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1.0 Introduction

The City of Burlington (City) has developed a Stormwater Management Program (SWMP) to meet the terms and conditions of its Western Washington Phase II Municipal Stormwater Permit (Permit) under the National Pollutant Discharge Elimination System (NPDES) permit program. This Permit is required because the City of Burlington has been designated by the Environmental Protection Agency and the Washington State Department of Ecology (Ecology) as one of thousands of municipalities in the United States requiring this special stormwater permit. These permits were deemed necessary because stormwater runoff from developed areas such as streets, parking lots, construction sites, industrial properties, and residential areas is now recognized as one of the leading sources of pollution to our streams, lakes, wetlands, rivers, and Puget Sound.

The Permit allows municipalities to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes, streams, and groundwater as long as there are programs in place to reduce pollutants in stormwater to the “maximum extent practicable” (MEP). Most stormwater runoff from the City of Burlington discharges into Gages Slough and is eventually pumped into the Skagit River. Improving habitat and water quality in Gages Slough was identified as a very high priority in the City’s Comprehensive Surface Water Management Plan and the Parks and Recreation Comprehensive Plan. Requirements under the Permit provide the City additional opportunities to accomplish cleaning up Gages Slough.

The Permit was originally issued to the City by Ecology in 2007 and most recently re-issued on July 1, 2024 and effective August 1, 2024. The City is required to post this Stormwater Management Program Plan (SWMP Plan) to a website by May 31st each year. The SWMP Plan summarizes the current stormwater program and identifies completed activities and those planned for the coming year. The SWMP Plan also serves as an attachment to the required annual report submittal to Ecology which reports permit compliance accomplishments carried out during the previous calendar year.

1.1 City Organizational Responsibilities

The City of Burlington Public Works Department holds the primary responsibility for developing the stormwater program and tracking Permit requirements. Within the Public Works Department, program administration is carried out by the Stormwater Engineer. Inspection, maintenance, and tracking duties are carried out by the Stormwater Engineer, the Public Works Inspector, and the Street Department. The Planning Department, and Fire Department also hold integral roles in implementing the components of the stormwater program. The Street Department, and Parks Department have been trained to carry out their duties in compliance with the permit.

1.2 Document Organization

This document is organized by program components in the order found in the Permit. To facilitate cross-reference with the permit language, each permit item is presented along with the associated permit section indicator in parentheses as follows:

- ✓ Section 2.0 addresses Stormwater Management Program Development (S5.A & S5.B)
- ✓ Section 3.0 addresses Planning Requirements (S5.C.1)
- ✓ Section 4.0 addresses Public Education and Outreach (S5.C.2)
- ✓ Section 5.0 addresses Public Involvement and Participation (S5.C.3)
- ✓ Section 6.0 addresses MS4 Mapping and Documentation (S5.C.4)
- ✓ Section 7.0 addresses Illicit Discharge Detection and Elimination (S5.C. 5)
- ✓ Section 8.0 addresses Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.6)
- ✓ Section 9.0 addresses Stormwater Management for Existing Development (S5.C.7)
- ✓ Section 10.0 addresses Source Control Program for Existing Development (S5.C.8)
- ✓ Section 11.0 addresses Municipal Operations and Maintenance (S5.C.9)
- ✓ Section 12.0 addresses Monitoring and Assessment (S8)

2.0 Stormwater Management Program Development (S5.A and S5.B)

2.1 Permit Requirements

Sections S5.A and S5.B of the Permit require the City to:

- Implement a Stormwater Management Program.
- Publish a report summarizing the SWMP at the City web site by May 31 (this SWMP Plan) which is organized based on components in S5.C.
- Submit the updated SWMP Plan as part of an annual report to Ecology by March 31, summarizing implementation status during the reporting period (S9.D.2.).
- Manage an ongoing program for gathering, tracking, maintaining and using information to evaluate the SWMP development, implementation and permit compliance and set priorities.
- Track the cost of the development and implementation of each component of the SWMP.
- Track the number of inspections, official enforcement actions and types of public education.
- Continue the existing program until beginning implementation of an updated program.

