

2026 Stormwater Management Program (SWMP) Plan
May 2026
Permit Term August 1, 2024 - July 31, 2029



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Glossary of Section Headings

This is a list of definitions of the section headers used in this Stormwater Management Program (SWMP) Plan:

Stormwater Planning – Planning for how we’ll manage rain falling on streets and other surfaces that add to pollution

Public Education and Outreach – Teaching residents about how to protect clean water

Public Involvement and Participation – Getting residents’ thoughts on how we protect clean water

MS4 Mapping and Documentation – Mapping where and how rainwater moves from roofs and roads, through storm pipes, and into streams and lakes

Illicit Discharge Detection and Elimination – How we prevent pollution and find out how it got into streams and lakes if it happens

Controlling Runoff from New Development, Redevelopment, and Construction Sites – Making sure construction doesn’t add pollution to streams and lakes during and after building

Stormwater Management for Existing Development – The construction, maintenance, and land use projects we’re doing to improve stormwater systems that already exist

Source Control for Existing Development – Making sure businesses that have the potential to cause pollution are doing everything they can to prevent it

Operations and Maintenance – Making sure tools the city owns that prevent pollution and flooding are working correctly

Compliance with Total Maximum Daily Load Requirements – Preventing already polluted waters from getting worse and even improving them

Monitoring and Assessment – How we’re confirming the work we’re doing is actually keeping things healthy and/or making them better



List of Abbreviations

AKART	All known, available, and reasonable methods of treatment	LEED	Leadership in Energy and Environmental Design
AOI	Area of interest	LID	Low Impact Development
BMP	Best management practice	MEP	Maximum Extent Possible
CBSM	Community Based Social Marketing	MR(s)	Minimum requirement(s)
CESCL	Certified Erosion and Sediment Control Lead	MS4	Municipal Separate Storm Sewer System
County	Skagit County	NMFS	National Marine Fisheries Service
CWA	Clean Water Act	NOI	Notice of Intent
E&O	Education and Outreach	NPDES	National Pollutant Discharge Elimination System
Ecology	Washington State Department of Ecology	NRD	Skagit County's Natural Resources Division
EM	Emergency Management	O&M	Operations and Maintenance
Engineering	Skagit County's Engineering Division	Operations	Skagit County Operations Division
EPA	United States Environmental Protection Agency	PCBs	polychlorinated biphenyls
ER&R	Equipment Retl and Repair	PDS	Planning and Development Services
ESA	Endangered Species Act	Permit	NPDES Phase II Municipal Stormwater Permit
ESHB	Engrossed Substitute House Bill	PFAS	per- and polyfluoroalkyl substances
FEMA	Federal Emergency Management Agency	PH	Public Health
GIS	Geographic Information System	PIC	Pollution identification and Correction
HAZWOPER	Hazardous Waste and Emergency Response standard	Plan	The documentation of the SWMP
IBC	International Building Code	POTW	Publicly Operated Treatment Works
IC/ID	Illicit Connection/Illicit Detection	PW	Public Works
IDDE	Illicit Discharges Detection and Elimination	Road Ops	Road Operations
IDT	Interdisciplinary Team		



RRMP	Regional Roadside Maintenance Program
SAM	Stormwater Action Monitoring
SCC	Skagit County Code
SCD	Skagit Conservation District
SCGIS	Skagit County Geographic Information Services
SMAP	Stormwater Management Action Plan
SMED	Stormwater Management for Existing Development
SOP(s)	Standard operating procedure(s)
STEM	Science, technology, engineering, and math
SWMMWW	Stormwater Management Manual for Western Washington
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TESC	Temporary Erosion and Sedimentation Control
TMDL	Total Maximum Daily Load
U&A	Usual and accustomed
WSDOT	Washington State Department of Transportation



Section 1

Purpose of the Stormwater Management Program Plan

The Washington State Department of Ecology (Ecology) authorizes Skagit County (County) to discharge stormwater from its municipal separate storm sewer system (MS4) to waters of the state under the Western Washington Phase II Municipal Stormwater Permit (Permit). This Permit is issued pursuant to the federal National Pollutant Discharge Elimination System (NPDES) program and is authorized under the federal Clean Water Act (CWA) and Chapter 90.48 RCW, the State Water Pollution Control Law.

The current Permit term began on August 1, 2024, and expires July 31, 2029. The Permit requires Skagit County to develop, implement, and maintain a comprehensive Stormwater Management Program (SWMP), and to track, document, and report program activities, associated costs, and funding sources. This document, the 2026 Stormwater Management Program Plan (Plan), describes the actions the County will implement during the current calendar year to meet Permit requirements and to protect water quality within the NPDES permit coverage area.

The County updates the Plan on an annual basis and makes it available for public review and comment. Consistent with Permit Condition S5.C.3.b, the County submits a draft Plan to Ecology by March 31, provides a public review period from April 15 through May 1, and posts the final Plan on the County website by May 31.

The Plan also describes how the County will implement any additional actions necessary to comply with applicable Total Maximum Daily Load (TMDL) requirements (Permit Condition S7) and monitoring and assessment obligations (Permit Condition S8). Implementation of the SWMP is a coordinated, multi-departmental effort involving the following partners:

- Natural Resources Division (NRD)
- Road Operations (Road Ops)
- Engineering
- Planning and Development Services (PDS)
- Equipment Rental and Repair (ER&R)
- Facilities Management
- Solid Waste
- Parks and Recreation
- Geographic Information Services (GIS)



The Permit is designed around two foundational standards that guide the County's approach to stormwater management as follows:

- **All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment (AKART)** standard establishes expectation that the County will apply the most effective and practicable measures available to prevent stormwater pollution at its source and to treat runoff before it reaches receiving waters.
- **Maximum Extent Practicable (MEP)** standard governs the overall scope and implementation of the SWMP. The MEP requires the County to make continual progress in improving stormwater management practices over time, considering available technologies, resources, and adaptive management strategies. Together, these standards make sure that the SWMP functions as a dynamic, performance-based program focused on measurable water quality improvement, rather than a static set of compliance actions.

1.1 Skagit County NPDES Permit Area

The County's NPDES stormwater permit does not apply countywide. Permit coverage is limited to defined coverage area of the urbanized areas of unincorporated Skagit County, as identified by the 2020 Census urban area boundaries. This Permit coverage area is shown on Figure 1-1, included in this Plan, and is also available for public reference through the County's iMap¹ portal. Within these areas, and across the county as a whole, effective stormwater management is a shared responsibility among the County, cities, Tribes, state and federal agencies, landowners, and residents. Stormwater runoff and water quality impacts extend beyond permit boundaries, affecting people, fish, wildlife, and the local economy throughout the region.

– ¹ iMap link: <https://www.skagitcounty.net/Maps/iMap/?mapid=27c3f114b86f442fa8893f568283a691>.



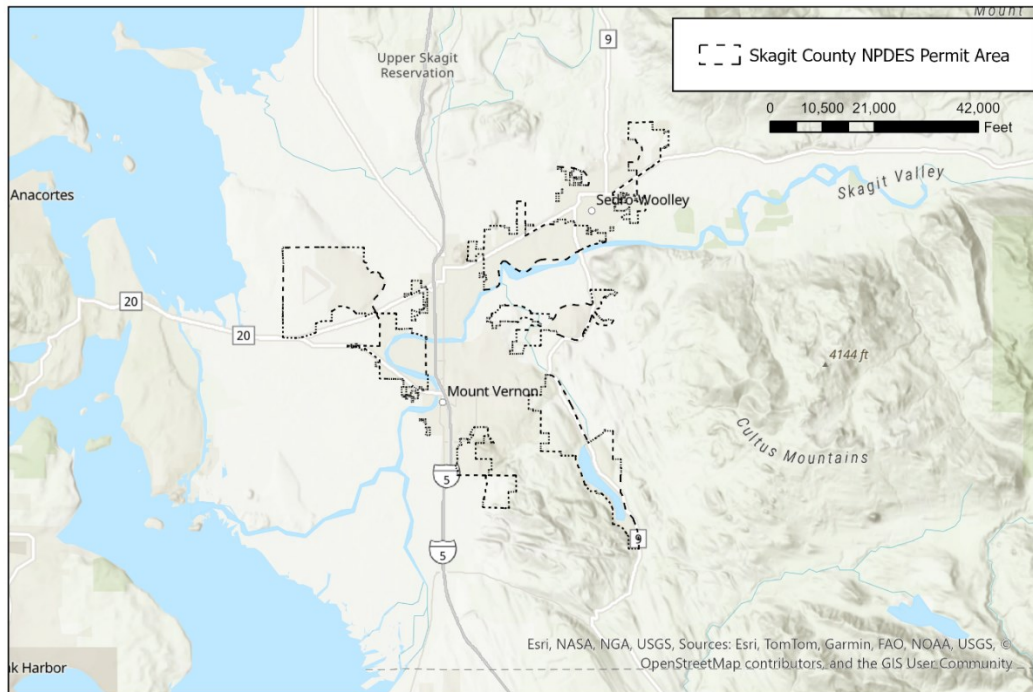


Figure 1-1. Skagit County's NPDES permit area.

Within and adjacent to Permit coverage area, Skagit County's surface waters primarily drain to Puget Sound through the Skagit River, one of the largest and most ecologically significant river systems in the region, as well as through Padilla Bay, Samish Bay, and numerous smaller tributaries. These waterways support salmon, shellfish, and other aquatic species of ecological, cultural, and economic importance. Local stormwater management priorities are informed by these resources and by specific regulatory drivers, including shellfish protection, salmon recovery initiatives, and TMDL requirements for impaired water bodies.

The condition of these local waters is directly connected to the overall health of Puget Sound, which remains on Washington State's Clean Water Action Section 303(d) list of impaired waters. The Puget Sound Watershed Health Assessment, which evaluates ecological, water quality, and biological indicators across Puget Sound's tributary basins, consistently identifies polluted stormwater runoff from urban and suburban areas as a leading impediment to ecosystem recovery. Stormwater runoff conveys a complex mixture of pollutants including heavy metals, petroleum products, bacteria, nutrients, and emerging contaminants from impervious surfaces such as roads, parking lots, and developed lands. These pollutants are discharged to waters of the state via County-owned and maintained stormwater facilities, many of which discharge directly into streams, wetlands, and marine waters with limited or no treatment.



The SWMP serves as Skagit County's primary regulatory and programmatic tool for reducing stormwater-related pollution and ensuring the County's MS4 discharges do not cause or contribute to violations of water quality standards. Through the implementation of a comprehensive, locally informed, and continuously improving SWMP, Skagit County seeks to protect public health, support salmon and shellfish recovery, fulfill its obligations under state and federal law, and contribute meaningfully to the long-term protection and restoration of Puget Sound.

1.2 What is Stormwater?

Stormwater is the runoff generated during and after precipitation events, including rainfall and snowmelt. It consists of surface runoff, drainage, and shallow subsurface interflow that travels across rooftops, streets, highways, parking lots, and other hard and impervious surfaces. As stormwater moves across the landscape, it mobilizes and transports pollutants such as oil, fertilizers, pesticides, sediment, trash, and animal waste, carrying them, often without treatment, directly to local streams, rivers, lakes, and marine waters as shown on Figure 1-2.

In urban and urbanizing areas, stormwater runoff is a leading contributor of water pollution. In addition to impairing aquatic ecosystems, unmanaged or inadequately treated stormwater runoff can pose risks to public health, exacerbate flooding and erosion, and damage public and private infrastructure as well as aquatic habitat. Skagit County manages stormwater runoff through its MS4, which consists of a network of pipes, ditches, catch basins, and other stormwater facilities designed to collect, convey, and discharge runoff from developed areas to receiving waters and, in some cases, to groundwater. **Error! Reference source not found.** shows an example of stormwater runoff flowing into a storm drain.

