

STORMWATER MANAGEMENT PROGRAM



2016

City of Longview



This page is intentionally blank

*This document outlines the City of Longview's Stormwater Management Program
in compliance with the provisions of
The State of Washington Water Pollution Control Law Chapter 90.48 Revised Code of Washington
and
The Federal Water Pollution Control Act (The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.*

Abbreviations and Acronyms

BMP	Best Management Practice
CDID #1	Consolidated Diking Improvement District #1
City	City of Longview
Ecology	Washington Department of Ecology
IDDE	Illicit Discharge Detection and Elimination
K-12	Kindergarten through 12 th Grade
LMC	Longview Municipal Code
LSAC	Longview Stormwater Advisory Committee
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
Permit	Western Washington Phase II NPDES Municipal Stormwater Permit
PSA	Public Service Announcement
RSMP	Puget Sound Regional Stormwater Monitoring Program
SIDIR	Source Identification Information Repository
SOP	Standard Operating Procedure
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan

STORMWATER MANAGEMENT PROGRAM

CITY OF LONGVIEW

TABLE OF CONTENTS

INTRODUCTION	1
Background	1
The City of Longview Municipal Separate Storm Sewer System.....	2
Stormwater Management Program Plan.....	2
SWMP Administration.....	4
PUBLIC EDUCATION AND OUTREACH	5
Permit Requirements	5
Minimum Performance Measures:.....	5
Completed and Current Activities.....	6
Planned Activities.....	8
PUBLIC INVOLVEMENT AND PARTICIPATION	9
Permit Requirements	9
Minimum Performance Measures:.....	9
Completed and Current Activities.....	9
Planned Activities.....	10
ILLICIT DISCHARGE DETECTION AND ELIMINATION	11
Permit Requirements	11
Minimum Performance Measures:.....	11
Completed and Current Activities.....	12
Planned Activities.....	13
CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES	14
Permit Requirements	14
Minimum Performance Measures:.....	14
Completed and Current Activities.....	15
Planned Activities.....	17

MUNICIPAL OPERATIONS AND MAINTENANCE 19
 Permit Requirements 19
 Minimum Performance Measures:..... 19
 Completed and Current Activities..... 20
 Planned Activities..... 21

COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS 23
 Permit Requirements 23
 Minimum Performance Measures:..... 23
 Completed and Current Activities..... 23
 Planned Activities..... 23

MONITORING AND ASSESSMENT..... 25
 Permit Requirements 25
 Minimum Performance Measures:..... 25
 Completed and Current Activities..... 25
 Planned Activities..... 26

INTRODUCTION

Background

The National Pollutant Discharge Elimination System (NPDES) is the program created under the Federal Clean Water Act to address water pollution by regulating point sources that discharge pollutants to waters of the United States. These sources are regulated by a set of permits which are administered by the Washington Department of Ecology (Ecology) in Washington State. Permitted discharges include municipal separate storm sewer systems (MS4's), which collect and convey stormwater runoff to surface waters. As an operator of a MS4, the City of Longview is required to have coverage under Ecology's NPDES municipal stormwater permit program.

The Western Washington Phase II Municipal Stormwater Permit (Permit) outlines stormwater program activities and implementation milestones that the City must follow to comply with the Clean Water Act. Each stormwater Permit holder is required to develop a Stormwater Management Program (SWMP) that outlines the required activities, implement those activities within the required timeframes of the permit term, and submit annual reports to Ecology by March 31st each year to document progress toward permit compliance. The City of Longview was first issued its Permit by Ecology in 2007 and has been implementing a SWMP since that time. The Permit was reissued in 2012 and is effective until July 31, 2018. The geographic area of Permit coverage and the SWMP is the entire incorporated area of the City and all future annexed areas.



Longview's Lake Sacajawea

The City of Longview Municipal Separate Storm Sewer System

The City of Longview owns and maintains a system designed for the safe collection, conveyance and passage of stormwater runoff known as a municipal separate storm sewer system or MS4. The MS4 includes all municipal roads and streets, curbs, gutters, catch basins, storm pipes, roadside ditches, culverts, man-made channels, pumps and other conveyances which are owned or operated by the City.

Various portions of the City's MS4 discharge to a number of different water bodies including Lake Sacajawea, the Cutoff Slough, and the man-made flood control ditches managed by the Consolidated Diking Improvement District #1 (CDID #1). The vast majority of Longview lies within CDID #1's system of flood protection levees, while the higher elevations of the City drain to Ditch 6 at the levee perimeter. Due to the nature of this controlled system, the City's stormwater discharges can ultimately only reach the receiving waters of either the Cowlitz or Columbia Rivers through a series of flood control pump stations.

Longview's MS4 shares a border with the portion of the City of Kelso's MS4 that lies west of the Cowlitz River and Cowlitz County's MS4 that is contiguous with Longview's city limits. The City works closely with both Kelso and the County on interconnected stormwater infrastructure and common watersheds, as well as overall implementation of several stormwater program elements and Permit-related requirements.

