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# Stormwater Management Plan



For  
City of Covington

**FOURTH DRAFT**  
**March 31, 2011**

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## Introduction



The City of Covington's Public Works Department is responsible for Surface Water Management and the National Pollutant Discharge Elimination System (NPDES) Phase II Permit implementation. Other City departments will need to be involved for full implementation including the Community Development Department, Finance Department, City Clerk and Community Relations Coordinator. These programs are typically implemented to respond to regulatory requirements, the need for public services and safety, and the City's commitment to protect and improve the quality of its natural resources and environment.

The City of Covington will refer to the Covington Municipal Code, the GMA Comprehensive Plan and the Comprehensive Stormwater Plan for guidance with planning, funding and implementation of the overall Surface Water Management Program. The Surface Water Management Program will address current and future regulatory and policy requirements for managing stormwater runoff, water quality, flooding problems, and the City's natural resources.

The City of Covington's Stormwater Management Plan was created for the Department of Ecology to meet the Stormwater Management Program (SWMP) requirements of the NPDES Phase II Permit. The purpose of the document is to outline the NPDES requirements and summarize the programs and effort implemented by the City of Covington to comply with the Permit. This is a working draft and will be updated annually to reflect new compliance deadlines and additional program elements, with a final document to be published by March 30,

2012. This document will be used by the City to report milestones and track needs in the planning for and implementation of the NPDES Permit.

As this document evolves, City staff will continue to evaluate the immediate and long-term needs of the Covington NPDES compliance program. Covington's general approach throughout the implementation of the current National Pollutant Discharge Elimination System (NPDES) permit has been, and will be, to focus on the most imminent program element to be implemented. Although Covington has been ahead in many areas, the limited resources of the City will be generally focused on the next deadline of the implementation schedule.

## Purpose

The purpose of the SWMP document is to address how the City of Covington will meet the requirements outlined in the Western Washington Phase II Municipal Stormwater / NPDES Phase II Permit. Covington is faced with many different but related regulations, adopted plans and programs, and policies that affect urban stormwater, flooding and associated water-dependent resources. Because many of these requirements stem from different sources but affect the same activities, an overall Surface and Stormwater Program is needed to address the interrelationships of the programs and efficient approaches for meeting requirements and implementing policy, consistent with long-term goals, objectives and policies as outlined in the City of Covington Comprehensive Plan, Comprehensive Stormwater Plan and NPDES Phase II Permit requirements.

Regulatory and policy obligations that affect the City of Covington's Surface and Stormwater Program include:

- **National Pollutant Discharge Elimination System (NPDES)**

The NPDES stormwater permitting program is a Federal Clean Water Act requirement delegated to

the State Department of Ecology, requires cities with municipal stormwater systems to implement stormwater maintenance and management programs as a means to control polluted discharges. The Western Washington Phase II Municipal Stormwater Permit came into effect on February 16, 2007.

- **Growth Management Act (GMA)**

The GMA, as implemented through the City's Comprehensive Plan, requires consistency of capital facilities – including stormwater – with current and projected land use plans. It also requires cities to address water resources through adequate development regulations, protection of water quality and conservation and protection of resource lands.

- **Stormwater Utility Level of Service**

GMA also requires that level of service standards be established for all utilities, and must be implemented consistently in the service area and in response to growth. This not only affects capital improvement programs, but also operations and maintenance to keep existing facilities operating at established levels of service.

- **Floodplain Management**

The City participates in the National Flood Insurance Program (NFIP), which makes federally subsidized flood insurance available to the community. In addition, participation in the NFIP's Community Rating System program provides residents with discounted flood insurance in exchange for the City implementing flood hazard management activities that exceed the minimum NFIP standards.

- **Endangered Species Act (ESA)**

In response to the March 1999 listing of Puget Sound Chinook Salmon under the Endangered Species Act, the Federal Government is developing new requirements to address impacts of stormwater on salmon and its habitat.

- **City Municipal Codes**  
Over the years the City has adopted many codes that promote responsible development, sustainability of resources, and environmental protection. Implementation of those requirements is typically through private development permits, but some affect City programs and operations.

