharges to water bodies either directly or through a collection and conveyance system. See also “Stormwater.”

SAM means Stormwater Action Monitoring.

Secondary Permittee is an operator of a regulated small MS4 which is not a city, town or county. Secondary Permittees include special purpose districts and other public entities that meet the criteria in S1.B.

Sediment/Erosion-Sensitive Feature means an area subject to significant degradation due to the effect of construction runoff, or areas requiring special protection to prevent erosion. See Appendix 7 Determining Construction Site Sediment Damage Potential for a more detailed definition.

Shared Water Bodies means water bodies, including downstream segments, lakes and estuaries that receive discharges from more than one Permittee.

Significant Contributor means a discharge that contributes a loading of pollutants considered to be sufficient to cause or exacerbate the deterioration of receiving water quality or instream habitat conditions.

Small Municipal Separate Storm Sewer System means an MS4 that is 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).

Source Control BMP means a structure or operation that is intended to prevent pollutants from coming into contact with stormwater through physical separation of areas or careful management of activities that are sources of pollutants. The *SWMMWW* separates source control BMPs into two types. Structural Source Control BMPs are physical, structural, or mechanical devices, or facilities that are intended to prevent pollutants from entering stormwater. Operational BMPs are non-structural practices that prevent or reduce pollutants from entering stormwater.

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

Stormwater Action Monitoring (SAM) is the regional stormwater monitoring program for Western Washington. This means, for all of Western Washington, a stormwater-focused monitoring and assessment program consisting of these components: status and trends monitoring in small streams and marine nearshore areas, stormwater management program effectiveness studies, and source identification projects. The priorities and scope for SAM are set by a formal stakeholder group that selects the studies and oversees the program's administration.

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 Facility Retrofits means both: projects that retrofit existing treatment and/or flow control facilities; and new flow control or treatment facilities or BMPs that will address impacts from existing development.

Stormwater Management Program (SWMP) means a set of actions and activities designed to reduce the discharge of pollutants from the MS4 to the MEP and to protect water quality, and comprising the components listed in S5 (for cities, towns, and counties) or S6 (for Secondary Permittees) of this Permit and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 – *Compliance with TMDL Requirements,* and S8 – *Monitoring and Assessment*.

Stormwater Treatment and Flow Control BMPs/Facilities means detention facilities, permanent treatment BMPs/facilities; and bioretention, vegetated roofs, and permeable pavements that help meet Appendix 1 Minimum Requirements #6 (treatment), #7 (flow control), or both.

Surface Waters includes lakes, rivers, ponds, streams, inland waters, salt water, and all other surface waters and water courses within the jurisdiction of the State of Washington.

SWMMWW or Stormwater Management Manual for Western Washington means *Stormwater Management Manual for Western Washington (2019).*

SWMP means Stormwater Management Program.

TMDL means Total Maximum Daily Load.

Total Maximum Daily Load (TMDL) means a water cleanup plan. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the water body can be used for the purposes the state has designated. The calculation must also account for seasonable variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each water body, for example, drinking water supply, contact recreation (swimming), and aquatic life support (fishing), and the scientific criteria to support that use. The Clean Water Act, Section 303, establishes the water quality standards and TMDL programs.

Tributary Conveyance means pipes, ditches, catch basins, and inlets owned or operated by the Permittee and designed or used for collecting and conveying stormwater.

UGA means Urban Growth Area.

Urban Growth Area (UGA) means those areas designated by a county pursuant to RCW 36.70A.110.

Urbanized Area is a federally-designated land area comprising one or more places and the adjacent densely settled surrounding area that together have a residential population of at least 50,000 and an overall

population density of at least 1,000 people per square mile. Urbanized Areas are designated by the U.S. Census Bureau based on the most recent decennial census.

Vehicle Maintenance or Storage Facility means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.

Water Quality Standards means Surface Water Quality Standards, Chapter 173-201A WAC, Groundwater Quality Standards, Chapter 173-200 WAC, and Sediment Management Standards, Chapter 173-204 WAC.

Waters of the State includes those waters as defined as "waters of the United States" in 40 CFR Subpart 122.2 within the geographic boundaries of Washington State and "waters of the State" as defined in Chapter 90.48 RCW which includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and water courses within the jurisdiction of the State of Washington.

Waters of the United States refers to the definition in 40 CFR 122.2.

Appendix B:

2019-2024 Western Washington Phase II Municipal Stormwater Permit Implementation Schedule

Western Washington Phase II Municipal Stormwater Permit Overview – 2019 to 2024

The timeline below provides an overview of major program deadlines for implementing permit requirements of S5 *Stormwater Management Program* (SWMP) and S8 *Monitoring and Assessment* for Continuing City, Town, and County Permittees (**By Date** means "no later than…"). This is guidance only. Table does not include all ongoing program elements. Please see the permit for additional detail and related requirements.

