



City of Mount Vernon

2025 Stormwater Management Program

March 2025 // FINAL



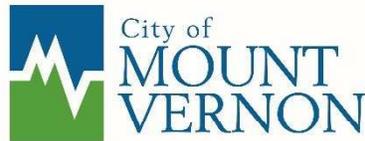
FINAL

City of Mount Vernon
2025 Stormwater
Management Program Plan

Prepared for
City of Mount Vernon, Washington
March 2025

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List of Acronyms and Abbreviations

2019 Ecology Manual	Stormwater Management Manual or Western Washington (2019)	SCPHD	Skagit County Public Health Department
2024 Ecology Manual	Stormwater Management Manual or Western Washington (2024)	SMED	Stormwater Management for Existing Development
BMP	best management practice	SOP	standard operating procedure
CAD	computer assisted design	STORM	Stormwater Outreach for Regional Municipalities
City	City of Mount Vernon	SWMP	Stormwater Management Program
CSO	combined sewer overflow	SWMP Plan	written documentation of the SWMP
CWA	Clean Water Act	SWPPP	stormwater pollution prevention plan
DS	Development Services (Department)	WLA	waste load allocation
E&O	education and outreach	WWCPA	Washington Wastewater Collection Personnel Association
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		
NA	not applicable		
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		

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 SWMP is prepared annually (by calendar year) and provides a summary of the permit requirements, the City’s current compliance activities and the City’s planned compliance activities. The current Permit was made effective on August 1, 2024 which means this SWMP summarizes the City’s NPDES activities for the previous (2019-2024) and current (2024-2029) Permit. Section 1.2 provides more detail on the issuance and effective dates of 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 13-1, 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 2023 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 sources of pollution to stormwater, the impacts of stormwater on receiving waters and biota 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 and potential impacts caused by stormwater discharges¹

- **Human Health:** Untreated stormwater contains 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.

¹ Ecology, “Fact Sheet for the Phase I, Western Washington Phase II, and Eastern Washington Phase II Municipal Stormwater Permits,” August, 2023.

- **Drinking Water:** In some areas of Washington, notably Spokane County and parts of Pierce and Clark Counties, gravelly soils allow rapid infiltration of stormwater. Untreated stormwater discharging to the ground could contaminate aquifers that are used for drinking water.
- **Shellfish:** Washington State’s multimillion dollar shellfish industry is increasingly threatened by closures due to stormwater contamination.
- **Pollution:** Urban stormwater is known to contain a fairly consistent suite of pollutants from common land use activities.
- **Degraded Water Bodies:** In urban and urbanizing areas across Washington State, residential, commercial, and industrial land development continues to change land cover and drastically alter stream channels. Unmanaged stormwater from urban areas has severely degraded beneficial uses of Washington’s waters.
- **Salmon Habitat:** Urban stormwater degrades salmon habitat in streams through effects on hydrologic flows and toxicity. Paved surfaces cause greater and more frequent winter stormwater flows that erode stream channels and damage spawning beds. Toxic chemicals in stormwater harm benthic insects, salmon embryos, immature fish, and adults returning to spawn.
- **Treaty Rights:** Due to 6PPD-quinone’s harmful impacts on salmon and fish-bearing watersheds, this stormwater issue also is directly linked to Tribal Treaty Rights. The Boldt Decision (United States v. Washington, 1974) established that the Tribes are entitled to 50% of the fishing catch in their usual and accustomed fishing grounds within WA State; additionally, the decision requires that the Tribes of WA State co-manage fisheries together. Tribal engagement is a priority action when addressing stormwater, including 6PPD-quinone pollutants carried in stormwater.

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 2025.

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. As Mount Vernon’s population was 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
- Stormwater Management for Existing Development (new component of the current Permit)
- Source Control Program for Existing Development
- Operation and Maintenance (O&M)
- 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 (referred to in this document as the 2013 Permit); it was subsequently modified in January 2015 to reflect the outcomes of appeals made to the Pollution Control Hearings Board (PCHB). The 2013 Permit was originally set to expire on July 31, 2018, but Ecology administratively extended the Permit for one year, and subsequently issued the 2019 Permit on July 1, 2019 with an effective date of August 1, 2019, and an expiration date of July 31, 2024. Ecology issued the 2024 Permit on July 1, 2024, with an effective date of August 1, 2024, and an expiration date of July 31, 2029. This 2025 SWMP incorporates requirements under the previous (2019-2024) and current (2024-2029) permits.

A summary schedule of requirements and deadlines for the previous and current permits are included as references in Appendix B to this SWMP Plan. Ecology prepared the summary for the 2019–2024 Permit and the Washington Stormwater Center prepared the summary for the 2024-2029 Permit. 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 Stormwater Management Manual for Western Washington (2019 Ecology Manual, 2024 Ecology Manual or 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 2024 Ecology Manual is available primarily in a digital format, on Ecology's website.

In June of 2022 Mount Vernon updated the Mount Vernon Municipal (MVM) Code to meet Permit requirements associated with Source Control for existing development and to adopt the 2019 Ecology Manual. The City will update the MVM Code to adopt the revised 2024 Ecology Manual in accordance with the Permit requirements. The 2019 and 2024 Ecology Manual are available on Ecology's website at: <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/stormwater-permittee-guidance-resources/stormwater-manuals>

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 with the Skagit Conservation District (SCD) (renewed through December 31, 2025) 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 with Skagit County Public Works (through December 31, 2025) 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 12 highlight the planned efforts of these departments and entities in more detail.

The City also participates and uses resources provided by the Stormwater Outreach for Regional Municipalities (STORM) and Stormwater Work Group for compliance assistance. STORM is a coalition of Western Washington jurisdictions that work together to create effective, regionally consistent, and cost-efficient education and outreach programs and messaging. The Stormwater Work Group oversees the Stormwater Action Monitoring (SAM) Program, which is the regional stormwater monitoring program implemented through the Permit.