Unlike the sanitary sewer system, the MS4 does not convey stormwater to a wastewater treatment plant prior to discharge. As a result, effective stormwater management relies on implementing source control, treatment, and flow control measures to protect downstream water quality and receiving waters.

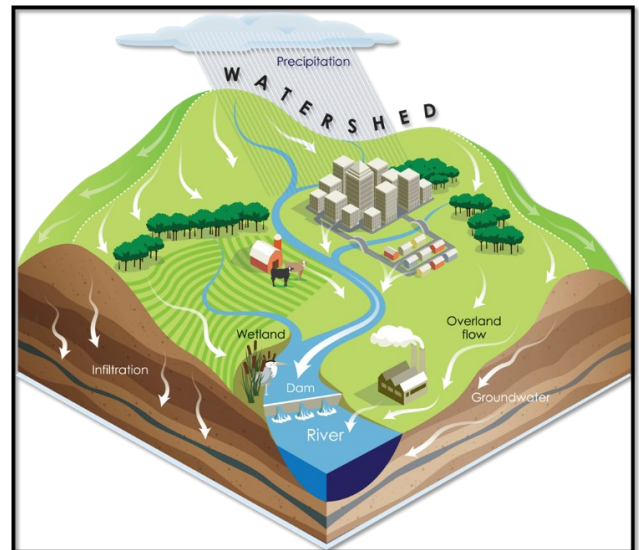


Figure 1-2. Stormwater runoff in a watershed.

Source: Lake County Illinois Stormwater Management Commission



Figure 1-3. Stormwater runoff entering a storm drain on the way to Skagit River.



1.3 Receiving Waters and Environmental Context of Skagit County

The County contains some of the most significant rivers, bays, and agricultural lands in the Pacific Northwest. The Skagit River is the largest river flowing into Puget Sound and drains a watershed of approximately 3,000 square miles. It supports major populations of salmon and trout, including Endangered Species Act (ESA)-listed Puget Sound Chinook salmon, Puget Sound steelhead, and bull trout, as well as coho and chum salmon. Many smaller streams throughout the county also provide critical habitat for salmon and trout, supporting feeding, rearing, and migration.

The western lowlands of the County drain to Padilla Bay and Samish Bay, both of which are important shellfish growing waters. Padilla Bay includes a National Estuarine Research Reserve and nearly 8,000 acres of eelgrass meadows that provide essential habitat for juvenile salmon, Dungeness crab, herring, and a wide variety of bird species. Samish Bay supports commercial shellfish harvesting and has been the focus of long-term water quality improvement efforts to reduce bacterial contamination and maintain shellfish bed openings. Many of the creeks and drainage ditches that flow to these bays are state priority waters or are subject to TMDL plans due to impairments such as elevated bacteria levels or low dissolved oxygen.

The County's land resources are equally important. The Skagit Valley floodplain supports a nationally recognized agricultural region producing tulip and daffodil bulbs, vegetable and seed crops, berries, beef, and dairy products. The local economy also depends on shellfish harvesting, Tribal and recreational fishing, tourism, and food processing and manufacturing associated with local agriculture. All of these activities rely on clean water, including healthy shellfish beds, strong salmon populations in the Skagit River and its tributaries, and safe lakes and streams for swimming, fishing, and boating.

1.4 SWMP Implementation Responsibilities

Implementing the SWMP relies on coordinated efforts across multiple County divisions and departments. At a high level, each division contributes to the program as shown in Table 1-1.



Table 1-1. SWMP Implementation Responsibilities

Division/Department	Primary SWMP Responsibilities
Natural Resources Division (NRD)	<ul style="list-style-type: none"> • SWMP coordination and plan administration • Stormwater planning and program development • Stormwater Management Action Plans (SMAPs) and Capital Improvement Plans (CIPs) • MS4 mapping and documentation • Source control and operations & maintenance (O&M) inspections • Clean Water Program implementation, including Illicit Discharge Detection and Elimination (IDDE), Pollution Identification and Correction (PIC), and water quality monitoring • Drainage utility surface water projects • Lake Management District administration • Skagit Regional Source Control Inspection Program • Public education, outreach, and involvement • Invasive vegetation control in stormwater corridors and MS4 infrastructure (via the Noxious Weeds Program, which holds a separate state NPDES permit)
Planning and Development Services (PDS)	<ul style="list-style-type: none"> • Land development review • Low impact development (LID) requirements • Permitting and construction inspections (pre-construction and mid-construction), including Temporary Erosion and Sedimentation Control (TESC) • Underground Injection Control (UIC) review and compliance tracking • Critical Areas program administration • Long-range planning and Comprehensive Plan updates • Permit counter outreach and education • Progressive enforcement and stormwater code enforcement



Table 1-1. SWMP Implementation Responsibilities

Division/Department	Primary SWMP Responsibilities
Road Operations	<ul style="list-style-type: none"> • Day-to-day MS4 operations and maintenance • Replacement and retrofit of County MS4 infrastructure • Catch basin and conveyance system maintenance • Street sweeping and vacuum truck operations • Road maintenance consistent with the Regional Road Maintenance Program (RRMP) • Stormwater Pollution Prevention Plan (SWPPP) implementation for road maintenance activities • Primary field crews for MS4 O&M within the permit area
Engineering Division (Engineering)	<ul style="list-style-type: none"> • Design and construction of stormwater capital projects • Stormwater infrastructure retrofits and replacements • Fish passage barrier correction projects • Support for onboarding MS4 assets into County inventory and GIS systems
Skagit Conservation District (SCD)	<ul style="list-style-type: none"> • Develops and coordinates watershed stewardship opportunities for residents, including Watershed Masters Training, Skagit Stream Team, and Skagit Storm Team monitoring programs that engage volunteers and build long-term watershed literacy. • Recruits, trains, and supports community volunteers to participate in hands-on watershed monitoring, restoration, and stormwater stewardship activities. • Provides school-based stormwater and watershed education, including EnviroScape classroom presentations and distribution of teacher resource packets, to extend stormwater messaging to students, families, and educators. • Delivers educational presentations and materials directly to schools and community learning spaces throughout the watershed. • Plans and hosts public participation and involvement activities, such as stormwater facility maintenance workshops, storm drain labeling events, and outreach at fairs and community events. • Increases public awareness of stormwater impacts, watershed health, and individual actions that support water quality protection.



Table 1-1. SWMP Implementation Responsibilities

Division/Department	Primary SWMP Responsibilities
Equipment Rental and Repair (ER&R)	<ul style="list-style-type: none"> • Maintenance of County fleet and MS4 maintenance equipment (e.g., vacuum trucks, sweepers, inspection cameras) • Management of the County Sand and Gravel NPDES permit • Maintenance of road maintenance facilities and equipment to prevent pollutant discharges to the MS4
Solid Waste	<ul style="list-style-type: none"> • Compliance with the Industrial Stormwater General Permit (ISGP) at the County Transfer Station • SWPPP implementation at solid waste facilities to prevent pollutant discharges to the MS4
Facilities Management	<ul style="list-style-type: none"> • Operation and maintenance of stormwater infrastructure at County-owned buildings and facilities • SWPPP compliance at County facilities
Parks and Recreation	<ul style="list-style-type: none"> • O&M for stormwater infrastructure at County parks and recreation sites • Management of pet waste and trash facilities to reduce bacteria and litter in stormwater runoff
Department of Emergency Management	<ul style="list-style-type: none"> • Coordination of emergency response to protect public safety and the environment • Spill response and marine spill coordination when receiving waters are threatened • Flood response affecting MS4 infrastructure or stormwater operations • Hazard mitigation planning to support long-term stormwater system resilience
Geographic Information Systems (GIS)	<ul style="list-style-type: none"> • GIS and mapping support for MS4 mapping and documentation • Development and maintenance of spatial datasets supporting SWMP implementation

1.5 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.” The organization of Sections 2 through 13 of this SWMP Plan is modeled after that of the Permit as follows are shown in Table 1-2.

Table 1-2. Document Organization	
Section	Content
1	Purpose of the Stormwater Management Program Plan
2	Stormwater Management Program Administration (S5.A)
3	Stormwater Planning (S5.C.1)
4	Public Education and Outreach (S5.C.2)
5	Public Involvement and Participation (S5.C.3)
6	MS4 Mapping and Documentation (S5.C.4)
7	Illicit Discharge Detection and Elimination (S5.C.5)
8	Controlling Runoff from New Development, Redevelopment, & Construction Sites (S5.C.6)
9	Stormwater Management for Existing Development (S5.C.7)
10	Source Control Program for Existing Development (S5.C.8)
11	Municipal Operations and Maintenance (S5.C.9)
12	Compliance with Total Maximum Daily Load Requirements (S7)
13	Monitoring and Assessment (S8)
Appendix A	Other Permit Requirements

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

As Specified in the Phase II Permit (S5.A)

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 2026 under the Permit.

2.1 Permit Requirements

The Permit defines a Stormwater Management Program as a set of actions and activities that implement the program components identified in Special Condition S5, along with any additional actions needed to meet applicable TMDL and monitoring requirements.

Under the Permit, the County is required to implement and maintain an SWMP that meets the requirements summarized in Table 2-1.

Table 2-1. SWMP Plan Requirements (Permit Condition S5.A)

Category	Description and Performance Measures	Key Deadlines/Notes
SWMP Development	Develop and implement a set of actions (SWMP) to reduce pollutant discharge to MEP and meet AKART.	Ongoing, annual.
SWMP Plan Documentation	Maintain a written SWMP Plan organized by permit components (S5.C) including planned activities, TMDL actions, and monitoring efforts.	Update annually for submittal with the Annual Report.
Information Gathering and Tracking	Establish ongoing program to track and use data to evaluate permit compliance and set program priorities.	Ongoing.
Cost and Funding Tracking	Track the cost (or estimated cost) of every SWMP component and identify specific funding sources.	Provide data and Annual Report by March 31, 2027.
Activity Metrics Tracking	Maintain records of the number of inspections, follow-up actions, official enforcement actions, and types of public education activities.	Must be included in each Annual Report.
Internal and External Coordination	Implement mechanisms to coordinate with other permittees (inter-entity) and among internal departments to eliminate barriers to compliance.	Written description of internal mechanisms due March 31, 2026.



Table 2-1. SWMP Plan Requirements (Permit Condition S5.A)		
Category	Description and Performance Measures	Key Deadlines/Notes
Program Continuity	Continue implementing existing stormwater programs until the updated SWMP is fully implemented per the new permit terms.	Ongoing during transition period.

2.2 Current Compliance Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- SWMP budget tracking and management oversight:** The County initiated its first formal SWMP budget tracking process on January 1, 2026, and incorporated budget review as a standing agenda item on the quarterly Interdisciplinary Team (IDT) Managers’ Meetings beginning in early 2026. This structure supports timely compliance with Permit cost-reporting requirements and improves transparency regarding investments in surface water management and local water quality protection for County leadership, Ecology, and the public.
- Interdepartmental coordination through the IDT:** The County conducts quarterly IDT meetings to coordinate SWMP implementation activities across participating departments and ensure alignment with Permit obligations. IDT includes staff from the Skagit County Public Works and partner departments listed in Table 1-1. Not all divisions attend every meeting, but participation is determined based on the topic to ensure the right staff are involved.

The IDT has evolved to better support SWMP implementation and permit compliance and now operates as two levels:

- Project level:** Topic-specific meetings to coordinate operations and maintenance, site-specific projects, code development, and long-range planning.
- Management level:** Formalized quarterly IDT Managers’ Meetings beginning in 2026. IDT Managers’ Meetings include managers and key staff responsible for ensuring SWMP work is adequately funded, staffed, and completed.