- Coordinate with other NPDES permittees and partners in the region on stormwater related policies, programs, and projects within adjoining or shared areas and coordinate internally among City Departments.

2.2 Current Compliance Activities

Since 2007, the City of Burlington has been developing and implementing a SWMP. Summarized below are many stormwater management activities and procedures the City currently has in place. Sections 3.0 through 9.0 provide additional detail on the ongoing program.

- Many public educational activities have been initiated by the City of Burlington, in partnership with the Skagit Conservation District (SCD) as described in Section 3.0 including a description of the types of educational activities and number of participants.
- An Interlocal Agreement is in place between the City and the SCD, first signed in 2008.
- The SCD partners with all five Phase II nearby jurisdictions including Skagit County and the Cities of Burlington, Sedro Woolley, Mt. Vernon, Anacortes. Working together with all five jurisdictions, SCD implemented a stormwater education and outreach (E&O) program to meet the requirements of the Phase II permit which avoids duplication of efforts, and shares resources among these jurisdictions.
- The City meets quarterly with the North Sound NPDES Municipal Stormwater Permit Phase1/Phase2 Forum to discuss stormwater policies and projects in the area and also attends NPDES coordination meetings with the Cities of Anacortes, Sedro Woolley and Mount Vernon, the SCD and Skagit County.
- The City of Burlington has worked with Skagit County to achieve local source control efforts through businesses inspections.
- Conduct an outfall reconnaissance inventory.
- Respond to illicit discharges.
- An ongoing training program for staff regarding codes, additional permit reviews for runoff control, illicit detection response procedures, pollution prevention best management practices (BMPs), erosion control, and low impact development (LID).
- The estimated cost was determined for each component of the stormwater management program.

- The City continued a Stormwater and Surface Water Inspection and Maintenance Program under Burlington Municipal Code 14.05 for both public and private facilities and expanded it for LID features.
- Public facility inspections occur annually for every pond, swale and pipe outflow into Gages Slough and corrective action is taken to fix identified problems.
- Inspection of public and private stormwater facilities.
- Enforcement action can be taken per Burlington Municipal Code 14.05. This program has been very successful at obtaining compliance from property owners.
- The Street Department maintains the storm drain systems.
- The Sewer Department maintains the six stormwater pump stations.

2.3 Plans for Program Activities in 2025

The City plans to continue work on stormwater tasks, programs, and issues listed above, even building on these systems and procedures.

3.0 Stormwater Planning (S5.C.1)

3.1 Permit Requirements

Section S5.C.1 of the Permit requires the City to address the following planning elements:

- Comprehensive Stormwater Planning for water quality and watershed protection including receiving water assessment by March 31, 2022 and receiving water prioritization by June 30, 2022 and develop a Stormwater Management Action Plan (SMAP) by March 31, 2024 and a long range comprehensive plan with short and long term actions by March 31, 2027 and tree canopy goals by December 31, 2028.
- Continue to require LID Principles and BMPs during code development.
- By August 1, 2020, convene an inter-disciplinary team to inform and assist in the development of this program.

3.2 Current Compliance Activities

- Previous Comprehensive Planning activities include identification of LID code amendments designed to make LID the preferred stormwater approach for Burlington.
- The city has completed the initial development and publication of the Stormwater Management Action Plan
- The city has convened an interdisciplinary team comprised of employees from public works and planning departments along with consultants.

3.3 Additional Activities Planned For 2025

- All programs will be continued and expanded per the schedule listed above.

4.0 Public Education and Outreach (S5.C.2)

4.1 Permit Requirements

Section S5.C.2 of the Permit requires the City to address the following public education and outreach elements:

- Educate target audiences (e.g., businesses, homeowners, students, developers, employees, or the general public) about the stormwater problem and provide specific actions that they can follow to minimize it.
- Build awareness about methods to address and reduce impacts from stormwater runoff and create awareness about stewardship opportunities.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.

