



City of Mount Vernon

2024 Stormwater Management Program

March 2024 // FINAL



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City of Mount Vernon 2024 Stormwater Management Program

Prepared for
City of Mount Vernon, Washington
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List of Acronyms and Abbreviations

2019 Ecology Manual	Stormwater Management Manual or Western Washington (2019)	STORM	Stormwater Outreach for Regional Municipalities
BMP	best management practice	SWMP	Stormwater Management Program
CAD	computer assisted design	SWMP Plan	written documentation of the SWMP
City	City of Mount Vernon	SWPPP	stormwater pollution prevention plan
CSO	combined sewer overflow	WLA	waste load allocation
CWA	Clean Water Act	WWCPA	Washington Wastewater Collection Personnel Association
DS	Development Services (Department)		
E&O	education and outreach		
Ecology	Washington State Department of Ecology		
EPA	U.S. Environmental Protection Agency		
HR	Human Resources		
GIS	geographic information system(s)		
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/the Permit	Western Washington Phase II Municipal Stormwater Permit		
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		
SOP	standard operating procedure		

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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 National Pollutant Discharge Elimination System (NPDES) Western Washington Phase II Municipal Stormwater Permit (Phase II Permit or the 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, Washington (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. State laws include the State of Washington Water Pollution Law (Chapter 90.48 RCW).

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. Please see Section 12-1, Summary, for an abbreviated list of the City’s key compliance activities.

Appendix A includes abbreviations and definitions from the Phase II 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 2018 Ecology 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 discharges¹:

- **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.
- **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.

¹—Ecology, “Fact Sheet for the Phase I, Western Washington Phase II, and Eastern Washington Phase II Municipal Stormwater Permits,” August, 2018

- **Flooding:** High flows from the MS4 can endanger human life, health and safety as well as inflicting damage to the natural environment, transportation systems, public and private property and economic vitality
- **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.
- **Pollution:** Urban stormwater is known to contain a fairly consistent suite of pollutants from common land use activities.
- **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.
- **Shellfish industry:** Washington State’s multimillion-dollar shellfish industry is increasingly threatened by closures due to stormwater contamination.

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, this plan is a look forward, to meet the ongoing demands of the Phase II Permit in 2023.

1.2 Regulatory Background

The NPDES permit program is a requirement of the federal CWA and the state Water Pollution Control Law (RCW 90.48), 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 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 website 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) provided 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 components consistent with the Permit:

- 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.

Ecology is now in the process of updating the permit for another 5-year term (2024 – 2029). The formal draft version of the next permit was released in the spring of 2023, with a targeted effective date of August 1, 2024. This 2024 SWMP incorporates requirements under the current 2019-2024 Permit.

A summary schedule of requirements and deadlines contained in the 2019–2024 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 also published an updated 2019 Stormwater Management Manual for Western Washington (2019 Ecology Manual) to correspond with new requirements in the Permit. Ecology Manuals provide stormwater permit implementation and management guidance to municipalities implementing a SWMP. The 2019 Ecology Manual is available primarily in a digital format, on Ecology’s website.

In June of 2022 Mount Vernon updated the Mount Vernon Municipal Code to meet Permit requirements associated with Source Control for existing development and to adopt the 2019 Ecology Manual. Ecology plans to issue a revised Ecology Manual in 2024.

<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 Phase II 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. This area is covered under Section 8 of the City’s NPDES Waste Discharge Permit, and runoff from this area drains to the City of Mount Vernon Wastewater Treatment Plant. The City’s NPDES Waste Discharge Permit renewal expired in January of 2022 and permit renewal is currently awaiting approval from Ecology.