Table 1-1. SWMP Implementation Responsibilities		
Program component	City Departments	Outside Entities
Stormwater Planning	<ul style="list-style-type: none"> Public Works Development Services Finance Information Services City Attorney's Office Human Resources 	Neighboring Municipalities (potential for coordination)
Public Education and Outreach	<ul style="list-style-type: none"> Public Works Information Services Development Services 	<ul style="list-style-type: none"> Skagit Conservation District Skagit County Public Health Department Stormwater Outreach for Regional Municipalities (STORM)
Public Involvement and Participation	<ul style="list-style-type: none"> Public Works Information Services 	<ul style="list-style-type: none"> Skagit Conservation District
MS4 Mapping and Documentation	<ul style="list-style-type: none"> Public Works 	NA
Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> Public Works Development Services Fire Department Information Services Police Parks & Recreation 	NA
Controlling Runoff from New and Re-Development and Construction Sites	<ul style="list-style-type: none"> Public Works Development Services City Attorney's Office 	NA
Stormwater Management for Existing Development	<ul style="list-style-type: none"> Public Works Development Services 	NA
Source Control Program for Existing Development	<ul style="list-style-type: none"> Public Works 	Skagit County Public Works
Pollution Prevention and Municipal Operation and Maintenance	<ul style="list-style-type: none"> Public Works Development Services City Attorney's Office Parks and Recreation Facilities 	NA
Water quality Monitoring and Assessment	<ul style="list-style-type: none"> Public Works Development Services 	<ul style="list-style-type: none"> Skagit Conservation District Stormwater Work Group

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 2025.
- **Section 3** addresses Permit requirements for stormwater planning for 2025.
- **Section 4** addresses Permit requirements for public education and outreach (E&O) for 2025.
- **Section 5** addresses Permit requirements for public involvement and participation (I&P) for 2025.
- **Section 6** addresses Permit requirements for MS4 mapping and documentation for 2025.
- **Section 7** addresses Permit requirements for IDDE for 2025.
- **Section 8** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2025.
- **Section 9** addresses Permit requirements for stormwater management for existing development for 2025.
- **Section 10** addresses Permit requirements for a source control program for existing development for 2025.
- **Section 11** addresses Permit requirements for municipal O&M for 2025.
- **Section 12** addresses Permit requirements for water quality monitoring and assessment for 2025.
- **Section 13** 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 2019–2024 Western Washington Phase II Municipal Stormwater Permit (published by Ecology) and the 2024-2029 Western Washington Phase II Municipal Stormwater Permit (published by the Washington Stormwater Center).
- **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 \(https://apps.ecology.wa.gov/publications/SummaryPages/0710100.html\)](https://apps.ecology.wa.gov/publications/SummaryPages/0710100.html)

Section 2

Stormwater Management Program Administration

This section provides a description of Permit requirements related to overall SWMP administration and descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Stormwater Management Program Administration.

2.1 2019-2024 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 2025 will be submitted to Ecology by March 31, 2025.
- 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 2024-2029 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 2025 will be submitted to Ecology by March 31, 2025.
- 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.

2.3 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:

- Defining roles and responsibilities and developing standard operating procedures (SOPs) for completing updates to future SWMP Plan and the Annual Compliance Report.
- Maintaining a cost accounting database for tracking annual Permit costs.
- Maintaining a training database for tracking and documenting compliance with all NPDES-related training.
- Continuing to coordinate with external entities such as the SCD, Sedro-Woolley, Burlington, Anacortes, and Skagit County.
- Meeting quarterly with The North Sound NPDES Municipal Stormwater Permit Phase I/II Forum to discuss stormwater policies and projects in the area.
- Monitoring the State Stormwater Work Group for any updates or developments.
- Participating 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.
- Holding 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).

2.4 Planned 2025 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 2025 SWMP administration activities. Future compliance time frames (beyond 2025) are included for reference.

Table 2-1. 2025 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	NA	City maintains cost-tracking database. The City must begin providing average annual costs to implement SWMP with each Annual Report no later than March 31, 2027.
SWMP-2	Continue use and updates for NPDES training management structure and tracking system.	Public Works, Information Services, Human Resources	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.

Table 2-1. 2025 Stormwater Management Program Administration Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
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 descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Stormwater Planning.

3.1 2019-2024 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 2024-2029 Permit Requirements

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

- Continue to 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 long-range or comprehensive planning update processes and influencing policies and implementation strategies within the City in the Annual Report due March 31, 2027.

- 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.
- Adopt and implement tree canopy goals and policies to support stormwater management no later than December 31, 2028.
- Conduct Stormwater Management Action Planning (SMAP) for one new high priority catchment area or additional actions for an existing SMAP no later than March 31, 2027.

3.3 Current Compliance Activities

The 2019 Permit introduced new requirements for Stormwater Planning in Special Condition S5.C.1.d. The goal of these requirements was 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 2024 Permit introduced new requirements for Stormwater Planning in Special Condition S5.C.1.c.iii, requiring municipalities to implement tree canopy goals and policies as a method of supporting stormwater management and water quality improvements.

The current compliance activities associated with the Permit include the following :

- Implementing LID principles and BMPs through the City’s municipal code and development review process with the intent of making LID the preferred and most commonly used approach to site development.
- Continuing to convene 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.
- Completing the SMAP process for Trumpeter Creek in 2023. The City:
 - Compiled a waterbody inventory, which was submitted to Ecology March 31, 2022,
 - Created a waterbody prioritization and documented the process of selecting Trumpeter Creek as the targeted basin for the SMAP, and
 - Prepared a SMAP for the Trumpeter Creek basin and submitted the SMAP to Ecology on March 31, 2023.

3.4 Planned 2025 Compliance Activities

The City plans to undertake the compliance activities listed in Table 3-1 in 2025. Future compliance time frames (beyond 2025) are included for reference.