Permittees may choose to meet these requirements individually or as a member of a regional group. Regional collaboration on general awareness or behavior change programs, or both, includes Permittees developing a

consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to effect behavior change. If a Permittee chooses to adopt one or more elements of a regional program, the Permittee should participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.

Each Permittee shall implement an education and outreach program. The program design shall be based on water quality information and priority audience characteristics to identify high priority audiences, subject area, and/or BMPs. Based on the priority audience's demographic, the Permittee shall consider delivering its selected message in languages other than English, as appropriate to the priority audience.

Each Permittee shall provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement. Permittees may provide, partner with, or promote stewardship opportunities created or organized by existing organizations (including non-Permittees)

4.2 Current Compliance Activities

The primary purpose of the Skagit Conservation District's Storm Water Education Program is to assist local jurisdictions with compliance efforts for the "Public Education and Outreach" requirements of the NPDES storm water permit. The purpose of the partnership is to work together cooperatively, share a common message, avoid duplication of efforts (which in turn will save money and resources), utilize existing programs when possible and to share resources and expertise.

Skagit Conservation District, in partnership with the Cities of Anacortes, Burlington, Mount Vernon, and Sedro-Woolley, and Skagit County, has provided a comprehensive and multifaceted series of programs and opportunities to reach a wide range of interest groups, including homeowners, businesses, contractors, youth, and the general public with the goal of educating, engaging, and inspiring local stewardship in order to reduce stormwater pollution impacts to our local waterways.

The Backyard Conservation workshops

Held 7 Wednesday evening presentations and 2 Saturday fieldtrips. The WSU Extension Discovery Garden fieldtrip for composting training and a garden tour, and to Skagit Land Trust 's riparian restoration site, Tope Ryan Preserve for an amphibian presentation. Between 8 and 19 (an average of 13) people attended each of the workshops which included classes on low impact development, rainwater harvesting, sustainable landscaping, Native plants, planting for wildlife, invasive plants, invasive Green Crabs, composting, and more.

Resource Materials/Education for Local Schools

- Skagit Conservation District provides support to local schools by providing educational resources and presentations throughout the year.
- Educational packets were prepared and distributed to 530 local teachers. The packets include information on stormwater, watersheds, and other resources and educational programs available for teachers and classrooms through the Skagit Conservation District.
- Promotion of the EnviroScape Model classroom presentations.
- Stormwater runoff and non-point source pollution materials were also distributed to students and available at several tabling events throughout the year.
- 30 storm water education presentations, using the EnviroScape watershed model, were conducted in 2024 at local elementary schools and outreach events reaching 642 Skagit County students.

Storm Water Educational Brochures, Fact Sheets, and Media Advertisements

In 2023 and 2024 SCD staff have spent time creating social media posts to promote Backyard Conservation, Watershed Masters, Stream Team, and other stormwater topics. Stormwater topics and workshops are consistently getting more views and interactions when compared to other SCD topics. Staff strive to create shareable content, which reaches more followers. This year we actually saw an increase in sign ups without using ads. Our SCD social media seems to have enough following to reach interested folks.

- Facebook: Less likes or comments, but reaches a lot of people through followers and shares
- Instagram: Steadily growing followers and have seen an increase in likes and shares
- NextDoor: Lots of organic interactions that are sent to the whole county, many folks comment and start interesting discussions.

Workshop for Local Contractors

“Rain garden Design and Maintenance” was held on Feb 22, 2024. There were 14 attendees the Morning workshop including a bilingual maintenance manager who requested a follow-up session for his crew. There were 6 attendees in the follow-up session which was translated into Spanish.

4.3 Planned Program Activities for 2025

In 2025, the City plans to similarly offer public education and outreach opportunities SCD states that All programs will be continued with additional emphasis on getting the message to unreached groups by including different venues to our current queue of events, updating display boards with current program information; creating informational signs to be posted at some of our clean water project areas, and using new outreach mediums (such as social media, working with Skagit Valley College and high school clubs). Skagit CD is working to reduce paper consumption, by using more digital means.