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
A. Stormwater Management Plan	**Annually** update & submit the SWMP with Annual Report (S9) - A.3.a. cost tracking: track the cost (or estimate) of development and implementation of each component of the SWMP - A.3.b. activity tracking: track # of inspections, follow up actions, official enforcement, public ed activities						
A.5. Coordination	**Ongoing** coordination			**By March 31:** Submit description of internal coordination mechanisms			
C.1 Stormwater Planning		**Annually** assess and report LID code-related requirements.	**By Aug. 1**: Convene interdisciplinary team to lead SW Planning program.	**By March 31**: Respond to series of Annual Report (AR) questions describing SW Planning during 13-19 permit	**By March 31:** Submit watershed inventory. **By June 30:** Document the prioritized and ranked list of receiving water basins.	**By Jan. 1:** Submit report of responses to SW Planning AR questions for coordination of long range plans during this permit term **By March 31:** Develop Stormwater Management Action Plan (SMAP) for at least 1 high priority area.	
C2. Public Education and Outreach	**Ongoing** implementation of ed & outreach		**By July 1:** Conduct new evaluation of	**By Feb 1:** Follow community-based social marketing			**By March 31:** Evaluate & report on

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
	program elements		effectiveness of current behavior change campaign	practices, or similar, to develop or modify behavior change campaign tailored to the community **By Apr 1:** Implement Strategy developed in S5.C.2.a.ii.(c)			implemented strategy
C.3 Public Involvement and Participation	**Ongoing** **-**Create opportunities for public, including overburdened communities, to participate in SWMP and SMAP - Post to website SWMP and Annual Report by **May 31** each year						
C.4 MS4 Mapping and Documentation	**Ongoing** Maintain mapping data		**By Jan 1:** Begin to collect size and material for all known MS4 outfalls	**By Aug 1**: mapping data in electronic format with fully described mapping standards		**By Aug 1**: Complete mapping all known MS4 connections to privately-owned stormwater systems	
C.5 Illicit Discharge Detection and Elimination	**Ongoing** - Implement program to probihit, address, and eliminate illicit discharges. - Train staff	**By Aug 1**: Begin tracking total % of MS4 screened	**By Mar 31**: MAY Begin using WQwebIDDE form for annual reporting - If using own tracking: submit as much of the info as possible in	**By Mar 31**: Required to use WQwebIDDE form for annual reporting - If using own tracking: submit .xml file that follows the schema, but may submit	**By Mar 31**: If using own tracking system for recordkeeping, submit a .xml that follows the data schema		

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
			format requested (or similar)	alternative formats (i.e. .xls,.csv, .txt)			
C.6 Controlling Runoff	-Implement & enforce program to reduce pollutants in runoff. -Train staff.				**By June 30:** Adopt and make effective program that meets requirements of App. 1 or equivalent PH I program.(See permit for other dates)		
C.7 Operations and Maintenance	-Inspect & maintain stormwater facilities and catch basins controlled by & regulated by the Permittee. - Implement practices, policies, and procedures to reduce SW impacts from all permittee lands. -Train staff.				**By June 30:** Update maintenance standards **By Dec 31:** Document practices, policies, and procedures to reduce SW impacts from all permittee lands. **By Dec 31:** Update SWPPPs for heavy equipment maintenance or storage yards/facilities.		
C.8 Source Control					**By Aug 1:** -Adopt & make effective ordinances requiring source control BMPs. -Establish inventory of properties with	**By Jan 1:** -Implement inspection program -Implement progressive	

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
					potential to generate pollutants to Permittee's MS4	enforcement policy - Train staff	

S8 Monitoring and Assessment

S8 Permit Components	2019	2020	2021	2022	2023	2024
S8.A Regional status and trends monitoring	**By Dec 1:** submit payment to collective fund if payed into during 2013 permit. - Submit written notification of option selected	**By Aug. 15:** If option chosen, make annual payments to collective fund				
S8.B SWMP Effectiveness and Source ID	**By Dec 1:** submit payment to collective fund if payed into during 2013 permit. -Submit written notification of option selected	**By Aug. 15:** If option chosen, make annual payments to collective fund				
S8.C Stormwater discharge monitoring		**By Feb 1**: If option chosen, submit draft QAPP for review and approval **By Aug 15**: submit final QAPP for approval within 60days of receiving approval of draft **By Oct 1**: Begin flow monitoring	**By Oct 1:** Fully implement discharge monitoring	**By Mar 31:** Annual report data and analysis in accordance with QAPP. Enter water & solids concentrations data into EIM		

