

#### **Water Quality Program**

#### **Permit Submittal Electronic Certification**

Permittee: KELSO CITY

Permit Number: WAR045010 Site Address: 203 S PACIFIC AVE

Kelso, WA 98626

Submittal Name: MS4 Annual Report Phase II Western

**Version:** 1 **Due Date:** 3/31/2023

#### Questionnaire

Number	Permit Section	Question	Answer
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)	Kelso_SWMP_2023_2_ 03282023125816
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020	
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes
16	S5.C.1.c	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
19	S5.C.1.d	Developed a Stormwater Management Action Plan (SMAP) for at least one high priority area? (S.5.C.1.d.iii – Required by March 31, 2023)	No Comment: Based on the results of the Receiving Waters Assessment it was determined that The City of Kelso is exempt from submitting SMAP submittals.
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes

20a	S5.C.2	If yes, list the elements, and the regional program.	The City of Kelso is part of the Cowlitz Clean Waters partnership developed to: 1) build awareness about methods to address and reduce impacts from stormwater runoff, and 2) effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Cowlitz Clean Waters develops public education and outreach campaigns to inform the Lower Columbia region about the impacts of stormwater runoff on the local waterways. The largest annual campaign sponsored by Cowlitz Clean Waters is the local calendar contest; The calendar contest goal is to raise awareness of the causes and ways to prevent stormwater pollution.
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	S5.C.2.a.i_General awareness e_21_03282023130501
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided.	S5.C.2.a.iii_Stewardship oppor_26a_0328202313 0501
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)	The City of Kelso has implemented a Kelso Stormwater Action Committee. Due to staffing changes no meetings were held in 2022.
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
28a	S5.C.3.	List the website address in Comments field.	https://www.kelso.gov/e ngineering/stormwater
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?	Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	Yes

30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).	Q30a_Kelso Outfalls_30a_03272023 121553
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	Not Applicable
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)	Yes
33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.	The general public, employees, and businesses are informed of hazards associated with illicit discharges and improper disposal of waste as illicit discharges are reported and investigates.
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit nonstormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5	Cite field screening methodology in Comments field.	The City of Kelso's methodology for detecting and identifying non-stormwater discharges and illicit connections consist of a variety of annual field screening activities, including: 1) Priority outfalls during dry weather; 2) Catch basin and manhole inspections in conjunction with O&M activities; 3) Video inspections as needed; 4) Permit-driven potential pollutant source or connection inspections; and 5) Illicit discharge response follow up inspections for potential illicit connections.
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	20
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.	Screened one manhole, six catch basins and one outfall.
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)	78

38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	The hotline telephone number is publicized on the City's website along with a "Stormwater Incident Report" online form to provide an alternative method of communication.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.	Yes
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.	WAR045010-2022- ImportedIDDEs_033020 23125421
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)	Yes
44a	S5.C.6.	Cite code reference in Comments field.	Kelso Municipal Code 13.09
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.	13
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?	No
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?	No

49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.	10
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii)	0
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)	Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?	Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022)	Yes
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes

59a	S5.C.7.	Attach documentation of maintenance time	Not Applicable
		frame exceedances that were beyond the Permittee's control.	
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?	Yes
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)	Yes
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)	Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	No
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	23
63b	S5.C.7.	Number of facilities inspected during the reporting period.	14
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.	14
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.	Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)	Yes
66a	S5.C.7.	Number of known catch basins?	1473
66b	S5.C.7.	Number of catch basins inspected during the reporting period?	329
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?	3
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c))	Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)	Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022)	Yes

69a	S5.C.7.	Cite documentation in Comments.	Municipal Stormwater Operations and Maintenance Program
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)	Yes
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)	Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022.	Yes
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022)	Yes
73a	S5.C.8	Cite ordinance. (Required by August 1, 2022)	3987
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)	Yes
74a	S5.C.8	Number of total sites identified for the inventory.	186
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).	Yes
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).	Yes
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.	S5.C.8.b.iii & S5.C.8.b.iv - S_77_03282023142018
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.	Permit Section S5.C.8.b.iii – _78_03282023142018
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?	Yes
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Not Applicable
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	Not Applicable
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes Comment: Payment was late

84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes Comment: Payment was late.
87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)	Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	No
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	No
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Yes
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	1
94a	G20	List permit conditions described in non-compliance notification(s).	Submitted Payment for cost-sharing for Stormwater Action Monitoring (SAM) Status and Trends S8.B.2.c Submitted Paymment for cost-sharingfor SAM effectiveness and source identification studies S8.B.2.a or S8.B.2.c