The added management structure improves interdepartmental coordination, management awareness, engagement, and integration of permit compliance into departmental planning and budgets.

- Regional coordination and information sharing:** The County participates in regional forums, such as NPDES Permit Coordinators Meetings, Greater Puget Sound Public



Works Stormwater Municipal Caucus³, Municipal Environmental Justice Workgroup⁴, Environmental Justice Salon⁵, Stormwater Outreach for Regional Municipalities (STORM)⁶, Business Inspection Group⁷ and similar venues, to stay informed of regulatory updates, share best practices, and maintain consistency with regional implementation approaches.

2.3 Planned 2026 Compliance Activities

County activities and actions planned for continued compliance are included in Table 2-2, which presents the work plan for the 2026 SWMP administration activities. Future compliance time frames (beyond 2026) are included for reference.

Task ID	Task description	Lead	Support	Compliance time frame
SWMP-1	SWMP budget tracking and management oversight.	NRD	PDS, Road Operations, Engineering	Ongoing, and County must begin reporting average annual costs in SWMP and Annual Report no later than March 31, 2027.
SWMP-2	Interdepartmental coordination through IDT.	NRD	PDS, Road Operations	Ongoing, quarterly meetings. The first quarterly Managers' Meeting in early 2026 focused on new budget and cost reporting requirements; the second quarterly meeting will review 2026 compliance progress and budget status.

³ Municipal caucus focuses on public works and stormwater issues (funding, infrastructure, and regulatory trends) and is used as a venue to understand statewide issues and advocate for municipal perspectives.

⁴ Washington Stormwater Center Municipal Environmental Justice Workgroup develops tools and guidance for meeting permit obligations related to overburdened communities and integrating environmental justice into stormwater planning.

⁵ Washington Stormwater Center Environmental Justice Salon is an informal forum for exploring the broader intersection of stormwater and environmental justice beyond specific permit requirements.

⁶STORM is coalition of Western Washington jurisdictions that collaborates on consistent, cost-effective public education and outreach campaigns (including Puget Sound Starts Here) that help meet S5.C.2 education and outreach requirements and provide professional development opportunities.

⁷ Washington Stormwater Center's Business Inspection Group is a regional forum that develops and shares best practices for business source control inspection programs, supporting Skagit County's implementation of S5.C.8 Source Control for Existing Development.



Table 2-2. 2026 Stormwater Management Program Administration Work Plan				
Task ID	Task description	Lead	Support	Compliance time frame
SWMP-4	Prepare SWMP and Annual Report.	NRD	PDS, Road Operations	Ongoing, annual.
SWMP-5	Continue providing NPDES training management structure and tracking system.	NRD	NA	Ongoing; develop and maintain NPDES training database.



Section 3

Stormwater Planning

As Specified in the Phase II Permit (S5.C.1)

This section of the SWMP Plan provides a description of Permit requirements related to Stormwater Planning, including descriptions of the County's current and planned compliance activities for 2026 under the Permit.

3.1 Permit Requirements

The Stormwater Planning section in the permit requires the County to implement a program that uses policies and strategies as water quality management tools to protect receiving waters as shown in Table 3-1.

Table 3-1. Stormwater Planning Requirements (Permit Condition S5.C.1)		
Category	Description and Performance Measures	Key Deadlines/Notes
Interdisciplinary Team	Convene a team to inform and assist in the development and progress of the planning.	Ongoing.
Long Range Plan Coordination	Describe how stormwater needs and receiving water health inform or influence local long-range or comprehensive planning update processes.	Description due in Annual Report by March 31, 2027.
LID Principles and Best Management Practices (BMPs)	Continue to require LID as the preferred approach to site development to minimize impervious surfaces and native vegetation loss.	Ongoing, annual assessment of barriers required.
Tree Canopy Goals	Adopt and implement long-term goals and policies for tree canopy (appropriately projected for 5, 10, or more years) to support stormwater management.	No later than December 31, 2028.
SMAP Development	Complete a planning process for one new high-priority catchment (or add actions to an existing plan) to identify strategic investments and retrofits.	Submittal due March 31, 2027.
Stormwater Management for Existing Development (SMED) Implementation Strategy	Implement stormwater facility retrofits or tailored actions identified in a SMAP or through opportunistic investments to manage existing development.	Ongoing throughout the permit term.



Table 3-1. Stormwater Planning Requirements (Permit Condition S5.C.1)

Category	Description and Performance Measures	Key Deadlines/Notes
SMED Project Listing	Provide a list of planned, individual projects scheduled for funding or implementation to meet the assigned equivalent acreage.	Included with each Annual Report (in .xlsx format).
Equity and Regional Collaboration	Report projects providing benefits for Tribal and overburdened community. Permittees may collaborate on regional goals but must manage 0.5 acres locally.	Ongoing; achievement reported by March 31, 2028.
Future SMED Projections	Submit a report to Ecology estimating the equivalent acres projected to be managed during the next Permit term (2029-2032).	Submittal due March 31, 2028.

3.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **Stormwater planning IDT:** Lead ongoing coordination across Public Works and partner departments to support SWMP implementation, permit compliance, and interdepartmental planning as follows:
 - Topic-specific and project-level coordination for stormwater planning, capital projects, code implementation, and reporting.
 - Quarterly IDT Managers' Meetings (initiated in 2026) to support management-level oversight, funding, staffing, and integration of SWMP priorities into departmental operations and budgets.
- **Long-range and capital planning coordination:** Facilitate coordination with PDS to ensure stormwater management needs, water quality goals, and SWMP priorities are reflected in future Comprehensive Plan amendments (most recent update completed June 2025) including following additional coordination efforts:
 - Continued participation in the FEMA National Flood Insurance Program Community Rating System (CRS) to support flood hazard mitigation and maintain CRS classification and associated insurance benefits.
 - Ongoing updates to stormwater-related counter materials and coordination with PDS counter staff regarding permit requirements and stormwater code thresholds.
 - Continued compliance with the Regional Road Maintenance Program (RRMP), including staff training, documentation, and coordination between Road Operations and NRD.
- **Low impact Development (LID) implementation:** County continues to implement LID principles and Best Management Practices (BMPs) adopted through the 2022 development code update, which aligned local regulations with the 2019 Stormwater Management Manual for Western Washington (SWMMWW) and prior permit requirements. LID requirements apply countywide, with enhanced standards applicable



to development within the NPDES permit coverage area. In addition to this, County has been implementing following LID-related activities as follows:

- County staff monitors development activity within and near the permit area, including plats, short plats, and infill development, to ensure compliance with LID requirements and to track growth trends relevant to stormwater planning.
- County maintains annual documentation of barriers to LID implementation; no new barriers identified for 2026 beyond those addressed in the 2022 update.
- County maintains ongoing monitoring of development activity within and near the NPDES permit coverage area, including documentation of permit boundary changes resulting from the 2020 Census urban-area update (pending Ecology confirmation).
- **Stormwater Management Action Plan (SMAP) – Big Lake East Catchment:** The County is actively implementing the Big Lake East Catchment SMAP completed and submitted to Ecology in 2023. Additional efforts in the catchment include the following:
 - Current efforts focus on advancing the technical foundation needed for future capital retrofits, including updated hydrologic and hydraulic analysis, verification and mapping of public and known private stormwater assets, and tributary conveyance mapping for MS4 outfalls.
 - Targeted phosphorus sampling initiated in 2025 is continuing through 2026 to support SMAP implementation and the County’s Pollution Identification and Correction (PIC) program. Sampling results will guide targeted outreach, stewardship actions, and retrofit prioritization.
 - The County continues to coordinate with Big Lake Lake Management District (LMD) #1 on in-lake monitoring and data sharing.
 - Ongoing community engagement includes presentations at LMD meetings, distribution of education materials related to nutrient management and runoff prevention, and development of a public-facing platform to share monitoring results.
- **Eastern Padilla Bay Watershed Surface Water Management Plan:** The County is developing a basin-wide Eastern Padilla Bay Watershed Surface Water Management Plan to support long-range stormwater planning and water quality protection that includes the following:
 - The plan is focused on inventorying and assessing County-owned and operated stormwater infrastructure across the watershed, including areas outside the current NPDES permit boundary.
 - Core planning activities include asset inventory and mapping, existing condition review of water quality and flow conditions, and identification of data gaps affecting capital planning and retrofit design.
 - The plan is aligned with the geographic scope of the WRIA 3 Padilla Bay Freshwater Tributaries TMDL and supports the County’s MS4 TMDL compliance obligations.
 - As part of this work, the County is evaluating Upper No Name Creek, Little Indian Slough, and Big Indian Slough as candidate areas for future SMAP development and capital investment sequencing.



3.3 Planned 2026 Compliance Activities

County activities and actions planned to ensure continued compliance with the Stormwater Planning requirements are summarized in Table 3-2, which presents the work plan for the 2026 SWMP administration activities. Future compliance time frames (beyond 2026) are included for reference:

Table 3-2. 2026 Stormwater Management Program Administration Work Plan				
Task ID	Task Description	Lead	Support	Compliance Time Frame
SMP-1	Implement annual SWMP budget tracking and cost reporting for each SWMP component; identify funding sources and track costs to support annual reporting.	NRD	Finance, Engineering, Road Operations, IDT	Systems operational throughout 2026; first full reporting due March 31, 2027.
SWP-2	Advance updates to the Big Lake East Catchment SMAP, including data collection, asset mapping, and analysis to support future retrofit implementation.	NRD	Engineering, GIS, Road Operations, IDT	Ongoing through 2026; updated SMAP due March 31, 2027.
SWP-3	Continue targeted phosphorus sampling and data analysis in the Big Lake East Catchment to support SMAP implementation and PIC efforts.	NRD	GIS, Big Lake LMD #1	Sampling ongoing through 2026; results inform future actions.
SWP-4	Begin review and coordination to update local stormwater code and development standards for alignment with the 2024 SWMMWW.	PDS	NRD, Engineering, Legal, IDT	Preparatory work in 2026; adoption required by June 30, 2027.
SWP-5	Initiate tree canopy assessment and mapping using existing data to support stormwater management and permit mapping requirements.	NRD	GIS, PDS, on-call consultants	Mapping completed by December 31, 2026.
SWP-6	Develop methodology for identifying and mapping stormwater supportive tree canopy, with emphasis on County owned lands and overburdened communities.	NRD	GIS, PDS	Methodology developed during 2026.



Table 3-2. 2026 Stormwater Management Program Administration Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
SWP-7	Formalize and conduct quarterly IDT Managers' Meetings to support management level coordination, budgeting, and staffing for SWMP compliance.	NRD	All participating departments, IDT Managers	Quarterly meetings beginning in 2026 (ongoing).
SWP-8	Refine GIS layers and data collection methods to meet MS4 mapping, permit coverage area, and overburdened community mapping requirements.	NRD	NRD, Engineering, PDS	Ongoing throughout 2026; phased deadlines per Permit.
SWP-9	Review and update the County's progressive enforcement and adaptive management approach to ensure consistency with current Permit requirements.	NRD	PDS, Legal, Code Enforcement	Ongoing through 2026.
SWP-10	Support development of the Eastern Padilla Bay Watershed Surface Water Management Plan, including asset inventory, condition assessment, and prioritization.	NRD	Engineering, GIS, Operations, IDT	Ongoing in 2026; plan completion targeted for 2027.
SWP-11	Provide stormwater input to the 2027 Capital Facilities Plan to reflect infrastructure needs and planned investments.	NRD	Engineering, Finance, PDS	Coordination during 2026; CFP update in 2027.
SWP-12	Continue coordination on stormwater and fish passage barrier correction projects, including tracking for S5.C.7 reporting.	NRD	Engineering, Operations, GIS	Ongoing throughout 2026.
SWP-13	Maintain compliance with RRMP requirements, including documentation, training, and interdepartmental coordination.	Operations	NRD	Ongoing throughout 2026.



