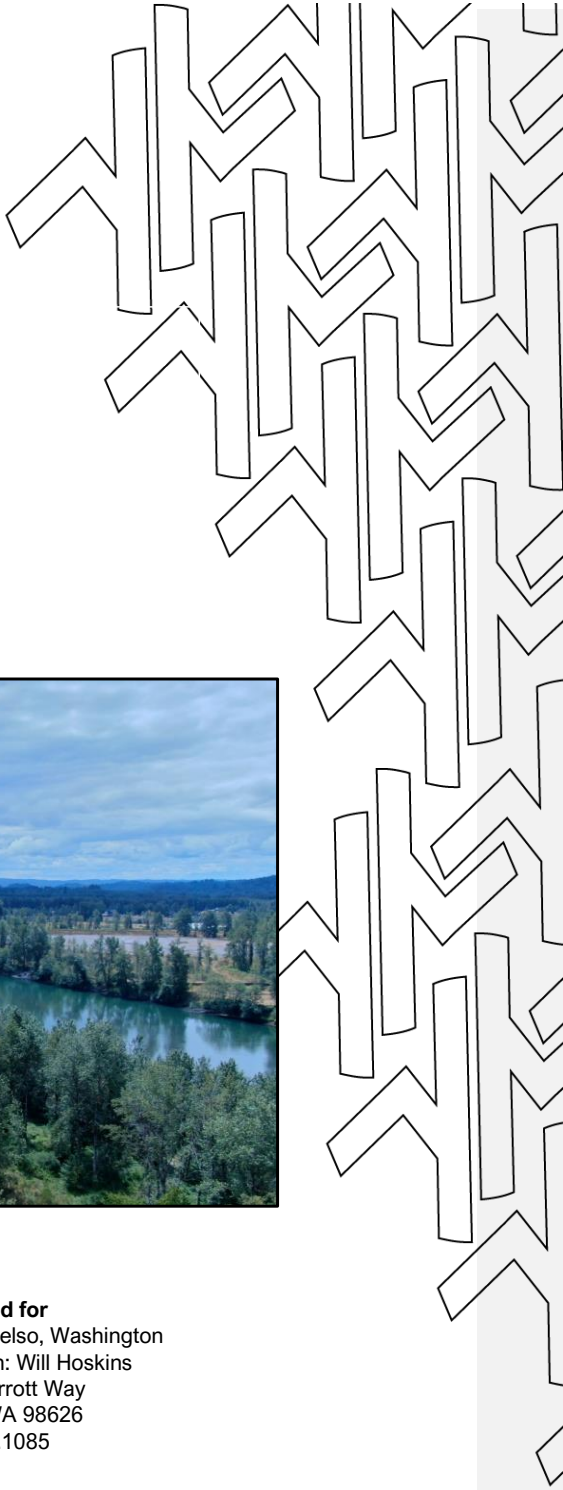




CITY OF KELSO Stormwater Management Program Plan 2025

MARCH 18, 2025



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Table 1: Abbreviations and Acronyms

AKART	All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment
BMP	Best Management Practice
CAD	Computer-Aided Design
City	City of Kelso
Ecology	Washington State Department of Ecology
GIS	Geographic Information System
IDDE	Illicit Discharge Detection and Elimination
KMC	Kelso Municipal Code
LID	Low Impact Development
MEP	Maximum Extent Practicable
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 Municipal Stormwater Permit
SAM	Stormwater Action Monitoring
SMAP	Stormwater Management Action Plan
SWMMWW	Stormwater Management Manual for Western Washington
SWMP Plan	Stormwater Management Program Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load



1.0 INTRODUCTION

The City of Kelso, Washington (City), is located in the southwestern region of the state, nestled on the east bank of the Cowlitz River near its confluence with the Columbia River. Directly across from its twin city, Longview, Kelso encompasses a diverse landscape of flat terrains and gentle hills, with an average elevation of approximately 171 feet (52 meters). The City is traversed by the Coweeman River, which, along with the Cowlitz and Columbia rivers, plays a significant role in local stormwater management. Kelso operates a municipal separate storm sewer system (MS4) to manage stormwater runoff, aiming to prevent flooding and reduce water pollution by directing runoff through a network of pipes, ditches, and treatment facilities into these rivers. Kelso operates under a council-manager form of government, where the elected City Council establishes policies, and a City Manager oversees daily operations. The City's mission emphasizes public service, integrity, and quality outcomes, aiming to meet the needs of its citizens while upholding ethical standards and fostering community engagement.

