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CITY OF KELSO

Public Works Department
203 S. Pacific Ave., Suite 205
PO Box 819
Kelso, WA 98626

March 31, 2008

Department of Ecology
Water Quality Program
Municipal Stormwater Permits
P.O. Box 47696
Olympia, WA 98504-7696

RE: 2008 Annual Report for Phase II NPDES Municipal Permit

Dear Sir/Madam:

The City of Kelso is permitted under the NPDES Western Washington Phase II Municipal Stormwater Permit Number WAR045010. One of the requirements of the permit (Section S9) is to submit by March 31, 2009 the 2008 Annual Report that includes a Stormwater Management Program (SWMP). Attached are two hard copies of these documents for the 2008 reporting period. An electronic copy of each of these documents was sent out by email today.

If you have any questions please contact me at 360-423-6590. Thank you.

Sincerely,

Van McKay, P.E.
Senior Engineer

Attachments: Annual Report
SWMP

I. Permittee Information

Permittee Name

City of Kelso

Permittee Coverage Number

WAR045010

Contact Name

Van McKay, P.E.

Phone Number

360-423-6590

Mailing Address

P.O. Box 819

City

Kelso

State

WA

Zip + 4

98626-0078

Email Address

vmckay@kelso.gov

II. Regulated Small MS4 Location

Jurisdiction

City of Kelso

Entity Type: Check the box that applies

County

City/Town

Other

X

Major Receiving Water(s)

Cowlitz and Coweeman Rivers

III. Relying on another Governmental Entity


If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. *Attach a copy of your agreement with the other entity to provide additional detail.*

Name of Entity:**Permit Obligation(s):**

IV. Certification

All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees. Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Name		Title	City Manager	Date	3/31/09
Name	_____	Title	_____	Date	_____
Name	_____	Title	_____	Date	_____
Name	_____	Title	_____	Date	_____
Name	_____	Title	_____	Date	_____