5.0 Public Involvement and Participation (S5.C.3)

5.1 Permit Requirements

Section S5.C.3 of the Permit requires the City to address the following public involvement and participation elements:

- Provide ongoing opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the SWMP.
- Make the SWMP and Annual Report available to the public, including posting on the City’s website by May 31 each year.

5.2 Current Compliance Activities

The City of Burlington provides opportunities for public involvement and participation in the stormwater program through multiple events including City Council and Public Works Committee meetings, community meetings, program evaluation surveys, city web site, and volunteer public participation programs. Status reports on the Stormwater Management Program were presented at the monthly Public Works Committee meetings. These meetings are open to the public and are always listed on the Council Agenda. The current SWMP is made available to the public by posting downloadable versions on the City’s website, with a request for public comment.

Public Involvement Opportunity	Description of Opportunity
City Council Meetings	City Council holds meetings twice a month. These are open to the public

Public Works Committee Meetings	Public Works Department holds monthly committee meetings that are open to the public
Website posting of SWMP and Annual Report	Downloadable versions of the current stormwater management documents are available to the public on the City website, with a request for public comment on how the SWMP can be improved.
Storm Drain Workshops	Staff provided support to several workshops and events.
Storm Drain Labeling Project	Storm drain labeling is promoted through SCD's Newsletter (4600 subscribers).
Gages Slough Stream Team	Volunteers are trained and then monitor water quality monthly at 4 sites in Gages Slough each year
Watershed Masters Volunteer Training Program	Watershed Masters Volunteer Training program was conducted October 18 th through November 9 th , with 9 individuals completing the training.

The primary purpose of the Skagit Conservation District's Storm Water Education Program is to assist local jurisdictions with compliance efforts for the "Public Participation and Involvement" requirements of the NPDES storm water permit. The purpose of the partnership is to work together cooperatively, share a common message, avoid duplication of efforts (which in turn will save money and resources), utilize existing programs when possible and to share resources and expertise.

Skagit Conservation District, in partnership with the Cities of Anacortes, Burlington, Mount Vernon, and Sedro-Woolley, and Skagit County, has provided a comprehensive and multifaceted series of programs and opportunities to reach a wide range of interest groups, including homeowners, businesses, contractors, youth, and the general public with the goal of educating, engaging, and inspiring local stewardship in order to reduce stormwater pollution impacts to our local waterways.

5.3 Planned Program Activities for 2025

In 2025, the City plans to similarly offer public involvement opportunities. SCD states that All programs will be continued with additional emphasis on getting the message to unreached groups by including different venues to our current queue of events, updating display boards with current program information; creating informational signs to be posted at some of our clean water project areas, and using new outreach mediums (such as social media, working with Skagit Valley College and high school clubs). Skagit CD is working to reduce paper consumption, by using more digital means.

6.0 Mapping and Documentation (S5.C.4)

6.1 Permit Requirements

Section S5.C.4, of the Permit requires the City to address the following mapping elements:

- Maintain an electronic map of the MS4 (ongoing mapping).
- No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known. (new mapping)
- No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed
- No later than 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 Permittee. Submit with the March 31, 2028 Annual Report a map(s) (.pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. (new mapping)
- No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties

6.2 Current Compliance Activities

The City has a comprehensive map of its MS4. The map contains all known municipal storm sewer outfalls and receiving waters, and structural stormwater BMP's owned or operated by the City. The City tracks and locates all outfalls, retains development records, and updates the map on an annual basis to show all connections. The map is periodically updated in AutoCAD. Copies of the map are available to the public at the Public Works/ Engineering Department counter. The pipe size and type of pipe were added to existing mapping documents.

6.3 Planned Program Activities for 2025

The city plans to continue this program at a commensurate level of effort listed above.