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Date
Michael Kardas	3/30/2023 12:58:30 PM

## Attachment 1 Cover Letter - City of Kelso

## Washington Department of Ecology Electronic Submission Cover Letter



#### WQWebSubmittal - Submittal Submission Id: 1867180 - 3/30/2023 12:58:31 PM

Company Name	Signer Name	System Name
City of Kelso	Michael Kardas	WQWebPortal

#### **Attachments:**

Document Name Or Description	Document Name
Submitted Copy of Record for City of Kelso	Copy of Record CityofKelso Thursday March 30 2023
WAR045010_42_03282023155418	2022 IDDEs for WAR045010_42_03282023155418
WAR045010_42_03302023125340	2022 IDDEs for WAR045010_42_03302023125340
WAR045010_03302023115104	Kelso_SWMP_2023_03302023115104.pdf
WAR045010_2_03282023125816	Kelso_SWMP_2023_2_03282023125816
WAR045010_78_03282023142018	Permit Section S5.C.8.b.iii78_03282023142018
WAR045010_03302023115104	Permit Section S5.C.8.b.iii – Source Control Inspe
WAR045010_03302023115104	Q30a_Kelso Outfalls_03302023115104.xlsx
WAR045010_30a_03272023121553	Q30a_Kelso Outfalls_30a_03272023121553
WAR045010_21_03282023130501	S5.C.2.a.i_General awareness e_21_03282023130501
WAR045010_03302023115104	S5.C.2.a.i_General awareness efforts_0330202311510
WAR045010_26a_03282023130501	S5.C.2.a.iii_Stewardship oppor_26a_03282023130501
WAR045010_03302023115104	S5.C.2.a.iii_Stewardship opportunities_03302023115
WAR045010_77_03282023142018	S5.C.8.b.iii & S5.C.8.b.iv - S_77_03282023142018
WAR045010_03302023115104	S5.C.8.b.iii & S5.C.8.b.iv - Summary of Actions Fi
ImportedIDDEsWAR045010-2022- ImportedIDDEs_03302023125421	WAR045010-2022-ImportedIDDEs_03302023125421

#### **Attestation Agreed to at Signing:**

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only



0D3f20VW0/cIakgqIAMxr1lR9tAczSv1o008dkNAkOt5xFTpOF5yQJhYeHHVf2Vy/tqlwZiu9u6LsY+0hhjvQ4GSMODM/I7ZfZRWjsK/JX8=

Report Received: 2023-03-30 12:58

Page 2 of 2 Pages

# Attachment 2 City of Kelso SWMP

## This SWMP is an attachment to the City's 2019 Annual Report to the Washington State Department of Ecology for its Phase II NPDES Permit

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 2023 for

City of Kelso

Prepared for: City of Kelso, Washington

Prepared by:
Otak, Inc.
700 Washington Street, Suite 401
Vancouver, WA 98660
Otak Project No. 17258



January 2015

Updated March 2023, City of Kelso

#### Table of Contents

١.	INTRODUCTION	I
	I.I Overview and Background	I
	I.2 Departmental Responsibilities	2
	1.3 Document Organization	2
2.	STORMWATER MANAGEMENT PROGRAM	3
	2.1 Stormwater Planning, Special Condition S5.C.1	3
	2.2 Public Education and Outreach, Special Condition S5.C.2	3
	2.3 Public Involvement and Participation, Special Condition S5.C.3	4
	2.4 MS4 Mapping and Documentation, Special Condition S5.C.4	5
	2.5 Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5	6
	2.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6	
	2.7 Operation and Maintenance (O&M), Special Condition S5.C.7	9
	2.8 Source Control Program for Existing Development, Special Condition S5.C.8	
	2.9 NPDES Program Administration	.11
3.	MONITORING AND ASSESSMENT	.12
	3.1 Stormwater Monitoring	.12

#### Abbreviations and Acronyms

AKART	All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment		
BMP	Best Management Practice		
City	City of Kelso		
Ecology	Washington State Department of Ecology		
IDDE	Illicit Discharge Detection and Elimination		
KMC	Kelso Municipal Code		
KSAC	Kelso Stormwater Advisory Committee		
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	Western Washington Phase II Municipal Stormwater Permit		
SMAP	Stormwater Management Action Plan		
SWMMWW	Stormwater Management Manual for Western Washington		
SWMP	Stormwater Management Program Plan		
SWPPP	Stormwater Pollution Prevention Plan		

#### CITY OF KELSO STORMWATER MANAGEMENT PROGRAM PLAN 2023

#### I. INTRODUCTION

#### 1.1 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 Western Washington Phase II Municipal Stormwater Permit (Permit) to operate the MS4.