## **Western Washington Phase II Municipal Stormwater Permit**

The City of Covington, with a population of less than 100,000, must comply with the conditions of the Western Washington Phase II Municipal Stormwater Permit. The permit was issued on February 16, 2007 and remains in effect until February 15, 2012. The permit allows the municipalities to discharge stormwater from the municipal systems into waters of the state such as rivers, lakes and streams, as long as programs are implemented to reduce pollutants in stormwater by conducting activities and implementing programs in the following areas:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment and Construction Sites
- Pollution Prevention and Operations and Maintenance for Municipal Operations

The entire NPDES Permit and Annual Compliance Report can be found at the following link:

[http://www.covingtonwa.gov/city\\_departments/publicworks/swm/swm.html](http://www.covingtonwa.gov/city_departments/publicworks/swm/swm.html)

## Responsibilities and Coordination

Compliance with the Permit will require coordination and documentation of activities in several City Departments. The Public Works Department staff will coordinate the City efforts, and will meet with the staff from other departments regularly to insure ongoing and planned activities meet permit requirements. Covington is also committed to support and seek support from regional partners and neighboring jurisdictions as the opportunities present themselves.

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## Public Education and Outreach



The City of Covington's Education and Outreach Program focuses on two main elements, broad stormwater education on a regional scale and targeted education to specific groups within Covington. On the regional level, Covington continues to be an active participant involved in the Stormwater Outreach for Regional Municipalities (STORM) Group. The STORM group has been able to create and sustain a regional advertising campaign for Western Washington. The Puget Sound Starts Here (PSSH) campaign that launched in the spring of 2009 with TV and Radio advertisements will continue through 2011. The PSSH educational website continues to grow and the PSSH brand is becoming widely recognized. The website highlights the negative affects of stormwater on the waterways of the Puget Sound. Covington is also a founding member of the Alliance of South King County Environmental Stewards (ACES). The focus of the ACES group is to educate home owners, landscapers, and business owners on the benefits of natural yard care, water conservation, salmon and wildlife habitat, and protection of native vegetation. ACES hosts five educational seminars during the summer months with topics ranging from how to install rain gardens to natural yard care. The seminars are free to the public and provide an excellent venue for the distribution of educational materials.

On a local level, the City of Covington has created several stormwater informational flyers that cover pet waste, car washing, natural yard care, and the importance of stormwater treatment facilities. The flyers have been made available at City Hall and City events as well as mailed to targeted audiences and property owners in Covington. The City actively pursues opportunities to educate and involve community groups, citizens and City staff. The City supports a variety of volunteer efforts within the City including Earth Day/Arbor Day, Make a Difference Day, Neighborhood Volunteer Drainage Facility and Wetland Cleanup, Volunteer Habitat Restoration, Recycling Events and Catch Basin Marking Program.

Covington utilizes volunteer events and other City sponsored events like Covington Days, community group meetings, City council and commission meetings and ACES events to distribute materials and educate. The City has acquired a car wash kit and created a Car Wash Program. The car wash kit is available for check out at Covington City Hall to be used for charity car washes and for commercial building exterior and parking lot cleaning. Covington also uses its Surface Water Management webpage to make educational materials and useful stormwater related links available to the public.

## Permit Requirements

- Prioritize and address the target audiences and subject areas listed in the permit on stormwater issues and practices currently existing.
- Develop education and outreach programs that are designed to reduce or eliminate behaviors and practices that contribute to or cause adverse stormwater impacts.
- Measure changes in the understanding and adoption of behaviors by targeted audiences and use that information to evaluate programs for effectiveness.
- Maintain records on public education and outreach activities.
- Summarize activities in Annual Compliance Report.

## Planned Activities

- Continue to support ACES and staff a stormwater informational booth at ACES events in 2011.
- Continue to distribute informational flyers to targeted audiences and property owners in Covington.
- Continue to participate in the Puget Sound Starts Here regional stormwater advertising campaign through the STORM group.
- Continue with stormwater educational presentations at City Council meetings, Planning Commission and HOA/Community Meetings.
- Continue to look for new educational opportunities.
- Utilize the Covington's website and official facebook page to distribute stormwater information.
- Summarize activities in Annual Compliance Report.

# Public Involvement and Participation



The City of Covington involves the public in several ways. We have posted the current NPDES Phase II Permit Annual Report and Draft SWMP on the City of Covington's Surface Water Management webpage and have requested comments from the public. The public can comment by phone or by sending an email to [stormwater@covingtonwa.gov](mailto:stormwater@covingtonwa.gov). Permit compliance issues and implementation progress reports are presented at public City Council meetings that are open to public comment. The Permit required Municipal Code and Comprehensive Plan changes that were presented to the City of Covington Planning Commission for comments and public hearings before discussion and adoption by Covington City Council. Additionally, a Public Works Advisory Committee was created to review all aspects of the Public Works Department including the Stormwater Program and NPDES Phase II Permit compliance. The Public Works Advisory Committee provided the Public Works Department with recommendations for program elements that will be included in the Public Works Strategic Plan.

