
Stormwater Management Plan



For
City of Covington

SECOND DRAFT
March 31, 2009

Table of Contents

1. Introduction
 - A. Purpose
 - B. Western Washington Phase II Municipal Stormwater Permit
 - C. Responsibilities and Coordination
 2. Public Education and Outreach
 - A. Permit Requirements
 - B. Current Activities
 - C. Planned Activities
 3. Public Involvement and Participation
 - A. Permit Requirements
 - B. Current Activities
 - C. Planned Activities
 4. Illicit Discharge Detection and Elimination
 - A. Permit Requirements
 - B. Current Activities
 - C. Planned Activities
 5. Controlling Runoff from New Development, Redevelopment and Construction Sites
 - A. Permit Requirements
 - B. Current Activities
 - C. Planned Activities
 6. Pollution Prevention and Operations and Maintenance for Municipal Operations
 - A. Permit Requirements
 - B. Current Activities
 - C. Planned Activities
 7. Conclusion
- 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, 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.

This Stormwater Management Plan (SWMP) is and will remain an evolving document until March 30, 2012. In 2008, Covington City Council approved a stormwater utility rate increase that will adequately fund and support the program through the full term of the Permit. In 2009, City staff will be finalizing the necessary changes to the City codes, standards and ordinances to comply with the 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 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 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 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**
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 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.

B. 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.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

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 involved in the Stormwater Outreach Regional Municipalities (STORM) Group of Puget Sound's efforts to create a regional advertising campaign for Western Washington that will highlight the negative affects of stormwater on the waterways of the Puget Sound. We are 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, protection of native vegetation. On a local level, the City of 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 Cleanup, Volunteer Habitat Restoration and Catch Basin Marking Program. Covington utilizes volunteer events and other City sponsored events like Covington Days, Community group meetings and ACES nature yard care events to distribute materials and educate. 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:

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

C. Planned Activities

- Stormwater Informational booth at five ACES events in 2009.
- Continue to participate in the regional stormwater advertising campaign development through the STORM Forum.
- Stormwater educational presentation to Public Works Advisory Committee, Planning Commission and HOA/Community Meeting.
- Fully develop an outreach strategy with input from the City Council, staff and the community.
- 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

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 Surface Water Management webpage and requested comments from the public. The public can comment by phone or by sending an email to stormwater@ci.covington.wa.us. Permit compliance issues and implementation progress reports are presented at public City Council meetings. Required policy changes will be presented to the City of Covington Planning Commission for comments and public hearings. In 2009, a Public Works Advisory Committee will be 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 will be providing the Public Works Department with recommendations for program elements.

C. Planned Activities

- Create a Public Works Advisory Committee that will address all Public Works issues including all stormwater/NPDES Permit issues.
- Continue to develop a public involvement and participation 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 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.

B. Current Activities

The City of Covington's Illicit Discharge Detection and Elimination (IDDE) Program will be taking shape over the next few years. Currently, City staff is revising the Covington Municipal Code to better reflect the need of the IDDE Program and Permit compliance. The code revisions will be completed and presented to Covington City Council for adoption mid year 2009. We have purchased the necessary supplies for spill response and illicit discharge cleanup and have trained key field staff in its use. 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. 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.

C. Planned Activities

- Develop enforcement policies and procedures.
- Document all responses.
- Define all training and education needs.
- Redevelop public and private drainage facility inspection program to include the IDDE program implementation, monitoring and education.
- Create a stormwater system map layer using GIS
- Summarize activities in Annual Compliance Report.

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 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 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

The City of Covington is in the process of revising and updating the Covington Municipal Code to comply with the requirements of the NPDES Permit. The City will be adopting the 2005 Stormwater Management Manual for Western Washington and the Puget Sound Partnership Low Impact Development Stormwater Management Practices in mid 2009. 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 Design Manual and revise Covington Municipal Code to meet NPDES Permit requirements.
- Review inspection, plan review and enforcement processes and procedures and make changes as needed.
- Enforce maintenance standard outlined in new 2005 Stormwater Management Manual for Western Washington.
- 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 (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.

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. Public storm drainage facilities are inspected, cleaned and repaired as necessary. Our Catch Basin Inspection and Cleaning Program meets the requirements of the Permit. All full-time O&M staff has been trained on pollutant reduction using best management practices. We have identified all publicly owned property and are evaluating their pollution and runoff affects. City staff is currently updating the Stormwater Capital Improvement Program to better reflect the requirements of the Permit.

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.
- Summarize activities in Annual Compliance Report.

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.