Stormwater Management Program Plan

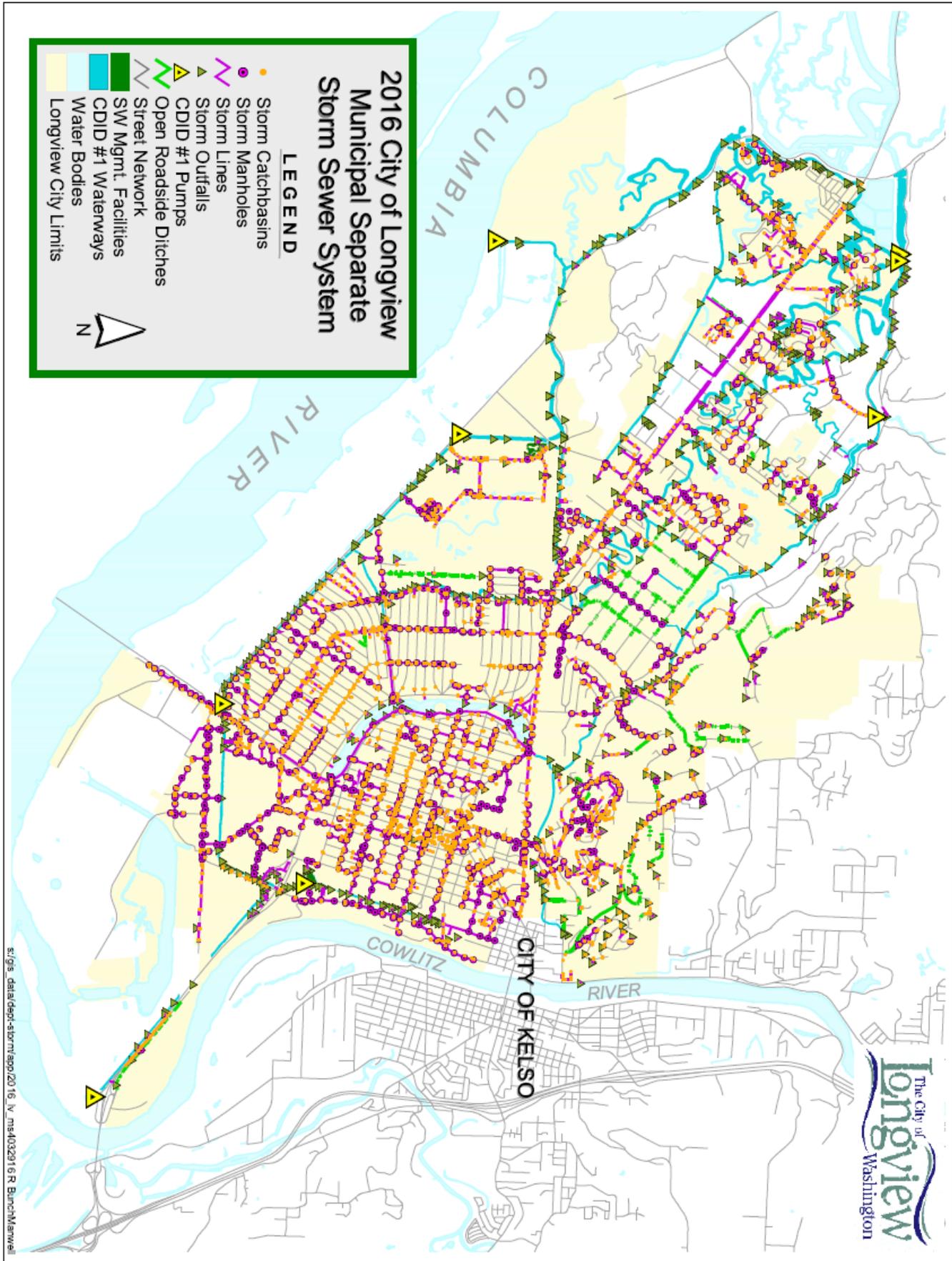
The Stormwater Management Program (SWMP) is the set of actions and activities undertaken by the City to reduce the discharge of pollutants from the MS4. The City is required to prepare written documentation of the SWMP as a SWMP Plan document.

This document, the City's SWMP Plan, details the completed, current and planned stormwater program actions and activities for the upcoming year in order to meet the requirements of the Permit. The SWMP Plan is intended to inform both the regulatory needs of the Permit as well as the public on the City's stormwater program and compliance efforts.