7.0 Illicit Discharge Detection and Elimination (S5.C.5)

7.1 Permit Requirements

Section S5.C. 5 of the Permit requires the City to address the following illicit discharge detection and elimination (IDDE) elements

- Implement an ordinance and ongoing program designed to prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges, into the Municipal Separate Storm Sewer System (MS4) owned or operated by the City including any adjacent adjoining MS4 and update by July 1, 2027.
- Develop procedures for and complete field screening of at least 12 percent each year, and document field screening methodology in the Annual Report and complete training and documentation and reporting per Appendix 13.
- Publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges.
- Inform staff, businesses, and the general public on proper IDDE response procedures and general hazards associated with illegal discharges and improper disposal of waste.
- Track all spills, illicit discharges and connections reported to the City and summarize response actions taken, including enforcement actions.

7.2 Current Compliance Activities

The City has taken many steps to identify and eliminate illicit discharges to address the NPDES Permit requirements. This inventory was conducted in accordance with the Center for Watershed Protection's Illicit Discharge Detection and Elimination Guidance Manual. A pollutant source study was previously completed to identify potential pollutant generating sources, activities, and hotspots within the City of Burlington.

An outfall reconnaissance inventory was conducted during dry weather conditions to screen for illicit connections for all outfalls and current maps were updated.

The City of Burlington is supported by the Skagit County for source control and pollution prevention education. Through the local source control program, the County Specialists have made 387 business inspection visits in Burlington since 2008. Specifically, 60 visits were made to businesses in 2023. In previous years, business inspections included 59 visits in 2023, 37 visits in 2020, 2021, and 2022. 22 visits in 2019, 30 visits made in 2018, 12 visits were made in 2017, 20 visits were made in 2016, 19 visits were made in 2015, 28 visits in 2014, 13 visits in 2013, 18 visits in 2012, 22 visits in 2011, 9 visits in 2010, 36 visits in 2009, and 2 visits in 2008. The year to year variation is due to a special emphasis on different business types each year. This program will continue in 2025 with focus on visits to vehicular based businesses. Educational materials were distributed to the businesses and the County sent follow-up letters itemizing specific recommendations for pollution prevention.

The biannual Flood Bulletins encourage the general public to report spills and illegal discharges and provides phone numbers. A water quality, illicit discharge hotline number (360-755-9715) is posted on the City's website. The Public Works Department is ready to record all calls regarding illicit discharges or illegal spills that are received on the hotline. No calls were received on the hotline number in 2024. The Fire Department responded to three calls relating to spills. These were primarily minor spills of automotive fluids. All circumstances were dealt with fully and resolved and contained prior to entering the MS4.

The City follows a spill response plan that is housed at both the public works engineering department and the street department. This plan offers detailed instructions to first responders. Minor items like those associated with less toxic discharges such as wash water and can be handled by public works staff. Most of these are not continuous and can be addressed directly with the discharger. Emergency contacts and reporting requirements are explicitly discussed. A spill report form is used to document the event. All crew vehicles have spill kit for containment and cleanup of small spills. The street crew has received training on the spill response plan and safety meetings address any additional questions or concerns that arise.

Medium and large spills require the fire department to be notified. These departments have emergency response protocols that include procedures for characterizing the nature of and potential threat to the public from illicit discharges. They have extensive training in emergency situations. Because the City is not equipped to respond to all hazardous spills, the City relies on Skagit County Department of Emergency Management (SDEM), Ecology and other agencies to assist. The fire department will call upon the SDEM if the spill clean-up is beyond its capabilities. Both departments have incident tracking software documenting each circumstance and follow-up actions. All incidents are summarized in the annual report to Ecology.

7.3 Planned Program Activities for 2025

The city plans to continue this program at a commensurate level of effort listed above.