The Permit outlines stormwater program activities and implementation milestones that the City must follow to comply with the federal Clean Water Act. As a general permit, the Permit applies to more than 80 MS4s in western Washington. The City was first issued the Permit in 2007 and has been implementing a Stormwater Management Program Plan (SWMP) since that time.

To document progress toward Permit compliance, each permittee is required to develop a SWMP that includes a description of the required activities and is required to implement activities within the required timeframes of the Permit term and submit annual reports to Ecology by March 31<sup>st</sup> of the following year.

Ecology re-issued the Permit in 2012, and it became effective on August 1, 2013. Ecology then issued a Permit modification on December 17, 2014, which became effective January 16, 2015. The Permit covered a five-year period from August 2013 to July 2018 and Ecology subsequently extended that period to July 2019. Ecology re-issued the Permit July 1, 2019 and the current Permit is effective from August 1, 2019 to July 31, 2024. This SWMP reflects the changes and additional requirements of the current permit.

Stormwater runoff via the MS4 eventually enters 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; The stormwater is eventually discharged to the Columbia River via a pump station operated by the Consolidated Diking Improvement District No. 1.

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 the City has and will take to comply with the requirements of the Permit.

#### 1.2 Departmental Responsibilities

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

The Community Development – Engineering 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 maintaining 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, and is 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
  - o 2.1 Stormwater Planning, Special Condition S5.C.1
  - o 2.2 Public Education and Outreach, Special Condition S5.C.2
  - 2.3 Public Involvement and Participation, Special Condition S5.C.3
  - o 2.4 MS4 Mapping and Documentation, Special Condition S5.C.4
  - 2.5 Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5
  - 2.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6
  - o 2.7 Municipal Operation and Maintenance (O&M), Special Condition S5.C.7
  - o 2.8 Source Control Program for Existing Development, Special Condition S5.C.8
  - o 2.9 NPDES Program Administration
- Chapter 3 Monitoring and Assessment, Special Condition S8

#### 2. STORMWATER MANAGEMENT PROGRAM

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

#### 2.1 Stormwater Planning, Special Condition S5.C.1

The City will develop and implement a new Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. This program will be carried out by the NPDES Coordinator.

#### 2.1.1 Permit Requirements

Section S5.C.1 requires the following:

 Continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.

#### 2.1.2 Existing Programs and Activities

The City's activities are as follows:

 Require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.

#### 2.1.3 Planned Activities

Planned activities for 2023 include:

 By December 31, 2023, review, revise, and make effective local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs.

#### 2.2 Public Education and Outreach, Special Condition S5.C.2

The City's public education and outreach program focuses on building general awareness among the public of problems created by stormwater runoff and of behavior changes to clean up local surface waters. The program is carried out by the NPDES Coordinator.

#### 2.2.1 Permit Requirements

Section S5.C.2 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.
- Provide an education and outreach program designed to build general awareness about methods to address and reduce impacts from stormwater runoff.

- Educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Affect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Implement a behavior change program for one target audience and one BMP. By March 31, 2024, evaluate and report on the campaign outcome.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

#### 2.2.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Continue to maintain the City's stormwater educational website at <a href="https://www.kelso.gov/engineering/stormwater/stormwater-documents">https://www.kelso.gov/engineering/stormwater/stormwater-documents</a>.
- Continue partnership with Cowlitz Clean Waters that developed a public information and an
  education campaign to inform the Lower Columbia region general public about the impacts of
  stormwater runoff on our local waterways, and to affect behavior changes and water quality
  improvements in our communities.
- Track and document all public education and outreach efforts.
- Implementation of the education and outreach program for the area served by the MS4.
- Charity car wash kit and City of Kelso "Adopt-a-Street" program stewardship opportunities.

#### 2.2.3 Planned Activities

Planned activities for 2023 include:

- Continue to develop stewardship opportunities with Kelso High School.
- Collaborate activities with the Cowlitz Clean Water Partners to produce educational materials, including bus ads, pet waste signs, refrigerator magnets and student art/poem calendars.
- Continue to implement the pet waste management and disposal behavior change campaign with Cowlitz Clean Waters.