This document details the elements of the City's SWMP, which coincide with the programmatic components and requirements under Sections S5, S7 and S8 of the Permit:

- Public Education and Outreach (S5.C.1)
- Public Involvement and Participation (S5.C.2)
- Illicit Discharge Detection and Elimination (S5.C.3)
- Controlling Runoff From New Development, Redevelopment & Construction (S5.C.4)
- Municipal Operations & Maintenance (S5.C.5)
- Compliance with Total Maximum Daily Load Requirements (S7)
- Monitoring & Assessment (S8)

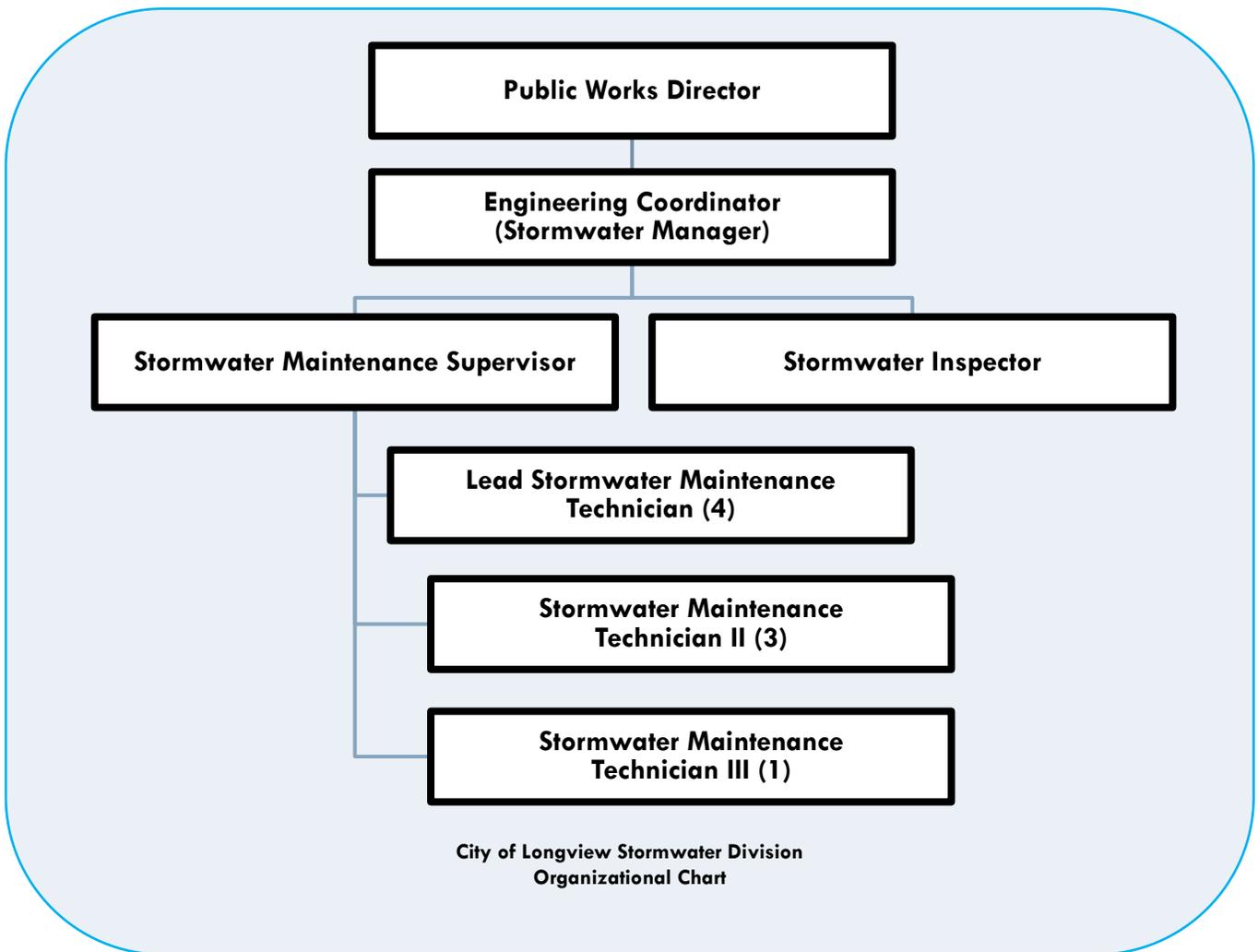
This SWMP Plan is revised annually and submitted to Ecology with the Permit annual report. It is available on the City's website at www.mylongview.com.



SWMP Administration

The administration of the City of Longview’s Permit is managed by the Stormwater Division of the Public Works Department. This Stormwater Division is also primarily responsible for the development and implementation of the SWMP. The Stormwater Division currently consists of the Division Manager (Engineering Coordinator), Stormwater Inspector, Stormwater Maintenance Supervisor, eight (8) Stormwater Maintenance Technicians, and a portion of an Administrative Assistant. The Stormwater Division reports to and is overseen by the Public Works Director. The organization of the Stormwater Division is shown below.

The majority of the City’s SWMP activities are funded by the City’s Stormwater Utility which is an enterprise fund based on user fees on properties within the City.



PUBLIC EDUCATION AND OUTREACH

The City's public education and outreach program focuses on building general awareness among the public on the impacts created by stormwater runoff and the ways that everyone can be part of the solution to stormwater pollution.