PLEASE indicate reporting year and your jurisdiction in Line 1, above.
 PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.
 NOTE: Items that have future compliance dates must still be answered to indicate status.
 NOTE: Highlighted questions indicate permit requirements that are due for calendar year 2008.
 NOTE: For clarification on how to answer questions, place cursor over cells with red flags.
 PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y		A copy of the draft SWMP can be found online at http://stormwater.kelso.gov .	The City of Kelso Phase II Municipal Stormwater Management Program (SWMP) is attached.
2. Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	N		The geographic area of the City of Kelso did not change in 2008.	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	Y		The City of Kelso is using computer software to track and manage development and implementation of the SWMP.	
4. Began tracking costs or estimated costs of the development and implementation of the SWMP? (Required no later than January 1, 2009, S5.A.3.a)	Y		The City of Kelso is currently tracking staff time and consultant costs required to develop and implement the SWMP.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? (Required to begin by February 15, 2009, S5.C.1)	Y		The City of Kelso, working with the Consolidated Diking District #1 (CDID#1), the City of Longview and Cowlitz County distributed educational brochures to target audience listed in permit. A copy of "Solution to Pollution" brochure can be found at http://stormwater.kelso.gov .	
6. Distributed appropriate information to target audiences identified in the area served by the MS4? (Required to begin by February 15, 2009, S5.C.1.a)	Y		The City of Kelso, working with the CDID#1, the City of Longview and Cowlitz County distributed educational brochures to target audience listed in permit. A copy of "Solution to Pollution" brochure can be found at http://stormwater.kelso.gov .	
6b. Please mark a Y next to audiences targeted in Y/N/NA box:	Y			
i General Public	Y			
ii Home-based business	Y			
iii Elected officials	Y			
iv Developers	Y			
v Contractors	Y			
vi Permittee Employees	Y			
vii Residents	Y			
viii Businesses	Y			
ix Policy makers	Y			
x Engineers	Y			
xi Property managers	Y			
xii Homeowners	Y			
xiii Mobile businesses	Y			
xiv Industries	Y			
xv Landscapers	Y			
xvi Planning Staff	Y			
7. Tracked the types of public education and outreach activities implemented. (Required to begin by February 15, 2009, S5.C.1.c)	Y		The City of Kelso is using computer software to track educational and outreach activities.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
7b. Number of activities implemented:		14		
8. Measured the understanding and adoption of the targeted behaviors among targeted audiences. <i>(Required to begin by February 15, 2009, S5.C.1.b)</i>	Y		The City of Kelso, working with the CDID#1, the City of Longview and Cowlitz County, commissioned a survey of target audiences regarding stormwater knowledge and behaviors to direct and prioritize educational efforts. A copy of the July 2008 "Stormwater Market Research Report" can be found at http://stormwater.kelso.gov	
9. Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? <i>(Required by February 15, 2008, S5.C.2.a)</i>	Y		The Kelso City Council adopted Ordinance #08-3667 on February 19, 2008, found at http://stormwater.kelso.gov , that established a stormwater advisory committee. Monthly Kelso Stormwater Advisory Committee (KSAC) meetings that are open to the public have been held since then.	
10. Developed and implemented a process for public involvement and consideration of public comments on the SWMP? <i>(Required by February 15, 2008, S5.C.2.a)</i>	Y		The Kelso City Council adopted Ordinance #08-3667 on February 19, 2008, found at http://stormwater.kelso.gov , that established a stormwater advisory committee. Monthly KSAC meetings that are open to the public have been held since then.	
11. Made the most current version of the SWMP available to the public. <i>(S5.C.2.b)</i>	Y		An updated version of the draft SWMP was posted online in 2009 and can be found at http://stormwater.kelso.gov .	
12. Posted the SWMP and latest annual report on your website. <i>(S5.C.2.b)</i>	Y		An updated version of the draft SWMP was posted online in 2009 and both documents can be found at http://stormwater.kelso.gov .	http://stormwater.kelso.gov
12b. NOTE website address in Attachment field:				
13. Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? <i>(Required August 19, 2011, S5.C.3)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the Permit requirements.	
14. Developed and currently maintain a map of your MS4? <i>(Required by February 15, 2011, S5.C.3.a)</i>	NA		The City has a draft map of the MS4. The City has mapped approximately one half of the MS4.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
14b. Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? (S5.C.3.a.ii)	Y		The City has a draft map of the MS4. The City has collected data to map approximately one half of the MS4. See the Stormwater Master Plan report at http://stormwater.kelso.gov .	
15. Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? (Required by February 15, 2011, S5.C.3.a.i)	NA		The City has collected data to map approximately one half of the MS4. See the Stormwater Master Plan report at http://stormwater.kelso.gov .	
16. Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? (Required by February 15, 2011, S5.C.3.a.i)	NA		The City has collected data to map approximately one half of the MS4. See the Stormwater Master Plan report at http://stormwater.kelso.gov .	
17. Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? (Required by February 15, 2011, S5.C.3.a.iii)	NA		The City has collected data to map approximately one half of the MS4. See the Stormwater Master Plan report at http://stormwater.kelso.gov .	
18. Map has been made available upon request? (S5.C.3.a.iv)	N		A request for the map has not been made.	
19. Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illegal discharges, and/or dumping into the Permittee's MS4? (Required by August 15, 2009, S5.C.3.b)	NA		The City with the input of the KSAC has developed a draft illicit discharge ordinance.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
20. Developed and implemented an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the Permittee's MS4? (Required by August 19, 2011, S5.C.3.c)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
21. Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in spills? (Required by August 19, 2011, S5.C.3.c.i)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
22. Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? (Required by August 19, 2011, S5.C.3.c.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
23. Prioritized receiving waters for visual inspection? (Required by February 15, 2010, S5.C.3.c.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
24. Conducted field assessments for three high priority water bodies? (Required by February 15, 2011, S5.C.3.c.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
25. Conducted field assessments on at least one high priority water body? <i>(Required annually after February 15, 2011, S5.C.3.c.ii)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
26. Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? <i>(Required by August 19, 2011, S5.C.3.c.iii)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
