

*This SWMP is an attachment to the City's 2017 Annual Report to the Department of Ecology for its
Phase II NPDES Permit*

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*In compliance with the provisions of
The State of Washington Water Pollution Control Law Chapter 90.48 Revised Code of
Washington*

and

*The Federal Water Pollution Control Act (The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.*

Stormwater Management Program Plan 2018 for

City of Kelso

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Abbreviation and Acronyms

AKART	All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment
BMP	Best Management Practice
CESCL	Certified Erosion and Sediment Control Lead
City / Kelso	City of Kelso
Ecology	Washington State Department of Ecology
IDDE	Illicit Discharge Detection and Elimination
KEDM	Kelso Engineering Design Manual
KMC	Kelso Municipal Code
KSAC	Kelso Stormwater Advisory Committee
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
Permit	Phase II Western Washington NPDES Municipal Stormwater Permit
SIDIR	Source Identification Information Repository
SWMMWW	Stormwater Management Manual for Western Washington
SWMP	Stormwater Management Program Plan
SWPPP	Stormwater Pollution Prevention Plan

CITY OF KELSO STORMWATER MANAGEMENT PROGRAM 2018

I. INTRODUCTION

I.1 Overview and Background

The City of Kelso (City) operates a municipal separate storm sewer system (MS4) which collects and conveys stormwater runoff from developed areas of the City to surface waters. Discharge of runoff from the MS4 is regulated by the Washington State Department of Ecology (Ecology), and the City is required to obtain a permit to operate the system.

The Western Washington Phase II Municipal Stormwater Permit (Permit) outlines stormwater program activities and implementation milestones that the City must follow to comply with federal Clean Water Act. As a general Permit, it applies to more than 80 MS4s in western Washington. Each Phase II community is required to develop a Stormwater Management Program Plan (SWMP) that includes a description of the required activities, implement those activities within the required timeframes of the Permit term, and submit annual reports to Ecology by March 31st each year to document progress toward Permit compliance.

Kelso was first issued a Permit in 2007 and has been implementing a SWMP since that time.

Ecology issued the current Permit in 2012, and it became effective on August 1, 2013. Ecology subsequently issued a Permit modification on December 17, 2014, which became effective January 16, 2015. The Permit modification includes minor changes to correct inconsistencies and scrivener's errors, changes to definitions to clarify the intent of some Permit language, and substantial changes to the watershed-scale stormwater planning requirement, which is not applicable to the City. The Permit covers a five-year period from August 2013 to July 2018 and Ecology subsequently extended that period to July 2019.

Stormwater runoff from the City eventually enter the Cowlitz and Coweeman Rivers through a combination of gravity outfalls and pump stations operated by the Diking Improvement District No. 1 and the Consolidated Diking Improvement District No. 3. The City's MS4 also connects to and discharges stormwater to the City of Longview's MS4.

In accordance with Permit requirements, the City has developed a SWMP designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), to meet all known, available, and reasonable methods of prevention, control and treatment (AKART)

requirements, and to protect water quality. A main goal of the SWMP is to inform the public of the stormwater activities the City plans to achieve during the year. The following sections describe the actions that Kelso has and will take to comply with the requirements of the Permit.

1.2 Departmental Responsibilities

The Community Development Department employs a full-time Senior Stormwater Engineer, who acts as the City's National Pollutant Discharge Elimination System (NPDES) Coordinator.

The Community Development Department is responsible for general Permit compliance, stormwater public education and outreach, public involvement in stormwater concerns, regulating the entrance of stormwater pollutants into the MS4, regulating runoff on construction sites and developments, developing procedures for compliance with the Permit, planning stormwater capital projects, training staff from other departments, and reporting.

The Public Works Department is responsible for spill response, maintaining components of the MS4, and operating City properties such as roads, rights-of-way, parks, and municipal buildings in a manner that prevents and reduces stormwater impacts.

Employees in the Police Department are responsible for maintaining awareness of the stormwater system and reporting potential illicit discharges that may be observed during the normal course of their duties in the community.

The City's stormwater utility funds the SWMP based on impervious area for commercial properties and on a base rate for residential properties.

1.3 Document Organization

This report comprises the required written documentation of the City's SWMP.

To aid in tracking Permit requirements, this document has been organized into sections that correspond with the Permit Special Conditions and are outlined in the Permit as follows:

- Chapter 2 – Stormwater Management Program
 - 2.1 - Public Education and Outreach, Special Condition S5.C.1
 - 2.2 - Public Involvement and Participation, Special Condition S5.C.2
 - 2.3 - Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.3
 - 2.4 - Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.4
 - 2.5 - Operation and Maintenance (O&M) for Municipal Operations, Special Condition S5.C.5

- 2.6 - NPDES Program Administration
- Chapter 3 – Stormwater Monitoring

2. STORMWATER MANAGEMENT PROGRAM

This chapter describes five required components of the Permit SWMP and the City's plan to meet each requirement and administer the program.