## Permit Requirements

- Create opportunities for public involvement through advisory councils, watershed committees, and participation in developing rate structures, stewardship programs and environmental activities. The public must be able to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, including posting on the City's website.
- Summarize activities in the Annual Report.

## Planned Activities

- Incorporate Public Works Advisory Committee's stormwater/NPDES Permit comments into the Public Works Strategic Plan.
- Present draft Public Works Strategic Plan to the Public Works Advisory Committee for final review.
- Continue to present NPDES related topics to the public at City Council and Planning Commission meetings.
- Continue to encourage public involvement and participation in the development and ongoing implementation of all permit requirements.
- Continue to post newly updated stormwater documents on the City's website for public review.
- Summarize activities in Annual Compliance Report.

## Illicit Discharge Detection and Elimination



The City of Covington's Illicit Discharge Detection and Elimination (IDDE) Program will be taking shape over the next few years. City staff has revised the Covington Municipal Code to comply with NPDES requirements and clearly reflects what is needed of the IDDE Program. Covington City Council officially adopted the Code revisions in early 2009. We have purchased the necessary supplies for spill response and illicit discharge cleanup and have trained our field staff in IDDE. The City is utilizing the King County Roads Dispatch Center for 24-hour Public Works emergencies and will be using their services for our illicit discharge and spill 24-hour hotline. The phone number is 206-296-8100. If the Dispatch Center is notified of a spill during business hours, they will call Covington City hall. For after hours, the Public Works 24-hour standby person will be notified. All IDDE phone calls will be responded to and documented. The Public Works Department is maintaining a GIS map of the City's stormwater system. The map is available to all field personnel, IDDE trained staff and City contractors to aid with maintenance and inspection activities. The map is available to the public on our Surface Water Management webpage and a hard copy is available for viewing at City Hall. We are currently working with King County to launch a Covington specific version of iMap through King County's GIS webpage. Covington iMap will allow anyone easy access to our stormwater GIS information and will be a useful tool for our IDDE program. In order to address IDDE issues on city owned property, mainly stormwater facilities, the City created a series of educational and enforcement door hangers. The purpose of these door hangers is to make homeowners near stormwater facilities aware that their behavior and illicit practices in stormwater facilities is now illegal. The City has fully implemented a Commercial Stormwater Facility Inspection Program. This program is designed to educate tenants and

business owners on IDDE and work with the owners and managers of commercial properties to ensure that private drainage systems are properly maintained.

## Permit Requirements

- Develop an ongoing program to detect and remove illicit connections, discharges and improper disposal including spills into the municipal stormwater system.
- Develop municipal storm sewer maps that include attributes for stormwater outfalls and notes receiving waters.
- Develop and implement an ordinance to prohibit non-stormwater discharges, spills, illicit connections and illegal dumping into stormwater systems.
- Develop and implement a program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into stormwater systems.
- Inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste and publicize a hotline phone number for the public to report spills, dumping and illicit discharges.
- Provide training for municipal field staff on the identification and reporting of illicit discharges in the stormwater system.
- Summarize activities in Annual Compliance Report.

## Planned Activities

- Finalize enforcement procedures for IDDE Program.
- Document all IDDE complaints and responses.
- Continue to add data to stormwater system GIS layers and update with new infrastructure.
- Continue ongoing training of staff as needed.
- Continue to utilize King County Roads Dispatch services for the City's 24-hour IDDE Hotline number.
- Continue to incorporate the public and private Stormwater Facility Inspection Program with the IDDE Program
- Distribute IDDE educational materials to properties adjacent to stormwater facilities, commercial property owners and business owners.
- Summarize activities in Annual Compliance Report.

# Controlling Runoff from New Development, Redevelopment and Construction Sites



The City of Covington has updated the Covington Municipal Code to comply with all of the ordinance requirements of the NPDES Permit. The City has also adopted the 2005 Stormwater Management Manual for Western Washington and the Puget Sound Partnership Low Impact Development (LID) Technical Guidance Manual as the basis for design, review, and inspection of new stormwater infrastructure. The City's inspection staff have been trained in the implementation and installation of BMP's to assure full effectiveness of runoff controls. This includes Low Impact Development approaches. The City maintains records of plan review, inspection and enforcement actions by City and contracted staff for all types for development in Covington. NPDES compliance staff have been included in all aspects of the development process.

At a regional level, the City of Covington has partnered with King County to assist with an EPA grant funded stormwater LID retrofit plan. This plan will examine the feasibility LID in the greater King County area.