Permit Requirements

An education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The education program may be developed and implemented locally or regionally.

Minimum Performance Measures:

- Provide an education and outreach program for the area served by the MS4. The program shall be designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem. The program should build general awareness as well as effect behavior changes.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area, and use the resulting measurements to direct education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors.



Completed and Current Activities

The City of Longview has developed a comprehensive public education effort to improve the understanding and adoption of strategy for various targeted behaviors and targeted audiences which have included:

- ☑ **Market Analysis** – A comprehensive Stormwater Market Research Study was completed by the City in conjunction with the City of Kelso, Cowlitz County and Consolidated Diking Improvement District #1 (CDID #1). This professional study was undertaken to evaluate the stormwater public education and outreach efforts to both the general public and target business audiences in the greater Longview-Kelso area. Surveys were conducted in 2008 before implementation of a public education and outreach plan, and repeated in November 2010 to determine improvements in the knowledge and practices of the public and key businesses compared to the baseline 2008 data.
- ☑ **Websites** – City of Longview Stormwater Division’s website, www.cleanstormwater.org, provides public information and awareness on a variety of topics including the City’s NPDES MS4 permit, water quality information, guidance on private stormwater facilities, and things that citizens can do. There is also a Frequently Asked Questions (FAQ) section, an online form to report illicit discharges and links to the City’s stormwater manual and Permit annual reports. These documents are also available on the City of Longview’s primary website, www.mylongview.com, found on the *Stormwater* page under *Your Government / Departments / Public Works Department*.
- ☑ **Brochure** – The City produced the general *Solution to Stormwater Pollution* brochure in conjunction with the City of Kelso, Cowlitz County and CDID #1. This brochure is made available at public events, City Hall, and other venues.
- ☑ **Utility Bill Inserts** – The City’s stormwater brochure and a stormwater leaflet has been included several times within the City’s bimonthly utility bills.
- ☑ **City Newsletter** – *City Info* (A newsletter for Longview citizens found on the City website) features articles related to stormwater including: stormwater utility fee rates, pervious concrete, improving water quality, charity car wash fundraisers, stormwater management services, and the local stormwater pollution hotline.



- ☑ **Paid Media Advertisements** – Paid ads in *The Daily News* (TDN) and the *Valley Bugler* focusing on general awareness of stormwater pollution, how to be part of the solution, and the local water pollution hotline.
- ☑ **Print Journalism** – Stories run by the local newspaper, *The Daily News* (tdn.com), covering the City’s stormwater program and activities.



Event Booth for Earth Day 2015

☑ **Radio Interviews** – Interviews on local radio stations covering stormwater and water quality topics.

☑ **Public Events** – Participation in a number of public events each year with a booth or table providing information and tips on stormwater pollution prevention. These events include Earth Day (with hands-on education activities for kids), the Cowlitz County Home & Garden Show, and Lower Columbia Contactors Association 811 Awareness Breakfast.

☑ **K-12 Education** – River Ranger presentations to Longview Public School District 4th grade classes focusing on the hydrologic cycle, stormwater pollution and its impacts, and Longview’s stormwater system.

- ☑ **Training Workshops** – A series of training workshops were provided for engineers, developers, and contractors covering the City’s stormwater regulations and manual, including topics such as flow control and treatment BMPs as well as Low Impact Development (LID) practices and approaches. The City has also offered a “Creating Your Own Rain Garden” class in cooperation with Washington State University (WSU) Extension.
- ☑ **Storm Drain Markers** – The City partnered with a local church on a stewardship program to install storm drain markers. More than 3,000 stormwater inlets and catch basins were marked by volunteers over a 3-year period.
- ☑ **Charity Car Wash Program** – The City offers the use of three car wash kits for charity fundraiser car washes at approved locations. The kits include a storm drain insert, a hose and a pump to direct the wash waters to a sanitary sewer drain or landscaped area. The kit also includes a sign to inform the public that the car wash is an authorized “stormwater-friendly” event.

Target Audience Study – The City began work on a study in 2015 to measure the adoption of target behaviors for a target audience (mobile carpet and interior cleaners) in conjunction with the City of Kelso and Cowlitz County.

Planned Activities

Planned activities for 2016 include:

- Update the City's stormwater web pages.
- Update the general stormwater brochure and create new collateral materials focused on target audiences and behaviors.
- Create new utility bill inserts and include inserts for a least two (2) billing cycles this year.
- Undertake additional direct mailings to target businesses.
- Full-page paid advertisement in the Columbia Reader.
- Combination of paid and public service announcement (PSA) radio ads on local stations.
- Participation in additional public events (e.g. Go 4th Festival, Squirrel Fest, Cowlitz Farmers Market, etc.).
- Work with the Longview School District on stormwater and water quality curricula for K-12 education.
- Explore new opportunities for stewardship activities.
- Use social media to facilitate and further disseminate stormwater education and outreach messaging.
- Complete the Target Audience Study with the participation of the City of Kelso and Cowlitz County.
- Continue all other ongoing programs and activities.
- Track and document all public education and outreach efforts.