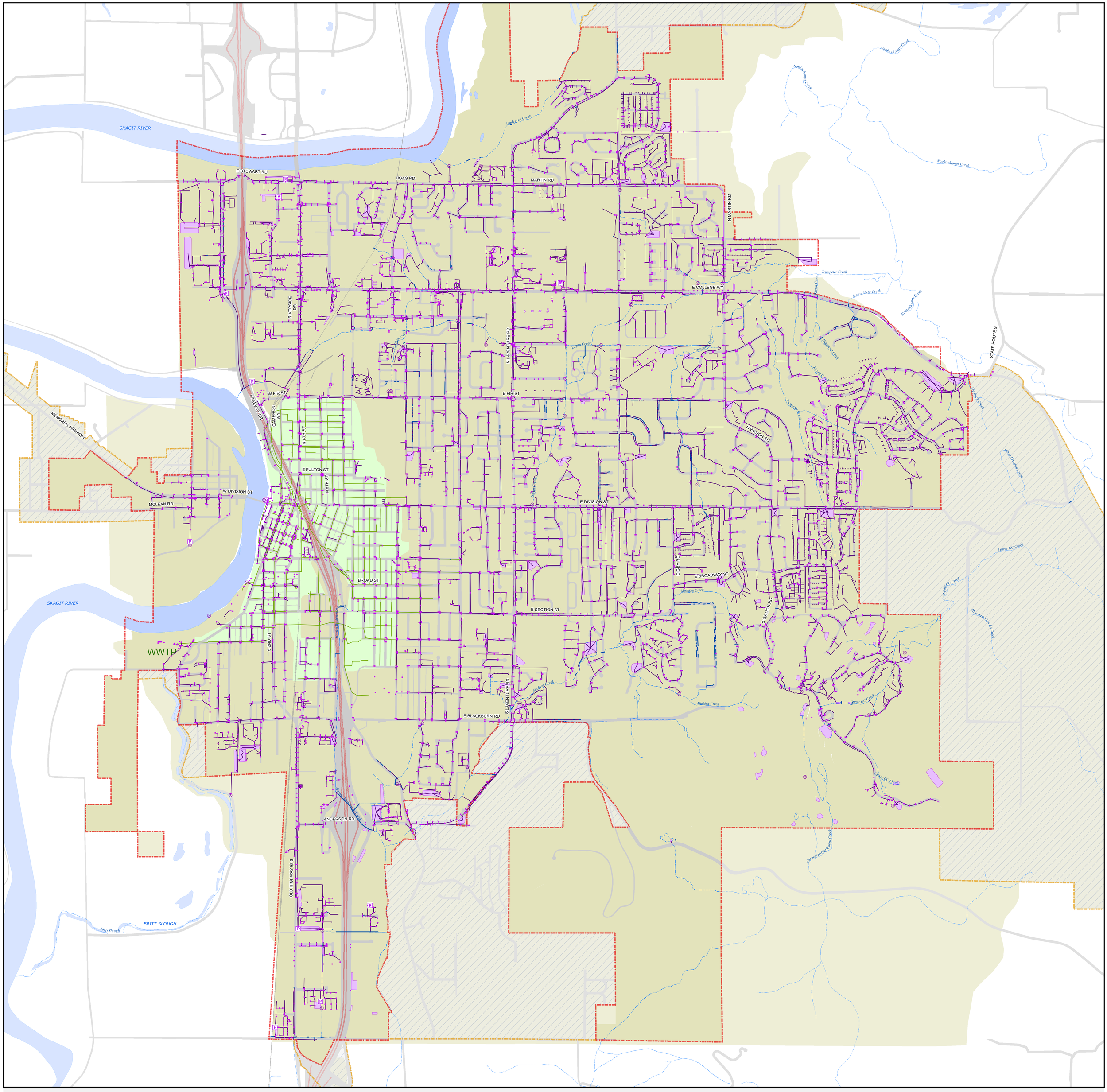
Other significant elements of the permit

S1 Application for coverage	Co-Permittees can end or amend agreements at any time.
S4.F Response to violations of Water Quality Standards	Notification and possible adaptive management may occur at any time.
S7 Compliance with Total Maximum Daily Load (TMDL) Requirements	Comply with applicable TMDL requirements listed in Appendix 2 per individual timelines.
S9 Reporting	Keep all records related to the permit for at least five years. Beginning March 31, 2020, annually submit a report for the previous calendar year using WQwebPortal.

G3 Notification of Discharge Including Spills: Report discharge into or from the MS4 which could constitute a threat to human health, welfare or the environment	Discharge to water: Call Emergency Management Division (EMD) 1-800-645-7911 or 1-800-258-5990 Discharge to/from MS4: Report to Ecology within 24 hours (do not need to report if EMD has been called).
G.18 Duty to Reapply	Apply for permit renewal no later than Feb. 2, 2024 (180 days before permit expiration).
G20 Non-compliance Notification	Notify Ecology within 30 days of becoming aware of permit non-compliance.

Appendix C:

Mount Vernon Storm Sewer System Map



Map Revised: February, 2021

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

- Stormwater Line
- Storm Culvert
- Combined Sewer Line
- Catch Basins
- Pumpstation
- Outfalls >=12"
- Detention/WQ Facility
- City Boundary
- UGA Boundary
- Railroad
- Stream
- MS4 Area
- Combined Sewer Area