#### 2.3 Public Involvement and Participation, Special Condition S5.C.3

The City's public involvement and participation program is designed to seek regular input from stakeholders through the Kelso Stormwater Advisory Committee (KSAC). The purpose of KSAC is to help guide the development, implementation and updates to the SWMP. KSAC members exhibit an interest in the quality of surface waters within and around Kelso and include a variety of stakeholders. The NPDES Coordinator is a liaison to KSAC and carries out this requirement.

#### 2.3.1 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 Permittee's Stormwater Management Action
  Plan (SMAP) and its SWMP.
- Make the SWMP document and Annual Report available to the public on the City's website by May 31. Any other submittals required by Ecology also must be available on the website.

#### 2.3.2 Existing Programs and Activities

The City'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.
- Tracks and documents public involvement and participation efforts.

#### 2.3.3 Planned Activities

Planned activities for 2023 include:

- Continue to hold quarterly meetings of KSAC.
- Continue to post KSAC meeting minutes to the City's website
- Post the 2023 SWMP to the City's website by March 31, 2023.
- Update the SWMP for 2024 by December 31, 2023.

#### 2.4 MS4 Mapping and Documentation, Special Condition S5.C.4

The City must implement an ongoing program for mapping and documenting the MS4.

#### 2.4.1 Permit Requirements

Section S5.C.4 requires the following:

- Ongoing Mapping: Maintain an ongoing program for mapping data for many features such as outfalls, discharge points, receiving waters, BMPs, connections between MS4s, connections to the MS4 after February 16, 2007 and other features.
- New Mapping: Collect size and material for all known MS4 outfalls during normal course of business such as during field screening.
- New Mapping: Complete mapping of all known connections from the MS4 to a privately owned stormwater system by August 1, 2023.
- Map and store points, lines, polygons of the MS4 with fully described mapping standards in a Geographical Information System or in CAD drawings no later than August 1, 2021.
- Make available to Ecology, upon request, the City's MS4 depicting the items above.
- Provide mapping information, upon request, to federally recognized Indian Tribes, municipalities and other permittees.

#### 2.4.2 Existing Programs and Activities

The City's activities in this area are ongoing:

• Maintains a GIS of the MS4.

#### 2.4.3 Planned Activities

Planned activities for 2023 include:

- Map any new public (City-operated) stormwater treatment and flow control facilities constructed in 2022.
- Map any new MS4 infrastructure constructed in 2022.
- Complete mapping for all known connections from the MS4 to a privately owned stormwater system by August 1, 2023.

#### 2.5 Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5

The City's stormwater management ordinance prohibits the discharge of anything that is not 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 monitors the system through inspection of priority outfalls. The program is carried out primarily by the Community Development – Engineering Department, although support for spill response is provided by the Public Works Department.

#### 2.5.1 Permit Requirements

Section S5.C.4 requires the following:

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit discharges, connections and improper disposal into the MS4.
- Implement a program for reporting and correcting or removing illicit connections, spills and other illicit discharges. Illicit connections and illicit discharges must be identified through field screening, inspections, source control inspections and other methods.
- 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 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.
  - o 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.
- o Procedures for tracing the source of an illicit discharge, including visual inspection and other methods and procedures.
- o 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 Permitestablished timelines (see S5.C.5.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.5.

#### 2.5.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Follows procedures for detection, reporting, characterization, response, investigation, removal, clean-up, and enforcement of illicit connections and illicit discharges detailed in the *Municipal Stormwater Illicit Discharge Detection and Elimination (IDDE) Program 2021*.
- 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 unless procedures are updated, to Public Works field staff and Police staff.
- Operates the City's stormwater hotline.
- Encourages the public to report illicit discharges, spills, or other stormwater-related issues using the online Stormwater Incident Report at <a href="http://www.kelso.gov/stormwater-incident-report">http://www.kelso.gov/stormwater-incident-report</a>.
- Tracks illicit discharge reports and responses.
- Tracks and documents required recordkeeping.

#### 2.5.3 Planned Activities

Planned activities for 2023 include:

- Ensure all new field employees are trained in IDDE.
- Continue ongoing activities listed above, including enforcing Kelso Municipal Code (KMC)
  13.09.050, 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.
- Follow indicator sampling procedures, when required, in response to illicit discharges discovered during field screening.
- Field screen at least 12% of the MS4 by December 31 of each year for non-stormwater discharges and illicit connections and track the total percentage of the MS4 screened.

### 2.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6

The City's stormwater regulatory program currently implements standards for temporary erosion control and permanent stormwater control on development, redevelopment, and construction projects greater than 2,000 square feet of new or replaced impervious surfaces. The program is based on the current ordinance that was required by the previous Permit.