Table 3-2. 2026 Stormwater Management Program Administration Work Plan				
Task ID	Task Description	Lead	Support	Compliance Time Frame
SWP-14	Update permit counter materials and provide ongoing coordination with PDS counter staff on stormwater requirements and thresholds.	PDS	NRD	Ongoing throughout 2026.



Section 4

Public Education and Outreach

As Specified in the Phase II Permit (S5.C.2)

The Public Education and Outreach requirements under section S5.C.2 are designed to build general awareness of stormwater impacts, effect behavior change to reduce pollutants, and create community stewardship opportunities. Permittees may meet these requirements individually or through regional collaboration.

4.1 Permit Requirements

Under the Permit, the County is required to implement and maintain an SWMP that meets the requirements summarized in Table 4-1.

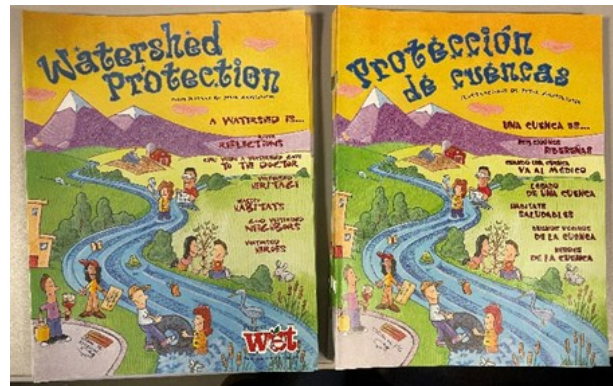
Category	Description and Performance Measures	Key Deadlines/Notes
Program Design	Identify high-priority audiences and subject areas based on local or regional water quality information. Messages must be delivered in languages other than English when appropriate to the demographic.	Ongoing.
General Awareness	Select at least one priority audience and one subject area annually to build awareness. Subjects include general impacts of stormwater, LID principles, or technical standards for erosion control.	Ongoing.
Behavior Change Strategy	Select at least one priority audience and one BMP (e.g., pet waste, pesticide use, illicit discharge prevention). Use social marketing practices to develop a tailored campaign.	July 1, 2025.
Campaign Implementation	Begin implementing the strategy and schedule developed for the behavior change campaign.	September 1, 2025.
Campaign Evaluation	Evaluate the changes in understanding and adoption of behaviors resulting from the campaign. Recommend changes to improve effectiveness.	Submit evaluation report by March 31, 2029.
Stewardship	Provide, partner with, or promote stewardship opportunities like stream teams, storm drain marking, volunteer monitoring, or riparian plantings.	Ongoing.



4.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **Skagit Conservation District (SCD) outreach activities:** The County participates in a long-standing, multi-jurisdictional partnership with the SCD to deliver Permit-required public education and outreach activities. This year marks the 15th consecutive year of collaboration with the cities of Sedro-Woolley, Burlington, Mount Vernon, and Anacortes. The partnership leverages shared resources to improve program consistency, operational efficiency, and regional water quality outcomes. Some examples of outreach activities and materials are shown in Figure 4-1, Figure 4-2, and Figure 4-3. These outreach activities include the following:
 - **Low impact development:** LID education and pilot installations including developing outreach materials on LID and facility maintenance.
 - **Professional and public education:** Workshops for contractors and businesses such as green building, LEED, and LID, including public workshops and informational series on backyard conservation, LID, facility maintenance, and Skagit Watersheds.
 - **School education:** Development of school outreach materials and packages including classroom presentations to hundreds or local students annually such as the one demonstrated in Figure 4-1.
 - **Equity and inclusion:** Collaboration with a cultural ambassador to improve outreach to Spanish-speaking community members.
- **Community events and in-person outreach:** SWMP staff participate in community events using interactive display tables with educational games and bilingual materials at events such as County Living Expo, Fidalgo Bay Day, WSU Master Gardener Plant Fair and Discovery Garden Open House, Festival of Family Farms, Farm Fest, El Grito (as applicable), and Libraries Love Lakes partnership events.



children's Watershed Protection workbook.



Figure 4-2. Skagit County staff provided education on permeable pavement at the 2025 Washington State University Master Gardeners Plant Fair.



- **Digital outreach:** Use of social media platforms (e.g., Facebook, YouTube, Instagram, Nextdoor) to share stormwater education messages, promote stewardship opportunities, and inform the public about County stormwater activities.
- **Community-Based Social Marketing (CBSM):** This is a program built on a 2023–2025 partnership with Whatcom County that focuses on reducing fecal coliform pollution through improved pet waste disposal. Strategies implemented in this program include in-person outreach (e.g., trailheads, pet stores, community events), distribution of pet waste tools (e.g., bags, dispensers, holders), behavior-change pledges, partnerships with trusted messengers (e.g., veterinarians, trainers, groomers, Humane Society), and distribution of “poop scooping kits” to dog owners through partner organizations.



Figure 4-3. A pet-waste campaign pop-up at a Skagit County pet store, featuring a pledge board where dog owners commit to improved poop-scooping behavior.

- **Stewardship promotion:** County sponsors promote local stewardship initiatives in partnership with organizations such as the Skagit Land Trust, Skagit Fisheries Enhancement Group, and the Padilla Bay National Estuarine Research Reserve. These efforts are delivered through the County website, e-newsletter, and social media platforms and include support for the following programs:
 - Stream Team and Storm Team
 - Salish Sea Stewards
 - Skagit Conservation District programs



- Skagit Marine Resources Committee
- Skagit Fisheries Enhancement Group

4.3 Planned 2026 Compliance Activities

Planned 2026 Public Education and Outreach activities supporting continued Permit compliance are summarized in Table 4-2.

Table 4-2. 2026 Public Education and Outreach Compliance Work Plan				
Task ID	Task Description	Lead	Support	Compliance Time Frame
E&O-1	Maintain contract with SCD for regional E&O delivery.	NRD	SCD	Ongoing.
E&O-2	Continue CBSM pet-waste campaign using established strategies.	NRD	Community Partners	Ongoing.
E&O-3	Continue promoting stewardship and volunteer opportunities with Skagit Land Trust, Skagit Fisheries Enhancement Group, and Padilla Bay National Estuarine Research Reserve through County platforms to participate in activities such as Stream Team and Storm Team, Salish Sea Stewards, Skagit Conservation District programs, Skagit Marine Resources Committee, and Skagit Fisheries Enhancement Group.	NRD	Partner Organizations	Ongoing.
E&O-4	Summarize annual activities for “Public Education and Outreach” component of Annual Report; identify any updates to SWMP document.	NRD	NA	The SWMP and Annual Report submittal is due on or before March 31 of each year.



Section 5

Public Involvement and Participation

As Specified in the Phase II Permit (S5.C.3)

Special Condition S5.C.3 of the Permit focuses on Public Involvement and Participation. The primary goal is to provide the public with opportunities to influence the development, implementation, and update of the SWMP and the SMAP.

5.1 Permit Requirements

The Public Involvement and Participation section in the Permit requires the County to conduct the activities summarized in Table 5-1

Table 5-1. Public Involvement and Participation (Permit Condition S5.C.3)		
Category	Description and Performance Measures	Key Deadlines/Notes
Public Decision-Making Opportunities	Create opportunities for the public, including overburdened communities, to participate in the development, implementation, and update of the SMAP and SWMP.	Ongoing.
Public Notice Compliance	Adhere to all applicable state and local public notice requirements when developing elements of the SWMP and SMAP.	As required by local/state law.
Overburdened Community Outreach	Adhere to all applicable state and local public notice requirements when developing elements of the SWMP and SMAP.	Ongoing.
Identification Methodology	Document the specific methods used to identify and locate overburdened communities within the jurisdiction.	No later than December 31, 2026.
Information Access	Post the current SWMP Plan and the Annual Report on the jurisdiction's website. Make all other permit-related submittals (beyond the Plan and Annual Report) available to the public upon request.	No later than May 31 each year.



5.2 Current Planning Activities

County's Public Involvement and Participation activities support Permit condition S5.C.3 by ensuring transparency, meaningful engagement, and consideration of community priorities in stormwater planning and implementation:

- **Public access to SWMP information:** The County provides public access to key stormwater program documents, including the SWMP Plan and the Annual Report, which are posted annually on the County's surface water management webpage for public review and comment prior to finalization. The stormwater program webpage serves as the primary public access point for stormwater information and includes the current SWMP Plan, Annual Report, and contact information for the SWMP Coordinator.
- **Ongoing public involvement opportunities:** SMAPs include public engagement during catchment planning and implementation. For capital projects, the County seeks input from property owners and the community during project scoping and design. Ordinance and code updates incorporate stakeholder outreach through IDT coordination and established public notice and comment processes.
- **Tribal coordination:** The County conducts ongoing outreach and coordination with all federally recognized Tribes whose reservation lands border Skagit County or whose usual and accustomed (U&A) fishing areas receive discharges from the County's MS4.
- **Consideration of overburdened communities:** The County considers the needs of overburdened communities by evaluating how stormwater programs may affect populations experiencing disproportionate stormwater impacts or barriers to participation. To inform outreach and prioritization, the County uses tools such as the Washington Environmental Health Disparities Map and Ecology's overburdened community designations. These efforts focus on ensuring engagement opportunities are accessible, inclusive, and meaningful.

5.3 Planned 2026 Compliance Activities

Planned 2026 Public Involvement and Participation activities supporting continued Permit compliance are summarized in



Table 5-2. 2026 Public Involvement and Participation Work Plan



Table 5-2. 2026 Public Involvement and Participation Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
PI-1	Post draft SWMP Plan for public review and comment on the County surface water management webpage. Post final SWMP Plan following public comment period.	NRD	Public Works	Draft by March 31, 2026. Final by May 31, 2026.
PI-2	Maintain public access to SWMP Plan, Annual Report, and SWMP Coordinator contact information on County website.	NRD	IT	Ongoing.
PI-3	Summarize annual activities for the “Public Involvement and Participation” component of the Annual Report; identify any updates to the SWMP document.	NRD	SCD	Due on or before March 31 of each year.
PI-4	Provide public engagement opportunities during SMAP development and implementation.	NRD	Engineering	Ongoing.
PI-5	Conduct public and stakeholder outreach during stormwater ordinance and code updates.	NRD	PDS, IDT	As needed (2026).
PI-6	Document methods used to identify overburdened communities.	PDS	GIS	No later than December 31, 2026.
PI-7	Coordinate with federally recognized Tribes regarding stormwater planning and MS4 discharges.	NRD	County Leadership	Ongoing.



Section 6

MS4 Mapping and Documentation

As Specified in the Phase II Permit (S5.C.4)

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 2026 under the Permit.

6.1 Permit Requirements

The MS4 Mapping and Documentation section in the permit requires the County to implement a program that uses policies and strategies as water quality management tools to protect receiving waters. These policies and strategies are summarized in Table 6-1.

Table 6-1. MS4 Mapping and Documentation Requirements (Permit Condition S5.C.4)		
Category	Description and Performance Measures	Key Deadlines/Notes
Ongoing Mapping	Maintain data for known MS4 outfalls and discharge points (including size and material): <ul style="list-style-type: none">• Receiving waters (excluding groundwater)• Stormwater BMPs/facilities owned or operated by the County• Geographic areas that do not discharge to surface waters• Connections to other public entities, private systems, and those authorized after February 16, 2007	Ongoing.
Large Tributary Mapping	For outfalls/discharge points \geq 24-inch diameter, map: <ul style="list-style-type: none">• Tributary conveyance type, material, and size• Associated drainage areas and land use	Ongoing.
Outfall Location Submittal	Submit locations of all known MS4 outfalls using the standard templates and format provided by Ecology.	Due March 31, 2026.
Tree Canopy Mapping	Map tree canopy on Permittee-owned or operated properties using existing data to support stormwater management.	Due December 31, 2026.