1.1 MS4 Phase II Compliance

The City of Kelso operates a MS4 that collects and conveys stormwater runoff to surface waters. The Washington State Department of Ecology (Ecology) regulates this system under the Western Washington Phase II Municipal Stormwater Permit (Permit), ensuring compliance with the National Pollutant Discharge Elimination System (NPDES) under the Clean Water Act. First issued in 2007, the Permit is updated every five years, with the current permit running from August 1, 2024, to July 31, 2029.

The Stormwater Management Program Plan (SWMP Plan) is a requirement of the Permit that must provide written documentation of SWMP components in a clear and easy to follow report for both the public and Ecology. The SWMP Plan covers a calendar year from January 1 to December 31 and must include the following:

- Planned activities for each of the program components included in S5.C Stormwater Management Program Components
- Any additional planned actions to meet the requirements of applicable Total Maximum Daily Loads (TMDLs) pursuant to S7-Compliance with TMDL Requirements.
- Any additional planned actions to meet the requirements of S8-Monitoring and Assessment.

The City is required to implement the activities within the required timeframes of the Permit term and submit an updated SWMP Plan as well as annual reports to Ecology annually by March 31st of the following year.



To protect water quality, the City's SWMP is designed to minimize pollutant discharge using best practices (AKART) and meet regulatory standards. A key goal is public awareness of Kelso's stormwater initiatives, detailed in the following sections.

A primary goal of the SWMP Plan is to inform the public of the stormwater activities the City plans to achieve during the upcoming year. The following sections describe the actions that the City has and will take to comply with the requirements of the Permit.

1.2 Interdisciplinary Team & Departmental Responsibilities

Within the City, many departments and individuals collaborate to fulfill the MS4 requirements. The Community Development – Engineering Department employs a full-time Senior Stormwater Engineer, who acts as the City's NPDES Coordinator. This position is responsible for general Permit compliance, stormwater public education and outreach, public involvement in stormwater concerns, regulating the entrance of stormwater pollutants into the MS4, regulating runoff on construction sites and developments, developing procedures for compliance with the Permit, planning stormwater capital projects, training staff from other departments, and reporting.

The Public Works Department is responsible for spill response, maintaining components of the MS4, and maintaining City properties such as roads, rights-of-way, parks, and municipal buildings in a manner that prevents and reduces stormwater impacts.

Employees in the Police Department are responsible for maintaining awareness of the stormwater system and reporting potential illicit discharges that may be observed during the normal course of their duties in the community.

To ensure effective coordination and compliance with MS4 requirements, engineers and public works stakeholders meet periodically on an as-needed basis to discuss stormwater-related issues, address concerns, and adjust strategies as necessary.

The City's stormwater utility funds the SWMP and is based on impervious area for commercial properties and on a base rate for residential properties.

1.3 Document Organization

This report has been organized into the following chapters and sections that each correspond with the Permit Program Components:

- Chapter 2 – Stormwater Management Program, Special Condition S5
 - 2.1 – Stormwater Planning, Special Condition S5.C.1
 - 2.2 – Public Education and Outreach, Special Condition S5.C.2
 - 2.3 – Public Involvement and Participation, Special Condition S5.C.3
 - 2.4 – MS4 Mapping and Documentation, Special Condition S5.C.4
 - 2.5 – Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5



- 2.6 – Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6
- 2.7 – Stormwater Management for Existing Development, Special Condition S5.C.7
- 2.8 – Source Control Program for Existing Development, Special Condition S5.C.8
- 2.9 – Operation and Maintenance (O&M), Special Condition S5.C.9
- Chapter 3 – Monitoring and Assessment, Special Condition S8



2.0 STORMWATER MANAGEMENT PROGRAM (S5.C)

This chapter describes nine required conditions of the Permit and the City's plan to meet each requirement and administer the program.

2.1 Stormwater Planning, Special Condition S5.C.1

The City continues to develop and implement a Stormwater Planning program to inform and assist in the development of policies and strategies to be used as water quality management tools to protect receiving waters. This program will be carried out by the NPDES Coordinator.