Table 3-1. 2025 Stormwater Planning and Compliance Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
SWP-1	Continue convening inter-disciplinary team to inform and assist in the development, progress, and influence of this program.	Public Works	NA	Ongoing.
SWP-2	Continue inter-departmental coordination to ensure stormwater impacts are addressed in long-term planning efforts.	Public Works	Development Services Streets	Ongoing.
SWP-3	Continue to implement LID principles and begin work on short-term actions in the Trumpeter Creek SMAP.	Public Works	Development Services	Ongoing.
SWP-4	Adopt and implement tree canopy goals and policies to support stormwater management.	TBD	Development Services, Parks	No later than December 31, 2028.

Table 3-1. 2025 Stormwater Planning and Compliance Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
SWP-5	Begin work on SMAP effort for new catchment area or additional efforts for Trumpeter Creek.	Public Works	Development Services, Parks	SMAP must be completed no later than March 31, 2027.

Section 4

Public Education and Outreach

This section provides a description of the Permit requirements related to public education and outreach (E&O), including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Public Education and Outreach.

4.1 2019-2024 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 2024-2029 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, 2029 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.

4.3 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 a member of the STORM group and participates in the group’s effort 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.

4.4 Planned 2025 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 2025 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 2025 Public Education and Outreach activities. Future compliance time frames (beyond 2025) are included for reference.

Table 4-1. 2025 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	Skagit Conservation District	Ongoing.
EDUC-2	Continue collaboration with other NPDES municipalities and the STORM group to identify appropriate program evaluation techniques.	Public Works	Skagit Conservation District, Stormwater Outreach for Regional Municipalities	Ongoing.
EDUC-3	Continue to implement E&O strategy with SCD to supplement existing activities.	Public Works	Skagit Conservation District, Information Services	Ongoing.
EDUC-4	Continue developing the process to evaluate understanding and adoption of target behaviors.	Public Works	Skagit Conservation District, Stormwater Outreach for Regional Municipalities	Ongoing.
EDUC-5	Summarize annual activities for “Public Education and Outreach” component of Annual Report; identify any updates to SWMP document.	Public Works	Skagit Conservation District	The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.

Table 4-1. 2025 Public Education and Outreach Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
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	Skagit Conservation District, Stormwater Outreach for Regional Municipalities	Ongoing.
EDUC-7	Evaluate and report on program strategies.	Public Works	Skagit Conservation District	Submit report no later than March 31, 2029.
EDUC-8	Develop a social marketing campaign development based on the recommendations from 2024 evaluation and report. Follow a social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan. City to selection one of the following approaches: 1. Develop a strategy and schedule to implement the existing campaign more effectively; or 2. Develop a strategy and schedule to expand the existing campaign to a new priority audience or BMPs; or 3. Develop a strategy and schedule for a new priority audience and BMP behavior change campaign.	Public Works	Skagit Conservation District	No later than July 1, 2025.
EDUC-9	Implement a behavior change campaign and begin to implement the strategy identified in EDUC-8.	Public Works	Skagit Conservation District	No later than September 1, 2025.

Section 5

Public Involvement and Participation

This section provides a description of the Permit requirements related to public involvement, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Public Involvement and Participation.

5.1 2019-2024 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 2024-2029 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.
 - Annually document specific public involvement and participation opportunities provided to overburdened communities and highly impacted communities.
 - Document methods used to identify overburdened communities.
- 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.

5.3 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:

- Defining a series of public involvement activities intended to meet the Permit requirements for public involvement in development of the 2025 SWMP Plan.
- Posting the Draft SWMP Plan on the City's website, making announcements on the City cable TV channel (TV10), and sending announcements to the Skagit Valley Herald for public comments prior to the public meeting.

- Making the 2025 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.

Public comments on the Draft SWMP are included in Table 5-1.

Table 5-1. 2025 SWMP Public Comments			
Comment ID	Comment description	Date Received	Action
COM-1	Pipe shown in map does not exist.	March 12, 2025	City GIS data was updated according to public comment received at the March 12 public hearing. Map included in Final 2025 SWMP Plan reflects GIS update.

5.4 Planned 2025 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 5-2, which presents the work plan for the 2025 public involvement activities. Future compliance time frames (beyond 2025) are included for reference.

Table 5-2. 2025 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	NA	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	Information Services	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	Skagit Conservation District	Due on or before March 31 of each year.
PI-4	Document specific public involvement and participation opportunities provided to overburdened communities and highly impacted communities.	Public Works	Skagit Conservation District	Annually.
PI-5	Document methods used to identify overburdened communities.	Public Works	Skagit Conservation District	No later than December 31, 2026.

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 compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for MS4 Mapping and Documentation.

6.1 2019-2024 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 2024-2029 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, connections to the MS4 authorized or allowed by the Permittee after February 16, 2007, and known connections from the MS4 to a privately owned system.
- By March 31, 2026, submit locations and report data for size and material for all known MS4 outfalls in the Annual Report.
- By December 31, 2026, map tree canopy to support stormwater management on City-owned or operated properties. Develop methodology to identify canopy and update as needed.
- By March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the City. Submit map(s) and table with the Annual Report containing a breakdown of estimated acres

managed/unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the City.

- By December 31, 2028, map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on City-owned or operated properties.
- Continue storing all mapping data electronically using geographic information system (GIS), computer assisted design (CAD) drawings, or other asset management software.

6.3 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:

- Maintaining much of the City’s storm sewer information system in an electronic format and producing 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.
- Maintaining data regarding outfall size and material for known MS4 outfalls.
- In 2023, the City switched to a new asset management software (Cartegraph) which continues to be used in conjunction with GIS to maintain assets more accurately.

6.4 Planned 2025 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 2025. Future compliance time frames (beyond 2025) are included for reference.