Table 6-1. MS4 Mapping and Documentation Requirements (Permit Condition S5.C.4)

Category	Description and Performance Measures	Key Deadlines/Notes
Acreage Assessment	Map and assess the acreage of MS4 tributary basins to outfalls > = 24-inch diameter to quantify estimated acres managed or unmanaged by County-owned BMPs.	Due March 31, 2028.
Equity Mapping	Map overburdened communities in relation to stormwater BMPs, outfalls, discharge points, and tree canopy on County-owned and operated lands.	Due December 31, 2028.
Technical Standards	All maps must be in an electronic format (e.g., GIS, CAD) with fully described mapping standards.	Ongoing.

6.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **MS4 system mapping and maintenance:** Since January 1, 2020, County is actively maintaining and updating comprehensive GIS-based digital mapping of its MS4 stormwater system for documentation, public transparency, and compliance with permit requirements as follows:
 - Maintain GIS-based digital mapping⁸ for stormwater infrastructure such as outfalls, BMPs, tributary conveyances, and system connections. This includes collecting size and material data for all known MS4 outfalls, mapping newly discovered stormwater infrastructure, and addressing any challenges of mapping unknown systems and keeping pace with the development.
Link:
 - Keep public-facing interactive stormwater map updated that follows Skagit County's GIS Stormwater Mapping Standard Operating Procedures (SOPs) for all updates.
 - Provide maps to Ecology, Tribes, municipalities, and the public upon request.
- **Overburdened community identification and mapping:** The County is identifying and mapping overburdened communities using state tools and demographic data to ensure stormwater planning, outreach, and program delivery are equitable and responsive to community needs.

6.3 Planned 2026 Compliance Activities

Planned 2026 MS4 Mapping and Documentation Requirement activities supporting continued Permit compliance are summarized in

⁸ iMap link: <https://www.skagitcounty.net/Maps/iMap/?mapid=27c3f114b86f442fa8893f568283a691>.



Table 6-2. 2026 MS4 Mapping and Documentation Work Plan



Table 6-2. 2026 MS4 Mapping and Documentation Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
MAP-1	Transition stormwater asset data from GEOSkagit to Confirm asset management system, integrating mapping, inspections, and maintenance records.	NRD	GIS, Engineering	Ongoing.
MAP-2	Submit locations of all known MS4 outfalls, including size and material where known, using standard templates and format provided in the Annual Report.	NRD	GIS	Ongoing, due March 31 annually.
MAP-3	Using available, existing data, map tree canopy on permittee-owned or operated properties to support stormwater management.	NRD	GIS	No later than, December 31, 2026
MAP-4	Develop a methodology to identify tree canopy for stormwater management and update it annually.	NRD	GIS	Due December 31, 2026, and update it annually thereafter.
MAP-5	Implement a methodology to map and assess acreage of MS4 tributary basins to larger outfalls (24-inch nominal diameter or larger) that have County-owned/operated stormwater treatment and flow control BMPs/facilities.	NRD	GIS	March 31, 2028.
MAP-6	Submit a map(s) (.pdf) and table (.xlsx) breaking down estimated acres managed or unmanaged by these facilities.	NRD	GIS	March 31, 2028.
MAP-7	Adopt and implement tree canopy goals that enhance stormwater management and improve water quality, including maintaining or increasing canopy cover (especially in overburdened communities) and prioritizing the preservation of mature trees. Establish a long-term (5-, 10-year, or longer) goal of canopy, existing or future projection, to be used for stormwater management that is appropriate to the jurisdiction.	NRD	GIS	No later than December 31, 2028.



Section 7

Illicit Discharge Detection and Elimination

As Specified in the Phase II Permit (S5.C.5)

This section provides a description of the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE), including descriptions of County's current and planned activities for 2026 under the Permit.

The goal of the IDDE program is to prohibit, prevent, detect, characterize, trace, and eliminate illicit discharges and illicit connections to the MS4. An illicit discharge is anything that enters the MS4 that is not clean rainwater, with limited exceptions for allowable non-stormwater discharges identified in the Permit. Common examples include septic seepage in roadside ditches, wash water from home improvement projects, and materials such as soaps, paint, cooking grease, auto fluids, pesticides, and fertilizers. An illicit connection is any unauthorized pipe, hose, or other feature that connects a waste source to the MS4.



Figure 7-1. Car oil is illicit discharge and is not permitted to flow down storm drains.

7.1 Permit Requirements

The IDDE section in the permit requires the County to implement a program that uses policies and strategies as water quality management tools to protect receiving waters as follows.



Table 7-1. IDDE Requirements (Permit Condition S5.C.5)

Category	Description and Performance Measures	Key Deadlines/Notes
Legal Authority	Implement an ordinance to effectively prohibit non-stormwater, illicit discharges. Must include escalating enforcement procedures.	Update by July 1, 2027.
Allowable Discharges	Categorize and allow specific non-polluting discharges like diverted stream flows, springs, and foundation drains.	Ongoing.
Conditionally Allowable	Allow discharges like swimming pool water or building washdown only if dechlorinated or assessed for polychlorinated biphenyls (PCBs) (for buildings built 1950–1980).	Assessment required prior to washdown.
Detection and Field Screening	Implement a field screening methodology to detect illicit connections. Publicize a hotline for reporting spills.	Screen an average of 12% of the MS4 annually.
Investigation Timelines	Respond to threats to health/environment immediately. Investigate complaints/reports within 7 days on average.	Ongoing.
Connection Elimination	Initiate investigation of suspected illicit connections within 21 days; eliminate confirmed connections within 6 months.	Ongoing.
PFAS/AFFF Coordination	Coordinate with fire departments regarding per- and polyfluoroalkyl substances (PFAS)-containing aqueous film-forming foam (AFFF) used for firefighting and update clean-up procedures to prevent MS4 discharge.	Coordination by December 31, 2026; procedures by January 1, 2027.
Staff Training	Train field staff on identification and reporting. Train IDDE staff on investigation and enforcement.	Ongoing.
Recordkeeping and Reporting	Maintain records of all IDDE activities and submit data for all investigated incidents using the format described in Appendix 13 of the Permit.	With each Annual Report.

7.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **IDDE field screening:** The County is actively detecting illicit discharges and illicit connections through systematic field screening, inspections, public reporting, and staff awareness as follows:
 - Conduct annual field screening of at least 12 percent of the MS4 area following the IDDE manual and maintain a public reporting hotline and online reporting form.
 - Train staff across departments to recognize and report illicit discharges.



- Completed a 2025 inventory of County-owned buildings potentially containing polychlorinated biphenyls (PCBs) to support source control planning.
- **IDDE response and enforcement:** County responds to illicit discharges and spills using established procedures, timelines, and enforcement tools to protect public health and the environment as follows:
 - Follow the spill-response procedures in the 2023 Road Shop SWPPP. Meet required response timelines for immediate threats, 7-day investigations, 21-day illicit connection investigations, and 6-month elimination deadlines. Use SCC 16.32 and 14.44 for enforcement, when necessary.
 - Coordinate with 19 volunteer fire districts to confirm discontinuation of per- and polyfluoroalkyl substances (PFAS)-containing aqueous film-forming foam (AFFF).
 - Update post-emergency cleanup procedures to reduce MS4 impacts.
- **Staff training for IDDE:** The County is providing ongoing IDDE training to staff across multiple departments (Public Works, Planning, Public Health, and Facilities staff) to ensure consistent detection, reporting, and response. In addition, this also includes:
 - Maintaining an in-house online IDDE training module with local examples and County procedures.
 - Provide onboarding training and 3-year refreshers for applicable positions.
 - Provide additional certifications and training (Certified Erosion and Sediment Control Lead [CESCL], Hazardous Waste and Emergency Response [HAZWOPER], Regional Roadside Maintenance Program [RRMP] ESA 4(d), Illicit Connection/Illicit Detection [IC/ID] screening, spill response, stormwater chemistry, LID, CBSM) and maintain records of training content, schedules, and participation.
- **IDDE recordkeeping and system modernization:** The County is documenting all IDDE activities and preparing to transition recordkeeping to the Confirm asset management system to improve tracking and compliance. This includes IDDE field activities, investigations, and enforcement records from NPDESPro and GEOSkagit slated to transition to the Confirm platform beginning in summer 2026.

7.3 Planned 2026 Compliance Activities

Planned 2026 IDDE Requirement activities supporting continued Permit compliance are summarized in



Table 7-2. 2026 IDDE Work Plan



Table 7-2. 2026 IDDE Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
IDDE-1	Continue annual field screening of at least 12% of the MS4 area following updated 2024–2029 Permit requirements.	NRD	GIS	Ongoing, annual reporting.
IDDE-2	Implement PCB-related source control planning based on the 2025 County-owned building inventory.	NRD	Facilities Management	2026 implementation.
IDDE-3	Update post-emergency cleanup procedures to minimize MS4 discharges and incorporate PFAS-related considerations.	NRD	Emergency Management, Fire District	No later than December 31, 2026.
IDDE-4	Deliver required IDDE training, including onboarding and refresher modules, through the County’s HR learning management system.	NRD	PDS, Facilities Management	Ongoing.
IDDE-5	Maintain complete IDDE documentation and prepare Annual Report summaries consistent with Appendix 13 of the Permit.	NRD	GIS	Ongoing, annual reporting.



Section 8

Controlling Runoff from New Development, Redevelopment, and Construction Sites

As Specified in the Phase II Permit (S5.C.6)

The Permit requires the County to implement and enforce a regulatory mechanism that controls stormwater runoff from new development, redevelopment, and construction activities. This requirement applies to both private and public development projects, including roads built within new developments as well as County-led road construction projects.

8.1 Permit Requirements

The Permit requires the County to implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities, which includes the efforts summarized in Table 8-1.

Table 8-1. Controlling Runoff from New Development, Redevelopment, and Construction Site Requirements (Permit Condition S5.C.6)

Category	Description and Performance Measures	Key Deadlines/Notes
Regulatory Mechanism	Adopt an ordinance or enforceable mechanism that includes the Minimum Requirements, thresholds, and definitions in Appendix 1 of the Permit (or an Ecology-approved equivalent). It must include BMP selection, design, and infeasibility criteria.	June 30, 2027.
Site Plan Review	Review all stormwater site plans for proposed development activities using qualified personnel.	Ongoing.
Pre-Construction Inspections	Inspect all permitted development sites with a high potential for sediment transport (as determined by Appendix 7 of the Permit) prior to clearing and construction.	Ongoing.



Table 8-1. Controlling Runoff from New Development, Redevelopment, and Construction Site Requirements (Permit Condition S5.C.6)

Category	Description and Performance Measures	Key Deadlines/Notes
Construction Phase Inspections	Inspect all permitted sites during construction to verify the installation and maintenance of erosion and sediment controls. Achieve at least an 80% annual inspection rate.	Ongoing.
Residential Development Maintenance	Inspect BMPs and catch basins in new residential developments twice every 12 months until 90% of lots are constructed or the site is fully stabilized.	Ongoing.
Post-Construction Inspections	Inspect all permitted sites upon completion and prior to final approval/occupancy to ensure permanent facilities are properly installed and maintenance responsibility is assigned.	Ongoing.
Enforcement and Recordkeeping	Implement an enforcement strategy to respond to non-compliance. Maintain detailed records of all inspections, warning letters, and enforcement actions.	Ongoing.
Information Availability	Make links available to Ecology's online NOIs for Construction and Industrial Stormwater General Permits and UIC registration.	Ongoing.
Staff Training	Train all staff responsible for plan review, inspections, and enforcement. Document all training provided and staff trained.	Ongoing.