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 website 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 of the Permit, 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 of the Permit, 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 compliance with the Permit constitutes compliance with the TMDL. Implementation of the SWMP ensures that the City is 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 (*renewed through December 31, 2025*) with the Skagit Conservation District (SCD) to implement the Public Education and Outreach requirements of the Permit. The Skagit County Public Health Department (SCPHD) conducts septic system inspections that help to educate citizens and businesses about stormwater pollution. In 2022, the City signed an Interlocal Agreement (*through December 31, 2024*) with Skagit County to conduct a local source control program to help educate citizens and businesses about stormwater pollution and to perform the inspection duties required in Permit special condition S5.C.8. 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Public Works IS DS 	SCD Skagit County Public Health Department
Public Involvement and Participation	<ul style="list-style-type: none"> Public Works IS 	SCD
MS4 Mapping and Documentation	<ul style="list-style-type: none"> Public Works 	
Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> Public Works DS Fire Department IS Police Parks & Recreation 	
Controlling Runoff from New and Re-Development and Construction Sites	<ul style="list-style-type: none"> Public Works DS City Attorney’s Office 	
Pollution Prevention and Municipal Operation and Maintenance	<ul style="list-style-type: none"> Public Works DS City Attorney’s Office Parks and Recreation Facilities 	
Source Control Program for Existing Development	<ul style="list-style-type: none"> Public Works 	Skagit County Public Works
Water quality Monitoring and Assessment	<ul style="list-style-type: none"> 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 Permits².” (December 2012)

The organization of Sections 2 through 11 of this SWMP Plan is modeled after that of the Permit:

- **Section 2** addresses Permit requirements for administering the City’s SWMP for 2024.
- **Section 3** addresses Permit requirements for stormwater planning for 2024.
- **Section 4** addresses Permit requirements for public education and outreach (E&O) for 2024.
- **Section 5** addresses Permit requirements for public involvement and participation (I&P) for 2024.
- **Section 6** addresses Permit requirements for MS4 mapping and documentation for 2024.
- **Section 7** addresses Permit requirements for IDDE for 2024.
- **Section 8** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2024.
- **Section 9** addresses Permit requirements for municipal O&M for 2024.
- **Section 10** addresses Permit requirements for a source control program for existing development for 2024.
- **Section 11** addresses Permit requirements for water quality monitoring and assessment for 2024.
- **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.

² [Guidance for City and County Annual Reports for Western Washington Phase II Municipal Stormwater General Permits](#)

Section 2

Stormwater Management Program Administration

Section 2 of this SWMP document provides a description of Permit requirements related to overall SWMP administration, including descriptions of the City's current and 2024 planned compliance activities for 2024 for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for Stormwater Management Program Administration.

2.1 Permit Requirements

The Permit (Special Condition 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) and the SWMP Plan has been updated annually. The SWMP Plan for 2024 will be submitted to Ecology by March 31, 2024.
- 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 Plan 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 monitors the State Stormwater Work Group for any updates or developments.

- 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.
- The City holds Interdisciplinary Team Meetings on a quarterly basis to discuss and coordinate on stormwater programs, projects, and priorities, including those identified in the Trumpeter Creek SMAP (dated March 2023) (see Section 3 for more details on the Trumpeter Creek SMAP).

2.3 Planned 2024 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 2024 SWMP administration activities.

Table 2-1. 2024 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, North Sound NPDES Municipal Stormwater Permit Phase I/II Forum, Road Map, and the NPDES Municipal Environmental Justice Work Group.. Monitor the State Stormwater Work Group.

Section 3

Stormwater Planning

This section provides a description of the Permit requirements related to Stormwater Planning and 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024, will address and be in compliance with the new permit requirements for Stormwater Planning.

3.1 Permit Requirements

The Permit (Special Condition 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 Low Impact Development (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 (SMAP), 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 2019 Permit introduced new requirements for Stormwater Planning in Special Condition S5.C1.d. The goal of these requirements is to motivate municipalities to think strategically about which of their watersheds are most in need of pollution control efforts and which would most benefit from a stormwater management action program.

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

- The City is implementing LID principles and BMPs through its municipal code and development review process with the intent of making LID the preferred and most commonly-used approach to site development.

- 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 submitted a report responding to a series of Stormwater Planning Annual Report questions prior to March 31, 2021, and prior to January 1, 2023.
- The City completed the SMAP process.
 - The City compiled a waterbody inventory, which was submitted to Ecology March 31, 2022.
 - The City created a waterbody prioritization and documented the process of selecting Trumpeter Creek as the targeted basin for the SMAP.
 - The City prepared a SMAP for the Trumpeter Creek basin, and submitted the SMAP to Ecology on March 31, 2023.

3.3 Planned 2024 Compliance Activities

The City plans to undertake the compliance activities listed in Table 3-1 in 2024.

Table 3-1. 2024 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 Streets	Ongoing
SWP-3	Continue to implement LID principles and begin work on short-term actions in the Trumpeter Creek SMAP.	Public Works	DS	Ongoing

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 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024, will address and be in compliance with the new permit requirements for Public Education and Outreach.