The City intends to collaborate with the other NPDES MS4 primary and secondary permittees within the Longview/Kelso area (City of Kelso, Cowlitz County, Consolidated Diking Improvement District #1, Kelso School District, Longview School District, Lower Columbia College) and the Port of Longview to develop a comprehensive regional social marketing strategy and public information and education campaign on stormwater and water quality protection.

PUBLIC INVOLVEMENT AND PARTICIPATION

The City's public involvement and participation program is designed to seek regular input from stakeholders and provide opportunities to provide feedback on the SWMP.

Permit Requirements

Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities.

Minimum Performance Measures:

- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the SWMP.
- Post the SWMP Plan and Permit annual report on the City website no later than May 31 each year. All other submittals shall be available to the public upon request.

Completed and Current Activities

- ☑ **Longview Stormwater Advisory Committee** – The Longview Stormwater Advisory Committee (LSAC) was prescribed and is governed by City Ordinance 1869 and Committee Bylaws. LSAC is comprised of five to seven appointed members who represent citizen, development, industry and environmental interests. LSAC's responsibilities are to assist, guide and make recommendations on the City's stormwater management program and policies. LSAC meetings are convened at least once quarterly, unless there is no business to be conducted.

LSAC provided extensive input and guidance on the development of the City's SWMP as well as the current stormwater ordinance and manual.

- ☑ **Reporting** – The City posts its updated SWMP Plan and each year's NPDES municipal stormwater permit annual report to www.mylongview.com no later May 31 each year.



Planned Activities

Planned activities for 2016 include:

- Involve LSAC and other stakeholder groups in the update of the City's stormwater ordinance, manual, and associated requirements for new development, redevelopment, and construction site projects to include the Minimum Requirements, thresholds, and definitions in Appendix 1 of the Permit.
- Involve LSAC and other stakeholder groups in the review and revision of local development-related codes, rules, standards, or other enforceable documents to incorporate and require Low Impact Development (LID) principles and BMPs.
- Publish the current SWMP Plan and 2015 NPDES Permit annual report to www.mylongview.com no later May 31, 2016.
- Involve LSAC and other stakeholder groups in the review and revision of the SWMP for 2017 to be completed no later than December 31, 2016.
- Track and document all public involvement and participation efforts.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City's stormwater ordinance prohibits non-stormwater, illicit discharges into the MS4. The IDDE program guides City responses to spills and reports of potential discharges to the municipal separate storm sewer system.

Permit Requirements

An ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

Minimum Performance Measures:

- Continue mapping of the MS4 on an ongoing basis and update maps periodically.
- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the MS4, which includes escalating enforcement procedures and actions.
- Implement a compliance strategy that includes informal compliance actions such as public education and technical assistance as well as the enforcement provisions of the ordinance or other regulatory mechanism.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the MS4, which includes the following components:
 - Procedures for conducting investigations of the MS4, including field screening and methods for identifying potential sources.
 - A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
 - An ongoing training program for all municipal field staff.
 - Program to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

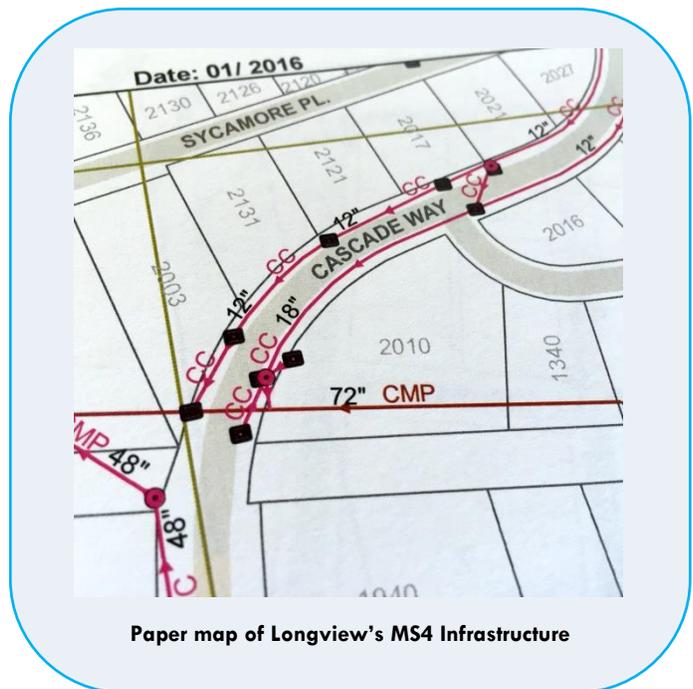
- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the MS4.
- Train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities.
- Track and maintain records of the activities conducted to meet the IDDE program requirements.