8.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **Regulatory mechanism updates:** The County maintains and updates its stormwater regulatory framework to meet current Permit requirements as follows:
 - Skagit County Code 14.32 was updated in 2022 to meet the prior Permit's Appendix 1 requirements.
 - The County is preparing additional updates to SCC 14.32 to meet the 2024–2029 Permit, with adoption required by June 30, 2027. Coordination is underway between NRD, PDS, and Engineering.
 - Staff document how site-planning, BMP selection, LID criteria, and BMP limitations meet water-quality protection, MEP, and AKART requirements.
- **Plan review, inspections, and enforcement:** The County continues to implement a comprehensive permitting, inspection, and enforcement program to ensure that public



and private development projects meet stormwater requirements along with the following:

- Staff review stormwater plans prior to permit issuance, conduct inspections before and during construction to verify erosion and sediment controls, and inspect stormwater facilities at project completion to confirm proper installation and maintenance responsibility.
- New residential developments receive twice-annual inspections of stormwater BMPs until 90 percent of lots are built.
- The County maintains records demonstrating compliance with the requirement to complete at least 80 percent of inspections annually and uses education and technical assistance as the primary response to non-compliance, with enforcement available under SCC 14.44 when necessary.
- **Coordination with other stormwater permits:** The County coordinates with Ecology’s Construction and Industrial Stormwater General Permit programs to ensure applicants understand their obligations under state and federal regulations along with the following:
 - Staff provide information on Notice of Intent (NOI) requirements and Underground Injection Control (UIC) well registration, and the County maintains up-to-date links and guidance on its stormwater permitting webpage.
 - Local stormwater ordinances continue to be enforced even when sites are also covered by Ecology-issued permits, and the County collaborates with secondary Permittees and partner agencies as appropriate.
- **Staff training for development and construction:** The County maintains a robust training program to ensure staff are equipped to implement stormwater requirements for development and construction activities, along with the following:
 - Staff whose work involves erosion and sediment control maintain CESCL certifications, supported by the County’s in-house Ecology-approved CESCL training program.
 - Additional training is provided on IDDE, spill response, drainage standards, and related topics through internal and external sources.
 - All training activities are documented and summarized annually to demonstrate compliance and support continuous improvement.

8.3 Planned 2026 Compliance Activities

Planned 2026 Controlling Runoff from New Development, Redevelopment, and Construction Site Requirement activities supporting continued Permit compliance are summarized in



Table 8-2. 2026 Controlling Runoff from New Development, Redevelopment, and
Construction Site Requirements Work Plan



Table 8-2. 2026 Controlling Runoff from New Development, Redevelopment, and Construction Site Requirements Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
CTRL-1	Begin formal update of SCC 14.32 to meet 2024-2029 Permit Appendix 1 requirements, including coordination across NRD, PDS, and Engineering.	NRD	PDS, Engineering	Work underway in 2026; adoption required by June 30, 2027.
CTRL-2	Continue implementation of plan review, construction inspections, and enforcement to meet the 80% annual inspection requirement.	PDS	Engineering, NRD	Ongoing.
CTRL-3	Maintain coordination with Ecology's Construction and Industrial Stormwater General Permit programs and update public resources as needed.	PDS	Engineering	Ongoing.
CTRL-4	Deliver CESCL, IDDE, spill-response, and drainage-standards training through the County's in-house and external programs.	NRD	PDS, Operations	Ongoing.
CTRL-5	Document how SCC 14.32 criteria meet MEP and AKART requirements and prepare required documentation for Permit compliance.	NRD	PDS	Ongoing.
CTRL-6	Maintain inspection and enforcement records for Annual Report compliance under S5.C.6.c.	NRD	PDS	Ongoing, annual reporting.



Section 9

Stormwater Management for Existing Development

As Specified in the Phase II Permit (S5.C.7)

The Permit requires the County to implement Stormwater Management for Existing Development (SMED) program to control or reduce stormwater discharges from established areas. This program focuses on strategic stormwater investments over longer planning timeframes.

9.1 Permit Requirements

The Permit requires the County to implement a SMED program with the following components shown in Table 9-1.

Table 9-1. SMED Requirements (Permit Condition S5.C.7)		
Category	Description and Performance Measures	Key Deadlines/Notes
Implementation Goal	Implement stormwater facility retrofits or tailored SWMP actions (per Appendix 12 criteria) to reduce discharges from existing development.	Ongoing.
Project Identification	Identify investments through SMAPs or "opportunistic" investments leveraged from other infrastructure projects.	Coordinate planning with S5.C.1.D Stormwater Planning requirement.
Project List Reporting	Provide a list of planned individual projects scheduled for the current permit term to meet assigned equivalent acreage goals.	Annual reporting using Appendix 12 .xlsx format.
Acreage Target Compliance	Fully fund, start construction, or completely implement projects that meet the assigned equivalent acreage specified in Appendix 12.	Documentation due with the March 31, 2028, Annual Report.
Retrofit Credits	Projects starting on or after January 1, 2023, count toward targets. Excess acreage implemented may be credited toward the next permit term (up to 50% of that term's requirement).	Applies to completely implemented projects only.
Equity and Tribal Benefits	Report which projects provide benefits to Tribal communities or overburdened communities, including vulnerable and highly impacted populations.	Ongoing reporting requirement.



Table 9-1. SMED Requirements (Permit Condition S5.C.7)

Category	Description and Performance Measures	Key Deadlines/Notes
Regional Collaboration	Permittees may collaborate to meet a collective regional goal (the sum of partners' assigned acreage).	Must manage at least 0.5 equivalent acres within your own jurisdiction.
Future Projections	Submit a report estimating the equivalent acres projected to be managed during the next permit term (2029–2032).	Submittal due March 31, 2028.

9.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- Stormwater facility retrofits:** The County is actively planning and implementing stormwater facility retrofits and other tailored SWMP actions that meet Appendix 12 criteria. These retrofits are guided by priorities identified in the County's SMAPs, which highlight strategic opportunities to improve stormwater management in areas of existing development. The County also evaluates opportunities to incorporate retrofit elements into other capital or maintenance projects when doing so can enhance water-quality outcomes.
- SMED project planning and implementation:** The County is identifying, tracking, and preparing SMED projects to meet its assigned requirement of 1.8 equivalent acres. The County's current SMED project, a retrofit of the stormwater treatment vault at the Skagit County Transfer Station, will install a Clear Water Treatment Train to improve pollutant removal effectiveness. The project is in design, with construction scheduled for summer 2026, and is expected to fulfill the County's SMED obligation.

Future SMED opportunities will be informed by the Big Lake East Catchment SMAP and the Eastern Padilla Bay Watershed Surface Water Management Plan as those planning efforts advance.
- Regional collaboration (S5.C.7.d):** The Permit allows jurisdictions to meet a portion of their SMED obligations through regional projects outside the MS4 permit area, provided they meet Appendix 12 criteria. For the 2024–2029 permit cycle, the County does not plan to pursue regional collaboration and intends to meet its full 1.8-acre SMED requirement through projects within its own jurisdiction.

9.3 Planned 2026 Compliance Activities

Planned 2026 SMED program requirement activities supporting continued Permit compliance are summarized in



Table 9-2. 2026 SMED Requirements Work Plan



Table 9-2. 2026 SMED Requirements Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
SMED-1	Advance design and preparation for the Transfer Station stormwater treatment vault retrofit (Clear Water Treatment Train) as the County's primary SMED project.	Solid Waste	Engineering, Operations, NRD	Construction begins summer 2026.
SMED-2	Continue annual identification and tracking of SMED projects to ensure progress toward the 1.8-acre requirement.	NRD	PDS	Ongoing.
SMED-3	Integrate SMAP-identified retrofit opportunities into capital and maintenance project planning.	NRD	Engineering, Operations	Ongoing.
SMED-4	Use the Big Lake East Catchment SMAP and Eastern Padilla Bay Plan to refine and prioritize future SMED opportunities.	NRD	PDS	Ongoing.
SMED-5	Confirm that SMED implementation remains on track to meet the March 31, 2028, funding/implementation deadline.	NRD	Solid Waste, Finance, Engineering	March 31, 2028.
SMED-6	Maintain documentation demonstrating that the County is meeting SMED requirements without regional collaboration.	NRD	Engineering	Ongoing, annual reporting.



Section 10

Source Control Program for Existing Development

As Specified in the Phase II Permit (S5.C.8)

The Permit requires the County to implement a Source Control Program for Existing Development. This program is designed to prevent and reduce pollutants in runoff from established areas through the application of BMPs, inspections, and enforcement.

10.1 Permit Requirements

The Permit requires the County to implement a Source Control Program for Existing Development with the components summarized in Table 10-1.

Table 10-1. Source Control Program for Existing Development Requirements (Permit Condition S5.C.8)

Category	Description and Performance Measures	Key Deadlines/Notes
Regulatory Mechanism	Enforce an ordinance or enforceable document requiring source control BMPs for pollutant-generating sources (based on Appendix 8 of the Permit). Must require operational BMPs for all sources and structural BMPs if operational ones are inadequate.	Update by August 1, 2027.
Inventory Establishment	Maintain an inventory of publicly and privately owned institutional, commercial, and industrial sites with potential to generate pollutants. Must include sites from Appendix 8 and others identified through complaints (e.g., home-based businesses).	Update inventory every 5 years.
Site Information	Provide information about pollutant-generating activities and applicable source control requirements to all identified sites with a business address.	Ongoing.
Inspection Program	Conduct inspections to assess BMP effectiveness: <ul style="list-style-type: none">• Annual rate: Equal to 20% of businesses/sites in the inventory.• Complaints: Inspect 100% of sites identified through credible complaints.	Ongoing.



Table 10-1. Source Control Program for Existing Development Requirements (Permit Condition S5.C.8)

Category	Description and Performance Measures	Key Deadlines/Notes
Progressive Enforcement	Implement a policy for sites failing to implement BMPs, starting with follow-up actions (e.g., phone calls, letters) and escalating to formal enforcement actions or judicial system involvement.	Ongoing.
Staff Training	Train staff responsible for the program on legal authority, source control BMPs, inspection protocols, and enforcement procedures. Maintain training records.	Ongoing.
Recordkeeping	Maintain records of every site visit, inspection report, warning letter, and enforcement action. Track sites where entry is denied.	Ongoing, annual reporting.

10.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- **Source control ordinances:** The County updated source control ordinance in 2022, SCC 16.32, to require operational and structural source control BMPs for pollutant-generating activities consistent with the SWMMWW. The ordinance applies to all public and private institutional, commercial, and industrial sites with the potential to discharge pollutants to the MS4. County staff emphasize education and technical assistance as the primary means of achieving compliance, using formal enforcement under SCC 14.44 only when necessary.
- **Inventory of potential pollutant generators:** The County maintains an inventory of institutional, commercial, and industrial sites within the permit area that have the potential to discharge pollutants to the MS4. The inventory, developed using Appendix 8 criteria and local data sources, currently includes 176 sites (as of 2025). The County updates this inventory at least once every 5 years to ensure it remains accurate and complete.
- **Regional source control inspection program:** The County operates a regional source control inspection program, launched in January 2023, through interlocal agreements with Burlington, Mount Vernon, and Sedro-Woolley. Under this program, the County conducts inspections within all four jurisdictions while each city maintains its own inventory and enforcement authority. This coordinated approach improves efficiency, ensures consistent messaging, and builds on relationships established through the Pollution Prevention Partnership. In 2025, the program met or exceeded the Permit's requirement to inspect at least 20 percent of inventoried sites annually.