City of Mount Vernon Stormwater System

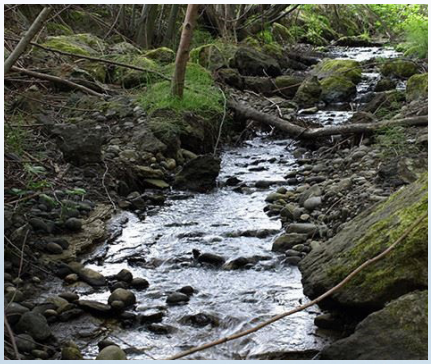
0 0.25 0.5 1 Mile

0 0.225 0.45 0.9 Kilometer

N

City of Mount Vernon
1024 Cleveland Avenue
Mount Vernon, WA 98273

Phone: (360)-336-6204



Brown AND Caldwell

Seattle Office

701 Pike Street
Suite 1200
Seattle, WA 98101
T 206.624.0100

City of Mount Vernon Outfall Report

MATERIAL	DIAMETER__	Outfall_ID	Note	ID_BC	ID_MV
					1
					2
					3
					4
	18				5
					6
HDPE	8		Outfall is draining plant nursery		7
PVC	1		none		8
Earthen	0		Origin of outfall is yard/ditch behind housing development		9
PVC/CMP	1		There are two perched outfalls on either side of the creek, origin is stormwater		10
PVC	0		Origin of outfall is presumed to be from yard drainage. There is are outfalls on both sides of stream		11
Earthen	0		Origin is pond and stormwater from Waugh Rd		12
Earthen	0		Origin is pond fed by small drainage ditch.		13
HDPE	4		Source is mowed lawn yard		14
CMP	0		2 RCP and 1 arch SMP feed Trumpeter Creek near large culvert at Fir St at south end of Bakerview Park. Outfall		15
cmp	12		Origin is from yard upstream		16
PVC	4		Origin is from lawn yard		17
PVC	2		There are three pipes together with one other nearby, all the same type, origin is from lawn yard		18
HDPE	4		Origin is yard drainage.		19
HDPE	2		Stormwater from Martin Rd., next to culvert		20
Rip rap	0		none		21
Rip rap	0		Origin is stormwater from College Way		22
PVC	1		Origin is stormwater from College Way		23
Earthen	0		It is a ditch from trailerpark		24
HDPE	12		Origin is stormwater pond		25
Earthen	0		Draining field behind JJ Place off of College Way		26
concrete	12		none		27
HDPE	4		Drainage from roof of nearby house		28
CMP/Earthen	3		Outfall is a branch of the creek that splits off upstream and flows through the trailer park		29
HDPE	4	u4	Drainage pipe from yard.		30
RCP	2		Origin is probably from roadway storm drain		31
PVC	8		Origin is roof gutter. There are two more similar outfalls upstream 3 feet.		32
RCP	2		Origin is possibly from storm drain		33
HDPE	0		Outfall is yard drainage pipe		34
Rip rap	0		Origin is stormwater pond		35
PVC	12		Origin is stormwater detention pond		36
HDPE	8		Origin is from nearby yard		37
Steel	2		Origin are two retention ponds		38
Earthen	0		Originates from ditch behind houses		39
CMP	1		located n branch closest to housing development		40
CMP	1		There are two 4"" PVC pipes approximately 40' downstream		41
CMP	1		Originates from storwater detention pond		42
HDPE	4		Originates from residential yard drainage		43
HDPE	1		Pipe drains nearby yard		44
HDPE	6		Pipe drains yard to the west		45
Earthen	0		Outfall is a slope wetland/ephemeral tributary		46
HDPE	8		Origin is either detention pond/ next to culvert		47
HDPE	3		Appears to drain from direction of parking lot		48
HDPE	4		Origin is drainage from road		49
Earthen	0		Outfall is a drainage ditch upslope and slope failure.		50
PVC	4		Outfall is roadside ditch, which includes two other 4" pipes.		51
CMP	12		none		52
PVC	6		Outfall originates from yard. There are two other identical outfalls upstream 30'.		53
PVC	6		Drains nearby yard		54
HDPE	4		Drains nearby yard		55
Rip rap	0		Outfall is ephemeral drainage ditch, channel into culvert		56
PVC	1		Pipe drains yard		57
RCP	24		headwater from stream		58
HDPE	1		Stormwater from Section St.		59
Earthen	0		Origin is probably roadway stormwater		60
HDPE	0		Origin is stormwater from Maddox Cr. Road		61
HDPE	0		Uncertain origin - possibly nearby development		62
HDPE	2		Originates in Bonnie Rae Park		63
HDPE	0		none		64
HDPE	1		Outfall drains adjacent field		65
RCP	1		Origin is unknown		66
PVC	1		None		67
CMP	18		Culvert under road	72	68

PVC	0		Outfall is a roof drain. There is a second 50' downstream and a 3rd 75' downstream.	73	69
HDPE	4		Source is yard runoff - Could not locate 2012 B&C	74	70
RCP	1		Drains along 19th St	75	71
HDPE	4		Located 2012 by B&C. Plugged, non-functional	76	72
PVC	1		Source is stormwater from commercial building parking lot	77	73
	0		From CB in road - 2012 B&C	78	74
DNS	1		Outfall located by ""Gentlemen Gene's"". Stormwater drain on road 55' up.	79	75
CMP	3		Standing water. Connects to Kulshan Creek by an open drainage	80	76
RCP	0		none	81	77
HDPE	8		Appears to originate from adjacent open space	82	78
PVC	1		Stormwater outfall fed by road runoff	83	79
Steel	1		none	84	80
PVC	8		Source is potentially from the parking lot of a commercial building upstream from Gentlemen Gene's	86	81
PVC	4		Stormwater from church parking lot is source.	87	82
CMP	36		Partially submerged. Source of water is road runoff/stormwater	88	83
PVC	4		Stormwater runoff from parking lot. Pipe appears plugged. Overland channel developing	89	84
PVC	8		No longer in use. Was pipe from parking lot. Now pervious pavement system.	90	85
HDPE	8		Stormwater swale for parking lot runoff	91	86
Ductile Iron	14	WM01			87
	24	CS01	Submerged		88
	36	CS02	Submerged		89
RCP	30	MC01	Pipe was not accessible due to vegetation, site also may need some repairs		90
RCP	48	TC02	Upstream location of stream was not identified, outfall may be headwater of stream		91
HDPE	24	TC01	Drains from detention pond to the North		92
CMP	10	KC01	Need to verify where smaller pipe comes from	98	93
	36	SR01	Outfall directly into large Lindegren Creek culvert. Some flow present, clear and odorless. Many branc	5	94
CMP	36	BS01	Site visit could not verify outfall because it was submerged		95
CMP	24	TC03	Not sure if this is long cross culvert or an outfall. Need to verify in plans NOT AN OUTFALL		96
HDPE	24	TC04	Drainage from detention pond, likely associated with Hagen store		97
HDPE	30	MC03	Culvert covered by blackberries, Lamprey noticed in stream		98
CMP	60	MC02	Possible signs of previous diesel spill		99
HPDE	30	NC01	Pond is overgrown with algea		100
CONC	18		Drainage from residential area	107	101
CMP	36		Drainage from N Laventure Road	108	102
PVC	8			109	103
LCPE	8			110	104
LCPE	8			111	105
HDPE	24		Found 2012 B&C 2012_01	2012_01	106
HDPE	18		Found 2012 B&C 2012_02	2012_02	107
PVC	8		2012_03 B&C. CB Partially plugged.	2012_03	108
	0			NN	109
Unknown	12		2012_04 B&C	2012_04	110
Unknown	12		2012_05a B&C	2012_05	111
Unknown	24		2012_05b B&C		112
Unknown	36		2012_06 B&C	2012_06	113
Conc	18		2012_07 B&C	2012_07	114
	12		2012_08 B&C	2012_08	115
Conc			2012_09 B&C 24"" Not an Outfall		116
Earthen	0		2012_10 B&C Ditch from N 18th to 15th on S side of Kulshan Trail	2012_10	117
	12			2012_11	118
HDPE	24		2012_12 B&C	2012_12	119
HDPE	4	U9	yard drainage		120
HDPE	4	u10	yard drainage		121
HDPE	4	u11	Two Pipes		122
HDPE	4	u12			123
	6	u13	Yard Drainage		124
HDPE	4	u14			125
		u15			126
		u16	Conglomerate of 2 pipes, one 6" HDPE, 1 4" PVC, Yard drainage		127
HDPE	4	u17	Yard Drainage		128
HDPE	4	u18			129
cmp	24	u19	drains catch basin in street		130
HDPE	4	u20	yard drainage		131
HDPE	4	u21	yard drainage		132
HDPE	12	u22	Yard Drainage		133
HDPE	4	u23			134
		u24			135
		u7	conglomarate of 3 pipes, two 8"pvc and one 2"pvc		136
HDPE	12	u5			137