Table 6-1. 2025 Mapping and Documentation Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
MAP-1	Continue updating storm system map and mapping methodology to address data gaps and Permit conditions	Public Works	NA	Ongoing.
MAP-2	Submit locations and report data for size and material for all known MS4 outfalls in the Annual Report.	Public Works	NA	No later than March 31, 2026.
MAP-3	Map tree canopy to support stormwater management on City-owned or operated properties.	Public Works	NA	No later than December 31, 2026.
MAP-4	Map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on City-owned or operated properties.	Public Works	GIS	No later than December 31, 2028.

Section 7

Illicit Discharge Detection and Elimination

This section provides a description of the Permit requirements related to IDDE, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Illicit Discharge Detection and Elimination (IDDE).

7.1 2019-2024 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 2024-2029 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.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

- 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.
- By December 31, 2026, coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.
- By January 1, 2027, update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities.
- 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.

7.3 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:

- Listing the public hotline to report illicit discharges and/or spills on the City's website and phonebook. The hotline is also publicized on public service announcements on television.
- Recording 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.
- Continuing self-administered IDDE training for new employees, and updating training software.
- Conducting regular online refresher trainings for City departments.
- Conducting inspections of portions of the storm sewer system, including screening for illicit discharges and connections.
- Conducting dry weather visual inspection of outfalls from the Britt Slough basin.
- Responding to reports of illicit discharges and taking appropriate actions to eliminate discharges, including following proper reporting procedures.
- Updating the City's in-house training software and continuing to track all staff training to ensure that all City staff have the appropriate training.
- Updating the City's asset management software to Cartegraph.
- Coordinating with the Mount Vernon Fire Department. The City has confirmed the department has transitioned to PFAS-free firefighting foam.
- Summarizing all illicit discharges and connections, response actions taken, and enforcement actions in its Annual Compliance Reports.

7.4 Planned 2025 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 2025 IDDE activities. Future compliance time frames (beyond 2025) are included for reference.

Table 7-1. 2025 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	Development Services	Ongoing.
IDDE-2	Continue to implement citywide IDDE Program.	Public Works	NA	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	NA	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	Development Services, 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	Information Services	Ongoing.
IDDE-6	Refresh self-administered intranet IDDE awareness training for all municipal staff in the field.	Public Works	Information Services	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	Development Services	Ongoing.
IDDE-8	Track the number of illicit connection inspections.	Public Works	Development Services	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	Development Services	Ongoing.
IDDE-10	Perform visual inspection of prioritized receiving water bodies. Nookachamps Creek outfalls are targeted for 2025.	Public Works	NA	Planned for summer 2025.
IDDE-11	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP.	Public Works	NA	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	NA	Ongoing.
IDDE-13	Update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities.	Public Works	Fire Department	No later than January 1, 2027.

Section 8

Controlling Runoff from New Development, Redevelopment, and Construction Sites

This section provides a description of the Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for New Development, Redevelopment and Construction Sites.

8.1 2019-2024 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 2024-2029 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.
- Manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed to identify maintenance needs and enforce compliance with maintenance standards as needed.
- 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 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 as well as a link to the online registration requirements for Underground Injection Control (UIC) wells 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.

8.3 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:

- Developing and implementing 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.
- Continuing existing programs, codes, standards, SOPs, and data management systems (SmartGov and Eclipse) addressing the Permit requirements. The plan review, inspection, and enforcement SOPs will be refined and updated as needed.
- Continuing to follow guidance from 2019 Ecology Manual.

- Continuing to encourage the use of LID at pre-permit application meetings. The City Code has provisions to allow for LID in the Critical Areas Ordinance.
- Completing the required inspections, including development sites prior to construction, future City infrastructure sites during construction, and future City infrastructure sites post-construction.
- Completing the required inspections for private infrastructure.
- Recording and maintaining inspection results in log-books.
- Inspecting new flow control and water quality treatment facilities at the required times and frequency.
- Continuing to ensure NOI forms are available at the customer service desk and are also mentioned in the Pre-permit application meetings for applicable developments.

8.4 Planned 2025 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 new Permit requirements.

Table 8-1 presents the work plan for 2025 SWMP activities related to runoff control for new development, redevelopment, and construction sites. Future compliance time frames (beyond 2025) are included for reference.

Table 8-1. 2025 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	Development Services	Ongoing.
CTRL-2	Apply technical thresholds in Appendix 1 to all sites 1 acre or greater.	Public Works	Development Services	Ongoing.
CTRL-3	Continue evaluating and implementing the City’s stormwater permitting, plan review, inspection, enforcement, and record-keeping processes.	Public Works, Development Services	City Attorney’s Office	Ongoing.
CTRL-4	Track number of inspections, plan reviews, and enforcement.	Public Works	Development Services	Ongoing.
CTRL-5	Establish program to annually inspect all stormwater treatment flow control facilities (other than catch basins) permitted by the Permittee.	Public Works	NA	Ongoing.
CTRL-6	Conduct staff training and public E&O on implementing Stormwater Manual and Permit requirements.	Public Works	Skagit Conservation District	Ongoing.
CTRL-7	Continue implementing long-term stormwater system operation and maintenance plans for stormwater facilities.	Public Works	Development Services	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	Development Services	The SWMP Plan and Annual Compliance Report submittal is due on or before March 31 of each year.
CTRL-9	Adopt 2024 Ecology Manual.	Public Works	Development Services	June 30, 2027.
CTRL-10	Inspect all stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, until 90 percent of the lots are constructed.	Development Services	Public Works	Biannually (twice a year).
CTRL-11	Continue providing Notice of Intent (NOI) forms to representatives of the proposed new development and redevelopment. Begin also providing the online registration requirements for Underground Injection Control (UIC) wells.	Development Services	Public Works	Ongoing.

Section 9

Stormwater Management for Existing Development

This section provides a description of the current (2024-2029) Permit requirements related to stormwater management for existing development, including descriptions of the City’s planned compliance activities for 2025 under the Permit.