2.1 Public Education and Outreach

The City's public education and outreach program focuses on building general awareness among the public of problems created by stormwater runoff. The program is carried out by the NPDES Coordinator.

2.1.1 Permit Requirements

Section S5.C.1 requires the following:

- Develop and administer an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The program must target residents, businesses, industry, and city employees at all levels.
- Provide an education and outreach program designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Measure adoption of targeted behaviors for at least one target audience in at least one subject area. Use the resulting measurements to direct outreach resources most effectively and to evaluate changes in adoption of the targeted behaviors and evaluation of the education program's effectiveness at changing targeted behaviors.
- Create stewardship opportunities to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, and riparian plantings.

2.1.2 Existing Programs and Activities

Kelso's activities in this area are ongoing:

- Continue to maintain the City's stormwater educational website at <http://www.kelso.gov/departments-services/community-development/engineering-department/stormwater>.
- Make available to the public the *Solution to Stormwater Pollution* brochure.
- Coordinate a storm drain marker volunteer program.
- Hold educational workshops.
- Track and document all public education and outreach efforts.

2.1.3 Planned Activities

Planned activities for 2018 include:

- Send remaining general stormwater brochures to residence through regular mail or utility inserts.
- Update the general stormwater brochure
- Implement a program to educate a target audience.
- Update the City’s outreach plan based on results of measurement.
- Continue to develop stewardship opportunities with Kelso High School.
- Collaborate activities with the Cowlitz Clean Water Partners to produce educational materials, including posters and student public service announcement videos.

2.2 Public Involvement and Participation

The City’s public involvement and participation program is designed to seek regular input from stakeholders through the Kelso Stormwater Advisory Committee (KSAC). The NPDES Coordinator carries out this requirement.

2.2.1 Permit Requirements

Section S5.C.2 requires the following:

- Provide ongoing opportunities for public involvement through advisory councils, public hearings, watershed committees, participation in developing rate structures or other similar activities.
- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP document and Annual Report available to the public on the City’s website. Any other submittals required by Ecology also must be available on the website.

2.2.2 Existing Programs and Activities

Kelso’s activities in this area are ongoing:

- Holds quarterly public meetings of KSAC.
- Seeks public input through the City Council.
- Posts annual reports, the SWMP, and other stormwater-related documents to the City’s website.
- Track and document all public involvement and participation efforts.

2.2.3 Planned Activities

Planned activities for 2018 include:

- Continue to hold quarterly meetings of KSAC.
- Update the SWMP by December 31, 2018.
- Post the 2018 SWMP to the website by January 2018
- Post the 2017 Annual Report to website by May 2018.

2.3 Illicit Discharge Detection and Elimination (IDDE)

The City's IDDE ordinance prohibits the discharge of non-stormwater, with a few exceptions, into the MS4. The IDDE program guides City responses to spills and to reports of potential discharges to the storm sewer. Staff monitored the system through inspection of priority outfalls. During the Permit term, the City plans to update its MS4 maps and increase system monitoring through a greater number of outfall inspections. The program is carried out primarily by Community Development, although primary responsibility for spill response is with Public Works.

2.3.1 Permit Requirements

Section S5.C.3 requires the following:

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit discharges, connections and improper disposal into the MS4.
- Develop a storm sewer system map and update it on an ongoing basis.
- Implement an ordinance to prohibit non-stormwater, illicit discharges into the MS4 that includes allowable discharges, conditionally allowable discharges, and escalating enforcement procedures and actions.
- Implement a compliance strategy that includes informal compliance actions such as public education and technical assistance as well as escalating enforcement penalties and an enforcement strategy. Include the following tools:
 - Apply operational and structural source control Best Management Practices (BMPs) for pollutant generating sources to prevent illicit discharges.
 - Maintain stormwater facilities to standards to prevent illicit discharges.
- Implement an ongoing program to detect and identify non-stormwater discharges and illicit connections to the MS4, including the following components:
 - Procedures for conducting investigations of the MS4, including field screening and methods for identifying potential sources of illicit discharges and connections.
 - Publicize a hotline or other local telephone number for reporting of spills or other illicit discharges.
 - Provide appropriate training to City field staff on identification and reporting of illicit discharges.
 - Inform public employees, businesses, and the general public of the hazards associated with illicit discharges and improper disposal of waste.
- Implement an ongoing program to address illicit discharges and illicit connections, including the following components:
 - Procedures for characterizing the nature of, and threat posed by, any illicit discharges found by or reported to the City, including evaluating if the discharge must be immediately contained.
 - Procedures for tracing the source of an illicit discharge, including visual inspection and other methods and procedures.

