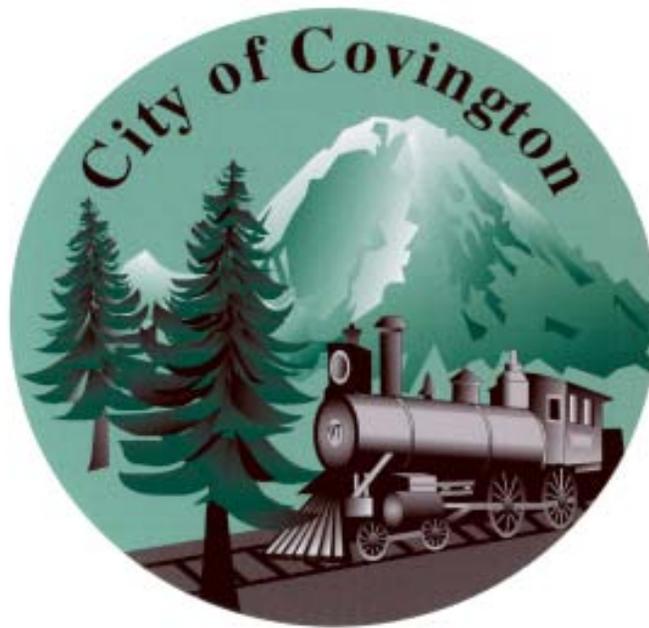

Stormwater Management Plan



For
City of Covington

March 31, 2014

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Introduction



The 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 the final report document as required by the Western Washington Phase II Municipal Stormwater Permit. This document will still need to be updated annually to reflect new compliance deadlines and additional program elements as

required by future permit cycles. This document was used by the City to report milestones and track needs in the planning for and implementation of the NPDES Permit.

In future permit cycles, 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 Pollution 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 first permit was issued on February 16, 2007 and expired on February 15, 2013. A new permit was issued on August 1, 2012 with an effective date of August 1, 2013. The new permit expires July 31, 2018. 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
- Monitoring and Assessment

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

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.

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 is an active participant involved in the Stormwater Outreach for Regional Municipalities (STORM) Group. Through grant funding, the STORM group has been able to create a regional advertising campaign for Western Washington. The Puget Sound Starts Here campaign that launched in the spring of 2009 with TV and Radio advertisements and an education website that highlights the negative affects of stormwater on the waterways of the Puget Sound. The Puget Sound Starts Here campaign is still making a difference in the region and Covington will continue to support it efforts.

On a local level, Covington 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 Cleanups, Volunteer Habitat Restoration, Recycling Events, Private Drainage Inspection Program, 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 to distribute materials and educate. The City has partnered with ECOSS and King County to provide stormwater education and training to business owner in our downtown area. The City is exploring the possibility of partnering with S.H.A.D.O.W and Green River Community College to expand our educational program and restoration efforts. There has also been interest in reviving the Alliance of South County Environmental Steward (ACES), which will allow Covington's stormwater education to reach a larger local audience. Covington uses its Surface Water Management webpage to make educational materials and useful stormwater related links available to the public. Covington's Surface

Water Management webpage can be found at following link:
http://www.covingtonwa.gov/city_departments/publicworks/swm/swm.html

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.

Compliance Activities

- Natural Yard Care and Pet Waste information is made available to Covington residents and mailers are sent to targeted 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 educate business owners through the Private Drainage Inspection Program.
- Continue working on partnership with S.H.A.D.O.W, Green River Community College and ACES to expand our educational program and restoration efforts.
- Partnership
- Continue to look for new educational opportunities.
- 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 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. 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 are 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 were included in the 2012 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.

Compliance Activities

- Incorporate Public Works Advisory Committee's stormwater/NPDES Permit comments into the Public Works Strategic Planning Document.
- 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.
- Summarize activities in Annual Compliance Report.

Illicit Discharge Detection and Elimination



The City of Covington's Illicit Discharge Detection and Elimination (IDDE) Program has taken shape over the last 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 actively look for illicit connections and discharges through its Public and Private Drainage Facility Inspection Program. The Public Works Department is maintaining a map of the City's stormwater system. The map is available to all field personnel and City contractors for field review throughout maintenance and inspection activities. The map is available to the public on our Surface Water Management webpage and through King County iMap at the following link:

<http://www5.kingcounty.gov/iMAP/viewer.htm?mapset=covington>.