2.1.1 Permit Requirements

Section S5.C.1 requires the following:

- Continue implementing the Stormwater Planning program to guide water quality management policies and strategies.
- Maintain an interdisciplinary team to support stormwater planning efforts.
- Coordinate with long-range plan updates.
- Report on how stormwater management influences long-term planning by March 31, 2027.
- Require Low Impact Development (LID) principles and best management practices (BMPs) in development-related codes to minimize impervious surfaces and runoff.
- Review and update local development codes to enforce LID standards by December 31, 2028, with a summary due by March 31, 2029.
- Adopt and implement tree canopy goals for stormwater management by December 31, 2028.
- Complete and submit a Stormwater Management Action Plan (SMAP) for a high-priority catchment area by December 31, 2027.

2.1.2 Existing Programs and Activities

The City has continued with the following existing programs and activities:

- Continue requiring LID principles and BMPs in development-related codes, rules, and standards.
- Monitor the effectiveness of enforceable standards in achieving LID goals.
- Coordination and efforts from the interdisciplinary team towards increasing MS4 awareness, permit awareness and BMP awareness for Engineering, Community Development and Public Works Operations.

2.1.3 Planned Activities

- Develop the Receiving Waters Assessment (RWA) further into a SMAP, prior to December 31, 2027.

Commented [ES1]: Note for Will - Once we get the 2025 SWMP Plan completed, we can then make it more of a 'template' for repeat use which will be minimal work once it's ready to submit.

Commented [ES2]: Will - Listing out the Permit Requirements is not a formal requirement of the SWMP Plan, do you want to keep a list of the requirements in here or remove entirely to avoid having to consistently update new requirements and or risk missing something in the list?

Commented [WH3R2]: I would like to keep the list. I'd also like a list (spreadsheet) listing the due dates for each permit required deliverable. This will be my 'to do list' each year. This list should have about as much detail as each due date activity has here, plus a permit reference for each item. I'd like the list to also include the 'X% a year' and similar activities as an annual tickler to do this.

Commented [SP4R2]: Ecology has a Permit Timeline PDF that we will send out with the SWMP

Commented [SP5R2]: @Emily Stephens I'm not sure what Will means by x% a year

Commented [ES6R2]: Windsor is working on the Working Task List with Timelines & % to complete each year.

Commented [ES7]: Will - please review these Planned Activities.



- *In 2022 the City completed a RWA that supported an exemption for the City from completing a full SMAP. In spring of 2025 Ecology determined that a full SMAP will be required prior to December 31, 2027 for permit compliance.*
- Work with a consultant to secure funding for steps 2 and 3 of the SMAP in 2024/2025 and complete the SMAP prior to December 31, 2027.
- Continued coordination and efforts from the interdisciplinary team towards increasing MS4 awareness, permit awareness and BMP awareness for Engineering, Community Development and Public Works Operations.
- Begin efforts towards creating a tree canopy plan by identifying current tree canopy with an in-house desktop analysis.

2.2 Public Education and Outreach, Special Condition S5.C.2

The City's public education and outreach program focuses on building general awareness among the public of problems created by stormwater runoff and of behavior changes to clean up local surface waters. The program is carried out by the NPDES Coordinator.

2.2.1 Permit Requirements

Section S5.C.2 requires the following:

- Develop and administer an education program to reduce harmful stormwater behaviors and promote stewardship.
- Increase public awareness of stormwater impacts and solutions through targeted outreach.
- Educate key audiences, including the public, overburdened communities, businesses, and students, with clear actions to reduce pollution.
- Drive behavior change to minimize stormwater pollution.
- Launch a behavior change program for one target audience and BMP by September 1, 2025, with an evaluation report due by March 31, 2029.
- Develop a social marketing campaign based on previous year findings, launching by July 1, 2025.
- Create community stewardship opportunities to engage residents in stormwater management.

2.2.2 Existing Programs and Activities

The City has continued with the following existing programs and activities:

- Continue to maintain the City's stormwater educational website at <https://www.kelso.gov/engineering/stormwater/stormwater-documents>.
- Continue partnership with Cowlitz Clean Waters (www.cowlitzcleanwaters.org) to develop a public information and an education campaign to inform the Lower Columbia



region general public about the impacts of stormwater runoff on our local waterways, and to affect behavior changes and water quality improvements in our communities.