- Procedures for eliminating the discharge through notification, technical assistance, inspections and the compliance strategy required above.
- Comply with requirements to address illicit discharges found or reported within Permit-established timelines (see S5.C.3.d.iv.).
- Train technical staff that is responsible to conduct these activities.
- Track and maintain records of the activities conducted to meet the requirements of S5.C.3.

2.3.2 Existing Programs and Activities

Kelso's activities in this area are ongoing:

- Follows procedures for detection, reporting, characterization, response, investigation, removal, clean-up, and enforcement in the *Municipal Stormwater Illicit Discharge Detection and Elimination (IDDE) Program 2015*.
- Contacts the public to provide education and enforcement when illicit discharges are reported or discovered.
- Provides training on IDDE awareness one time, per Permit term, to Public Works field staff and Police.
- Operates the Kelso stormwater hotline.
- Encourages the public to report illicit discharges, spills, or other stormwater-related issues using the online Stormwater Incident Report at <http://www.kelso.gov/stormwater-incident-report>.
- Tracks illicit discharge reports and responses.
- Tracks and documents required recordkeeping.

2.3.3 Planned Activities

Planned activities for 2018 include:

- Ensure all new field employees are trained in IDDE.
- Continue ongoing activities listed above, including enforcing KMC 13.11, responding to illicit discharges and spills, educating the public about the hazards of IDDE through educational enforcement, and providing the public ways to report illicit discharges and spills, including the hotline and an online incident report.
- Map any new public (City-operated) stormwater treatment and flow control facilities constructed in 2018.
- Map discharge points.
- Follow indicator sampling procedures, when required, in response to illicit discharges discovered during field screening.
- Contact concrete suppliers to educate and give technical guidance on proper on-site washout procedures.
- Field screen the MS4 by December 31 for non-stormwater discharges and illicit connections.

2.4 Controlling Runoff from Development, Redevelopment, and Construction Sites

The City's stormwater regulatory program currently implements local standards for temporary erosion control and permanent stormwater control on most development, redevelopment, and construction projects, while applying state standards to those projects greater than one acre in size.

Note: the Permit includes Section S5.C.4.g for watershed-scale stormwater planning. None of these requirements apply to the City, so they are not listed below.

2.4.1 Permit Requirements

Section S5.C.4 requires the following:

- Implement and enforce a program to reduce pollutants in stormwater runoff that enters the MS4 from new development, redevelopment and construction site activities.
- Implement an ordinance with necessary legal authority to require development, redevelopment, and construction applications submitted after June 30, 2017 to control runoff according to the minimum technical requirements in either the 2014 Ecology Stormwater Management Manual for Western Washington, or an equivalent Manual approved by Ecology.
- Include a permitting process with site plan review, inspection, and enforcement capability to all sites that meet the minimum thresholds in Appendix 1 of the City's Permit, including the following components:
 - Review all stormwater site plans.
 - Inspect, prior to clearing and construction, all permitted development sites that have high potential for sediment transport.
 - Inspect all permitted development sites during construction to verify proper installation of erosion and sediment controls.
 - Inspect all permitted development sites upon completion of construction, and prior to final approval or occupancy, to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is complete and responsibility for maintenance is assigned.
 - An enforcement strategy to respond to issues of non-compliance with above-noted components.
- Notify representatives of proposed new development and redevelopment of the Notice of Intent (NOI) for Construction Activity and the NOI for Industrial Activity..
- Train staff on the new codes, standards, processes and procedures.
- Summarize the results of the LID integration and revision process by March 31, 2018.

2.4.2 Existing Programs and Activities

Kelso's activities in this area are ongoing:

- Enforce existing local stormwater and erosion control codes for development, redevelopment, and construction sites that meet stormwater thresholds.
- Enforce stormwater and erosion control regulations using Ecology’s 2014 SWMMWW for sites over 2000 square feet that meet thresholds established in Appendix 1.
- Review site plans and grading permit applications that meet the SWMMWW Minimum Requirements.
- Perform site inspections before, during, and after construction on regulated sites.
- Make known the NOIs for Construction Activity and Industrial Activity to developers.
- Continue review of development, redevelopment, and construction sites using thresholds established in Appendix 1 of the 2013.
- Continue inspecting regulated sites before, during, and after construction.
- Document all required recordkeeping.