Completed and Current Activities

☑ **MS4 Mapping** – The City has both digital GIS maps and physical map books of its MS4 and stormwater infrastructure assets. This mapping is regularly updated to address new development as well as to meet the Permit requirements.

☑ **Stormwater Ordinance** – The City passed Ordinance 3100 in 2009 which prohibits non-stormwater illicit discharges and illegal connections to the MS4 and provides for escalating enforcement of violations. These provisions are codified as Longview Municipal Code (LMC) 17.80 - *Stormwater Management*.

☑ **IDDE Program** – The City developed an ongoing program and standard operating procedures (SOP's) to detect and identify non-stormwater discharges and illicit connections into the MS4. This program is based on information included in the Center for Watershed Protection IDDE guidance manual. The City's program includes windshield surveys undertaken by Stormwater Division staff in the field, reports by other City staff and departments, dry weather outfall inspections performed on a rotating basis, and screening of inlets and catch basins for illicit discharges and illegal connections during regular inspection and cleaning activities.



Paper map of Longview's MS4 Infrastructure

☑ **IDDE Public Awareness and Education** – The City maintains both a telephone hotline (360-578-0900) in conjunction with the City of Kelso as well as an online form on its website for reporting illicit discharges, spills, and illegal dumping to the MS4. The City's stormwater public education and outreach program includes a major focus on informing businesses and the general public on water quality impacts associated with illicit discharges and improper disposal of waste.

- Staff Training** – The City ensures that all staff involved with implementing the IDDE Program receive adequate training, including those responsible for either recognizing and reporting illicit discharges, spills, or illegal dumping and those who respond to them.
- Recordkeeping** – The Stormwater Division tracks and keeps records of all IDDE reports/complaints, inspection, and remediation actions.

Planned Activities

Planned activities for 2016 include:

- Continue to implement the current IDDE program.
- Review and update the MS4 maps and GIS data as needed for compliance with Permit requirements.
- Review and revise the current ordinance to address Permit requirements as it relates to IDDE.
- Review and revise the City's program and SOP's based on the 2013 Ecology IDDE guidance document (*Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*).
- Train new City staff and provide refresher training for other staff on recognizing and reporting illicit discharges, spills, or illegal dumping.
- Continue all required recordkeeping.

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

The City's stormwater program promulgates and ensures compliance with standards for construction stormwater (erosion and sediment) control as well as permanent stormwater management on most development, redevelopment, and construction projects.

Permit Requirements

A program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities for both private and public development, including roads.

Minimum Performance Measures:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects that includes the Minimum Requirements, thresholds, and definitions in Appendix 1 of the Permit.
- A permitting process with site plan review, inspection, and enforcement capability for both public and private projects that meet the minimum thresholds, which includes the following components:
 - Review of all stormwater site plans for proposed development activities.
 - Site inspections of all permitted development sites that have high potential for sediment transport, prior to clearing and construction.
 - Site inspections of all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls.
 - Site inspections of all permitted development sites upon completion of construction, and prior to final approval or occupancy, to ensure proper installation of permanent stormwater facilities.
 - An enforcement strategy to respond to issues of non-compliance.



- Provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that are permitted and constructed, including:
 - Implementation of an ordinance or other enforceable mechanism that clearly identifies the party responsible for ongoing maintenance, requires regular inspections of facilities, and establishes enforcement procedures for compliance.
 - Maintenance standards that are as or more protective of facility function than those specified in the *Stormwater Management Manual for Western Washington*.
 - Annual inspections of all regulated stormwater treatment and flow control BMPs/facilities that discharge to the MS4.
 - Inspections of all permanent stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every six months until 90% of the lots are constructed, or site is fully stabilized.
 - Maintain records of all inspections and enforcement actions.
- Make available as applicable Ecology's forms for the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" to representatives of proposed new development and redevelopment.
- Train all staff whose primary job duties are implementing the program, including permitting, plan review, construction site inspections, and enforcement.
- Review, revise and make effective local development-related codes, rules, standards, or other enforceable documents to incorporate Low Impact Development (LID) principles and LID BMPs as the preferred approach no later than June 30, 2017. Submit a summary of the results of the LID review and revision process no later than March 31, 2018.

Completed and Current Activities

- ☑ **Stormwater Ordinance** – In 2009, the City Council adopted Ordinance 3100 which includes the stormwater requirements for new development, redevelopment, and construction site projects for sites over one acre established in Appendix 1 of the 2007 Permit. The ordinance also includes local criteria for projects below the state thresholds. These provisions are codified as Longview Municipal Code (LMC) 17.80 - *Stormwater Management*.
- ☑ **Longview Stormwater Manual** – The Longview Stormwater Manual, updated most recently in 2011, provides the guidelines and standards for addressing the City's stormwater management requirements. The Manual is intended to be consistent with, and serve as a local addendum to, the *Stormwater Management Manual for Western Washington*.