			31			138
metal	8	u3	8" metal pipe, yard drainage?			139
	12	u1	draining a ditch into the culvert under fir street			140
pvc	6	u6	yard drainage			141
		u4				142
HDPE	4	u26	Yard Drainage			143
HDPE	4	u27	yard drainage			144
	12		Trash Rack to Quarry Spalls			145
	18					146
						147
						148
						149
						150
						151
						152
HDPE	12	2014_n1				153
HDPE	12	2014_n2				154
CPEP	12					155
HDPE	12					156
HDPE	12					157
HDPE	12					158
HDPE	12					159
HDPE	12					160
HDPE	12					161
HDPE	12					162
HDPE	12		Clogged with sediment at time of survey			163
HDPE	12					164
	8			2016_1		165
	18			2016_2		166
HDPE	12		Possibly in Carpenter Creek basin			167
Unknown			Unable to locate			168
HDPE	12		Possibly in Carpenter Creek basin			169
HDPE	12		Very close to private property			170
Unknown			Unable to locate. Saw another pipe coming from golf course, but none from the street			171
HDPE	18					172
CMP	18		Culvert under golf cart path			173
Iron	10		No flow present		1	174
PVC	18		Some stagnant water		2	175
PVC	10		No flow present		3	176
PVC	12		No Flow present		4	177
	0			2016_3		
	12			2016_4		

City of Mount Vernon Stormwater Stewardship Opportunities

In partnering with the Skagit County Conservation District Mount Vernon has provided the following stewardship opportunities:

- A “Managing Stormwater Facilities Maintenance” workshop
- Stream Team volunteering opportunities (abbreviated due to COVID)
- Watershed Masters Volunteer Training Program (abbreviated due to COVID, although 2,600 hours of volunteer time was reported in 2020
- Backyard Conservation Stewardship Program
- Smart Gardening Webinar

Please see Skagit County Conservation District’s full 2020 report for a complete list of stewardship opportunities.

City of Mount Vernon Stormwater Capital Projects

In additional to the 16 projects on Mount Vernon's Surface Water CIP, there are also 17 projects on the Transportation Improvement Plan that have significant drainage elements.

CIP Projects on the Surface Water Utility CIP:

- D-05-02 – South Mount Vernon Surface Water Enhancement
- D-05-03 – West Mount Vernon Stormwater Force Main Upgrade
- D-06-03 – Regional Stormwater Treatment Facility
- D-08-01 – (CAO) Critical Area Ordinance Restoration Sites
- D-09-02 – Blodgett Rd Culvert Replacement/Stream Restoration
- D-10-02 – Freeway Drive Drainage System Installation
- D-12-01 – Storm System Restoration Program
- D-14-01 – Logan Creek Stream Restoration Project
- D-14-03 – Kulshan Creek Flood Reduction Project
- D-18-01 – S 13th St Drainage System Analysis and Construction
- D-19-01 – Park Street Pump Station Upgrade
- D-21-01 – Hickox Road Culvert Replacement
- D-21-02 – North 19th Street Culvert Replacement
- D-21-03 – North 18th Street Culvert Replacement
- D-21-04 – Seneca Drive Culvert Replacement
- D-94-11 – Trumpeter Creek Erosion Problem Repairs.