9.1 2024-2025 Permit Requirements

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

- Implement an ongoing program to control or reduce stormwater discharges to waters of the State from areas of existing development.
- Implement stormwater facility retrofits or tailored SWMP actions that meet the criteria described in Appendix 12 using one or a combination of the following:
 - Strategic stormwater investments identified in SMAP
 - Opportunistic stormwater investments from leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.
- Provide a list of planned, individual projects scheduled for funding or implementation during the Permit term to meet the assigned 5.7 equivalent acres as described in Appendix 12.
- No later than March 31, 2028, fully fund, start construction, or completely implement project(s) that meet the assigned 5.7 equivalent acres and submit documentation with the Annual Report as described in Appendix 12.
- Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term, no later than March 31, 2028.

9.2 Planned 2025 Compliance Activities

The City has begun planning for their SMED program introduced in the new 2024 Permit. Table 9-1 presents the work plan for 2025 SWMP activities related to stormwater management for existing development (SMED). Future compliance time frames (beyond 2025) are included for reference.

Table 9-1. 2025 Stormwater Management for Existing Development (SMED) Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
SMED-1	Implement stormwater facility retrofits or tailored SWMP actions that meet the criteria described in Appendix 12.	Public Works	Interdisciplinary Team	Ongoing.
SMED-2	Provide a list of planned, individual projects scheduled for funding or implementation during the Permit term to meet the assigned 5.7 equivalent acres as described in Appendix 12.	Public Works	Interdisciplinary Team	The SMED project list is due with the Annual Report on or before March 31 of each year, starting in 2025.

Table 9-1. 2025 Stormwater Management for Existing Development (SMED) Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
SMED-3	Fully fund, start construction, or completely implement project(s) that meet the assigned 5.7 equivalent acres and submit documentation with the Annual Report as described in Appendix 12.	Public Works	NA	March 31, 2028.
SMED-4	Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term.	Public Works	Interdisciplinary Team	March 31, 2028.

Section 10

Source Control Program for Existing Development

This section provides a description of the Permit requirements related to the source control program for existing development, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for the City's Source Control Program for Existing Development.

10.1 2019-2024 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 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 2024-2029 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.

- Continue enforcing an ordinance (or other enforceable documents) requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. Continue updating as necessary no later than August 1, 2027.
- Continue updating City's inventory of publicly and privately owned sites which have the potential to generate pollutants to the MS4 at least once every 5 years. This inventory shall include businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8), and other pollutant generating sources based on complaint response, such as home-based businesses and multi-family sites.
- Continue implementing 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.
 - 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.
- Continue implementing 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.
- Annually report inspections organized by business type or activities with potential to generate pollutants to the MS4.

10.3 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:

- Continuing partnership with Skagit County through an Interlocal Agreement (ILA) 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 as 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 2024, sixty inspections were completed at City businesses. No enforcement actions were necessary.
- Amending the City's 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.

10.4 Planned 2025 Compliance Activities

The City has an existing Source Control for Existing Development 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 10-1, which presents the work plan for the 2025 Source Control activities. Future compliance time frames (beyond 2025) are included for reference.

Table 10-1. 2025 Source Control Program for Existing Development Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
CTRL-EX-1	Continue coordination with Skagit County to implement a program which seeks to prevent and reduce 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.
CTRL-EX-3	Update Source Control Program inventory.	Public Works	NA	Once every 5 years at minimum. (Note, City is currently updating annually.)
CTRL-EX-4	Report inspections organized by business type or activities with potential to generate pollutants to the MS4.	Public Works	NA	Due with the Annual Report on or before March 31 of each year.

Section 11

Municipal Operations and Maintenance

This section provides a description of the Permit requirements related to municipal operations and maintenance, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Municipal Operations and Maintenance.

11.1 2019-2024 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.

11.2 2024-2025 Permit Requirements

The Permit (Special Condition S5.C.9) 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 2024 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, 2027, 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 annually.
- Perform inspection of all catch basins and inlets owned and operated by the Permittee by December 31, 2025 and every 2 years after.
- 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.
- No later than July 1, 2027, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.
- No later than March 31, 2028, submit information about the City’s street sweeping program with the Annual Report, including priority areas swept, sweeping dates, sweeping frequency, type of sweeper, total curb miles of priority areas and curb miles swept, and an approximation of street waste solids removed for each sweeping event.
- 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.
- Continue training program for City staff whose primary construction, operations, or maintenance job functions may impact stormwater quality, with additional follow-up training as processes are updated, and document all trainings.
- Summarize annual activities for the “Municipal Operations and Maintenance” component of the Annual Compliance Report; identify any updates to the SWMP.

11.3 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:

- Operating the City’s 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.
- Complying 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.
- Conducting 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.
- Maintaining the City’s existing street sweeping program that includes sweeping all streets, typically at a minimum of once a month.
- Updating Fir Street Maintenance Facility SWPPP as needed to address changes in operations. The SWPP was originally created in 2017 and last updated it in 2024.
- Making sure sewer and drainage crews continue receive training from the Washington Wastewater Collection Personnel Association (WWCPA) biennially.

- Continuing to conduct regular refresher trainings for all maintenance yard staff.
 - City staff from the Public Works Department, Roads Department, and Parks Department have received training on pollution prevention.
- Adopting 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 updated these plans in 2024 and will update them again as needed.
- Summarizing all associated activities in its Annual Compliance Report, due on March 31 of each year.
- Continue updating asset management software and to maintain O&M compliance.

11.4 Planned 2025 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 11-1 presents the work plan for 2025 SWMP activities related to pollution prevention and O&M activities. Future compliance time frames (beyond 2025) are included for reference.

Table 11-1. 2025 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	NA	Ongoing.
PPOM-2	Continue to implement City maintenance standards in accordance with 2019 Ecology Manual for City-performed maintenance activities. Adopt 2024 Ecology Manual per permit requirements.	City Attorney's Office	Public Works	Ongoing. 2024 Manual adoption by June 30, 2027.
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	NA	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, Development Services	Ongoing.
PPOM-5	Summarize annual activities for "Municipal Operations and Maintenance" component of Annual Report; identify any updates to SWPPP.	Public Works	NA	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	NA	Inspect all catch basins and inlets owned or operated by the Permittee by December 31, 2025 and every two years after. Ongoing.
PPOM-7	Refresh staff training on SWPPP.	Public Works	NA	Ongoing.
PPOM-8	No later than March 31, 2028, submit information about the City's street sweeping program with the Annual Report.	Public Works	NA	No later than March 31, 2028.