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.
- Assess receiving water and prioritize the top three for annual inspection.
- 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.

Compliance Activities

- Continue to support the efforts of the IDDE program.
- Maintain GIS based stormwater map that includes all public and privately owned systems and update with new infrastructure as needed.
- Evaluate adopted enforcement procedures for IDDE program.
- Document all IDDE investigations and responses.
- Continue annual inspection of top three priority receiving waters.
- 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 support the Public and Private Drainage Facility Inspection Program.
- Distribute IDDE educational materials to properties adjacent to stormwater facilities and receiving waters.
- Continue to request feedback from the public on the City's IDDE efforts.
- 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 2012 Stormwater Management Manual for Western Washington and the Puget Sound Partnership Low Impact Development Stormwater Management Practices as the basis for design, review, and inspection of new stormwater infrastructure. The City's inspection staff has 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 review, inspection and enforcement actions by City and contracted staff.

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 2012 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.

Compliance Activities

- Continue to implement adopted Stormwater Design Manual and Covington Municipal Code to meet NPDES Permit requirements.
- Continue to encourage Low Impact Development practices where feasible.
- Continue to review plans, inspect and enforce to the standard set forth in the 2012 Stormwater Management Manual for Western Washington.
- Provide education and assistance to developers working with the new standards.
- 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 2012 Stormwater Management Manual for Western Washington. City maintenance staff has 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 Program meets the requirements of the Permit. We have identified all publicly owned property and have evaluated their pollution potential and runoff affects. City staff is currently updating the Stormwater Capital Improvement Program to better reflect the maintenance requirements of the Permit. We have acquired a new asset management system that was be fully implemented in 2013. This asset management system will increase tracking capabilities for our stormwater maintenance program as well as provide useful information for budgeting and prioritizing.

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 2012 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.

Compliance Activities

- Continue to implement the Stormwater Pollution Prevention Plan at the City of Covington Interim Maintenance Facility and update plan annually.
- Continue to maintain Covington's storm drainage system and perform repairs as needed to ensure system functionality.
- Continue tracking all maintenance inspection processes, procedures and repair activities.
- Continue developing and implementing Covington's Stormwater Capital Improvement Program to address larger system repairs and retrofits.
- Continue to review and update all practices and procedures to assure permit compliance and make adjustments as needed.
- Continue to utilize new asset management system.
- Continue on going training of staff as needed.
- Summarize activities in Annual Compliance Report.

Monitoring and Assessment

The City of Covington does not current have a program in place for stormwater monitoring or stormwater related studies due to limited in-house capabilities. But the Soos Creek Basin is has been studied and monitored for year by other agencies including King County, Department of Ecology, and the Muckleshoot Tribe. Over the last few year we have found several opportunity to partner with these entities and supported the existing programs in the area.

In order to help local jurisdictions meet the Monitoring and Assessment requirement in the permit, a Regional Stormwater Monitoring Program (RSMP) was establish in 2013. The RSMP is funded and organized by Permittees with the help of the Department of ecology. Covington makes an annual payment to the RSMP to carry of Status and trends monitoring and program effectiveness studies in the greater the Puget Sound region. Covington also holds a seat on the RSMP Oversight Committee to help insure that the RSMP is use funds appropriately and that the work being done in meets the intent of the permit.

Permit Requirements

- Monitor status and trends of receiving waters, including water quality, benthos, habitat, and sediment chemistry.
- Study the effectiveness of Stormwater Management Program.
- Pay into a collective fund to create a Source Identification Information Repository.

Compliance Activities

- Pay into RSMP for Status and Trends Monitoring.
- Pay into RSMP for Program effectiveness studies.
- Pay into RSMP for Source Identification Information Repository.
- Continue to take an active role in the RSMP Oversight Committee.

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 the 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. Although the Permit required this document to be a final report, it will continue to evolve. This document and our compliance programs will continue to change to meet the future requirements and deadlines set forth in the new permit. We will continue to update it annually 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 Surface Water Management program, please visit Covington's Surface Water Management webpage.