2.4.3 Planned Activities

Planned activities for 2018 include:

- Ensure all Community Development staff are trained on the updated stormwater requirements, provisions and procedures.
- Create new public guidance materials and checklists for development-related activity.

2.5 Municipal Operations and Maintenance (O&M)

The Public Works Department operates the MS4 and City properties, including streets, rights-of-way, parks, and municipal buildings. Employees follow procedures to reduce stormwater impacts from City operations. During the Permit term, the City plans to update its maintenance standards, increase frequency of catch basin inspection, and implement a catch basin repair and replacement program.

2.5.1 Permit Requirements

Section S5.C.5 requires the following:

- Develop and implement an operations and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- By June 30, 2017, establish and adopt maintenance standards for components of the municipal separate stormwater system that are at least as protective as those specified in Volume V of the SWMMWW.
- Conduct annual inspections of City-operated stormwater treatment and flow control and treatment BMPs/facilities, and conduct required maintenance within Permit-established deadlines.
- Spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events and system-wide inspection if spot checks indicate widespread damage. Then conduct required maintenance within Permit-established deadlines.

- Inspect all City-operated catch basins and inlets at least once by August 1, 2017 and then every two years thereafter.
- Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities including but not limited to streets, parking lots, roads, highways, buildings, parks, open space and maintenance yards owned or maintained by the City.
- Implement an ongoing training program for staff whose job functions may impact stormwater quality. Document the training program.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City that are not covered by an Industrial Stormwater General Permit.
- Maintain records of inspections and maintenance or repair activities.

2.5.2 Existing Programs and Activities

Kelso's activities in this area are ongoing:

- Annual inspection of six City-operated permanent stormwater treatment and flow control facilities.
- Annual cleaning of two stormwater facilities.
- Spot check stormwater facilities and flood-prone areas of the conveyance system after rain storms larger than the 24-hour, 10-year storm event.
- Routine street sweeping.
- Clean ditches and culverts as needed.
- Follow City of Kelso *Municipal Stormwater O&M Program 2015* for operation of stormwater facilities, streets, parks and buildings owned or operated by the City.
- Follow City of Kelso *Nutrient, Integrated Pest Management and Herbicide Plan 2015* to guide the use of nutrients and chemicals on City-operated properties and rights-of-way.
- Follow protocols for spills response on City streets and properties in the City of Kelso *Illicit Discharge Detection and Elimination (IDDE) Program 2015*.
- Train new Operations staff on operational source control BMPs for the maintenance yard, City street and property operations, and City parks operations or when the program is modified.
- Maintain the SWPPP for the Public Works maintenance yard; conduct quarterly inspections.
- Document all required recordkeeping.

2.5.3 Planned Activities

Planned activities for 2018 include:

- Review maintenance standards and revise as necessary to ensure they are as effective as the current edition of the SWMMWW.

- Review the street sweeping program and consider strategies to document where, when and how much street sweeping has been performed. Investigate the possibility to increase the frequency of street sweeping.
- Implement a catch basin structural repair and replacement program to repair or replace approximately six catch basins in 2018.
- Inspect the Operations maintenance yard for proper application of BMPs to document conformity with the SWPPP; revise SWPPP as needed based on conditions.
- Inspect approximately half of City-operated catch basins and maintain those that need it.

2.6 NPDES Program Administration

The City's NPDES compliance program requires administration to develop plans and schedules, administer contracts, maintain tracking systems, process payments, and prepare reports.

2.6.1 Planned Activities

Planned activities for 2018 include:

- Manage contract with consultant for assistance with LID code and manual update implementation.
- Implement new NPDES time tracking procedures for Community Development and Public Works.
- Submit the 2017 Annual Report and attachments, including the 2018 SWMP.
- Submit the annual Permit fee.
- Submit required payments for regional monitoring activities (see Chapter 3).
- Update the SWMP for 2019 activities in late 2018.
- Maintain records of NPDES activities for each Permit component.

3. MONITORING AND ASSESSMENT

3.1 Stormwater Monitoring

Stormwater monitoring requirements are given in Section S8 of the Permit. The basic requirements for stormwater monitoring include the following:

- Provide Ecology with any stormwater-related monitoring or studies conducted by or on behalf of the City.
- Study the effectiveness of the SWMP, either through contributing to Ecology's established regional effort or by conducting stormwater discharge monitoring.
- Pay into a collective fund to conduct source identification and diagnostic monitoring, which will implement the Source Identification Information Repository (SIDIR).

3.1.1 Ongoing Activities

- The City has chosen to pay into the regional effort for monitoring. The City will remit payments to Ecology annually through 2018 for effectiveness monitoring and the SIDIR.