Section 12

Monitoring and Assessment

This section provides a description of the Permit requirements related to water quality monitoring, including descriptions of the City's current and planned compliance activities for 2025 under the Permit. The City's activities after August 1, 2024 were adjusted to address and be in compliance with the new 2024 permit requirements for Monitoring and Assessment.

12.1 2019-2024 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.

12.2 2024-2029 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 the Regional Status and Trends Monitoring and Effectiveness Studies Options in the 2019 Permit, requiring the City to pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP).
 - As of the 2024 Permit, the City is required to contribute a one-time payment of \$5,683 into the Stormwater Action Monitoring (SAM) collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in Puget Sound or urban streams in the Lower Columbia River basin. and \$10,387 into the SAM collective fund to implement effectiveness and source identification studies. These payments were due to Ecology on or before December 1, 2024.
 - For the 2024-2029 Permit term, the City is required to contribute \$8,875 into the SAM collective fund for small streams and marine nearshore status trends, and \$13,135 for effectiveness and source identification studies each year. Annual payments are due to Ecology on or before August 15 each year beginning in 2025.
- 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.

12.3 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:

- Summarizing monitoring activities in the Annual Report.
- Making payments to Ecology for the Stormwater Action Monitoring (SAM) collective fund.

12.4 Planned 2025 Compliance Activities

The City created a Water Quality Monitoring Program to maintain compliance as Ecology phases in current and future Permit requirements. Table 12-1 presents the work plan for 2025 SWMP monitoring activities. Future compliance time frames (beyond 2025) are included for reference.

Table 12-1. 2025 Monitoring Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
MNTR-1	Summarize annual monitoring activities for the Annual Report.	Public Works	NA	The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.
MNTR-2	Continue annual payment into SAM collective fund for small streams and marine nearshore status trends.	Public Works	NA	Annual payment of \$8,875 to Ecology to be made on or before August 15 each year.
MNTR-3	Continue annual payment into SAM collective fund for effectiveness studies and Source Identification studies.	Public Works	NA	Annual payments of \$13,135 to Ecology to be made on or before August 15 each year.

Section 13

Summary

The City of Mount Vernon is currently in compliance with the Phase II Permit and has planned activities for 2025 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 can be found online for the following;

- The City's NPDES program: <https://www.mountvernonwa.gov/426/NPDES-Stormwater-Permit>
- The current Ecology Stormwater Permit:
<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>
- The City's stormwater standards and codes:
<https://www.mountvernonwa.gov/129/City-Code-and-Ordinances>

Appendix A: Abbreviations and Definitions from the Phase II Permit

Abbreviations and Definitions from the Phase II 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.

Aqueous Film Forming Foam (AFFF) is a type of foam used to fight liquid-fueled fires (i.e., those started by oil, gasoline, or other flammable liquids).

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 (AKART) 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.

E&O means Education and Outreach.

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.

GIS means Geographic Information System.

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.

IDDE means Illicit Discharge Detection and Elimination.

ILA means Interlocal Agreement.

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.

O&M means Operations and Maintenance.

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 a geographic area where vulnerable populations face combined, multiple environmental harms and health impacts, and includes, but is not limited to, highly impacted communities.

“Vulnerable populations” means population groups that are more likely to be at higher risk for poor health outcomes in response to environmental harms, due to:

1. Adverse socioeconomic factors, such as unemployment, high housing and transportation costs relative to income, limited access to nutritious food and adequate health care, linguistic isolation, and other factors that negatively affect health outcomes and increase vulnerability to the effects of environmental harms; and
2. Sensitivity factors, such as low birth weight and higher rates of hospitalization.

“Vulnerable populations” includes, but is not limited to:

- Racial or ethnic minorities;
- Low-income populations;
- Populations disproportionately impacted by environmental harms; and
- Populations of workers experiencing environmental harms.

“Highly impacted community” means a community designated by the Department of Health based on cumulative impact analyses or a community located in census tracts that are fully or partially on “Indian country” as defined in 18 U.S.C. Sec. 1151.

PCBs means Polychlorinated biphenyls.

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

PFAS means Per- and Polyfluoroalkyl Substances.

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.

Qualified Third Party means someone who has 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 trained volunteers with professional certification. Permittees may train and certify volunteers.

Quality Assurance Project Plan (QAPP) 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.

SIC means Standard Industrial Code.

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).

SMAP means Stormwater Management Action Plan.

SMED means Stormwater Management for Existing Development.

SOP means Standard Operating Procedure.

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.

SWPPP means Stormwater Pollution Prevention Plan.

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.

UIC means Underground Injection Control.

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

Urban Area means urban areas with a population of 50,000 or more people. Urban Areas are designated by the U.S. Census Bureau based on the most recent decennial census.

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

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

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

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

Appendix B: 2019-2024 and 2024-2029 Western Washington Phase II Municipal Stormwater Permit Implementation Schedules

NEW PERMITTEE - Western Washington Phase II Municipal Stormwater NPDES Permit Overview – 2019 to 2024

The timeline below provides an overview of major program components deadlines for implementing permit requirements of S5 Stormwater Management Program (SWMP) for New Permittees (**By Date** means “no later than...”). This is guidance only. Please see the permit for additional detail and related requirements.