City of Mount Vernon
Illicit Discharge Detection and Elimination (IDDE'S)

Jurisdiction permit number	Date incident discovered	Date beginning response	Date end response	How incident discovered / reported to you	Discharge to MS4	St Address or Intersection City / Zip	Pollutants Identified	Source / Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and/or other comments
WAR045553	4/1/2020	4/1/2020	4/1/2020	Direct report to your staff	No, Cleaned Up	309 S 3rd St Mount Vernon 98273	Food-related oil/grease	Intentional dumping	Not applicable	Clean-up	4/1/20 Collections crew cleaned out the grease in the catch basin. The source is unknown at this point because the restaurant is not operating due to the COVID-19 outbreak and stay-home order. Will need to follow-up with the business owners / managers once the stay-home order has been lifted. - Daniel S Restaurant is no longer in business. No further action necessary. - Daniel S
WAR045553	4/22/2020	4/22/2020	4/22/2020	Other agency referral	Yes, Allowable Discharge	3803 Ridge C Mount Vernon 98273	Other: Iron-rich algae.	Other: Algae-rich lump of moss trapped in pipe.	Observation (color/sheen/turbidity /floatables/odor)	Clean-up, Education/technical assistance	Description: A code enforcement officer with another entity phoned noting what he thinks could be an IDDE. There is a pipe that drains out of the back of 3803 Ridge Ct that is very red with iron. He said it is very sludgy in the ditch itself and would like us to take a look at it. Comments: 4/22/2020: I visited the site, and there was some rusty colored water coming out of the pipe. It appeared to be just iron-rich water coming from the backyard, which was being fed by the downspouts of the neighboring house. There appeared to be a blockage in the pipe, and I removed a slump of rusty colored soft sediment. This lead to a flush of water coming out of the pipe. I talked with the homeowner to see if he had any additional information, and he did mention having his roof treated for moss a couple years prior. I don't think the iron phosphate would have lingered on the roof for that long, especially since this has been a recent occurrence. After talking with the homeowner, the water coming out of the pipe returned to a clear color. My best guess then is that there was some blockage of moss or leaf litter came through the downspouts and built up at the end of the pipe with some leftover iron phosphate leaching out of the blockage. I don't believe this is considered an illicit discharge due to the fact that iron-rich water and algae gets deposited in our system throughout the year, so there is no further action necessary. - Daniel S
WAR045553	4/23/2020	4/23/2020	4/23/2020	Pollution hotline (phone, web, app)	No, None Found	4116 Apache Dr Mount Vernon 98273	Unconfirmed, unspecified, or not identified	Unconfirmed, unspecified, or not identified	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Description: Mr. Steve Kettel / 4116 Apache Drive Spill or dumping in the creek has caused a scum on the rocks and the entire creek bed. Would like an investigation to determine the source and what can be done about it. (360) 420-8315 Comments: 4/23/2020 Ken Scott called in to let me know he went to check on the creek and noticed nothing out of the ordinary. There was some dark moss growing, but that is fairly typical in the creek and ravine area. - Daniel S I visited the site as well and checked both upstream and downstream. There wasn't anything that looked unnatural, just some brown algae buildup on the rocks. I called Steve to let him know what we found, and he was concerned because of he has never seen this type of algae buildup here throughout all his years living by the stream. I let him know that even though it is unusual, that algae buildup is still natural. I believe that it was likely caused by the long stretch of sunny weather in April with no precipitation. He also had concerns about the debris flowing down the stream from the pond blowout at Twin Brooks causing himself and neighbors to lose portions of their backyards. As there is no further actions required, I'm closing out the IDDE. - Daniel S

Jurisdiction permit number	Date incident discovered	Date beginning response	Date end response	How incident discovered / reported to you	Discharge to MS4	St Address or Intersection City / Zip	Pollutants Identified	Source / Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and/or other comments
WAR045553	5/20/2020	5/20/2020	5/20/2020	Pollution hotline (phone, web, app), ERTS referral	No, Cleaned Up	912 Tomahawk Dr Mount Vernon 98273	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Clean-up, Enforcement	Description: A concerned neighbor called in about a house in his cul de sac that consistently has cars being worked on. He stated that yesterday he noticed multiple spots on the road in front of the house and in the driveway where the resident of the house had put down kitty litter to absorb oil or antifreeze. His wife also noticed today on her way to get the mail that the kitty litter/oil or Antifreeze is running down the road of the culdesac due to rainfall. He stated that there are ususally between 8-12 cars in the driveway at a time. The caller said that there are only 6 houses in their cul de sac, and Claudio Benitez lives at the address being reported. The house is rented by Benitez and owned by someone else. The caller stated that Benitez is running an automotive shop out of his house with no permits. He said that law enforcement has been out to talk to Benitez about the cars and garbage on his property. The caller also said he had spoken to law enforcement about the house and they had told him that they had the most engines and cars in their back yard they had seen. The caller also said that he has reported the house to his local code enforcement and the neighbor had told them he only works on cars of family and friends. The caller prefaced his report with the fact that he is a retired Mount Vernon police officer and was involved in a gang shooting in 2016, and one of the gang members lives in the residence he is reporting. The caller wanted ecology to be aware of this because the neighbor may not be friendly if approached. Comments: 5/20/2020: Received the complaint from the citizen, and nearly simultaneously received a call from Ecology about the same issue. I went out to check the spill and confirmed that our MS4 was not impacted. Ken Lee was made aware of the issue and has been dealing with the reporting and responsible parties for a while, so he recommended bringing the sweeper out and billing them for the service. Those actions were carried out by our Streets department. No further actions necessary. - Daniel S
WAR045553	6/3/2020	6/3/2020	6/3/2020	ERTS referral	No, Cleaned Up	E College Wy & N Laventure Rd Mount Vernon 98273	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Clean-up	Description: Equipment Failure - Mechanical Failure / Oil - Diesel Low Sulphur Comments: Drove through the area, but couldn't find anything. Based on the ERTS report, it seems like they cleaned it up really well. No further action seems necessary. - Daniel S Email to ECY: Hi Katelynn, After receiving the ERTS, I went out to check on the spill site within 10 minutes. Based on the comments in the ERTS, I didn't expect to find much as it looks like the spill was small in quantity and handled properly. There was no signs of spillage going into or having gone into our catch basins and MS4, and it looked like the cleanup up process went smoothly since I couldn't find much of a trace of the spill. I have filed this within our system and am closing it out as I believe no further action is necessary. Thanks, Daniel
WAR045553	7/9/2020	7/9/2020	7/9/2020	Pollution hotline (phone, web, app)	Other: No discharge to MS4, only into stream.	4516 Edgemont Pl Mount Vernon 98273	Paint	Construction activity, Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Received a call from a concerned citizen that some milky liquid was flowing down the creek that runs next to his property. By the time I arrived, it had mostly dissipated, but I was able to trace the source back up to the neighbor across the street from the original caller. I spoke with the family at that residence who informed me that the father had washed his paint brush in his pond that overflows into the creek. I told him that the creek is part of an overall environmental system and washing paint brushes can disrupt the system and also result in fines for the individual. They let me know that they will wash things properly going forward. Since no spill entered into our MS4, there were no further actions