- ☑ **Development Permitting and Review Process** – The City has in-place a development permitting process that includes site plan review, inspections, and enforcement capability for all public and private projects that meet the local and/or state thresholds. The City's code enforcement provisions (LMC 1.33) are utilized to respond to issues of non-compliance. The Stormwater Division has responsibility for and performs all plan reviews, site inspections and code enforcement.
- ☑ **Long-Term Operations and Maintenance** – City Ordinance 3100 (LMC 17.80) includes provisions for the long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that have been permitted by the City since the 2009 ordinance went into effect. Inspections of all regulated stormwater treatment and flow control BMPs/facilities that discharge to the MS4 are completed annually by the Stormwater Division.
- ☑ **Recordkeeping** – The Stormwater Division tracks and keeps records of all regulated plan reviews, construction inspections, and ongoing O&M of regulated BMPs/facilities.
- ☑ **State of Washington Permits** – The City makes available as applicable copies of NOI forms and general information on the Ecology stormwater permits for both Construction Activity and Industrial Activity.
- ☑ **Staff Training** – The City ensures that all staff involved with implementing the program receive adequate training, including those responsible for permitting, plan review, construction site inspections, and enforcement.
- ☑ **Low-Impact Development (LID)** – As part of the Longview Stormwater Manual update, low impact development principles and credits were incorporated and offered as an option for meeting the City's stormwater management requirements.



Planned Activities

Planned activities for 2016 include:

- Continue to perform site plan review, inspection, and enforcement of all public and private projects that meet the minimum thresholds.
- Continue to ensure adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that have been permitted by the City since the 2009 ordinance went into effect.
- Review and revise all local development-related codes, rules, standards, or other enforceable documents to incorporate and require Low Impact Development (LID) principles and BMPs as applicable the preferred and commonly-used approach to site development.
- Update of the City's stormwater ordinance, manual and associated documents to include the Minimum Requirements, thresholds, and definitions in Appendix 1 of the 2012 Permit as well as LID principles and BMPs.
- Ensure all City staff are trained on the updated stormwater requirements, provisions and procedures.
- Create new public guidance materials and checklists for development-related activities.
- Continue all required recordkeeping.

This page is intentionally blank

MUNICIPAL OPERATIONS AND MAINTENANCE

The City's stormwater municipal operation and maintenance program helps to prevent the pollutants to the MS4 from City-owned and operated properties or operations, as well as to maintain adequate performance of MS4 components in compliance with applicable maintenance standards.



Permit Requirements

An operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

Minimum Performance Measures:

- Implement maintenance standards that are as or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* no later than June 30, 2017.
- Annual inspection of all City-owned or operated permanent stormwater treatment and flow control BMPs/facilities, and taking appropriate maintenance actions in accordance with the adopted maintenance standards.
- Spot checks of City-owned or operated permanent stormwater treatment and flow control BMPs/facilities after major storm events, with repairs or appropriate maintenance actions, as needed.
- Inspection of all City-owned or operated catch basins and inlets at least once no later than August 1, 2017 and every two years thereafter.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, including road maintenance activities under the City's functional control.

- Ongoing training program for City employees whose primary construction, operations or maintenance job functions may impact stormwater quality.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City that are not covered by an Industrial Stormwater General Permit.
- Maintain records of inspections and maintenance or repair activities.

Completed and Current Activities

- ☑ **O&M Performance Standards** – The City of Longview has adopted operations and maintenance guidance and stormwater facility maintenance standards consistent with the Stormwater Management Manual for Western Washington.
- ☑ **Facility/BMP Inspections and Maintenance** – The Stormwater Division performs annual inspection of all City-owned or operated permanent stormwater treatment and flow control BMPs/facilities and performs spot checks after major storm events. Repairs or appropriate maintenance actions are undertaken as informed or indicated by the inspection reports.
- ☑ **Catch Basin and Inlet Cleaning** – City-owned or operated catch basins and inlets are inspected and cleaned on a rotating basis by the Stormwater Division's field crews. In a typical year, approximately one-third of all of the catch basins are inspected and cleaned. Therefore, all of the catch basins are inspected and cleaned within a three-year period.
- ☑ **Street Sweeping Program** – The City has a street sweeping program which runs two Elgin street sweepers on a full-time (40 hour/week) basis to sweep all public streets, alleys and parking lot. The program effectively cleans and removes potential pollutants and debris from all streets, alleys and parking lots on an approximately weekly basis.
- ☑ **Municipal Pollution Prevention/Good Housekeeping Practices and SOPs** – The City has developed and implemented its *Municipal Stormwater O&M Manual* which includes stormwater pollution prevention/good housekeeping BMP's and standard operating procedures for all of its municipally-owned and operated properties and operations. This includes streets, parking lots, buildings, parks and open space, right-of-ways, the City shop and maintenance yards,



Street Sweeping is an essential component of Longview's Stormwater O&M Program

Parks and Recreation facilities, water treatment plant and all mobile operations for repair and maintenance of City rights-of-way, public areas and utilities.