S5 Permit Components	2019	2020	2021	2022	2023	2024
A. Stormwater Management Plan		By Mar 31: Annually submit SWMP with Annual Report (S9)	By Mar 31: Submit description of coordination mechanisms By Aug 1: Begin tracking costs of development and implementation of the SWMP			By Feb. 2: Fully develop and implement SWMP
C.1 Stormwater Planning		By Aug. 1: Convene interdisciplinary team to lead SW Planning program	By March 31: Respond to series of Annual Report questions for coordination of long range plans during 2013-2019		By Jan 1: Submit response to series of Annual Report questions for coordination of long range plans during this permit term By Dec. 31: Review, revise, and make effective in local development codes LID principles and LID BMPs	By March 31: Submit summary of process to review, revise, and make effective development-related codes, rules, standards, or other enforceable documents to incorporate LID principles and LID BMPs.
C2. Public Education and Outreach			By Aug 1: Develop & implement general awareness and follow community-based social marketing practices, or similar, to develop behavior change program tailored to the community			By March 31: Evaluate and submit report on implemented strategy

S5 Permit Components	2019	2020	2021	2022	2023	2024
C.3 Public Involvement and Participation		<p>By May 31: Annually post to website SWMP and Annual Report.</p> <p>By Aug 1: Create opportunities for the public to participate in SWMP decision-making process.</p>	<p>By Oct. 1: Begin to implement the behavior change program</p>			
C.4 MS4 Mapping and Documentation	<p>Aug 1: Begin to maintain mapping data for all connections to MS4 authorized or allowed by Permittee after August 1, 2019</p>					<p>By Feb 2: Develop and implement mapping requirements</p>
C.5 Illicit Discharge Detection and Elimination			<p>By Feb 2: Develop training program for IDDE and field staff</p> <p>By Aug 1:</p> <ul style="list-style-type: none"> - Implement ordinance or other regulatory mechanism to prohibit non-stormwater, illicit discharges into MS4. 		<p>By Aug 1: Implement program to detect and identify non-stormwater discharges and illicit connections into MS4.</p>	<p>By Mar 31: Submit information in WQwebIDDE for annual report</p>

S5 Permit Components	2019	2020	2021	2022	2023	2024
			- Inform public employees, businesses and general public of hazards associated with illicit discharges and improper disposal of waste		Fully develop and implement plan to address illicit discharges into MS4. By Dec 31: Field screen 12% of MS4. Track total % of MS4 screened.	
C.6 Controlling Runoff	By Aug 1 Make construction, industrial stormwater eNOI links available			By Dec 31: Implement program to address runoff from new development, redevelopment and construction sites; train staff;		
C.7 Operations and Maintenance				By Dec 31: - Implement maintenance standards as specified in SWMMWW - Verify long-term O&M BMPs regulated by the permittee - Annually inspect all permittee owned or operated BMPs, conduct spot checks after major storm events - Implement practices, policies, and procedures to reduce SW impacts from lands		By Feb 2: Inspect and if needed, clean all owned and operated by Permittee

S5 Permit Components	2019	2020	2021	2022	2023	2024
				owned/maintained by Permittee - Train staff - Implement SWPPP 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 potential to generate pollutants to Permittee's MS4	By Jan 1: -Implement inspection program -Implement progressive enforcement policy	

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.

Western Washington Phase II Municipal Stormwater Permit Overview – 2024 to 2029

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 paraphrases requirements and does not include all ongoing program elements. Please see the permit for additional details and related requirements.

S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
A. Stormwater Management Plan	<p>Annually update & submit the SWMP with Annual Report (S9)</p> <ul style="list-style-type: none"> - A.3.a. Cost tracking: track the cost 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 				<p>By March 31 (ongoing from this year forward): Submit the (estimated) cost of development and implementation of each component of the SWMP and sources of funding.</p>		

S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
A.5 Coordination	Ongoing coordination			<p>By March 31: Submit description of internal coordination mechanisms among departments.</p>			
C.1 Stormwater Planning	<p>Ongoing</p> <ul style="list-style-type: none"> -Continue to convene interdisciplinary team -Assess and report LID code-related requirements. 				<p>March 31: Respond to series of Annual Report (AR) questions for coordination of long-range plans during this permit term</p> <p>Submit completed SMAP for new catchment area, or additional actions for existing SMAP.</p>	<p>By Dec 31: Adopt and implement tree canopy goals/policies to support stormwater management.</p>	