#### 2.6.1 Permit Requirements

Section S5.C.6 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 to address runoff from development, redevelopment and construction site projects. The ordinance shall include the minimum technical requirements, thresholds and definitions found in the Permit appendices.
- 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 Permit, including the following
  components:
  - o Review all stormwater site plans.
  - o Inspect, prior to clearing and construction, all permitted development sites that have high potential for sediment transport.
  - o 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.
- Make available the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form and, as applicable, a link to the electronic Industrial Stormwater General Permit NOI.
- Train staff on the new codes, standards, processes and procedures.

#### 2.6.2 Existing Programs and Activities

The City'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 2019 Stormwater Management Manual for Western Washington (SWMMWW) for sites over 2,000 square feet that meet thresholds established in the Permit Appendix 1.
- Review site plans and grading permit applications that meet the SWMMWW Minimum Requirements.

- 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 Permit.
- Continue inspecting regulated sites before, during, and after construction.
- Document all required recordkeeping.

#### 2.6.3 Planned Activities

Planned activities for 2023 include:

 Ensure all Community Development – Engineering staff are trained on the updated stormwater requirements, provisions and procedures.

#### 2.7 Operation and Maintenance (O&M), Special Condition S5.C.7

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 replace more catch basins and replace failing or faulty portions of the MS4.

#### 2.7.1 Permit Requirements

Section S5.C.7 requires the following:

- Implement and document an O&M program with the ultimate goal of preventing or reducing stormwater impacts.
- Implement maintenance standards for components of the municipal separate stormwater system that are at least as protective as those specified in the SWMMWW. Document standards no later than June 30, 2022.
- Conduct annual inspections of City-operated stormwater treatment and flow control and treatment BMPs/facilities, and conduct required maintenance within Permit-established deadlines.
- Conduct annual inspections of privately owned stormwater treatment and flow control and treatment BMPs/facilities that discharge to the MS4 and are regulated by the City. These facilities are covered under Stormwater Improvement Restrictive Covenants that require annual inspection and maintenance, if necessary, of the permitted stormwater facilities.
- 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 every two years and clean, if necessary, to comply with maintenance standards of the SWMMWW.
- 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. Document practices no later than December 31, 2022 of these practices, policies, and procedures.

- 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. Update SWPPP no later than December 31, 2022.
- Maintain records of inspections and maintenance or repair activities.

#### 2.7.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Annual inspection of City-operated permanent stormwater treatment and flow control facilities.
- Review of inspection and maintenance records submitted to the City of parcels that have stormwater treatment and flow control BMPs permitted under the Permit, and spot checks of those 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 and conduct quarterly inspections of the yard.
- Document all required recordkeeping.

#### 2.7.3 Planned Activities

Planned activities for 2023 include:

- Inspect all City-operated catch basins and stormwater BMPs/facilities and maintain those that need it.
- Inspect all privately owned stormwater BMPs/facilities that are regulated by the City.

#### 2.8 Source Control Program for Existing Development, Special Condition S5.C.8

The Source Control Program is a new requirement of the Permit. The City will develop and implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program will include tasks such as application of operational source control BMPs, inspections of pollutant generating sources at private and public sites, and adopting an ordinance to require source control BMPs.

#### 2.8.1 Permit Requirements

Section S5.C.8 requires the following:

- Adopt and make effective an ordinance requiring the application of source control BMPs for pollutant generating sources, no later than August 1, 2022.
- Establish an inventory identifying publicly and privately owned institutional, commercial and industrial sites that have the potential to generate pollutants to the MS4 no later than August 1, 2022.
- Starting January 1, 2023, implement an inspection program for sites identified in the potential pollutant-generating businesses inventory.
- By January 1, 2023, develop a progressive enforcement policy that requires sites to comply with stormwater source control requirements within a reasonable time.
- Train staff who are responsible for implementing the source control program.

#### 2.8.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Start January 1, 2023 inspecting businesses that have possible pollution generating sources. These inspections will be provided through an interlocal agreement with the City of Longview.
- Inspect 100% of sites through credible complaints.
- Complete the number of inspections equal to 20% of the businesses and/or sites listed in the source control inventory.
- Train staff to conduct source control activities and provide follow up training as needed to address procedures, techniques, requirements, or staff.

#### 2.8.3 Planned Activities

Planned activities for 2023 include:

- Send businesses identified on the inventory list as a potential pollutant-generating business, education and outreach material about the source control program.
- Train staff who are responsible for implementing the source control program.