4.1 Permit Requirements

The Permit (Special Condition 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.
- 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.

The City worked in partnership with the Skagit Conservation District (SCD) to 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 to be more effective. A copy of the report and associated findings can be found attached to the City's 2023 Annual Report.

4.3 Planned 2024 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 2024 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 2024 Public Education and Outreach activities.

Table 4-1. 2024 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-8	Evaluate and report on program strategies.	Public Works	SCD ³	Completed.

³ The City is also a member of STORM, but the SCD is the main partner with the City in public education and outreach.

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 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024, will address and be in compliance with the new permit requirements for Public Involvement and Participation.

5.1 Permit Requirements

The Permit (Special Condition 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 as well as SMAP efforts.
- Make the SWMP and Annual Compliance Report available to the public, including posting it on the City's website 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 2024 SWMP Plan.
- The City posted the Draft SWMP Plan on the City's website, 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 2024 Final SWMP Plan available to the public on the City's website, at the public library, and in the Public Works Department main office building.

5.3 Planned 2024 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 2024 public involvement activities.

Table 5-1. 2024 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, Annual Compliance Report, and SMAP elements available to the public by posting it on the City website, public library, and in the Public Works Department building. Post announcements on website and in newspaper, and on TV10.	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 MS4 mapping and documentation, including descriptions of the City's current and planned 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for MS4 Mapping and Documentation.

6.1 Permit Requirements

The Permit (Special Condition 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, 2021, have all mapping data stored electronically using geographic information system (GIS), computer assisted design (CAD) drawings, or other asset management software.
- By August 1, 2023, complete mapping of all known connections from MS4 to privately owned stormwater systems.

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 stormwater system to validate the GIS network model.
- The City maintains data regarding outfall size and material for known MS4 outfalls.
- In 2023, the City switched to a new asset management software (Cartegraph) which will be used in conjunction with GIS to maintain assets more accurately.

6.3 Planned 2024 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 2024.

Table 6-1. 2023 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. ⁴	Public Works		Ongoing.

⁴ The City is working on addressing data gaps in storm system map database, including more accurate invert elevations. This is an extensive multi-year effort, which is also being completed in the combined sewer and separate sewer systems for a portion of the City.

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 2024 planned compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for IDDE.

7.1 Permit Requirements

The Permit (Special Condition 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 dry-weather field screening for an average of 12 percent of the MS4 each year to check for illicit connections or discharges.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track through closeout any illicit discharge reports and actions taken in response, including enforcement actions.
- 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 website 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 Britt Slough basin.
- 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 to Cartegraph.
- The City summarizes all illicit discharges and connections, response actions taken, and enforcement actions in its Annual Compliance Reports.

7.3 Planned 2024 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 2024 IDDE activities.

Table 7-1. 2024 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 2023 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 2023 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	Track 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.

Table 7-1. 2024 Illicit Discharge Detection and Elimination Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
IDDE-10	Perform visual inspection of prioritized receiving water bodies. Kulshan Creek outfalls are targeted for 2023.	Public Works		Planned for summer 2024.
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		Ongoing.

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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 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for Controlling Runoff from New Development, Redevelopment and Construction Sites.

8.1 Permit Requirements

The Permit (Special Condition 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 2022.
- 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 as needed.
- The City adopted the 2019 Ecology Manual in June of 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 2024 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 2024 SWMP activities related to runoff control for new development, redevelopment, and construction sites.

Table 8-1. 2024 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 2019 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.

Table 8-1. 2024 Controlling Runoff from New Development, Redevelopment, and Construction Sites Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
CTRL-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.
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.

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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 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for Municipal Operations and Maintenance.

9.1 Permit Requirements

The Permit (Special Condition 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 30, 2022, the City shall update their maintenance standards as necessary to meet the requirements of this Special Condition.
- 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 reducing pollutant runoff from municipal operations. Current maintenance standards are set in the municipal code, which as of December 2022, references the 2019 Ecology Manual.

- 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 in 2017 and reviewed it in 2022. The SWPPP will be updated as needed to address changes in operations.
- 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 Special Condition S5.C.5.f of the Permit. The City is currently reviewing these plans and will update them as needed.
- 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 and will continue to utilize this in O&M compliance.