- **Source control enforcement policy:** The County implements a progressive enforcement policy under SCC 14.44 to ensure timely compliance with source control requirements. Staff begin with education, follow-up calls, reminder letters, and return visits, escalating to formal enforcement only when necessary. Records are maintained for all inspections, warnings, notices of violation, and cases where access is denied. Non-emergency violations may be referred to Ecology when progressive enforcement has been documented.
- **Staff training for source control program:** Staff responsible for implementing the source control program receive ongoing training on inspection procedures, BMP application, enforcement protocols, and program updates. Training also covers changes in requirements, new techniques, and staff transitions. The SWMP documents and maintains records of all training activities to demonstrate compliance.

10.3 Planned 2026 Compliance Activities

Planned 2026 Source Control Program for Existing Development requirement activities supporting continued Permit compliance are summarized in Table 10-2.

Table 10-2. 2026 Source Control Program for Existing Development Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
CTRL-EX-1	Continue implementation of SCC 16.32, ensuring operational and structural BMP requirements are applied consistently across all pollutant-generating sites.	NRD	PDS	Ongoing.
CTRL-EX-2	Update and maintain the inventory of potential pollutant-generating sites, ensuring accuracy for the next 5-year update cycle.	NRD	PDS, GIS	Ongoing.
CTRL-EX-3	Conduct regional source control inspections to meet or exceed the 20% annual inspection requirement across all four jurisdictions.	NRD	Burlington, Mount Vernon, Sedro-Wooley	Ongoing, annual reporting.
CTRL-EX-4	Implement progressive enforcement actions under SCC 14.44 for sites failing to implement required BMPs, including documentation of all enforcement steps.	NRD	PDS, Legal	Ongoing.



Table 10-2. 2026 Source Control Program for Existing Development Work Plan				
Task ID	Task Description	Lead	Support	Compliance Time Frame
CTRL-EX-5	Provide ongoing training for staff conducting source control inspections, including updates to BMPs, protocols, and enforcement procedures.	NRD	PDS, Public Health	Ongoing.
CTRL-EX-6	Maintain complete inspection, enforcement, and training records for inclusion in the Annual Report.	NRD	GIS, PDS	Ongoing, annual reporting.



Section 11

Municipal Operations and Maintenance

As Specified in the Phase II Permit (S5.C.9)

The Permit requires the County to mandate an Operations and Maintenance (O&M) program to regulate and conduct activities that prevent or reduce stormwater impacts from both municipal and regulated private infrastructure. The County's O&M program aims to prevent and reduce pollutant runoff from municipal operations and to ensure that stormwater facilities owned or regulated by the County are properly maintained and functioning.

11.1 Permit Requirements

The Permit requires the County to implement an O&M program with the components summarized in Table 11-1.

Table 11-1. O&M Requirements (Permit Condition S5.C.7)		
Category	Description and Performance Measures	Key Deadlines/Notes
Maintenance Standards	Implement standards at least as protective as the SWMMWW. Maintenance is required when these standards are exceeded.	Update by June 30, 2027.
Maintenance Timelines	Once an exceedance is identified, perform maintenance within: <ul style="list-style-type: none">• 6 months for catch basins• 1 year for typical facilities• 2 years for capital construction <\$25,000	Ongoing (once standards are adopted).
Private Facility Maintenance	Verify long-term O&M of private facilities (permitted under S5.C.6.c) through an enforceable mechanism and annual inspections.	Achieve 80% inspection rate annually.
Municipal Facility Maintenance	Conduct annual inspections of all County-owned treatment and flow control BMPs. Perform spot checks after major storm events (10-year/24-hour).	Achieve 95% inspection rate annually.
Catch Basin Inspections	Inspect all County-owned catch basins and inlets. Clean them if the inspection indicates it is needed.	By December 31, 2025, and every 2 years thereafter.



Table 11-1. O&M Requirements (Permit Condition S5.C.7)

Category	Description and Performance Measures	Key Deadlines/Notes
Municipal Lands & Road Activities	Document and implement practices to reduce impacts from runoff on all County-owned lands (e.g., parks, streets, maintenance yards) and road activities.	No later than December 31, 2027.
PCB/Building Maintenance	Assess Permittee-owned buildings (built/renovated 1950–1980) for PCBs before washdown. Prohibit discharge to MS4 if PCBs are confirmed/suspected.	Prior to building washdown, renovation, or demolition.
Street Sweeping Program	Implement a sweeping program for priority areas (high-traffic, commercial, or industrial streets).	Implement by July 1, 2027.
SWPPP for Municipal Yards	Implement a SWPPP for all heavy equipment maintenance/storage yards and material storage facilities.	Includes annual inspections and visual discharge observations.
Staff Training	Provide an ongoing training program for employees whose primary job functions (e.g., construction, ops, maintenance) may impact water quality.	Ongoing; document dates and staff in attendance.

11.2 Current Planning Activities

The County currently implements the following activities and programs to address the associated Permit requirements as follows:

- Maintenance standards:** The County maintains stormwater facility maintenance standards that meet or exceed those in the SWMMWW. These standards define the thresholds that trigger maintenance and establish required timelines for completing work, including 6 months for catch basins, 1 year for most stormwater facilities, and 2 years for maintenance requiring small capital construction. The County documents any delays due to access issues, permitting constraints, or emergency staff reassignments and is preparing to update its maintenance standards to reflect the 2024 SWMMWW by June 30, 2027.





Figure 11-1. A County crew cleans out a catch basin at the Skagit County Transfer Station.

- **Transition to Confirm asset management system:** The County is preparing to transition from its in-house GEOSkagit platform to the Confirm asset management system to modernize and streamline how stormwater infrastructure data are recorded, accessed, and managed across departments. The new platform will:
 - Integrate mapping, inspections, work orders, and maintenance history into a single system.
 - Improve cross-department access to stormwater infrastructure information.
 - Enhance operations and maintenance responsiveness, budget tracking, and documentation.
 - Strengthen compliance with permit-required mapping and recordkeeping standards.
- **Maintenance of regulated stormwater treatment and flow control facilities:** The County continues to implement its Private Stormwater Facility Inspection Program, which ensures that:
 - Stormwater treatment and flow control facilities permitted under S5.C.6.c are maintained according to adopted standards.
 - Staff conduct annual inspections of municipally owned or operated facilities, provide education and technical assistance to responsible parties, and use SCC 14.32 and SCC 14.44 to ensure compliance when maintenance or inspection requirements are not met.
 - Records are maintained digitally and through Excel-based documentation, supported by a reference list of qualified stormwater service providers.
- **Annual inspections of treatment and flow control facilities:** The County inspects all stormwater treatment and flow control BMPs and facilities that discharge to the MS4 and were permitted under current or previous permits. Staff inspect at least 80 percent



of these facilities annually and maintain comprehensive records of inspections, maintenance activities, and enforcement actions.

- **Maintenance of County-owned stormwater facilities:** The County conducts annual inspections of all County-owned or operated stormwater treatment and flow control facilities and maintains them according to adopted standards. After major storm events, staff perform spot checks to confirm facility function and identify damage. All MS4 catch basins and inlets were inspected by December 31, 2025, and are now on a 2-year inspection and cleaning cycle. Compliance with these requirements is demonstrated by maintaining an inspection program that achieves at least 95 percent of required inspections annually.
- **Reducing stormwater impacts from County lands and road maintenance:** The County maintains roads, rights-of-way, buildings, parks, and other County-owned lands using documented practices designed to minimize stormwater impacts. Activities include ditch and culvert maintenance, street cleaning, pavement repair, snow and ice control, vegetation management, erosion control, and proper handling of fertilizers, pesticides, and waste.

The County also participates in the RRMP, implementing BMPs approved by NOAA NMFS as AKART for protecting ESA-listed species. Staff follow RRMP guidelines, complete required training, document BMP use, and participate in quarterly meetings. A new mobile-friendly RRMP BMP guide supports field implementation.

- **Street sweeping program:** The County operates a municipal street sweeping program that provides routine and as-needed sweeping within the permit area. Priority areas are swept at least once between July and September and at least twice more each year. Sweeper equipment is maintained according to manufacturer specifications, waste is disposed of per Appendix 6 of the Permit, and all sweeping activities are documented and reported annually.
- **SWPPPs:** The County implements SWPPPs for the Burlington Road Shop and the Skagit County Transfer Station, updating them as needed to remain consistent with the SWMMWW and Permit requirements. Each SWPPP includes facility descriptions, BMPs, annual inspections, seasonal spot checks, inventories of pollutant-generating materials, site maps, and spill-response procedures. The County maintains records of all SWPPP inspections, maintenance, and repairs and will update the Road Shop SWPPP in 2026.
- **Training:** The County maintains a comprehensive training program for staff in Public Works, Parks and Recreation, and Facilities Management whose work may affect stormwater quality. Training topics include CESCL certification, IDDE, RRMP BMPs, SWMMWW maintenance standards, SWPPP implementation, spill response, and street sweeper operation. Refresher training is provided as needed, and all training activities are documented.



11.3 Planned 2026 Compliance Activities

Planned 2026 Source Control Program for O&M requirement activities supporting continued Permit compliance are summarized in Table 11-2.

Table 11-2. 2026 O&M Work Plan				
Task ID	Task Description	Lead	Support	Compliance Time Frame
O&M-1	Begin updating County maintenance standards to align with the 2024 SWMMWW.	NRD	Engineering, Operations	Work underway in 2026; adoption by June 30, 2027.
O&M-2	Transition stormwater asset data from GEOSkagit to Confirm asset management system, integrating mapping, inspections, and maintenance records.	NRD	GIS, Engineering	Ongoing.
O&M-3	Conduct annual inspections of at least 80% of stormwater treatment and flow control facilities regulated under S5.C.6.c.	NRD	PDS, GIS, Operations	Ongoing, annual reporting.
O&M-4	Conduct annual inspections of County owned stormwater facilities and maintain 95% inspection completion.	NRD	Stormwater, GIS, Operations	Ongoing, annual reporting.
O&M-5	Perform spot checks after major storm events and complete follow up inspections where needed.	NRD	Operations	Ongoing, annual reporting.
O&M-6	Continue 2-year inspection and cleaning cycle for all MS4 catch basins and inlets.	NRD, Operations	Operations	Ongoing, annual reporting.
O&M-7	Implement RRMP BMPs, complete required RRMP training, and document BMP use at job sites.	NRD, Operations	Parks, Facilities	Ongoing, annual reporting.
O&M-8	Operate the street sweeping program to meet Permit frequency, equipment, disposal, and documentation requirements.	NRD, Operations	Operations	Ongoing, annual reporting.



Table 11-2. 2026 O&M Work Plan

Task ID	Task Description	Lead	Support	Compliance Time Frame
O&M-9	Update the Burlington Road Shop SWPPP and continue implementation of both facility SWPPPs.	NRD, Operations	Facilities, Operations	Ongoing, annual reporting.
O&M-10	Provide required training for staff on CESCL, IDDE, RRMP BMPs, SWPPP implementation, and spill response.	NRD, Operations	HR, Parks, Facilities	Ongoing, annual reporting.
O&M-11	Maintain complete inspection, maintenance, enforcement, and training records for Annual Report compliance.	NRD, Operations	GIS, Operations	Ongoing, annual reporting.



Section 12

Compliance with Total Maximum Daily Load Requirements

As Specified in the Phase II Permit (S7)

Skagit County implements all applicable Total Maximum Daily Load (TMDL) requirements for stormwater discharges covered under the 2024–2029 Western Washington Phase II Municipal Stormwater Permit.