- ☑ **Municipal SWPPPs** – The City has also developed and implemented stormwater pollution prevention plans (SWPPPs) for all of the municipally-owned and operated heavy equipment maintenance or storage yards, and material storage facilities. This includes the City Shop (Streets, Stormwater, Traffic and Fleet Services), Utilities (Water and Sewer) Operations Center, Parks maintenance yard, water treatment filter plant, and the Mint Valley Golf Course maintenance shop.
- ☑ **Staff Training** - The City ensures that all staff are properly trained on the Municipal Stormwater O&M Manual and the appropriate stormwater SOPs and SWPPPs for their property, operations and job activities.
- ☑ **Recordkeeping** - The Stormwater Division tracks and keeps records of all ongoing O&M of the stormwater system, including regulated BMPs/facilities.

Planned Activities

Planned activities for 2016 include:

- ☐ Review maintenance standards and revise as necessary to ensure they are as effective as the current edition of the *Stormwater Management Manual for Western Washington*.
- ☐ Continue the annual inspection of all City-owned or operated permanent stormwater treatment and flow control BMPs/facilities and performs spot checks after major storm events.
- ☐ Continue the stormwater catch basin and inlet inspection and cleaning program. Consider alternate strategies for scheduling inspection/cleaning frequency based upon inspection records and needs.
- ☐ Continue implementation of stormwater pollution prevention/good housekeeping practices and standard operating procedures (SOPs) at all of its City-owned and operated properties and operations. Review and revise the City's O&M manual and SOP's as needed.
- ☐ Review the street sweeping program and consider alternate strategies for scheduling sweeping based on land use, need and other relevant factors.
- ☐ Continue implementation of stormwater pollution prevention plans (SWPPPs) at all City-owned and operated heavy equipment maintenance/storage yards and material storage facilities. Review and revise the SWPPP documents as needed.
- ☐ Train new City staff and provide refresher training for other staff on the *Municipal Stormwater O&M Manual* and relevant SOP's and SWPPP's.
- ☐ Continue all required recordkeeping.

This page is intentionally blank

COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

The City's stormwater management program currently complies with the Permit requirements for Total Maximum Daily Load (TMDL) designated waters.

Permit Requirements

Address requirements for any applicable TMDL approved for stormwater discharges from MS4s owned or operated by the City.

Minimum Performance Measures:

- For applicable TMDL's listed in Appendix 2 of the Permit, comply with the specific requirements identified. The status of the TMDL implementation shall be included as part of the annual report submitted to Ecology.
- For applicable TMDL's not listed in Appendix 2, compliance with the Permit shall constitute compliance with those TMDL's.
- For TMDL's that are approved by EPA after this Permit is issued, Ecology may establish TMDL related permit requirements through future permit modification.

Completed and Current Activities

- There are currently no applicable TMDL's within or to which the City's MS4 discharges.

Planned Activities

Planned activities for 2016 include:

- The City's MS4 discharges to four water bodies currently on the 303(d) impaired water list: Lake Sacajawea and CDID #1 flood control ditches 3, 4 and 5. The City will comply with any new TMDL requirements.

This page is intentionally blank

MONITORING AND ASSESSMENT

The City participates in and funds regional efforts for status and trends monitoring, effectiveness studies and source identification and diagnostic monitoring.

Permit Requirements

Applicable provisions for status and trends monitoring, effectiveness studies and source identification and diagnostic monitoring.

Minimum Performance Measures:

- Status and Trends Monitoring (S8.B): *No requirements for southwest Washington permittees in the 2012 Permit.*
- Effectiveness Studies (S8.C): Permittees may choose either-
 - Option 1 - Pay into a collective fund to implement effectiveness studies undertaken by the Puget Sound Regional Stormwater Monitoring Program (RSMP); or
 - Option 2 - Conduct stormwater discharge monitoring in accordance with Appendix 9.
- Source Identification and Diagnostic Monitoring (S8.D): Pay into a collective fund to implement the Puget Sound RSMP Source Identification Information Repository (SIDIR).

Completed and Current Activities

- ☑ The City has choose Option #1 to satisfy its Permit requirements for effectiveness studies and pays a sum of \$14,687 annually to Ecology to fund the collective effectiveness study program being undertaken by the Puget Sound RSMP.
- ☑ The City pays a sum of \$1,362 annually to Ecology to fund the collective SIDIR program being undertaken by the Puget Sound RSMP.
- ☑ The City has participated in, and has partially funded, the collaborative Lower Columbia Habitat Status and Trends Monitoring (HSTM) grant project which will recommend a regional status and trends monitoring program for the southwest Washington permittees in the upcoming 2018 Permit.

Planned Activities

Planned activities for 2016 include:

- Continue to meet the effectiveness and SIDIR Permit requirements through the "Pay-in" approach.
- Continue participating in the Lower Columbia HSTM program to develop recommendations on a regional status and trends monitoring program for the southwest Washington permittees for the next permit cycle.



The City of
Longview
Washington