Jurisdiction permit number	Date incident discovered	Date beginning response	Date end response	How incident discovered / reported to you	Discharge to MS4	St Address or Intersection City / Zip	Pollutants Identified	Source / Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and/or other comments
WAR045553	7/29/2020	7/29/2020	7/29/2020	Other agency referral	Yes, No Notice Required	3323 Shelly Hill Rd Mount Vernon 98273	Paint	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Clean-up, Education/technical assistance	~~Description: Hi Blaine and Dan,~~ We received a complaint from a Lori Jenkins at 3323 Shelly Hill Road (503-298-9753) regarding her neighbor across the street. They have a contractor that is repeatedly dumping white liquid down the storm drain near her house from some sort of painting and/or remodel project at the neighbor's house. She tried talking to them and they continue to dump the wastewater in the drain. The voicemail was received from Lori approximately 10:30 today. Would you please follow up with her. Thanks, Britt Pfaff Dunton, REHS Environmental Health Specialist III / Skagit County Public Health Comments: Spoke with a Lori, who reported the incident, and Mark, who was the offending party. Mark initially denied knowing how the spill happened, but I persisted in explaining that it is illegal and against city code to dump anything other than rain down the drain. I did tell him that I was visiting in order to educate at this time, but that fines would be levied against the offending party if the City has to come back. I then spoke with Lori who informed me that Mark had deliberately dumped some chalky fluid down the drain despite their protestations. I let her know that I had talked with him and that I explained to him that it was illegal to do so. After this conversation with Lori, Mark came up and admitted that he was the offending party and that he didn't want to be fined. I let him know that this trip out was for educational purposes, so no fines would be handed out this time. He told me that it was water with some chalky material from the tile and grout work he was doing for the homeowner, but that he didn't dump the sand at the bottom of the bucket. He informed me that from now on he will not be dumping any liquid down the storm drains either. Called Ken Scott to have the catch basins cleaned out since some residue looked like it was still in the water as well as the residue on the catch basin itself - Daniel S