12.1 Background and TMDL Context

A TMDL establishes the maximum amount of a pollutant that can enter a waterbody while still meeting state water-quality standards. Within the County’s NPDES Permit coverage area, the primary TMDL driver is the Padilla Bay Freshwater Tributaries Fecal Coliform Bacteria TMDL published in December 2020. This TMDL addresses elevated fecal coliform levels in tributaries that currently do not meet Washington’s bacteria criteria or support designated beneficial uses such as recreation and downstream shellfish harvesting.

Because Skagit County is predominantly rural, bacteria sources are diverse and diffuse, originating from livestock, hobby farms, onsite septic systems, pets, wildlife, and other land uses. The County’s stormwater-related responsibilities focus on preventing and reducing bacterial pollution from developed areas and County-owned stormwater facilities, while also supporting watershed-scale cleanup efforts and collaborating with landowners and regional partners.

12.2 Permit-Required Program Elements Supporting TMDL Implementation

Ecology identifies stormwater-related TMDL requirements for Phase II Permittees in Appendix 2 of the Permit. County meets these requirements through the following program elements:

- Source Control Program for Existing Development
- Public Education and Outreach program
- O&M, including park and public-land management
- IDDE program
- Ambient monitoring and PIC activities under the Clean Water Program



Together, these programs reduce pollutant discharges from the MS4, address persistent bacteria problems identified through monitoring and PIC work, support attainment of TMDL load allocations, and guide adaptive management.

12.3 Business Inspections and Source Control

Under the Padilla Bay TMDL, the County evaluates and improves pollution-prevention practices at businesses with potential bacterial sources, such as animal-handling operations and composting facilities. TMDL considerations are fully integrated into the Skagit Regional Source Control Inspection Program, which uses standardized inspection checklists, educational materials emphasizing BMPs for process water, manure handling, and waste management, and referrals to Clean Water Program resources. In addition, the County has identified a composting facility, an animal-processing site, and an industrial facility.

These sites are inspected on a recurring schedule, with follow-up inspections and progressive enforcement applied as needed. Inspection findings support TMDL tracking, PIC source-identification priorities, and annual permit reporting.

12.4 Public Education and Outreach Supporting TMDLs

The County's Public Education and Outreach program supports the Padilla Bay TMDL by raising awareness about bacterial pollution sources and promoting behaviors that reduce fecal coliform loading to local waterways. Working closely with the Skagit Conservation District, local jurisdictions, and the Clean Water Program, the County participates in a CBSM pet-waste campaign that targets trails, natural areas, and backyards where runoff can carry waste into Padilla Bay tributaries. Outreach includes coordinated messaging, in-person engagement, and partnerships with trusted messengers such as veterinarians and dog trainers. Campaign effectiveness is evaluated through surveys, waste counts, pledges, and digital engagement metrics, which help guide adaptive management and refine future outreach strategies.

12.5 Operations, Maintenance, and Park Management

To reduce bacteria loading from County-owned lands, the County maintains pet waste stations, trash receptacles, and related infrastructure in parks and high-use public spaces where runoff may reach MS4 conveyances or surface waters. These facilities are serviced routinely as part of the County's broader operations and maintenance program.

Parks and Recreation and Road Operations staff continue to coordinate with the SWMP, Clean Water Program, and PIC partners to identify locations where additional pet-waste infrastructure, signage, or minor drainage improvements could further support TMDL goals and reduce bacteria contributions from public lands.



12.6 IDDE Screening, Ambient Monitoring, and TMDL Support

The County incorporates bacteria screening into its IDDE program, collecting samples during field screenings in drainage circuits that discharge to Padilla Bay tributaries. These efforts are guided by long-term trends from the Skagit County Monitoring Program (SCMP) and targeted PIC investigations. SCMP provides biweekly ambient monitoring at approximately 40 sites, documenting mixed trends in fecal-indicator bacteria across the County.

PIC monitoring adds storm and bracket sampling to pinpoint high-bacteria sources affecting shellfish beds and recreation areas. When monitoring or field observations indicate potential bacteria problems, the County initiates source tracing and corrective actions, including outreach, referrals to partner agencies, financial-assistance connections, or enforcement under County code. All sampling results and follow-up actions are documented in Annual Reports to Ecology and in Clean Water Program reporting.



Section 13

Monitoring and Assessment (S8)

As Specified in the Phase II Permit (S8)

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

13.1 Monitoring and Assessment (S8)

On October 15, 2019, the SWMP notified Ecology in writing that it will pay into the collective fund for trends monitoring, Stormwater Action Monitoring (SAM) effectiveness, and source identification studies for the duration of this Permit. The 2025 fiscal year payment of \$7,066 was paid on May 15, 2025.

On November 7, 2024, the SWMP notified Ecology in writing that it will pay into the collective fund for trends monitoring, SAM effectiveness, and source identification studies for the duration of this 2024-2029 Permit. The annual payments into the collective fund are due on August 15 each year beginning in 2025, in the amount listed in Appendix 11.

The County submits records of SWMP activities tracked and/or maintained in accordance with S5 and/or S9 in response to requests from the SAM Coordinator for information associated with effectiveness and source identification studies that are under active SAM contracts.



Appendix A: Other Permit Requirements



This attachment to the SWMP Plan identifies Permit requirements that are outside of the nine core elements of the SWMP Plan in Sections 2 through 10.

Obtaining Coverage under the Permit (S1.D)

The County, as required by the Permit, filed a Duty to Reapply – NOI for Coverage under NPDES Municipal Stormwater General Permit. The County will use AKART to prevent and control pollution of waters of the State of Washington. This overarching requirement to use AKART guides all actions in this SWMP Plan.

MS4 Compliance (S4.F)

Reporting Water Quality Standard Violations (S4.F.1)

The County policy regarding water quality violations is to notify Ecology in writing within 30 days of becoming aware of a violation based on credible site-specific information that a discharge from the MS4 owned or operated by the County is causing or contributing to a known or likely violation of water quality standards in the receiving water. The County provides written notification of each incident that includes identification of the source of the site-specific information, the nature and extent of the known or likely violation, and the reasons why the MS4 discharge is believed to be causing or contributing to the water quality problem. For ongoing or continuing violations, the County provides a single written notification to Ecology to fulfill this requirement.

Correcting Water Quality Violations by Using Permit Requirements or Adaptive Management (S4.F.2&3)

The County must correct any discharges from the MS4 that result in violations of water quality standards in a receiving water. Special Condition S4.F.2&3 describes the adaptive management process for correction.

TMDL Requirements (S7)

Stormwater discharges covered under the Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDLs. Applicable TMDLs are TMDLs which have been approved by the United States Environmental Protection Agency (EPA) before the issuance date of the permit, or which 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>.

Where a TMDL or detailed implementation plan developed for the TMDL identifies actions or activities beyond what is required by this permit, Ecology has identified the additional requirements in Appendix 2 of the permit for all TMDLs approved by EPA prior to issuance of this permit and any subsequent modifications.

Appendix 2 of the permit lists the cities and counties affected by one or more TMDLs.



Reporting (S9)

Annual Report Submittal (S9.A&D)

By March 31 each year (as of 2020), the County submits an annual report to Ecology including the following items:

- A copy of the County's current SWMP Plan as required by Special Condition S5.A.2.
- Submittal of the annual report form as provided by Ecology pursuant to Special Condition S9.A, describing the status of implementation of the requirements of this permit during the reporting period.
- Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of this permit during the reporting period. Refer to Appendix 3 of the Permit for annual report questions.
- Certification and signature pursuant to Special Condition G19.D, and notification of any changes to authorization pursuant to Special Condition G19.C.
- A notification of any annexations, incorporations, or jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of Permit coverage during the reporting period.

The County is in compliance with the Permit requirements in S9A&D.

Records Retention (S9.B)

The Permit requires that the County keep all records related to this Permit and the SWMP for at least 5 years. The County is in compliance with the Permit requirements in S9.B.

Public Access (S9.C)

The County will make all records related to the Permit and the SWMP available to the public during the Permit period. The County may require advanced notice for access to documents and charge a fee for printing copies of records.

Proper Operation and Maintenance (General Condition 2)

The County will always properly operate and maintain all facilities and systems of collection, treatment, and control (and related components) which are installed or used by the Permittee for pollution control to achieve compliance with the terms and conditions of this Permit.

Notification of Discharge, Including Spills (General Condition 3)

If the County has knowledge of a discharge, including spills, into or from a MS4 that could constitute a threat to human health, welfare, or the environment, the County will:

- Take appropriate action to correct or minimize the threat to human health, welfare and/or the environment.



- Notify the Ecology regional office and other appropriate spill response authorities immediately, but in no case later than within 24 hours of obtaining that knowledge.
- Immediately report spills or other discharges that might cause bacterial contamination of marine waters, such as discharges resulting from broken sewer lines and failing onsite septic systems, to the Ecology regional office and to the Washington State Department of Health, Shellfish Program.
- Immediately report spills or discharges of oils or hazardous substances to the Ecology regional office and to the Washington Emergency Management Division at 1-800-258-5990.

Bypass Prohibited (General Condition 4)

The County will not allow bypasses of stormwater from all or any portion of a stormwater treatment BMP when the design capacity of the treatment BMP is not exceeded unless the provisions of Permit General Condition 4 are met.

Right of Entry (General Condition 5)

The County will allow Ecology, or an authorized representative of Ecology (including an authorized contractor acting as a representative of Ecology), upon the presentation of credentials and such other documents as may be required by law to:

- Enter upon the Permittee's premises where a regulated facility or activity is located or where records shall be kept under the conditions of this Permit.
- Have access to, and copy at reasonable cost and at reasonable times, any records that shall be kept under the terms of the Permit.
- Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, operations regulated or required under this Permit.
- Sample or monitor at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

Duty to Mitigate (General Condition 6)

The County will take all reasonable steps to minimize any discharge in violation of this Permit, which has a reasonable likelihood of adversely affecting human health or the environment.

Monitoring and Sampling (General Condition 9)

All monitoring and sampling performed to comply with this Permit will meet the requirements specified in Permit General Condition G9.



Removed Substances – Proper Handling (General Condition 10)

Except for decant material from street waste vehicles, the County shall not allow collected screenings, grit, solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of stormwater to be resuspended or reintroduced to the MS4 or to waters of the state. Decant from street waste vehicles resulting from cleaning stormwater facilities may be reintroduced only when other practical means are not available and only in accordance with the Street Waste Disposal Guidelines in Permit Appendix 6. Solids generated from maintenance of the MS4 may be reclaimed, recycled, or reused when allowed by local codes and ordinances. Soils that are identified as contaminated pursuant to Chapter 173-350 WAC shall be disposed at a qualified solid waste disposal facility (see Permit Appendix 6).

Reporting a Cause for Modification or Revocation (General Condition 15)

The County will report to Ecology any actions taken or planned that would constitute cause for modification or revocation and re-issuance of the Permit.

Duty to Reapply (General Condition 18)

The County will apply for Permit renewal at least 180 days prior to the specified expiration date of this Permit.

Certification and Signature (General Condition 19)

All formal submittals to Ecology shall be signed and certified in accordance with Permit General Condition G9.

Non-Compliance Notification (General Condition 20)

In the event the County is unable to comply with any of the terms and conditions of this Permit, the County will:

- Notify Ecology of the failure to comply with the permit terms and conditions in writing within 30 days of becoming aware that the non-compliance has occurred. The written notification shall include all of the following:
 - a. A description of the non-compliance, including dates
 - b. Beginning and end dates of the non-compliance and, if the compliance has not been corrected, the anticipated date of correction
 - c. Steps taken or planned to reduce, eliminate, or prevent reoccurrence of the non-compliance
- Take appropriate action to stop or correct the condition of non-compliance.