## Permit Requirements

- Adopt an ordinance that addresses runoff from new developments, redevelopment and construction sites.
- Adopt minimum stormwater design standards that are equivalent to the Department of Ecology's 2005 Stormwater Management Manual for Western Washington.
- Implement program to review plans, inspect sites during construction and to take enforcement action against those failing to follow approved guidelines to provide facilities as required during plan review.

- Adopt codes and standards and develop practices to allow for non-structural preventative actions and source reduction practices such as Low Impact Development (LID) that use amended or native soils and vegetation to minimize runoff and remove pollutants from stormwater.
- Adopt ordinance for maintenance standards, inspection procedures and enforcement provisions to verify long-term operation and maintenance of permanent stormwater control facilities constructed after the effective date of the permit.
- Provide training for staff on new and revised regulations, standards, processes and procedures.
- Develop a process for centralizing record keeping of activities associated with new development, redevelopment and construction sites as required by the permit.
- Summarize activities in Annual Compliance Report.

## **Planned Activities**

- Continue to review plans, inspect and enforce to the standard set forth in the 2005 Stormwater Management Manual for Western Washington, Puget Sound Partnership LID Technical Guidance Manual and Covington Municipal Code.
- Provide education and assistance to developers working with the new standards.
- Continue to support the Community Development Department to ensure compliance with NPDES requirements.
- Encourage developers to use LID techniques where feasible.
- Continue ongoing training of staff as needed.
- Summarize activities in Annual Compliance Report.

## Pollution Prevention and Operations and Maintenance for Municipal Operations



The City of Covington Operations and Maintenance Program minimizes the pollutants from City activities by complying with the ESA Regional Road Maintenance Program guidelines and the maintenance standards set forth in the 2005 Stormwater Management Manual for Western Washington. City maintenance staff have been trained in the selection and use of Best Management Practices as well as spill prevention and cleanup. Public stormwater facilities are inspected, cleaned and repaired as necessary. The City's Catch Basin Inspection and Cleaning Programs meet the requirements of the Permit. We have identified all publicly owned property and have evaluated their pollution potential and runoff affects. A Stormwater Pollution Prevention Plan has been implemented at the City's Interim Maintenance Facility.

The City has dedicated funds and started a Stormwater Capital Improvement Program. Major deficiencies in the stormwater conveyance system have been identified and prioritized and the City plans to complete one project per year. System maintenance and drainage facility rehab projects have been identified and prioritized and Covington's Maintenance Crew will complete the top priorities each summer.

Covington is currently in negotiations with the cities of Maple Valley and Black Diamond to enter into a joint stormwater system cleaning and street sweeping contract. This joint contract will lower administration costs and allow all three cities to more effectively apply available funds to system maintenance.

## Permit Requirements

- Develop and implement a Municipal Operations and Maintenance (O&M) Program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards that are as protective as those noted in the 2005 Stormwater Management Manual for Western Washington.
- Perform an inspection of publicly owned and operated water quality treatment and flow control facilities and catch basins at frequency required in the permit.
- Establish and implement practices to reduce pollutants in runoff from all lands owned and maintained by the City of Covington.
- Develop and provide training for staff in implementation practices and policies to reduce pollutants in runoff from maintenance operations.
- Develop and implement a Stormwater Prevention Plan for all heavy equipment maintenance or storage yards and material storage yards and material storage facilities owned by the City of Covington.

## Planned Activities

- Maintain Stormwater Pollution Prevention Plan for the City Interim Maintenance Facility.
- Track all maintenance inspection processes, procedures and repair activities.
- Review and update all practices and procedures to assure permit compliance and make adjustments as needed.
- Continue ongoing training of staff as needed.
- Finalize joint stormwater system cleaning and street sweeping contract with the cities of Maple Valley and Black Diamond.
- Continue to assess the City's stormwater system and identify maintenance needs.
- Summarize activities in Annual Compliance Report.

## Conclusion



This Stormwater Management Plan was created by the City of Covington for the Department of Ecology as a requirement of the NPDES Phase II Permit. This document is intended as a written report of Covington's compliance with the NPDES Permit. The information in this document reflects only the portions of the City's Surface Water Management Program that are required by the Permit and does not represent the program as a whole. This document is a working draft and will be updated yearly to reflect compliance levels. This plan and level of compliance is subject to change depending on City Council decisions, funding, staffing and public participation and comment. For more information on the City of Covington's Surface Water Management Program, please visit Covington's Surface Water Management webpage.