8.0 Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.6)

8.1 Permit Requirements

Section S5.C.6 of the Permit requires the City to address the following elements regarding controlling runoff for new development, redevelopment and construction sites:

- Enforce regulations to ensure proper installation of permanent stormwater controls for both private and public projects.
- Implement a permitting process for development that includes plan review, inspection, and escalating enforcement capability.
- Verify adequate long term operation and maintenance
- Provide copies of the Notice of Intent for construction or industrial activities to representatives of the proposed new development and redevelopment as applicable
- All primary staff are trained on stormwater program implementation
- Implement a process to record and maintain all inspections and enforcement actions by staff and provide an inspection of all permanent stormwater treatment and flow control facilities including those on private property or associated with single family residences.

8.2 Current Compliance Activities

The City adopted the 2019 DOE Manual and LID to control runoff from new development, redevelopment and construction sites.

- City Staff were trained in the use of the 2019 Manual and instruct development applicants to meet the new requirements to guide practices related to new development or redevelopment
- At monthly Technical Review Committee meetings, the City instructs developers to comply with the 2019 manual requirements
- Public Works Department reviews stormwater site plans and maintenance plans for all new development and redevelopment projects

- The City also conducts pre- and post-construction inspections, and enforces implementation of Best Management Practices during construction and tracks these inspections and enforcement actions
- The City Permit Center provides information on Ecology's Construction Stormwater General Permit, Notice of Intent (NOI's) for all permitted development
- The City Public Works Department currently inspects all public stormwater treatment facilities on an annual basis and records these inspections in log books
- The City updated development codes.

8.3 Planned Program Activities for 2025

The city plans to continue to control runoff at a commensurate level of effort as in 2024.

9.0 Stormwater Management for Existing Development (S5.C.7)

9.1 Permit Requirements

Section S5.C.7 requires the city to implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development:

- Utilize Appendix 12 and implement the existing Stormwater Management Action Plan (SMAP) by March 31, 2028 and update the SMAP with each annual report in the approved file format.

9.2 Current Compliance Activities

As mentioned in section 3.0 of this report, significant planning has occurred to bring the city into compliance with the assigned equivalent acreage mentioned (S5.C.7.b)

9.3 Planned Program Activities for 2025

The city will continue to plan and implement projects to meet the assigned equivalent acreage.

10.0 Source Control Program for Existing Development (S5.C.8)

10.1 Permit Requirements

The Permit requires the City of Burlington to implement a program to prevent or reduce pollutants in runoff from existing development that discharge to the MS4 including:

- Application of operational and/or structural source control or treatment BMPs and facilities
- Inspections of pollution generating sources at privately owned sites and NPDES permitted sites including enforcement
- Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers

10.2 Current Compliance Activities

The City of Burlington is supported by the Skagit County for source control and pollution prevention education under an interlocal agreement. Through the local source control program, the County Specialists have made 387 business inspection visits in Burlington since 2008. Specifically, 60 visits were made to businesses in 2024 (20.3% of the total). In previous years, business inspections included 59 visits to businesses in 2023, 37 visits in 2020, 2021, and 2022. 22 visits in 2019, 30 visits made in 2018, 12 visits were made in 2017, 20 visits were made in 2016, 19 visits were made in 2015, 28 visits in 2014, 13 visits in 2013, 18 visits in 2012, 22 visits in 2011, 9 visits in 2010, 36 visits in 2009, and 2 visits in 2008.

The year to year variation is due to a special emphasis on different business types each year. This program will continue in 2025 with focus on visits to Vehicular based businesses. Educational materials were distributed to the businesses and the County sent follow-up letters itemizing specific recommendations for pollution prevention. This program will continue while development of the expanded program occurs.

10.3 Planned Program Activities for 2025

The city plans to continue to implement source control as described above at a commensurate level of effort as in 2024.

11.0 Operation and Maintenance (S5.C.9)

11.1 Permit Requirements

Section S5.C.9 of the Permit requires the City to address the following operation and maintenance elements:

- Continue an operations and maintenance program including training, with the ultimate goal of preventing pollutant runoff from municipal operations
- Perform and document annual inspections and maintenance of stormwater facilities including enforcement on responsible party
- Updated maintenance standards to the 2024 Stormwater Management Manual for Western Washington and develop a street sweeping program prior to June 30, 2027. Develop a maintenance standard for facilities that do not have one.
- Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned by the City of Burlington
- Implement an ongoing training program for employees whose primary construction, operations or maintenance job functions may impact stormwater quality
- Spot check facilities after a 10 year - 24 hour storm.
- Implement a Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City.
- Update SWPPP by December 31, 2027.