#### 2.9 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.

#### 2.9.1 Planned Activities

Planned activities for 2023 include:

- Submit to Ecology the annual Permit fee.
- Submit the 2022 Annual Report and attachments, including the 2023 SWMP, to Ecology by March 31, 2023.
- Post the 2022 Annual Report to City's website by May 31, 2023.
- 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:

- For Regional Status and Trends Monitoring, make annual payments into a collective fund to implement regional receiving water status and trends monitoring.
- For Effectiveness and Source Identification Studies, make annual payments into a collective fund to implement effectiveness and source identification studies.

#### 3.1.1 Ongoing Activities

- The City will continue to pay into collective funds to implement both Regional Status and Trends Monitoring and Effectiveness and Source Identification Studies.
- The City will continue to assist in the development of the Quality Assurance Project Plan for southwest Washington.

# Attachment 3 City of Kelso Outfalls

#### City of Kelso Outfalls

<u>ID</u>	Discharges to:	Material	Diameter (in)
OF-0001	Coweeman River	CMP	18
OF-0003	Unnamed Stream	CMP	24
OF-0004	Cowlitz River	Concrete	24
OF-0005	Coweeman River	CMP	18
OF-0006	Unnamed Stream	CMP	8
OF-0007	Unnamed Stream	ADS	10
OF-0008	Unnamed Stream	ADS	12
OF-0009	Coweeman River	CMP	8
OF-0010	Coweeman River	Concrete	12
OF-0011	Coweeman River	ADS	12
OF-0012	Coweeman River	Concrete	12
OF-0013	CDID No. 3 Slough	CMP	36
OF-0014	Baker Way Slough	CMP	48
OF-0015	Coweeman Slough	CMP	48
OF-0016	Coweeman Slough	CMP	42

Page 1/1 3/30/2023

# Attachment 4 General Awareness Memorandum



#### **MEMORANDUM**

DATE: March 16, 2023

TO: File

FROM: Community Development and Engineering

RE: Permit Section S5.C.2.a.i – General awareness efforts conducted by the City of Kelso

Target Audience selected:

General Public with emphasis on school age children

#### Efforts Conducted:

- The City maintained and regularly updated its stormwater website with many documents and videos to educate the public on stormwater pollution and the City's stormwater management program (SWMP). The documents include annual reports, educational documents and stormwater ordinances. It also includes supporting documents for the SWMP such as the IDDE program, the O&M program and the Operations SWPPP. The City's stormwater website is located at: http://stormwater.kelso.gov.
- 2. The City provided support for KPTV's Clean Water Campaign. The City convenes with 28 other agencies from Oregon and Southwest Washington to review elements and deliverables of the campaign. The campaign includes television commercials, social media postings, digital advertisements and <a href="https://www.kptv.com/water/">https://www.kptv.com/water/</a>.
- 3. Cowlitz Clean Waters held its fourth annual "Solutions to Stormwater Pollution" calendar contest where middle-school students submitted artwork and poems, and won prizes. Cowlitz Clean Waters received 48 art and 13 poetry entries from schools located in Kelso and Longview. Approximately 4,000 calendars will be distributed throughout Cowlitz County schools, government offices, and libraries in January of 2023.
- 4. The City provided financial supported and participated in a Cowlitz Clean Waters table at Longview's Squirrel Fest and Kelso Highlander Festival. The table included a game with prizes to teach children how to prevent stormwater pollution.

## Attachment 5 Stewardship Opportunities



#### **MEMORANDUM**

DATE: March 16, 2023

TO: File

FROM: Community Development and Engineering

RE: Permit Section S5.C.2.a.iii – Stewardship opportunities provided by the City of Kelso

The City of Kelso provided the following stewardship opportunities in 2022:

Charity Car Wash Kit. The City makes a car wash kit available to businesses, schools, groups, and organizations that host charity car wash events. The kit includes a submersible pump, power cord, hose and plastic insert that fits into a catch basin to help prevent car wash wastewater from entering the City's stormwater system. The reservation form is available on the City's website:
 <a href="https://www.kelso.gov/stormwater/charity-car-wash-kit">https://www.kelso.gov/stormwater/charity-car-wash-kit</a>.

2. Adopt-a-Street. The City organized and maintains an Adopt-a-Street program for businesses, groups and organizations to remove litter from the streets of their choice at least twice per year. Adopted streets display an "Adopt-a-Street Program" sign with the adoptive group's name.