Jurisdiction permit number	Date incident discovered	Date beginning response	Date end response	How incident discovered / reported to you	Discharge to MS4	St Address or Intersection City / Zip	Pollutants Identified	Source / Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and/or other comments
WAR045553	8/11/2020	8/12/2020	8/12/2020	ERTS referral	No, Cleaned Up	2405 E College Wy Mount Vernon 98273	Fuel and/or vehicle related fluids	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Clean-up	ERTS Incident #699981 Environmental Report Tracking - Generated 8/12/2020, 12:51 PM Primary Initial Report - Reported: 08/11/20 17:56 Where did it happen? Location name: Physical address: 2405 E College Way, MOUNT VERNON WA 98273 , US, County: SKAGIT Ecology region: NWRO / Lat, long: 48.43736 , -122.31028 Directions/Landmarks: What happened? Incident date: 08/11/20 00:00 Activity: Not operating or not performing designed function Cause: Medium: Ground - Soil / Source: Vehicle - Commercial truck Substance: Oil - Diesel oil/Marine gas / Substance amount: 10 U.S. gallons Who might be responsible? Jacob Rawls, Organization: Rawls Electric and Excavation Phone number(s): (360) 739-8326 / Address: 4879 Samish Way, Bellingham WA 98229 US How was it reported? Intake type: Call / Reported date: 08/11/20 17:56 Entered by: Danielle Devoe / Entered at: 08/12/20 07:46 Who reported it? Reporter type: Name: Jacob Rawls Organization: Rawls Electric and Excavation Phone number(s): (360) 739-8326 Are they anonymous? No / Do they want this to be confidential? No / Are they self-reporting? No Comments/notes: AHR: Work truck struct fire hydrant and punctured fuel tank containing 70 gallons of diesel. Most of the fuel was captured in buckets and placed in storage tanks; 5-10 gallons of diesel spilled to roadway should and soil. Sorbent boom placed, no drains impacted. WRS hired by company for clean up. Pictures of clean up sent. ROTD will check on clean up tomorrow morning. Consulted with Walls. / Incident details / Life cycle status: Follow-up(s) email not sent Incident Date 08/11/20 / Was it self-reported?: No / Show to public?: No Program owners: •NWRO - Toxics Cleanup / Katelynn Piazza (Primary) NWRO - External / •Robert Walls / NWRO - Water Quality / Location NWRO - Spill Prevention, Preparedness & Response / •Katelynn Piazza Location name: Physical Address: 2405 E College Way, MOUNT VERNON WA 98273, US County: SKAGIT / Ecology region: / NWRO / Lat, long: 48.43736 , -122.31028 Directions/Landmarks: Follow-ups / Program: Water Quality : Subject: Oil Spill to Impermeable Surface What happened? Primary activity / Activity: Not operating or not performing designed function Action history / Status Action Date Started Follow-up owner assigned 8/12/2020 12:51:50 PM Follow-up owners Status Organization First name Last name Is external? Email Phone number / Pending acceptance WA Ecology Mathew Kwartin N mkwa461@ecy.wa.gov (425) 649-4484 Program: External : Subject: Oil Spill to Impermeable Surface What happened? Primary activity Activity: Not operating or not performing designed function Action history / Status Ac tion Date / Email not sent Follow-up owner email not sent 8/12/2020 12:51 PM / Follow-up owners: Status Organization First name Last name is external? Email Phone number / Email not sent Mount Vernon City of mvengineering@mountvernonwa.gov (360) 336-6227 Program: Spill Prevention, Preparedness & Response : Subject: Oil Spill to Impermeable Surface What happened? Primary activity / Activity: Not operating or not performing designed function Action history / Status Ac tion Date / Started Follow-up owner assigned 8/12/2020 8:41:40 AM Follow-up owners: Status Organization First name Last name Is external? Email Phone number Pending acceptance WA Ecology Danielle Devoe N ddev461@ecy.wa.gov (425) 649-7036 Disclaimer: Contact Ecology if you would like a copy of any of these attachments / From: Katelynn Piazza / Email: KPIA461@ecy.wa.gov / Phone number: (425) 649-7229 Comments: Responded to the incident, but the spill had already been taken care of on site and no impact to our MS4 on the day before receiving the ERTS. - DLS 8/12/20 2:30pm

Jurisdiction permit number	Date incident discovered	Date beginning response	Date end response	How incident discovered / reported to you	Discharge to MS4	St Address or Intersection City / Zip	Pollutants Identified	Source / Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and/or other comments
WAR045553	9/9/2020	9/9/2020	9/9/2020	Staff referral	No, Cleaned Up	2903 Habitat Pl Mount Vernon 98273	Solid waste / trash	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Clean-up, Education/technical assistance	Will from Streets talked to me about some garbage being dumped into the pond which prevented them from completing their mowing. I brought this to the attention of the resident in the house next to the pond, who would be the likeliest culprit of the garbage dumping. She mentioned that she had no knowledge of it, maybe her son did, and I made sure to mention that I'm not leveling fines at this moment and I'm just making sure everyone is aware. I left her with a copy of the City Code sections on Illicit Discharges and fines. I will also put together a letter to send out to the neighborhood to let everyone know to keep garbage from being dumped into the stormwater system. - Daniel S 9/9/2020
WAR045553	12/9/2020	12/9/2020	12/9/2020	Pollution hotline (phone, web, app)	No, None Found	3400 E Fir st Mount Vernon 98273	Unconfirmed, unspecified, or not identified, Sediment/soil	Unconfirmed, unspecified, or not identified	Observation (color/sheen/turbidity /floatables/odor)	Other: No actions necessary since no spill was found.	Description: Received a report on Wednesday 12/9/20 of muddy water coming down a branch of Trumpeter Creek. Reporting party believed that it was excessive and inhibiting salmon spawning habitat. Comments: The report mentioned that the muddy water was coming down the stream between 11:30am to 12:30pm, and I went out to investigate the report at around 1:00pm. The stream looked to be flowing normally at with normal coloration by that time. I checked with the construction workers to see if they noticed anything, but they didn't have any answers for me. As well, the origin of the muddy water would have to be upstream from their project, and they informed me that they were working at the other end of Fir St by Laventure Rd around that time. The adjacent property owners didn't notice anything either. Tracing back upstream, I could not find any obvious signs of a deliberate spill or dumping activity. Most likely there was some erosion upstream that fell in to the stream and caused it to become muddy. - Daniel S

Washington Department of Ecology
Electronic Submission Cover Letter

DEPARTMENT OF ECOLOGY
State of Washington

WQWebSubmittal - Submittal Submission Id: 1763277 - 3/29/2021 4:51:48 PM

Company Name	Signer Name	System Name
City of Mount Vernon	Blaine Chesterfield	WQWebPortal

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for City of Mount Vernon	Copy of Record CityofMountVernon Monday March 29 2021
WAR045553_21_03292021152731	Education&Outreach_annual repo_21_03292021152731
WAR045553_4a_03292021152523	Internal Coordination_4a_03292021152523
WAR045553_2_03292021151510	Mount Vernon_SWMP2021_FINAL_Co_2_03292021151510
WAR045553_30a_03292021152745	OutfallReport20_30a_03292021152745
WAR045553_26a_03292021152732	Stewardship Opportunities_26a_03292021152732
WAR045553_7_03292021152609	Stormwater Capital Projects_7_03292021152609
WAR045553-2020-ImportedIDDEs_03292021152752	WAR045553-2020-ImportedIDDEs_03292021152752

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

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