9.3 Planned 2024 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 2024 SWMP activities related to pollution prevention and O&M activities.

Table 9-1. 2024 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 2023 asset management system upgrade.	Public Works		Ongoing.
PPOM-2	Continue to implement City maintenance standards in accordance with Ecology 2019 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.

Table 9-1. 2024 Pollution Prevention and Operations Maintenance Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
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.
PPOM-8	Refresh IPM and Property and Facility Management Plan for Pollution Reduction.	Public Works		Ongoing.

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Section 10

Source Control Program for Existing Development

This section provides a description of the Permit requirements related to municipal operations and maintenance, including descriptions of the City's current and planned 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City's activities after August 1, 2024 will address and be in compliance with the new permit requirements for the City's Source Control Program for Existing Development at that time.

10.1 Permit Requirements

The Permit (Special Condition 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 to address source control for existing development. As a part of this effort the City previously identified all businesses that are of the Standard Industrial Classification (SIC) as well other businesses and sites that fall under the category of businesses and

activities that are likely sources of pollutants, per Appendix 8 of the Permit. Through the ILA, Skagit County conducts source control inspections on behalf of the City. In 2023, sixty-five inspections were completed at City businesses. No enforcement actions were necessary.

- The City has amended their municipal code through Ordinance 3852 to include an existing source control program as a part of their Stormwater Utility functions, within the Mount Vernon Municipal Code Title 13.

10.3 Planned 2024 Compliance Activities

The City plans to address requirements in Special Condition S5.C.8 in 2024 by performing the following compliance activities:

Table 10-1. 2024 Pollution Prevention and Operations Maintenance Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
CTRL-EX-1	Continue coordination with Skagit County to implement a program which prevents and reduces pollutants in runoff from existing development.	Public Works	Skagit County	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	Skagit County	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 2024 compliance activities for the current Permit. Permit planning activities will be adjusted to reflect the new permit due to be issued on August 1, 2024. The City’s activities after August 1, 2024 will address and be in compliance with the new permit requirements for Monitoring and Assessment.

11.1 Permit Requirements

The Permit (Special Condition 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 Ecology for the RSMP.

11.3 Planned 2024 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 2024 SWMP monitoring activities.

Table 11-1. 2024 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 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 each year.

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Section 12

Summary

The City of Mount Vernon is currently in compliance with the Phase II Permit and has planned activities for 2024 to ensure continued compliance. There are multiple tasks that the City has completed and multiple ongoing tasks that the City is conducting to ensure continued compliance with the Permit requirements.

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:

- Working with SCD to implement the Public Education and Outreach Program
- Working with Skagit County to manage the existing regional source control program
- Posting the SWMP document online every March, presenting it at the City Council, and providing a period for public comment
- Providing an ongoing IDDE program including a reporting hotline available to the public
- Providing training to staff to identify and respond to illicit discharges and connections; as well as
- Ongoing implementation of the source control program with the support of Skagit County
- 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>
- Additional information on the City's stormwater standards and codes can be found online at: [Municipal Code | Mount Vernon, WA - Official Website \(mountvernonwa.gov\)](#)

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Appendix A: Abbreviations and Definitions from the Phase II Permit

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Appendix A

Abbreviations and Definitions from Permit

The following abbreviations and definitions are taken directly from the Phase II Permit and are reproduced here for the reader's convenience. *Note: Some of these abbreviations and definitions are not used in the current SWMP.*

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 rights-of-way 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 reasonable 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.

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

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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) <ul style="list-style-type: none"> - 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 prohibit, 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