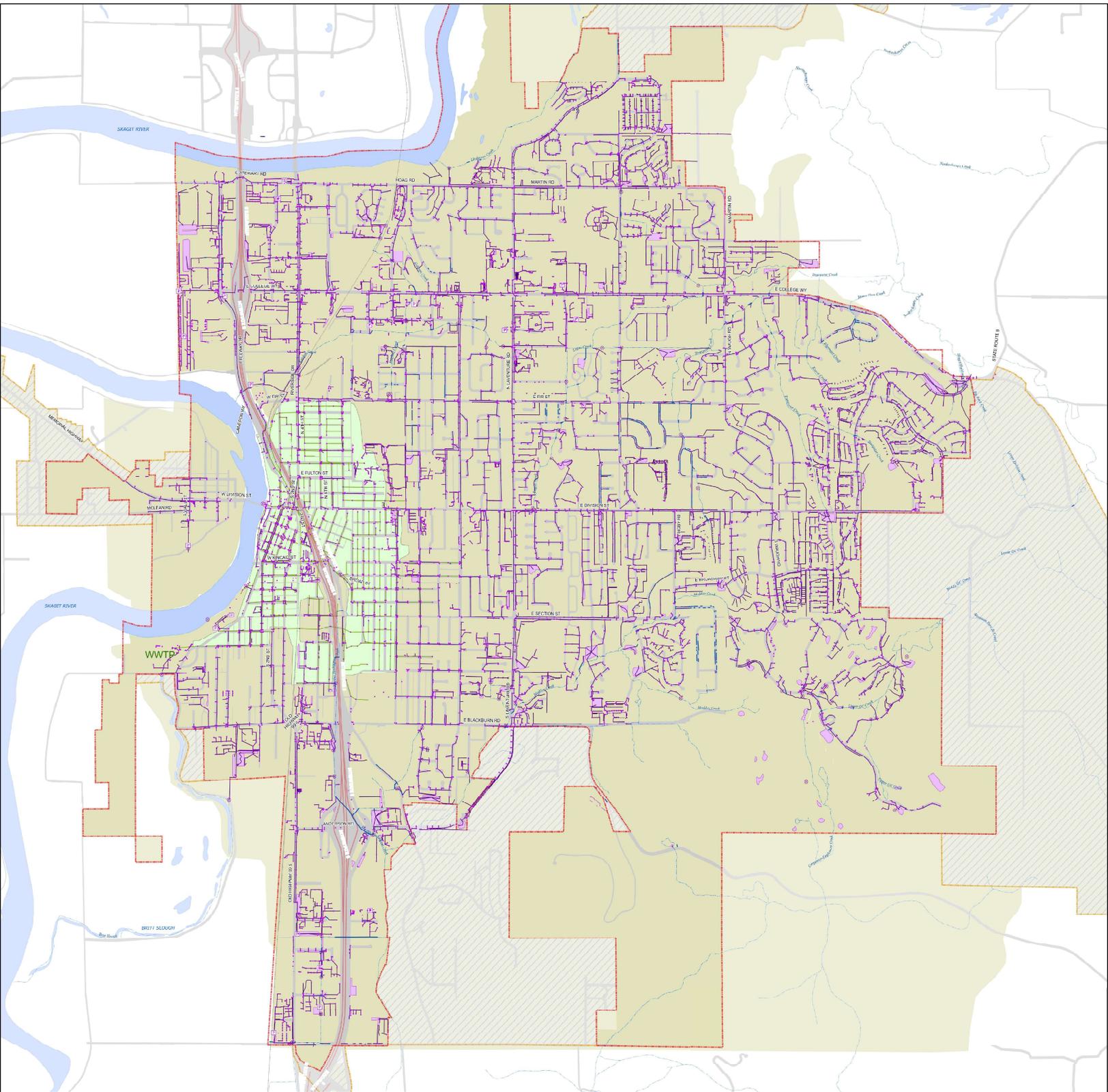
S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
C2. Public Education & Outreach	Ongoing: Implementation of ed & outreach programs and stewardship		<p>By July 1: Follow Social Marketing methodology to develop strategy and schedule for new or modified campaign.</p> <p>By Sept 1: Begin to implement strategy</p>				<p>By March 31: Submit report on evaluation of behavior change campaign.</p>
C3. Public Participation	<p>Ongoing:</p> <ul style="list-style-type: none"> -Create opportunities for public, including overburdened communities, and specifically, highly impacted communities, to participate in SWMP and SMAP. -Post SWMP and Annual Report to website by May 31. 			<p>By Dec 31: Document methods used to identify overburdened communities</p>			

S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
<p>C4. Mapping & Documentation</p>	<p>Ongoing Maintain mapping data</p>			<p>By March 31: Submit locations of all known outfalls according to standardized template in annual report.</p> <p>By Dec 31: Use available, existing data to map tree canopy to support stormwater management on Permittee-owned or operated properties.</p>		<p>By March 31: Map and assess acreage of MS4 tributary basins to outfalls or discharge pts with publicly owned SW Treatment or FC BMPs/facilities. Submit with the Annual Report a map(s) (.pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins (see permit for details).</p> <p>By Dec 31: Map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned/operated properties.</p>	

S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
C5. IDDE	<p>Ongoing</p> <ul style="list-style-type: none"> - Implement program to prohibit, address, and eliminate illicit discharges. - Train staff - Field screen on average 12% of the MS4 each year. -Track and maintain records through WQ WebIDDE or submit .xml following the App 12 schema. 			<p>By Dec 31: Coordinate with firefighting agencies to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.</p>	<p>By Jan 1: Update and implement procedures to minimize discharges to MS4 during firefighting post-emergency cleanup and disposal activities.</p> <p>By July 1: Update ordinance or other regulatory mechanism in effect, if necessary, to meet the requirements of this section.</p>		
C6. Controlling Runoff	<p>Ongoing:</p> <ul style="list-style-type: none"> - Implement & enforce program to reduce pollutants in runoff. - Train Staff 				<p>By June 30: Adopt and make effective local program that meets requirements of S5.C.6.b.i-iv.</p>		

S5 Permit Components	Ongoing Program Implementation	2024	2025	2026	2027	2028	2029
<p>C7. Stormwater Management for Existing Development (SMED)</p>	<p>March 31: Provide list of planned, individual projects scheduled for funding or implementation during this permit term for the purposes of meeting the assigned equivalent acreage in Appendix 12 using the report format in Appendix 12.</p>					<p>By March 31: Submit documentation/report showing that the jurisdiction has fully funded, started construction or completely implemented project(s) that meet assigned equivalent acreage as described in App 12.</p> <p>Report the amount of estimated or projected equivalent acres managed by facility retrofits which will be credited to the next permit term (2029-2034)</p>	

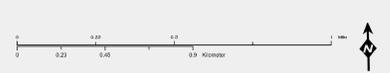
Appendix C: Mount Vernon 2025 MS4 Storm Sewer System Map



Map Revised: March, 2020
 City of Mount Vernon: The information provided on this map has been compiled by City of Mount Vernon staff from a variety of sources. The City of Mount Vernon makes no representations or warranties, expressed or implied, as to the accuracy, completeness, timeliness, or quality of the data or information. The City of Mount Vernon shall not be liable for any general, special, indirect, or consequential damages or any other damages, including reasonable attorneys' fees, arising out of or from the use of this map.

- Stormwater Line
- Storm Catcher
- Combined Sewer Line
- Catch Basins
- Transmission
- Valves 12" >
- Deteriorated Facility
- City Boundary
- Local Boundary
- Interroad
- Stream
- MS4 Area
- Combined Sewer Area

City of Mount Vernon Stormwater System



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