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APPENDIX A

CHAPTER SECTION LINE		WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER PERMIT IMPLEMENTATION SCHEDULE																																																																																			
		as of: 11-5-08						2007					2008					2009					2010					2011					2012																																																				
		J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
S5	A1	Produce written SWMP document																																																																																			
S9	A1	Annual Compliance Report																																																																																			
S5	C2	a. Public Involvement & Participation																																																																																			
S5	C2	b. Surface Water Management website posting																																																																																			
S5	A1	a. Track costs of SWMP Plan																																																																																			
S5	C1	a. Public Education & Outreach																																																																																			
S5	C1	b. Track education & outreach activities																																																																																			
S5	C3	d.ii Illicit discharge hotline / public reporting																																																																																			
S5	C3	b. Discharge regulatory mechanism / ordinance																																																																																			
S5	C3	f.i Field staff training (Illicit Discharge)																																																																																			
S5	C4	a. Runoff regulatory mechanism / Ordinance																																																																																			
S5	C4	a.i Ordinance to enforce Appendix 1 of the permit																																																																																			
S5	C4	a.i Ordinance for variance criteria to Appendix 1																																																																																			
S5	C4	a.i Track number of variances to Appendix 1																																																																																			
S5	C4	a.ii Ordinance for site planning & BMP selection																																																																																			
S5	C4	a.iii Ordinance for private stormwater facility inspect																																																																																			
S5	C4	a.iv Ordinance to allow low impact development																																																																																			
S5	C4	a.v Ordinance for "Erosivity Waiver" in Appendix 1																																																																																			
S5	C4	b. Implement development permitting process																																																																																			
S5	C4	b. Apply permitting process to all project ≤ 1 acre																																																																																			
S5	C4	b.i Review all Stormwater Site Plans																																																																																			
S5	C4	b.ii Pre-development site inspection per Appendix 7																																																																																			
S5	C4	b.iii Inspect all site erosion and sediment controls																																																																																			
S5	C4	b.iii Enforce erosion and sedimentation control plan																																																																																			
S5	C4	b.iv Inspect new storm facilities prior to approval																																																																																			
S5	C4	b.iv Maintenance plan for new facilities (bond program)																																																																																			
S5	C4	b.iv Enforce maintenance plan (bond program)																																																																																			
S5	C4	b.vi Enforcement strategy for non-compliance																																																																																			
S5	C4	c. Long-term O&M for facilities and BMPs																																																																																			
S5	C4	c. Inspect post construction stormwater controls																																																																																			
S5	C4	c.i Ordinance to identify responsible parties for O&M																																																																																			
S5	C4	c.ii Est. maint. standard = to Ch.4 Vol.V of 05' SMMWV																																																																																			
S5	C4	c.ii Perform timely maintenance																																																																																			
S5	C4	c.iii Inspect all storm treatment & flow control facilities																																																																																			
S5	C4	c.iv Inspect all storm systems owned by developers																																																																																			
S5	C4	d. Track records from new development inspections																																																																																			
S5	C4	f. Train all related staff in Comm. Dev.																																																																																			
S5	C3	f.i Train all related staff on IDDE																																																																																			
S5	C3	c.ii Prioritize receiving waters for inspection																																																																																			
S5	C3	f.ii Ongoing training program / documentation																																																																																			
S5	C5	Operations & Maintenance Program																																																																																			
S5	C5	a. Est. maint. standard = to Ch.4 Vol.V of 05' SMMWV																																																																																			
S5	C5	c. Check all stormwater facilities after major storms																																																																																			
S5	C5	c.ii Perform timely maintenance																																																																																			
S5	C5	c.iii Inspect all storm treatment & flow control facilities																																																																																			
S5	C5	d. Inspect all city owned catch basins																																																																																			
S8	C1	a. Long-term stormwater monitoring																																																																																			
S8	C1	b.ii BMP effectiveness monitoring																																																																																			
S5	C3	c.ii Inspect three receiving waters																																																																																			
S5	C3	a. Develop stormwater mapping system																																																																																			
S5	C3	a.i Map outfalls, receiving waters, & structural BMPs																																																																																			
S5	C3	a.iii Map systems that do not drain to surface water																																																																																			
S5	C3	c.ii Assessment of 3 high priority receiving waters																																																																																			
S8	C2	a. Submit status of Monitoring Plan																																																																																			
S5	A1	SWM Program fully developed & implemented																																																																																			
S5	C3	Illicit Discharge Detection and Elimination																																																																																			
S5	C3	c. Non-stormwater discharge program																																																																																			
S5	C3	c.ii Identify possible discharge areas																																																																																			
S5	C3	c.ii Implement field assessment activities																																																																																			
S5	C3	c.iii Procedures for characterizing nature of discharge																																																																																			
S5	C3	c.iv Procedures for tracing IDDE program																																																																																			
S5	C3	c.v Procedures for removing discharge source																																																																																			
S5	C3	d. Inform public on hazards of illegal discharges																																																																																			
S5	C3	d.i Distribute info on illegal discharges to public																																																																																			
S5	C3	e. Track number & type of spills																																																																																			
S5	C3	e. Track number & type of illicit discharges																																																																																			
S5	C3	e. Track number of inspections for illicit connections																																																																																			
S5	C3	e. Feedback form illicit discharge education efforts																																																																																			

Effective Date of Permit: February 16, 2007

Permit Expiration Date: February 16, 2012

	Existing program noncompliant
	In development
	Implemented
	Compliant
	Compliance dead line
	On going work required