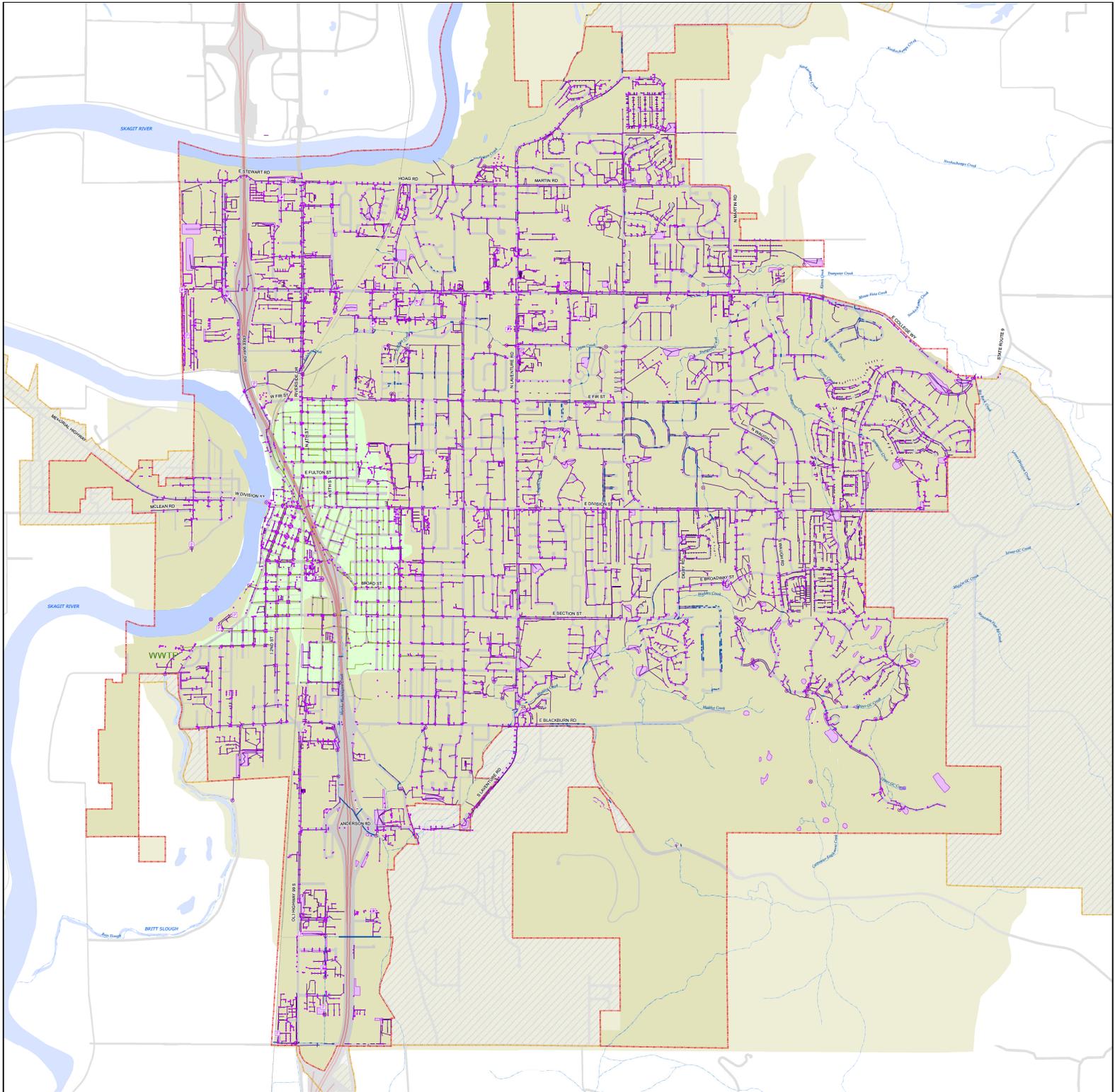
S1 Application for coverage	Co-Permittees can end or amend agreements at any time.
S4.F Response to violations of Water Quality Standards	Notification and possible adaptive management may occur at any time.
S7 Compliance with Total Maximum Daily Load (TMDL) Requirements	Comply with applicable TMDL requirements 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.

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Appendix C: Mount Vernon 2024 MS4 Storm Sewer System Map

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Map Revised February, 2024

City of Mount Vernon Disclaimer: The information included on this map has been compiled by City of Mount Vernon and from a variety of sources. The City of Mount Vernon makes no representation or warranty, expressed or implied, as to the accuracy, completeness, timeliness, or quality for the use of such information. The City of Mount Vernon shall not be liable for any personal, special, indirect, incidental or consequential damages including lost profits, 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
- Outfall >12"
- Unimproved Facility

- City Boundary
- USA Boundary
- Railroad
- USGS

- MSA Area
- Combined Sewer Area

City of Mount Vernon Stormwater System



City of Mount Vernon
3024 Cleveland Avenue
Mount Vernon, WA 98273
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