11.2 Current Compliance Activities

The City of Burlington maintains its stormwater facilities on an annual basis and responds promptly to reported maintenance issues. The inspection program for private stormwater facilities requires maintenance within 60 days of inspection problem notification. In addition, the City completed the following:

- Implemented the components of the SWPPP for the maintenance yard located off Section Street
- Continued to inspect municipally owned facilities at least once annually and after major storms
- Continued to inspect privately owned facilities and ensure maintenance when needed
- Purchased a new replacement street sweeper and continued to sweep city streets

11.3 Planned Program Activities for 2025

The city plans to continue to implement pollution prevention and maintenance for municipal operations at a commensurate level of effort as in 2024.

12.0 Monitoring and Assessment (S8)

12.1 Permit Requirements

The Permit 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:

- The City of Burlington has selected Option 1 regarding status and trends monitoring and has paid into a collective fund as part of the Regional Stormwater Management Program.
- The City of Burlington has also selected Option 1 regarding effectiveness studies and source identification and has paid into a collective fund.

12.2 Current Compliance Activities

The City has selected Option 1 for status and trends monitoring, and Option 1 for effectiveness studies.

12.3 Planned Program Activities for 2025

The city plans to continue to participate in these collectives/studies at a commensurate level of effort as in 2024.

MS4 Annual Report Phase II Western

Number	Permit Section	Question
1	S9.D.6	Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6. Not Applicable
2	S5.A.2; S9.D.1	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1) NPDESAnnualRpt2024_2_03262025133429
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP. Yes
4	S5.A.5.b	Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b) Yes
5	S9.D.4	If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4) Not Applicable
6	S5.C.1.a	Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.) Yes
12	S5.C.1.c.i	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually) Yes
13	S5.C.1.c.i(a)	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually) No
19	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2) Yes
19a	S5.C.2	If yes, list the elements, and the regional program. Public Education and Outreach using Skagit Conservation District in partnership with Sedro-Woolley, Anacortes, Mount Vernon, and Skagi County, Business inspection program with Skagit County in partnership with Mount Vernon and Sedro-Woolley.

Number	Permit Section	Question
20	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i. Poop Fairy Social Marketing PI_20_03122025101310
24	S5.C.2.a.iii	Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii. Yes
24a	S5.C.2.a.iii	Attach a list of stewardship opportunities provided. 2024 Stormwater education prog_24a_03122025101310
25	S5.C.3.a	Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. The City of Burlington provides opportunities for public involvement and participation in the stormwater program through multiple events including City Council and Public Works Committee meetings, community meetings, program evaluation surveys, city web site, and volunteer public participation programs. Status reports on the Stormwater Management Program were presented at the monthly Public Works Committee meetings. These meetings are open to the public and are always listed on the Council Agenda. The current SWMP is made available to the public by posting downloadable versions on the City's website, with a request for public comment.
25a	S5.C.3.a.i	Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i) We are reaching out to the Spanish speaking community by translating the publications into Spanish.
26	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b) Yes
26a	S5.C.3.	List the website address in Comments field. https://burlingtonwa.gov/DocumentCenter/View/6045/2024-Stormwater-Management-Program-PDF
27	S5.C.4.	Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.? Yes
32	S5.C.5.b	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b) Yes
32a	S5.C.5.b	Describe actions in Comments field. (S5.C.5.b) The City of Burlington is supported by Skagit County for source control through an interlocal agreement. Additionally, a public information campaign is completed annually through Skagit Conservation District.
33	S5.C.5.c	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c. Yes