- Track and document all public education and outreach efforts.
- Implementation of the education and outreach program for the area served by the MS4.
- Charity car wash kit and City of Kelso “Adopt-a-Street” program stewardship opportunities.
- Collaborate activities with the Cowlitz Clean Water Partners to produce educational materials, including bus ads, pet waste signs, refrigerator magnets and student art/poem calendars.
- Continue to implement the pet waste management and disposal behavior change campaign with Cowlitz Clean Waters.

2.2.3 Planned Activities

Planned activities for the coming year include:

- Continue the ongoing programs from the previous year.
- Evaluate and report on the effectiveness of the behavior change program for one target audience and BMP, as well as the social marketing campaign development program.

2.3 Public Involvement and Participation, Special Condition S5.C.3

The City’s public involvement and participation program is designed to seek regular input from stakeholders.

2.3.1 Permit Requirements

Section S5.C.2 requires the following:

- Provide ongoing public involvement through advisory councils, hearings, watershed committees, and similar activities.
- Document and report outreach efforts for overburdened communities annually by December 31, 2026.
- Create public participation opportunities in developing and updating the SMAP and SWMP.
- Publish the SWMP and Annual Report on the City’s website by May 31, along with any required Ecology submittals.

2.3.2 Existing Programs and Activities

The City’s activities in this area are ongoing:

- Seeks public input on the stormwater management program activities and planning documents through the City Council.



- Seeks public involvement and input on the stormwater management program activities and planning documents through the Kelso Stormwater Advisory Committee (KSAC), which, in 2024 was not successful in maintaining members. To remove barriers to public involvement in the KSAC, the city removed certain age and profession requirements and reduced the required minimum number of memberships.
- Posts annual reports, the SWMP Plan, and other stormwater-related documents to the City's website.
- Tracks and documents on public involvement and participation efforts.

2.3.3 Planned Activities

Planned activities for the coming year include:

- Continue to seek more public involvement and input on the stormwater management program activities and planning documents through KSAC, which at the time of this Plan has only two active members.
- No later than December 31, 2026, document the methods used to identify overburdened communities.
- Post the previous year's SWMP Plan and Annual Report to the City's website by May 31 of each year.
- Update the SWMP Plan for the upcoming year by December 31.

2.4 MS4 Mapping and Documentation, Special Condition S5.C.4

The City must implement an ongoing program for mapping and documenting the MS4.

2.4.1 Permit Requirements

Section S5.C.4 requires the following:

- Maintain an ongoing mapping program for outfalls, discharge points, receiving waters, BMPs, and MS4 connections.
- Map all known MS4 connections to privately owned stormwater systems.
- Submit all known MS4 outfall locations, including size and material, by March 31, 2026.
- Map tree canopy on Permittee-owned properties for stormwater management by December 31, 2026.
- Implement a methodology to map and assess MS4 tributary basins with 24-inch+ outfalls by March 31, 2028, submitting maps and data with the Annual Report.
- Map overburdened communities in relation to stormwater facilities, outfalls, and tree canopy by December 31, 2028.
- Collect and document MS4 outfall size and material during routine fieldwork by March 31, 2026.
- Store and manage MS4 mapping data in Geographic Information System (GIS) or computer-aided design (CAD), ensuring standards compliance.



- Provide mapping data to Ecology, Tribes, municipalities, and permittees upon request.

2.4.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Maintains a GIS database of the MS4.

2.4.3 Planned Activities

Planned activities for the upcoming year include:

- Map any new public (City-operated) stormwater treatment and flow control facilities constructed.
- Map any new MS4 infrastructure constructed.
- Submit locations of all known MS4 outfalls provided in the Annual Report by March 31, 2026.
- Map tree canopy on Permittee-owned properties to support stormwater management by December 31, 2026.
- Map all MS4 tributary basins with 24-inch or greater outfalls by March 31, 2028.
- Map overburdened communities in relation to stormwater facilities, outfalls, and tree canopy by December 31, 2028.
- Map all outfalls in GIS, noting the size and material of the outfalls.

2.5 Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5

The City's stormwater management ordinance (KMC 13.09) prohibits the discharge of anything that is not stormwater, with a few exceptions, into the MS4. The IDDE program guides City responses to spills and to reports of potential discharges to the storm sewer. Staff monitors the system through inspection of priority outfalls. The program is carried out primarily by the Community Development – Engineering Department, although support for spill response is provided by the Public Works Department.

2.5.1 Permit Requirements

Section S5.C.5 requires the following:

- Implement an ongoing program to prevent, detect, and eliminate illicit discharges and connections to the MS4.
- Establish a program for reporting, correcting, and removing illicit discharges, including field screening and inspections.
- Enforce an ordinance prohibiting illicit discharges, with allowable discharges and enforcement procedures, revised by July 1, 2027.
- Detect non-stormwater discharges and illicit connections through investigations, public reporting hotlines, and staff training.



- Address illicit discharges with procedures for characterization, emergency response, source tracing, and discharge elimination.
- Comply with timelines for addressing illicit discharges as specified in the Permit.
- Train staff on illicit discharge identification, investigation, and response, with ongoing follow-up training and recordkeeping.
- Track and maintain records of activities related to illicit discharge management.

2.5.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Follow procedures for detection, reporting, response, and enforcement of illicit discharges as outlined in the 2021 IDDE Program.
- Educate and enforce with the public when illicit discharges are reported or discovered.
- Provide IDDE awareness training for Public Works and Police staff once per Permit term, or when procedures are updated.
- Operate the City's stormwater hotline.
- Encourage public reporting of illicit discharges through the online Stormwater Incident Report.
- Track and document illicit discharge reports and responses, as well as required recordkeeping.

2.5.3 Planned Activities

Planned activities for the coming year include:

- Train all new field employees in IDDE procedures.
- Continue enforcing Kelso Municipal Code (KMC 13.09.050), responding to illicit discharges, educating the public, and providing reporting options like the hotline and online report.
- Assess the 2021 IDDE Program against the 2024 Permit requirements and make updates where necessary to be consistent with IDDE specific updates.
- Follow indicator sampling procedures when illicit discharges are discovered during field screening.
- Screen at least 12 percent (%) of the MS4 annually for non-stormwater discharges and illicit connections, tracking the total percentage screened.

2.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6

The City's stormwater regulatory program enforces standards for temporary erosion control and permanent stormwater management on development, redevelopment, and construction projects that exceed 2,000 square feet of new or replaced impervious surfaces. The program operates under the



applicable ordinance KMC 13.09.060, which aligns with the requirements established by the relevant stormwater permit.

2.6.1 Permit Requirements

Section S5.C.6 requires the following:

- Implement and enforce a program to reduce pollutants from stormwater runoff due to new development, redevelopment, and construction activities.
- Adopt and enforce an ordinance to address runoff from development projects, meeting the minimum requirements outlined in the Permit, by June 30, 2027.
- Document how the program will protect water quality, reduce pollutants to the maximum extent practicable (MEP), and meet AKART requirements.
- Include a permitting process with site plan review, inspections, and enforcement for sites meeting the Permit's minimum thresholds.
- Inspect sites before construction, during construction for erosion control, and upon completion to ensure proper stormwater facilities and maintenance plans.
- Maintain records of inspections, enforcement actions, and maintenance activities.
- Achieve at least 80% of required inspections annually and maintain a comprehensive inspection program.
- Implement an enforcement strategy for non-compliance and provide links to relevant stormwater permit forms.
- Make available the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form and, as applicable, a link to the electronic Industrial Stormwater General Permit NOI.
- Train staff on new codes, standards, and procedures, documenting training provided.

2.6.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Enforce existing local stormwater and erosion control codes for development, redevelopment, and construction sites that meet stormwater thresholds.
- Enforce stormwater and erosion control regulations using Ecology's 2024 Stormwater Management Manual for Western Washington (SWMMWW) for sites over 2,000 square feet that meet thresholds established in the Permit Appendix 1.
- Review site plans and grading permit applications that meet the SWMMWW Minimum Requirements.
- Make known the Notice of Intent (NOIs) for Construction Activity and Industrial Activity to developers.
- Continue review of development, redevelopment, and construction sites using thresholds established in Appendix 1 of the Permit.



- Continue inspecting regulated sites before, during, and after construction.
- Document all required recordkeeping.

2.6.3 Planned Activities

Planned activities for the coming year include:

- Ensure all Community Development – Engineering staff are trained on the updated stormwater requirements, provisions and procedures.
- Continue to enforce Kelso Municipal Code (KMC) 13.09.210, detailing standards for temporary erosion control and stormwater management on applicable projects

2.7 Stormwater Management for Existing Development, Special Condition S5.C.7

In the 2019-2024 SWMP Phase II Permit, Section S5.C.7 was titled "Operation and Maintenance." However, with the 2024-2029 MS4 update, this section has been entirely revised and is now titled "Stormwater Management for Existing Development."

The City shall implement a Program to control or reduce stormwater discharges to the waters of the State from areas of existing development. The Program will aim to focus on strategic stormwater investments over longer planning timeframes.

2.7.1 Permit Requirements

Section S5.C.7 requires the following:

- Implement stormwater facility retrofits or tailored actions that meet Appendix 12 criteria, using strategic investments from Stormwater Management Action Plans (SMAPs) or opportunistic improvements from projects outside SMAP areas.
- Provide a list of planned projects for funding or implementation in the Annual Report to meet the required acreage as specified in Appendix 12.
- By March 31, 2028, fully fund, start construction, or implement projects that meet the assigned acreage and submit documentation in the Annual Report.
- Include projects starting construction after January 1, 2023, toward meeting the requirement, and contribute to regional goals if applicable.
- Projects exceeding the required area can be credited towards the next Permit term, not to exceed 50% of the next requirement.
- Report projects benefiting Tribal or overburdened communities, including Vulnerable Populations and Highly Impacted Communities.
- Collaborate with others to meet a regional goal, with credits for in-kind services and contributions outside the MS4 coverage area.
- Submit a report on the estimated equivalent acres managed by stormwater retrofits for the next Permit term by March 31, 2028.



2.7.2 Planned Activities

Planned activities for the coming year include:

- Develop a SMAP by March 31, 2027.
- Utilize the SMAP to provide a list of planned projects as soon as possible for funding or implementation in each Annual Report to meet the assigned equivalent acreage in Appendix 12.
- Implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12 of the Permit. Appendix 12 assigns Kelso 2 equivalent acres to be treated.
- By March 31, 2028, fully fund, start construction, or implement projects meeting the required acreage and submit documentation with the Annual Report.

2.8 Source Control Program for Existing Development, Special Condition S5.C.8

The City developed and implemented a program to prevent and reduce pollutants in runoff from areas discharging to the MS4. The program includes tasks such as applying operational source control BMPs, inspecting pollutant-generating sources at private and public sites, and adopting an ordinance to require source control BMPs.

2.8.1 Permit Requirements

Section S5.C.8 requires the following:

- Adopt an ordinance requiring source control BMPs for pollutant-generating sources by August 1, 2027.
- Establish and update an inventory of publicly and privately owned institutional, commercial, and industrial sites with pollutant potential at least every five years. This includes businesses and other sources identified via complaints (e.g., home-based businesses, multi-family sites).
- Implement an inspection program for identified sites, conducted by qualified personnel, and maintain inspection records.
- Develop a progressive enforcement policy for stormwater source control compliance and maintain records of enforcement actions.
- Train staff on the source control program and document all training sessions.

2.8.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Inspecting businesses that have possible pollution generating sources. These inspections will be provided through an interlocal agreement with the City of Longview.
- Inspect 100% of sites through credible complaints.



- Complete the number of inspections equal to 20% of the businesses and/or sites listed in the source control inventory.
- Train staff to conduct source control activities and provide follow up training as needed to address procedures, techniques, requirements, or staff.

2.8.3 Planned Activities

Planned activities for the coming year include:

- Update the business inventory from the Washington Department of Revenue database.
- Send businesses identified on the inventory list as potential pollutant-generating business, education and outreach material about the source control program.
- Ensure that staff who are responsible for implementing the source control program are trained to do so.

2.9 Operation and Maintenance (O&M), Special Condition S5.C.9

The Public Works Department operates the MS4 and City properties, including streets, rights-of-way, parks, and municipal buildings. Employees follow procedures to reduce stormwater impacts from City operations. During the Permit term, the City plans to replace more catch basins and replace failing or faulty portions of the MS4.

2.9.1 Permit Requirements

Section S5.C.9 requires the following:

- Implement and document an Operation and Maintenance (O&M) program aimed at preventing or reducing stormwater impacts.
- Implement maintenance standards for MS4 components, ensuring they align with SWMMWW standards. Document by June 30, 2027.
- Conduct annual inspections of City-operated stormwater treatment and BMPs, and complete necessary maintenance within Permit deadlines.
- Inspect privately owned stormwater treatment and BMPs that discharge to the MS4 and are regulated by the City, ensuring compliance with annual inspection and maintenance requirements.
- Perform spot checks of potentially damaged permanent BMPs after major storms; conduct system-wide inspections if needed and complete maintenance within Permit deadlines.
- Inspect City-operated catch basins and inlets every two years, cleaning as necessary to meet SWMMWW standards.
- Implement policies and procedures to reduce stormwater impacts from municipal operations, including streets, parking lots, and parks, documenting them by December 31, 2027.



- Develop and implement a municipal street sweeping program by July 1, 2027, targeting areas that maximize water quality benefits.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for City-owned or operated heavy equipment yards and material storage facilities not covered by an Industrial Stormwater General Permit.
- Implement an ongoing training program for employees whose work may impact stormwater quality, covering key topics like BMPs, inspection procedures, and pollution prevention practices.
- Provide follow-up training as needed for changes in procedures or staffing.
- Maintain records of training, inspections, and maintenance activities.

2.9.2 Existing Programs and Activities

- The City's activities in this area are ongoing:
 - Annual inspection of City-operated permanent stormwater treatment and flow control facilities.
 - Review of inspection and maintenance records submitted to the City of parcels that have stormwater treatment and flow control BMPs permitted under the Permit, and spot checks of those facilities.
 - Spot check stormwater facilities and flood-prone areas of the conveyance system after rainstorms larger than the 24-hour, 10-year storm event.
 - Routine street sweeping.
 - Clean ditches and culverts as needed.
- Follow City of Kelso *Municipal Stormwater O&M Program 2015* for operation of stormwater facilities, streets, parks and buildings owned or operated by the City.
- Follow City of Kelso *Nutrient, Integrated Pest Management and Herbicide Plan 2015* to guide the use of nutrients and chemicals on City-operated properties and rights-of-way.
- Follow protocols for spills response on City streets and properties in the City of Kelso *Illicit Discharge Detection and Elimination (IDDE) Program 2015*.
- Train new Operations staff on operational source control BMPs for the maintenance yard, City street and property operations, and City parks operations or when the program is modified.
- Maintain the SWPPP for the Public Works maintenance yard and conduct quarterly inspections of the yard.
- Document all required recordkeeping.

Commented [E58]: Will - Please provide to Windsor

2.9.3 Planned Activities

Planned activities for the coming year include:

- Inspect and maintain all City-operated catch basins and stormwater BMPs/facilities as needed. Note: A G20 form will be filed with the 2024 annual report as the required number of catch basins was not inspected.



- Inspect all privately owned stormwater BMPs/facilities regulated by the City. Note: A G20 form will be filed if the required number of catch basins cannot be inspected.

3.0 MONITORING AND ASSESSMENT (S8)

3.1 Stormwater Monitoring

Stormwater monitoring requirements are given in Section S8 of the Permit. The basic requirements for stormwater monitoring include the following:

- Make a one-time payment into the Stormwater Action Monitoring (SAM) collective fund by December 1, 2024, for regional small streams and marine nearshore areas monitoring in Puget Sound or urban streams in the Lower Columbia River basin.
- Notify Ecology in writing by **December 1, 2024**, of the chosen regional status and trends monitoring option (S8.A.2.a or S8.A.2.b) for the permit term. The written notification must include a G19 signature.
- Make annual payments into the SAM collective fund by August 15 each year, starting in 2025, for regional receiving water status and trends monitoring of small streams and marine nearshore areas in Puget Sound or urban streams in Clark and Cowlitz Counties, depending on location. Alternatively, conduct stormwater discharge monitoring per S8.C.
- For Effectiveness and Source Identification Studies, make annual payments into a collective fund to implement effectiveness and source identification studies.

3.1.1 Ongoing Activities

- The City will continue to pay into SAM.
- The City will continue to assist in the development of the Quality Assurance Project Plan for southwest Washington.

Commented [WH9]: Is this the right date?

Commented [SP10R9]: Yes that's what in the new permit

Commented [ES11R9]: City has already paid - Will, please send receipt of payment from sometime in December