
Stormwater Management Plan



For
City of Covington

FIRST DRAFT
March 31, 2008

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Appendix A Western Washington Phase II Municipal Stormwater Implementation Schedule

1. Introduction

The City of Covington's Stormwater Management Plan was prepared to guide the City in planning, funding and implementing a comprehensive program for addressing current and future regulatory and policy requirements for managing stormwater runoff, water quality, flooding problems, and the City's natural resources.

The Public Works Department is responsible for Surface Water Management and the National Pollutant Discharge Elimination System (NPDES) implementation. Other City departments will need to be involved for full implementation including the Community Development Department, City Clerk/Public Information Officer and Finance Department. 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.

This Stormwater Management Plan (SWMP) is and will remain an evolving document until March 30, 2012. Many key policy issues will be decided over the next 12 months that will clarify the direction and specifics of the SWMP. Currently funding, staff and enforcement levels are all being discussed and considered by the Covington City Council. A gap analysis of the City codes, standards and ordinances is also underway that will determine the immediate and long-term needs of the Covington 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 is currently ahead in many areas, the limited resources of the City will be generally focused on the next deadline of the implementation schedule.

A. Purpose

The purpose of the Stormwater Management Plan is to address how to meet the 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 stormwater plan 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.

To address current problems the City of Covington is faced with many regulatory and policy obligations, including:

- **The Phase II National Pollution Discharge Elimination System** (NPDES) stormwater permitting program, 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 Phase II Permit came into effect on February 16, 2007.
- **Growth Management Act** (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.** In response to the March 1999 listing of Puget Sound Chinook salmon under the Endangered Species Act (ESA), the Federal Government is developing new requirements to address impacts of stormwater on salmon and its habitat.
- **City 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.

B. Western Washington Phase II Municipal Stormwater Permit

The City of Covington as a City of less than 100,000 populations 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
- Construction Runoff Controls
- Pollution Prevention and Municipal Operation and Maintenance
- Monitoring

The entire NPDES Permit, Covington Stormwater Comprehensive Plan, and Annual Compliance Report can be found at the following link:

<http://www.ci.covington.wa.us/departments/surfacewatermanagement.cfm>

C. 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.

2. Public Education and Outreach

A. 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.

B. Current Activities

- Biannual planning and education days during Earth Day/Arbor Day in April and Make a Difference day in October.
- Catch basin marking program.
- Public Works Week and Covington Days booths.
- Maintaining SWM specific webpage on Covington website.

C. Planned Activities

- Fully develop an outreach strategy with input from the City Council, staff and the community.
- Participate in the regional education program development through the Storm Outreach Forums.
- Summarize activities in Annual Compliance Report.

3. Public Involvement and Participation

A. 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.

B. Current Activities

- Posting of the Annual Report and SWMP on the City website.
- Maintaining a stormwater email address (stormwater@ci.covington.wa.us) to allow for citizen comment.
- Continuing City Council and public education process on NPDES implementation.

C. Planned Activities

- Create a Public Works Task Force that will address all Public Works issues including all stormwater issues.
- Continue to develop a public involvement and participating opportunities to include all permit requirements.
- Summarize activities in Annual Compliance Report.

4. Illicit Discharge Detection and Elimination

A. 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 map that includes 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 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.

B. Current Activities

- Maintaining stormwater system map available to all field personnel and contractors for field review throughout maintenance and inspection activities.
- Have begun GAP analysis of all ordinances and codes to include Community Development Department.
- Utilizing available training programs to enhance education of all City field staff on water quality issues.
- Managing spill response program that includes all field staff and contracted Police and Fire Departments.

C. Planned Activities

- Develop enforcement policies and procedures.
- Document all responses.
- Define all training and education needs.
- Redevelop commercial and private facility inspection program to include the IDDE program implementation, monitoring and education.
- Implement a hotline for reporting IDDE.

5. Controlling Runoff from New Development, Redevelopment and Construction Sites

A. Permit Requirements

- Adopt an ordinance that addresses runoff from new developments, redevelopment and construction sites.
- Adopt minimum stormwater designs 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 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.

B. Current Activities

- All City Inspection staff has been trained in 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.

C. Planned Activities

- Adopt a new stormwater manual and revise codes and standards as identified in GAP analysis.
- Review inspection, plan review and enforcement process and procedures and make changes as needed.
- Revise maintenance standards.
- Develop a staff training plan.
- Create an education and outreach plan for commercial and private facility owners.
- Summarize activities in Annual Compliance Report.

6. Pollution Prevention and Operations and Maintenance for Municipal Operations

A. Permit Requirements

- Develop and implement a municipal operations and maintenance program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards that are as protecting 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.

B. Current Activities

- The City of Covington Operations and Maintenance Program takes steps to minimize pollutants in runoff from City activities as noted in the ESA Regional Road Maintenance Program guidelines, which have been formally adopted by the City.
- Water quality treatment and flow control facilities are inspected, cleaned and repaired as necessary.
- The catch basin inspection and cleaning program currently meets permit requirements.

- All full-time Operations & Maintenance staff has been trained on pollutant reduction using best management practices.
- The City has identified all publicly owed property and is evaluating their pollution and runoff affects.

C. Planned Activities

- Develop a Stormwater Pollution Prevention Plan for all heavy equipment maintenance and storage areas and facilities owned and operated by the City of Covington.
- Tracking of all maintenance inspection processes, procedures and repair activities.
- Review and update all practices and procedures to assure permit compliance and make adjustments as needed.

7. Conclusion

This is a working document. It will be updated annually with the final plan to be published by March 30, 2012. This plan is likely to change depending on City Council decisions, funding, staffing and public participation and comment.