Number	Permit Section	Question
35	S5.C.5.d.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i. Yes
35a	S5.C.5.d.i	Cite field screening methodology in Comments field. Outfall Inspections
36	S5.C.5.d.i(a)	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.) 100
36a	S5.C.5.d.i(a)	Cite field screening techniques used to determine percent of MS4 screened. Inspected every outfall this year.
37	S5.C.5.d.ii	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii) Hotline is listed on the city website.
38	S5.C.5.d.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii. Yes
39	S5.C.5.e	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e. Yes
40	S5.C.5.f	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f. Yes
41	S5.C.5.g	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13. IDDE REPORTING FORM_41_03262025102619
42	S5.C.6.b.i-iii	Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. Yes
44		Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)? No Comment: Burlington has adopted the 2019 DOE SWMM Manual and will adopt the 2024 manual prior to the required 6-30-27 deadline.

Number	Permit Section	Question
45	S5.C.6.b.i. and Section 5 of Appendix 1	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) 0
46	S5.C.6.b.i., and Section 6 of Appendix 1	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) 0
47	S5.C.6.c.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) Yes
47a	S5.C.6.c.i	Number of site plans reviewed during the reporting period. 12
48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii? Yes
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. Yes
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii. 11
49b	S5.C.6.c.iv	Inspected 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, per S5.C.6.c.iv? Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v) Yes
52	S5.C.6.c.viii	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii) 3
53	S5.C.6.c.vi	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi) Yes

Number	Permit Section	Question
54	S5.C.6.d	Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d) Yes
55	S5.C.6.e	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e) Yes
56	S5.C.7.b	Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,) Burlington Stormwater Retrofit_56_03262025103850
57	S5.C.8.b	Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years) Yes
57a	S5.C.8.b	Number of total sites identified for the inventory. 296
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d. 2023-46 Inter-Local with Skagi_58_03122025115101
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d. 2024 Inspections (for Cities)_59_03122025115101
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e? Yes
61	S5.C.9.a	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.9.a? Yes
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a) No
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard. Yes

Number	Permit Section	Question
64a	S5.C.9.a.ii	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control. Not Applicable
65	S.5.C.9.b.i(a)	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)? Yes
66	S5.C.9.b.i(b)	Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b) Yes
66a	S5.C.9.b.i(b)	Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency? No
66b	S5.C.9.b.i(b)	If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b). Not Applicable
67	S5.C.9.b.ii	Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii) Yes
68	S5.C.9.c.i	Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i) Yes
68a	S5.C.9.c.i	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i) 55
68b	S5.C.9.c.i	Number of facilities inspected during the reporting period. 55
68c	S5.C.9.c.i	Number of facilities for which maintenance was performed during the reporting period. 27
69	S5.C.9.c.i	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i. Not Applicable
70	S5.C.9.c.ii	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii. Not Applicable Comment: There was no 10 year storm this year.

Number	Permit Section	Question
71	S5.C.9.c.iii	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.9.c.iii) Yes
71a	S5.C.9.c.iii	Number of known catch basins and inlets? 2330
71b	S5.C.9.c.iii	Number of catch basins and inlets inspected during the reporting period? 2330
71c	S5.C.9.c.iii	Number of catch basins and inlets cleaned during the reporting period? 765
72	S5.C.9.c.iii	Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii. Not Applicable
73	S5.C.9.d	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.9.d) Yes
79	S5.C.9.f	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f) Yes
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g) Yes
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) Yes
81a	S7.A	List any requirements that were not met. Not Applicable
82	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A) TMDL required actions_82_03262025113350
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.) Yes

Number	Permit Section	Question
84	S8.A.2.a, S8.A.2.b	Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b. Yes
85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)? Yes
86	S8.B.2.a, or S8.B.2.b.	Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b. Yes
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9) Not Applicable
89	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3) Not Applicable
90	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A. Yes
91	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1) Not Applicable
92	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a. Not Applicable
93	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d) Not Applicable
94	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20) Not Applicable
95	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field. Not Applicable

Attachments: