

STORMWATER MANAGEMENT PROGRAM



2023

City of Longview



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*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
SAM	Stormwater Action Monitoring
SIDIR	Source Identification Information Repository
SMAP	Stormwater Management Action Planning
SOP	Standard Operating Procedure
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan

STORMWATER MANAGEMENT PROGRAM

CITY OF LONGVIEW

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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 that are administered by the Washington Department of Ecology (Ecology) in Washington State. Permitted discharges include municipal separate storm sewer systems (MS4s), 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 has been implementing a SWMP since it originally came under Permit coverage in 2007. The current Permit was issued in 2019 and is effective until July 31, 2024.



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, inlets, catch basins, storm pipes, roadside ditches, culverts, pumps and other stormwater infrastructure that is owned or operated by the City.

The City's MS4 drains to a number of different water bodies including Lake Sacajawea, the Cutoff Slough, and the man-made flood control network of surface water conveyances managed by the Consolidated Diking Improvement District #1 (CDID #1). Most of Longview lies within CDID #1's system of flood protection levees, and the hillside areas of the City drain to CDID #1 Ditches 6 East and 6 West on the District's northern perimeter. As a closed watershed and managed drainage system, almost all of the City's stormwater ultimately reaches the Cowlitz River, Columbia River or Coal Creek Slough through the District's series of flood control pump stations.

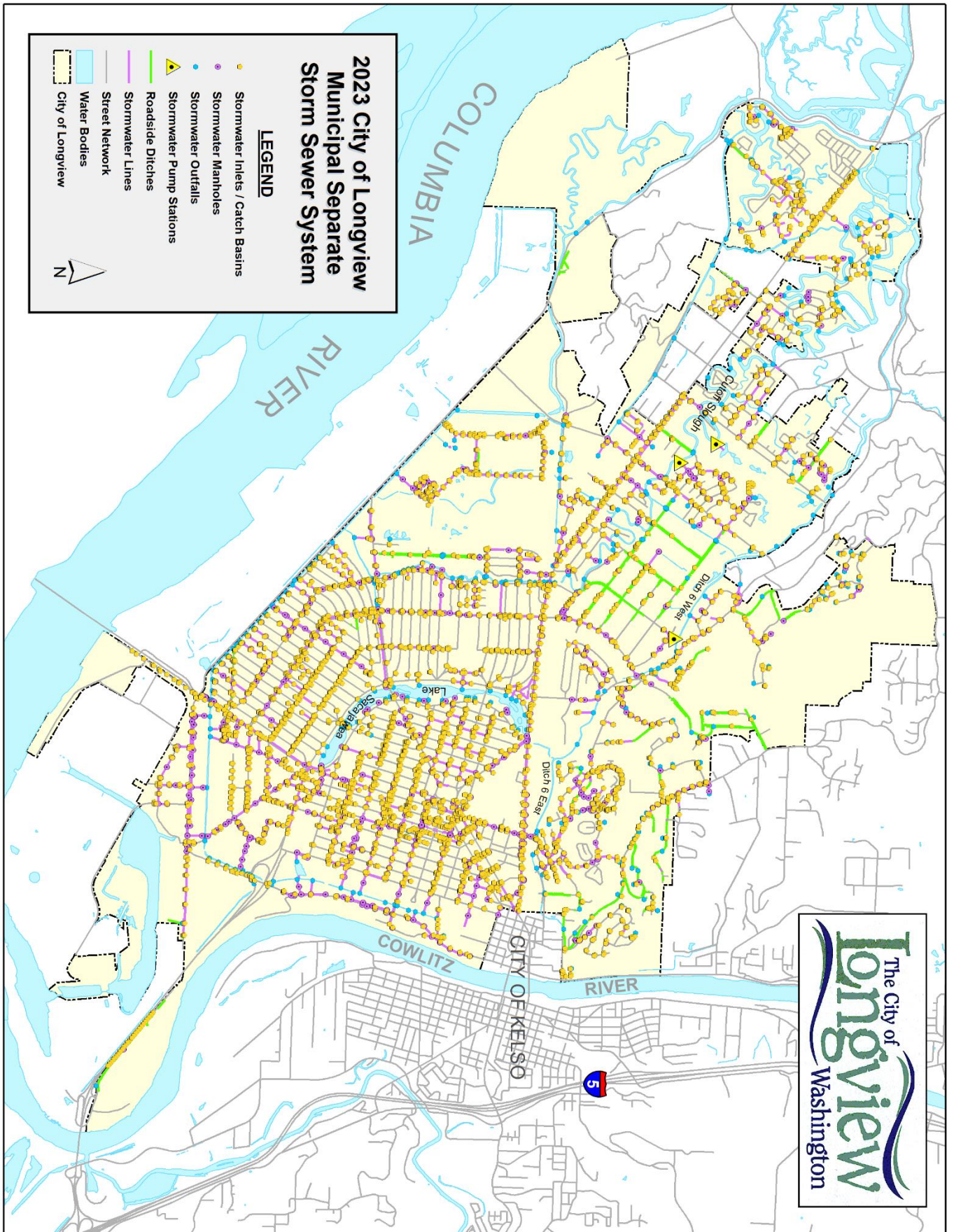
Longview's MS4 shares a border with the portion of the City of Kelso's MS4 that lies west of the Cowlitz River and Cowlitz County's MS4 that is contiguous with Longview's city limits. The City works closely with both Kelso and the County on interconnected stormwater infrastructure and common watersheds, 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 to be made available to the public. As such, this document details the City of Longview's SWMP by outlining the current and proposed stormwater program actions and activities for meeting the requirements of the Permit, and is intended to inform the public on the City's stormwater program and Permit compliance efforts. This SWMP document is revised annually and submitted to Ecology with the Permit annual report, and is available on the City's website at www.mylongview.com.

The SWMP covers ten elements, which coincide with the programmatic components and requirements under Sections S5, S7 and S8 of the 2019 Permit:

- Stormwater Planning (S5.C.1)
- Public Education and Outreach (S5.C.2)
- Public Involvement and Participation (S5.C.3)
- MS4 Mapping and Documentation (S5.C.4)
- Illicit Discharge Detection and Elimination (S5.C.5)
- Controlling Runoff From New Development, Redevelopment & Construction Sites (S5.C.6)
- Operations & Maintenance (S5.C.7)
- Source Control Program for Existing Development (S5.C.8)
- Compliance with Total Maximum Daily Load Requirements (S7)
- Monitoring & Assessment (S8)



**2023 City of Longview
Municipal Separate
Storm Sewer System**

LEGEND

- Stormwater Inlets / Catch Basins
- Stormwater Manholes
- Stormwater Outfalls
- ▲ Stormwater Pump Stations
- Roadside Ditches
- Stormwater Lines
- Street Network
- Water Bodies
- City of Longview

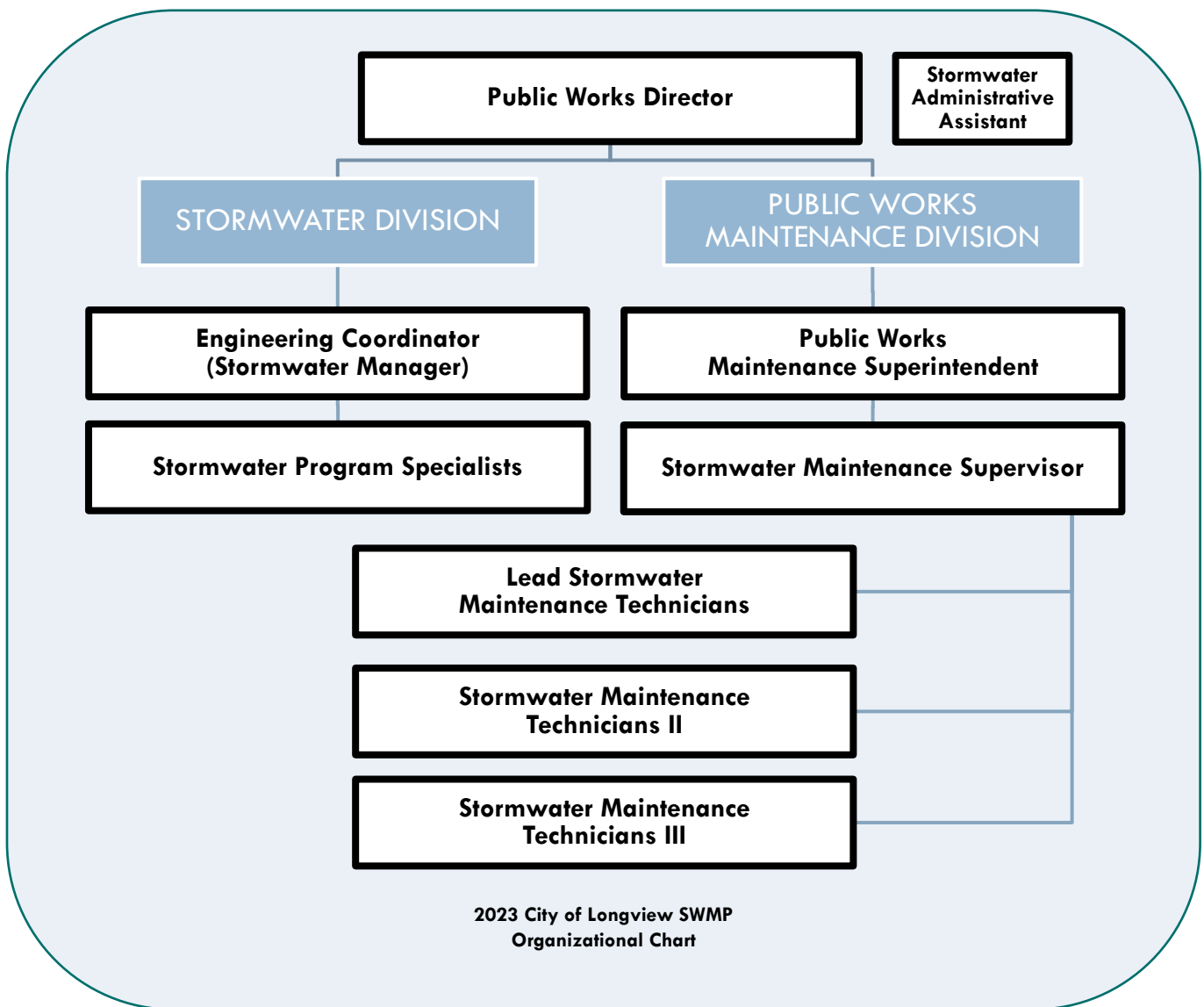
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SWMP Administration

The Public Works Department manages the administration of the City of Longview’s Permit. Within Public Works, the Stormwater Division is responsible for the development and implementation of the SWMP, public education and outreach, public involvement, plan review and permitting, development inspections, IDDE program activities, source control, and City-wide coordination and training. The Street/Stormwater Maintenance Division is responsible for all stormwater-related operations and maintenance activities. Both Divisions report to and are overseen by the Public Works Director. The organization chart is shown below.

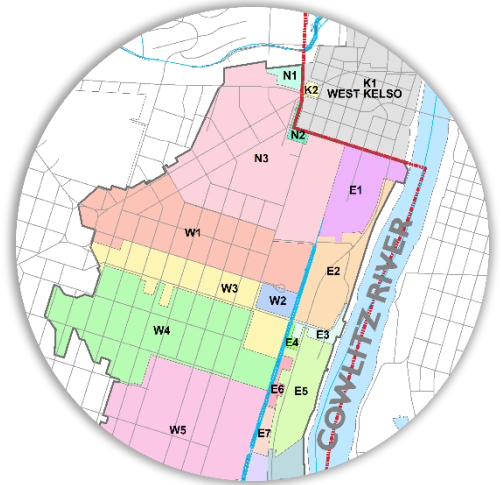
The majority of the SWMP activities are funded by the City’s stormwater utility, which is an enterprise fund based on user fees calculated by the amount of impervious cover on a property.



2023 City of Longview SWMP
Organizational Chart

STORMWATER PLANNING

Stormwater planning is a new requirement under the 2019 Permit which tasks the City with developing and implementing plans, policies and strategies aimed at protecting local receiving waters.



Permit Requirements

Implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

Minimum Performance Measures:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of a stormwater planning program by August 1, 2020.
- Document how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in their jurisdiction.
- Continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.
- Conduct a stormwater planning process which considers the range of issues outlined in the Ecology *Stormwater Management Action Planning Guidance* document. This shall include the following items for submission to Ecology:
 - Receiving Water Assessment (*due no later than March 31, 2022*)
 - Receiving Water Prioritization (*due no later than June 30, 2022*)
 - Stormwater Management Action Plan [SMAP] (*due no later than March 31, 2023*)

Completed and Current Activities

- Convened an inter-disciplinary team in 2020 of City staff from relevant departments to begin conversations on how to undertake and implement the permit requirements for stormwater action planning as a jurisdiction.
- Assessed how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the City's planning update processes and influencing policies and implementation strategies.
- Conducted the receiving water assessment process in early 2022 and evaluated the relative current and potential future influence of the MS4 on each of the City's receiving waters.
- Organized the assessment information for further prioritization of receiving waters/basins. A summary report was prepared and submitted with the MS4 Annual Report.
- Gathered input from stakeholders and selected the CDID #1 Ditch 4 subbasin and receiving water for the development of a SMAP.

Planned Activities

Planned activities for 2023 include:

- Complete a SMAP for the CDID #1 Ditch 4 subbasin to identify specific stormwater management actions to protect water quality, as well as an appropriate schedule and budget sources for implementing the activities and projects identified.
- Continue reviewing current local water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, or taking into account stormwater management needs or limitations.
- Continue to review, revise, and make effective local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs.

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 build general awareness about methods to address and reduce impacts from stormwater runoff, effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts, and create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Minimum Performance Measures:

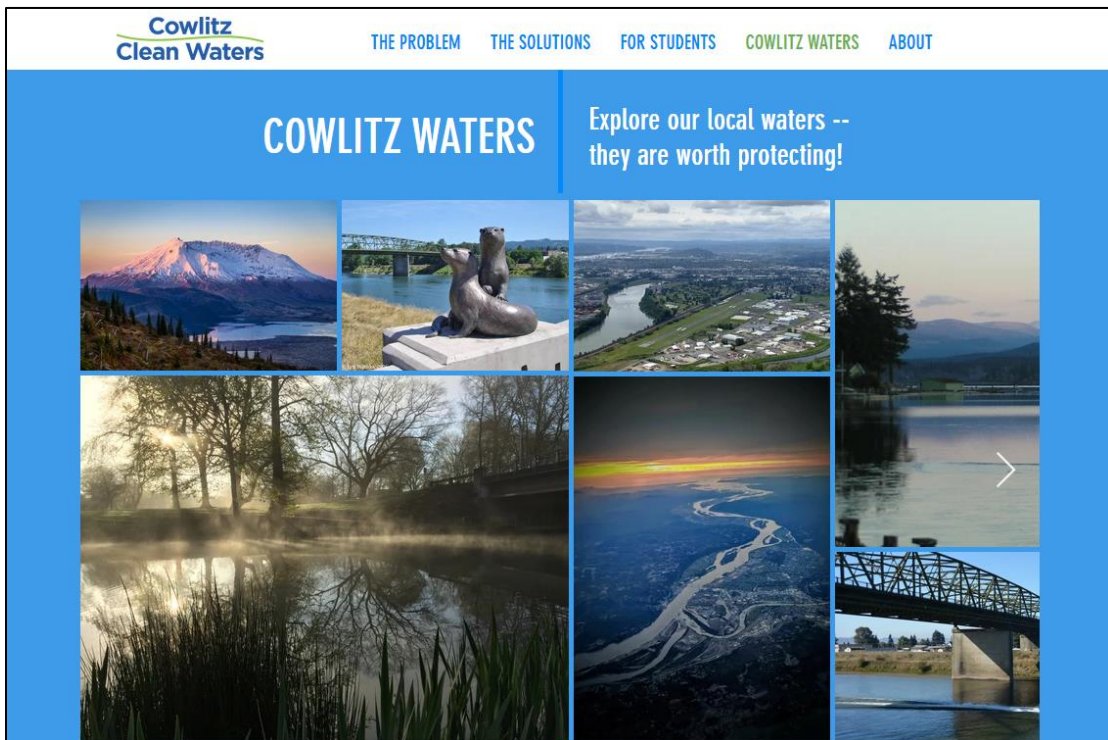
- Provide an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics. The program should build general awareness as well as effect behavior changes.
- Conduct a new evaluation of the effectiveness of an ongoing behavior change campaign (required under the 2013 Permit), or develop a strategy and schedule for a new target audience and BMP behavior change campaign and begin to implement that strategy by April 1, 2021.
- 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.

Completed and Current Activities

The City of Longview has developed a comprehensive public education and outreach program with strategies designed to inform the general public as well as educate targeted behaviors and audiences:

- ☑ **Cowlitz Clean Waters Regional Education and Outreach Campaign** – The City partners with other NPDES MS4 primary and secondary permittees within the Longview/Kelso area on a regional public information and education campaign under the brand “Cowlitz Clean Waters.” The City of Kelso, Cowlitz County, Consolidated Diking Improvement District #1, Kelso School District, Longview School District, Lower Columbia College and WSU Cowlitz County Extension collaborate with the City with the goal of reaching a county-wide audience on topics related to stormwater and water quality. In 2016, Longview, Kelso, Cowlitz County and CDID #1 approved an interlocal agreement to commit funding to the cooperative effort with the City serving as administrator of the program.

In 2019, Cowlitz Clean Waters launched its revamped website at www.cowlitzcleanwaters.org which continues to serve as the primary focal point for the regional effort and a clearinghouse of information on how to be a solution to stormwater pollution.



Cowlitz Clean Waters Website

- ☑ **Website** – The City’s SWMP, annual reports, stormwater regulations and other documents are available on the City of Longview’s primary website, www.mylongview.com, found on the Stormwater page under *Your Government / Departments / Public Works / Stormwater Division*.

- ☑ **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.
- ☑ **Social Media** – The City’s Facebook page feature articles related to stormwater including: stormwater utility fee rates, pervious concrete, improving water quality, charity car wash fundraisers, stormwater management services, and how to report illicit discharges and stormwater pollution.
- ☑ **Public Events** – Participation in a number of public events each year with a booth or table providing information and tips on stormwater pollution prevention. In 2022, the City helped staff the Cowlitz Clean Waters booth at three different events: The City of Longview Earth Day Festival held at Lake Sacajawea, Longview’s Squirrel Fest, and the City of Kelso’s Highlander Festival.



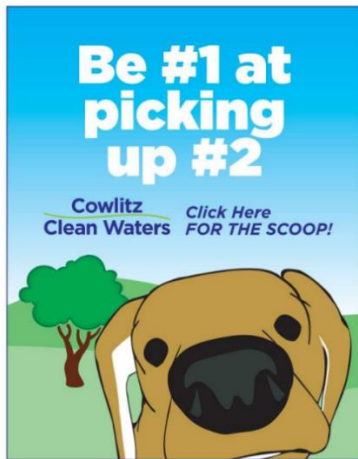
Cowlitz Clean Waters Booth at the 2022 Earth Day Festival

- ☑ **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.

- ☑ **Storm Drain Markers** – 1,200 additional new stainless steel medallions were purchased in 2020 to replace the existing plastic storm drain markers that are deteriorating or missing. Installation of the new markers is being undertaken by City maintenance crews during scheduled inspection and cleaning of inlets and catch basins.
- ☑ **Pet Waste Signage** – A pet waste sign was designed and produced in 2019 in conjunction with the Cowlitz Clean Waters partners for use at pet waste posts with bag dispensers in the Longview/Kelso area. Within Longview’s city limits, over 60 signs were installed in and along City parks and trails.
- ☑ **Behavior Change Campaign** – Dog owners and pet waste were selected as the target audience for the regional effort with the City of Kelso, Cowlitz County and CDID #1 to meet the behavior change program requirements under the 2019 permit. The permittees developed a comprehensive outreach strategy and plan to focus on this audience beginning in 2020. In 2022, the permittees continued implementation of the regional behavior change program focused on pet owners and picking up after their pets. Activities included the printing and distribution of 15,000 pet waste brochures and purchasing a three-month targeted internet ad and social media placement buy totaling \$12,000.

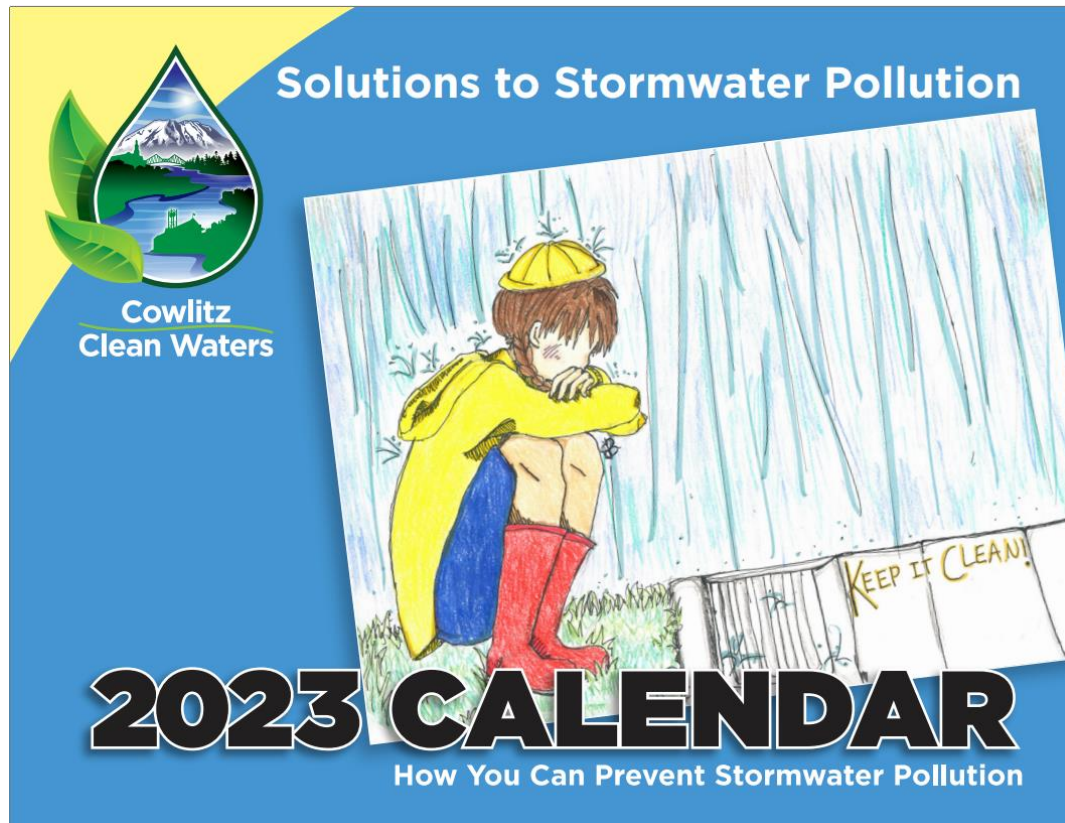


New Pet Waste Campaign Informational Brochure



Pet Waste Campaign Internet Banner Ads

- ☑ **Student Calendar Contest** – Each year Cowlitz Clean Waters host a calendar contest where it invites local middle school students to create art and poetry focusing on how to prevent stormwater pollution. The winners are featured in the next year's "Solutions to Stormwater Pollution" calendar.



2023 "Solutions to Stormwater Pollution" Calendar

Planned Activities

Planned activities for 2023 include:

- Ongoing participation with the Cowlitz Clean Waters partners on regional public education efforts, deliverables and activities which may include the following:
 - Updated website with stormwater information for businesses
 - Updated general stormwater brochure and new collateral materials focused on target audiences and behaviors
 - Social media presence with ongoing educational postings
 - Calendar art and poetry contest for middle school students
 - Video and radio public service announcements
 - Print media ads and articles in local papers
 - Outdoor advertising such as billboards and bus wraps
 - Public events
- Conduct a post-campaign poll of audience awareness and attitudes for the regional pet waste behavior change campaign.
- Prepare a report to document the changes in understanding and adoption of targeted behaviors resulting from the regional behavior change campaign, including recommendations to improve effectiveness.
- Provide additional content on the City's stormwater web pages (*mylongview.com*).
- Use social media and new utility bill inserts to facilitate and further disseminate stormwater education and outreach messaging.
- Participate in additional public events.
- Create and install new educational/interpretive signage at municipal owned or maintained stormwater management facilities.
- Explore new opportunities for stewardship activities.
- Continue all other ongoing programs and activities.
- Track and document all public education and outreach efforts.

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, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the SMAP and 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.

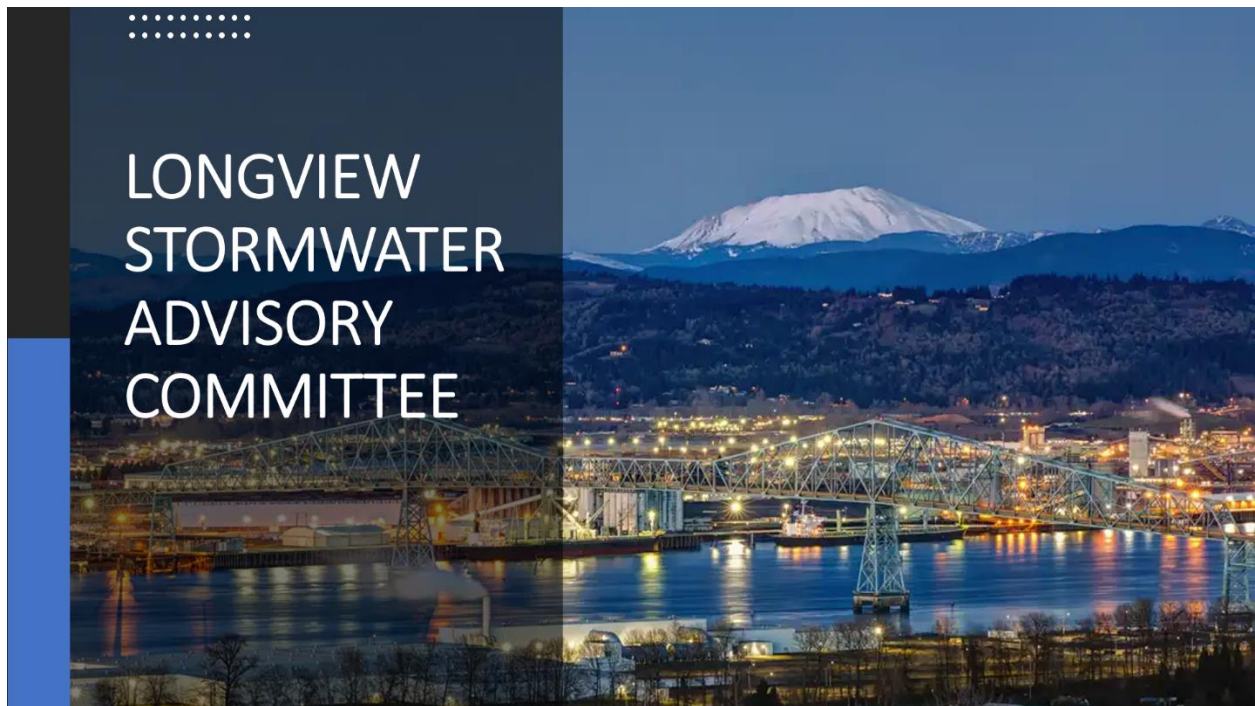
LSAC provides extensive input and guidance on the development of the City's SWMP as well as stormwater policy, regulations and guidelines.

- 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 2023 include:

- Involve LSAC and other stakeholder groups in the update of the City's stormwater guidelines document, which will provide additional information and technical guidance on meeting the City's stormwater regulations and requirements.
- Involve LSAC and other stakeholder groups in the review and revision of other applicable local development-related standards or enforceable documents related to implementing the City's stormwater regulations and guidelines.
- Publish the current SWMP Plan and 2022 NPDES Permit annual report to www.mylongview.com no later than May 31, 2023.
- Involve LSAC and other stakeholder groups in developing a strategy for implementing the new program requirements of the 2019 Permit.
- Involve LSAC and other stakeholder groups in the review and revision of the 2024 SWMP.
- Track and document all public involvement and participation efforts.



MS4 MAPPING AND DOCUMENTATION

The City has ongoing efforts to keep its stormwater management system asset inventory and mapping current and accessible to both staff and the public.



Permit Requirements

*An ongoing program for mapping
and documenting the MS4.*

Minimum Performance Measures:

- Ongoing mapping of the MS4 to include known outfalls, discharge points, receiving waters, City-owned/operated treatment and flow control facilities, areas that do not discharge to surface waters, tributary conveyances, connections to other MS4's, and connections to the MS4 authorized or allowed after February 16, 2007.
- New mapping of the following:
 - Size and material for all known MS4 outfalls
 - All known connections between the MS4 and privately-owned stormwater systems (to be completed by August 1, 2023)
- Electronic mapping (GIS, CAD or other software) with fully described mapping standards (no later than August 1, 2021).

Completed and Current Activities

- ☑ **MS4 Mapping** – The City has both a digital Geographical Information System (GIS) 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.

Work continued in 2022 on updating the City's stormwater GIS datasets, including as-built information from City projects and private development.

Planned Activities

Planned activities for 2023 include:

- Review and update the MS4 maps and GIS data as needed for compliance with Permit requirements.
- Collect field data on the size and material of MS4 outfalls where there is currently no attribute information.
- Complete mapping of all known connections between the MS4 and privately owned stormwater systems by August 1, 2023.



Correcting Stormwater Infrastructure Mapping Information Using Field Surveys and Aerial Imagery

ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City's stormwater ordinance prohibits non-stormwater, illicit discharges into the MS4. The illicit discharge detection and elimination (IDDE) program guides City responses to spills and reports of potential polluting 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:

- Procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified, including procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- 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 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; and
 - An ongoing training program for all municipal field staff
 - Complete field screening for an average of 12% of the MS4 each year

- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the MS4, which includes:
 - Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found;
 - Procedures for tracing the source of an illicit discharge; and
 - Procedures for eliminating the discharge, including notifications and compliance strategy
- 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

- ☑ **Stormwater Ordinance** – The City passed an ordinance in 2009 which prohibits non-stormwater illicit discharges and illegal connections to the MS4 and provides for escalating enforcement of violations. These provisions were updated in 2017 for consistency with the Permit and are codified as Longview Municipal Code (LMC) 17.90 – *Stormwater Illicit Discharge Prevention*.
- ☑ **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 and the *Illicit Connection and Illicit Discharge Field Screening and Source Tracking Guidance Manual (May 2013)*. The City's program includes windshield surveys undertaken by Stormwater Division staff in the field, responding to citizen complaints and reports provided 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.
- ☑ **Illicit Discharge Public Awareness and Education** – The City maintains both a telephone hotline (360-578-0900) as well as an online customer service application (*Ask Longview*) on its website with a form 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 recognizing and reporting illicit discharges, spills, or illegal dumping and staff who respond to illicit discharge incidents.

- ☑ **Recordkeeping** – The Stormwater Division tracks and keeps records of all IDDE reports/complaints, inspection, and remediation actions, and includes the information specified in Appendix 12 of the Permit.

Planned Activities

Planned activities for 2023 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 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.



Illicit Discharge of Paint to the City's Stormwater System in 2022

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

The City's stormwater requirements and development review program promulgates and ensures compliance with standards for construction stormwater pollution prevention as well as permanent stormwater management on land development projects within the City.



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 transportation projects.

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 current Permit.
- A permitting process with site plan review, inspection, and enforcement capability for both private and public projects, 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 stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every six months until construction has stopped and the site is fully stabilized;

- 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;
 - Maintain records of inspections and enforcement actions; and
 - An enforcement strategy to respond to issues of non-compliance
- Make available, as applicable, the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic *Industrial Stormwater General Permit* NOI form 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.

Completed and Current Activities

- ☑ **Stormwater Ordinance** – In 2009, the City Council adopted an ordinance with stormwater requirements for new development, redevelopment, and construction site projects for sites over one acre established in the 2007 Permit, as well as a set of local stormwater guidelines for smaller projects.

These regulations were updated in 2017 to be consistent with the Minimum Requirements, thresholds, and definitions in Appendix 1 of the 2012 Permit. These provisions are codified as Longview Municipal Code (LMC) 17.80 - *Stormwater Management*.

- ☑ **Low-Impact Development (LID)** – Beginning in mid-2016, the City reviewed all local development-related codes, rules, standards, or other enforceable documents for opportunities to incorporate Low Impact Development (LID) principles and BMPs as applicable the preferred and commonly-used approach to site development.

Based on the review, a set of proposed recommendations to revise various LMC code sections were reviewed by stakeholders and the Planning Commission in 2017 and subsequently considered and adopted through Ordinance 3351.

- ☑ **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. 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. The City updated its development permitting and review process in 2017, including the creation of new submission forms and checklists, to respond to the new stormwater regulations and thresholds included under the Permit.

- ☑ **Recordkeeping** – The Stormwater Division tracks and keeps records of all regulated plan reviews, construction inspections, and ongoing O&M of regulated BMPs/facilities.

In 2022, the City contracted with NPDESPro for cloud-based software & database for tracking and coordinating on-site inspections and compliance for construction sites as well as long-term O&M for both public and private stormwater 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.

Planned Activities

Planned activities for 2023 include:

- Continue to perform site plan review, inspection, and enforcement of all public and private projects that meet the minimum thresholds.
- 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.



New Bioretention Facility at the St. Helens Village Apartments Completed in 2022

OPERATIONS AND MAINTENANCE

The City's stormwater program provides for annual inspection of both public and private stormwater facilities. The City undertakes operation and maintenance activities 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

A program to regulate maintenance activities and to conduct maintenance activities by the City to prevent or reduce stormwater impacts.

Minimum Performance Measures:

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* no later than June 30, 2022.
- 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;
 - Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 that were permitted by the City in accordance with the Permit; and
 - Maintain records of all inspections and enforcement actions.
- Maintenance of stormwater facilities owned or operated by the City, including:
 - Annual inspection and maintenance of all City-owned or operated stormwater treatment and flow control BMPs/facilities, with appropriate maintenance actions taken 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 every two years, or alternative based on maintenance records or circuit basis.
- 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.
- ☑ **Public Stormwater Facility/BMP Inspections and O&M** – 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.
- ☑ **Private Stormwater BMP/Facility Inspections** – LMC 17.80 includes provisions for the long-term operation and maintenance of private 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 private stormwater treatment and flow control BMPs/facilities that discharge to the MS4 are completed annually by the Stormwater Division, with follow-up maintenance compliance requests and enforcement as required.
- ☑ **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. Over 90% of the total number of catch basins in the City were inspected and cleaned in 2022.

- ☑ **Street Sweeping Program** – The City has a street sweeping program which has run two Elgin street sweepers on a full-time (40 hour/week) basis to sweep all public streets, alleys and parking lots. The program effectively cleans and removes potential pollutants and debris from all streets, alleys and parking lots on an approximately weekly basis. The City purchased a new Ravo vacuum street sweeper in 2018, which has improved the program’s stormwater pollutant removal capabilities.
- ☑ **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 maintained properties and operations. This includes streets, parking lots, buildings, parks and open space, right-of-ways, the City shop and maintenance yards, 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 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 private BMPs/facilities. The City began implementing its Lucity stormwater asset management system in 2018 for managing inspection and maintenance information for all stormwater infrastructure assets. Lucity is also used to track street sweeping program activities.

Planned Activities

Planned activities for 2023 include:

- Continue the annual inspection of all City-owned or operated permanent stormwater treatment and flow control BMPs/facilities and perform spot checks after major storm events.
- Continue to ensure adequate long-term operation and maintenance (O&M) of private stormwater treatment and flow control BMPs/facilities that have been permitted by the City since the 2009 ordinance went into effect.

- Implement NPDESPro commercial software/cloud solution for tracking inspection and compliance information for both public and private stormwater facilities.
- 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 maintained properties and operations. Review and revise the City's O&M manual and SOP's as needed.
- Continue implementation of 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 maintenance procedures, SOP's and SWPPP's.
- Continue all required recordkeeping.



Street Sweeping on the Longview Civic Circle in 2022

SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

Stormwater Source Control is a new requirement under the 2019 Permit which tasks the City with developing a program for inspecting publicly and privately-owned non-residential properties for potential stormwater pollution sources that could discharge to the MS4.



Permit Requirements

Program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.

Minimum Performance Measures:

- Adopt and make effective an ordinance or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities;
- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4 (*no later than August 1, 2022*);
- Implement an inspection program for sites identified for the source control inventory, which includes providing information about activities that may generate pollutants and the source control requirements applicable to those activities (*no later than January 1, 2023*); and
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period (*no later than January 1, 2023*).
- Train staff who are responsible for implementing the source control program.

Completed and Current Activities

- Hired a new stormwater specialist to develop, implement and manage the City's source control program.
- Modified the City's existing illicit discharge ordinance to require the application of source control BMPs for pollutant generating sources associated with existing land uses and activities, and mandate participation in the City's stormwater source control program for applicable sites.
- Completed an inventory of sites for the source control program.
- Developed an inspection program, including policies and procedures, for sites identified for the source control inventory, which includes providing information about activities that may generate pollutants and the source control requirements applicable to those activities.
- Implemented a progressive enforcement policy that requires sites to comply with the stormwater source control requirements within a reasonable amount of time.


Planned Activities

Planned activities for 2023 include:


- Begin inspections of sites on the City's source control inventory.
- Continue development of educational training materials for local sites on industry and activity-specific stormwater source control and pollution prevention.
- Update City website with stormwater source control program information.



Improper Outdoor Storage of Chemicals Can Result in Stormwater Pollution



City of Longview Source Control Inspection Form



Section 1A: Site/Business Information

Business/site name:		
Parcel Identification Number (PIN):	Business/site ID:	
Street address:	City, State:	Zip:
Mail address/PO Box:	City, State:	Zip:

Section 1B: Site/Business Activities

Hazardous waste: <input type="checkbox"/> Very Small Quantity Generator (VSQG) <input type="checkbox"/> Small Quantity (SQG) <input type="checkbox"/> Large Quantity (LQG) <input type="checkbox"/> N/A	
NAICS code(s):	NAICS category(ies):
SIC code(s):	SIC category(ies):
Applicable permit(s): <input type="checkbox"/> General (ISGP) <input type="checkbox"/> Industrial Stormwater Individual <input type="checkbox"/> Other Sector Ecology Permit <input type="checkbox"/> N/A	
Permit details and #:	
Mobile business? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Notes on site activities:	

Section 1C: Stormwater Structures and BMPs on Site

Stormwater Discharge	Runoff Treatment and/or Flow Control BMPs
<input type="checkbox"/> Discharge to MS4	<input type="checkbox"/> Oil-water separator
<input type="checkbox"/> Discharge to another jurisdiction's MS4	<input type="checkbox"/> Detention pond <input type="checkbox"/> Detention vault <input type="checkbox"/> Detention pipe
<input type="checkbox"/> Stormwater managed on site	<input type="checkbox"/> Wet pond <input type="checkbox"/> Wet vault
<input type="checkbox"/> Discharge to surface water	<input type="checkbox"/> Infiltration/LID BMPs (bioretention, permeable pavement, etc.)
<input type="checkbox"/> On-site infiltration	<input type="checkbox"/> Dispersion BMPs
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other runoff treatment or flow control BMPs:

How many access points to stormwater on site? (catch basins or inlets): _____

Describe condition of catch basins/inlets: _____

Notes on maintenance frequency: _____

Is a maintenance contract in place? Yes No *(if not, explain the benefits of a routine maintenance contract)*

Does this site also have annual private stormwater facility inspection requirements? Yes No

Section 2: Source Control Inspection

Inspector name(s):	
Date:	Time: _____
Type of Visit	Additional Details Related to Visit
<input type="checkbox"/> Screening visit/routine visit	Response to complaint? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(if yes, attach file)</i>
<input type="checkbox"/> Initial inspection	Denied entry? <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Follow-up inspection # _____	

Public Works Stormwater Division P.O. Box 128 1525 Broadway Street Longview, WA 98632 Direct 360-442-5219

In 2022, the City Developed a Source Control Program and Plans to Begin Site Visits in 2023

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 2023 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 that should apply in the future.

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.A): Permittees may choose either-
 - Option A - Make annual payments into a collective fund to implement regional receiving water status and trends monitoring for urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin; or
 - Option B - Conduct stormwater discharge monitoring per the requirements in section S8.C of the Permit
- Effectiveness Studies (S8.B): Permittees may choose either-
 - Option A – Make annual payments into a collective fund to implement effectiveness studies undertaken by the Western Washington Stormwater Action Monitoring (SAM) program; or
 - Option B - Conduct stormwater discharge monitoring per the requirements in section S8.C of the Permit
- Provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects.

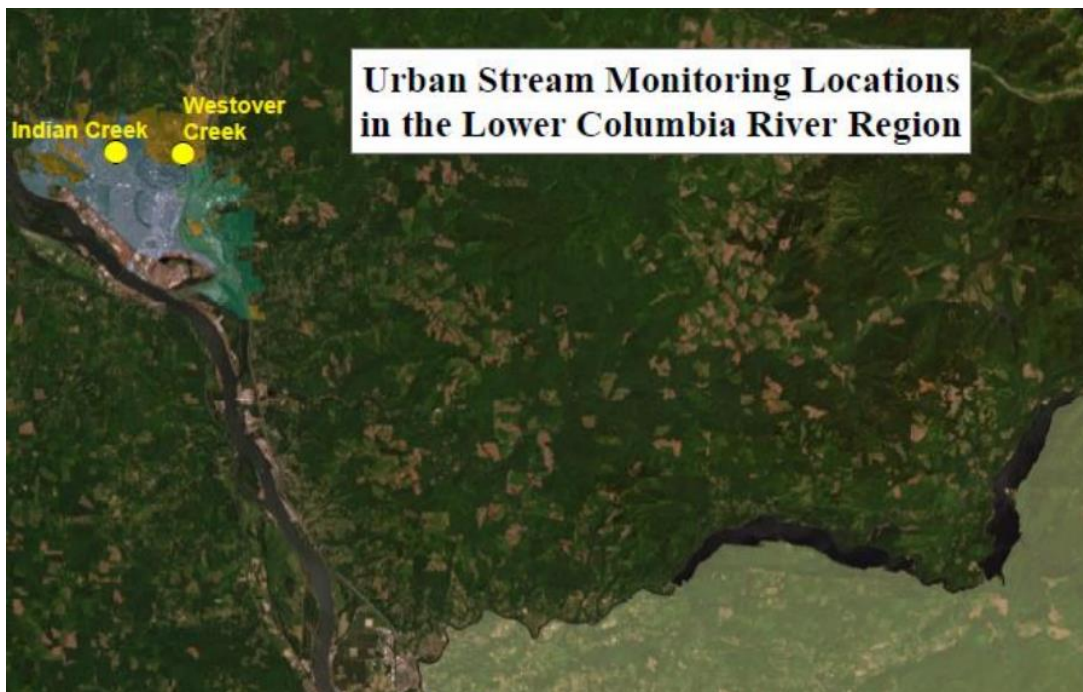
Completed and Current Activities

- Status and Trends Monitoring: The City has chosen Option A to satisfy its Permit requirements by making annual payments into a collective fund to implement regional receiving water status and trends monitoring for urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin.
- Effectiveness Studies: The City has chosen Option A to satisfy its Permit requirements by making annual payments into a collective fund to implement effectiveness studies undertaken by the Western Washington Stormwater Action Monitoring (SAM) program.

Planned Activities

Planned activities for 2023 include:

- Make required payments into collective fund to implement regional receiving water status and trends monitoring.
- Continue collaborating with other southwest Washington permittees on implementation of the Lower Columbia Urban Stream Monitoring Program.
- Make required payments into collective fund to implement effectiveness studies.
- Review results of effectiveness studies for applicability to public and private development projects within the City.



Stream monitoring sites in Cowlitz County which are part of the Lower Columbia Urban Stream Monitoring Program

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The City of
Longview
Washington