27. Developed and implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? <i>(Required by August 19, 2011, S5.C.3.c.iv)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
28. Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? <i>(Required by August 19, 2011, S5.C.3.c.v.)</i>	NA		A draft illicit discharge ordinance will address some of the requirements to this permit requirement.	
29. Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? <i>(Required by August 19, 2011, S5.C.3.d)</i>	NA		The City of Kelso is working with our consultant to develop educational materials.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
30. Distributed appropriate information to target audiences identified pursuant to S5.C.1? (Required by August 19, 2011, S5.C.3.d.i)	Y		The City of Kelso has distributed educational brochures to target audience listed in permit. A copy of "Solution to Pollution" brochure can be found at http://stormwater.kelso.gov .	
31. Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? (Required by February 15, 2009, S5.C.3.d.ii)	Y			
31b. Number of hotline calls received:		0		
31c. Number of follow-up actions taken in response to calls:		0		
32. Tracked the number and type of spills? (Required by August 19, 2011, S5.C.3.e)	NA		The illicit discharge inspection program is being developed.	
32b. Number of spills:		0		
33. Tracked the number of illicit discharges identified? (Required by August 19, 2011, S5.C.3.e)	NA		The illicit discharge inspection program is being developed.	
33b. Number of illicit discharges identified:		0		
34. Tracked the number of inspections made for illicit connections? (Required by August 19, 2011, S5.C.3.e)	NA		The illicit discharge inspection program is being developed.	
34b. Number of inspections:		0		
35. Received feedback from IDDE public education efforts? (Required by August 19, 2011, S5.C.3.e)	NA		The illicit discharge inspection program is being developed.	
36. Attached report on IDDE public education efforts? (Required by August 19, 2011, S5.C.3.d, S5.C.3.e)	NA		The illicit discharge inspection program is being developed.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
37 Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? (Required by August 15, 2009, S5.C.3.f.i)	NA		The illicit discharge inspection program is being developed.	
37b. Number of trainings provided:	0			
37c. Number of staff trained:	0			
38 Provided follow-up training as needed to address changes in procedures, techniques or requirements? (Required by August 15, 2009, S5.C.3.f.i)	NA			
38b. Number of trainings provided:	0			
38c. Number of staff trained:	0			
39 Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? (Required by February 15, 2010, S5.C.3.f.ii.)	NA			
39b. Number of trainings provided:	0			
39c. Number of staff trained:	0			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
40 Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? (Required by August 15, 2009, S5.C.4)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
41 Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (Required by August 15, 2009, S5.C.4)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
42 Applied stormwater runoff program to private and public development, including roads? (Required by August 15, 2009, S5.C.4)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
43 Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (Required by August 15, 2009, S5.C.4)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
44 Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? (Required by August 15, 2009, S5.C.4.a)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
45 Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? (S5.A.4)	Y		Existing codified stormwater runoff controls and thresholds remain in place.	
46 The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? (Required by August 15, 2009, S5.C.4.a.i)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
47 The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? (Required by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
48 Were exceptions or variances to the minimum requirements in Appendix 1 granted? (Required by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	NA		The City has developed a draft development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
48b. If so, how many were granted?		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
49 The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? (Required by August 15, 2009, S5.C.4.a.ii)	NA		The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
49b. Cite documentation to meet this requirement in Attachment field:	Y		The ordinance has not been adopted yet.	
50 The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? (Required by August 15, 2009, S5.C.4.a.iii)	NA		The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51 The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? (Required by August 15, 2009, S5.C.4.a.iv)	NA		The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
52 If the ordinance or regulatory mechanism allows construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is required by August 15, 2009, S5.C.4.a.v)	NA		The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
53 Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (Required by August 15, 2009, S5.C.4.b)	NA		This already exists but is being updated. The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
54 Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4.b)</i>	NA		The City has drafted a development/redevelopment ordinance with the input of KSAC. A copy can be found at http://stormwater.kelso.gov .	
55 Reviewed Stormwater Site Plans for new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.b.i)</i>	NA		The City of Kelso is developing a program for review of Stormwater Site Plans as per the draft development/redevelopment ordinance that has not been adopted.	
55b. Number of site plans reviewed during the reporting period:		0		
56 Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Potential? <i>(Required by August 15, 2009, S5.C.4.b.ii)</i>	NA		The City of Kelso is developing a program for inspection as per the draft development/redevelopment ordinance that has not been adopted.	
56b. Number of qualifying sites inspected prior to clearing and construction during the reporting period:		0		
57 Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? <i>(Required by August 15, 2009, S5.C.4.b.iii)</i>	NA		The City of Kelso is developing a program for inspection as per the draft development/redevelopment ordinance that has not been adopted.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57b. Number of sites inspected during the construction phase for the reporting period:	0			
58. Enforced as necessary based on the inspection at new development and redevelopment projects? (Required by August 15, 2009, S5.C.4.b.iii)	NA			
58b. Number of enforcement actions taken during the reporting period:	0			
59. Inspected qualifying permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? (Required by August 15, 2009, S5.C.4.b.iv and v)	NA		The City of Kelso is developing a program for inspection as per the draft development/redevelopment ordinance that has not been adopted.	
59b. Number of qualifying sites known during the reporting period:	0			
59c. Number of qualifying sites inspected during the reporting period:	0			
60. Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying projects? (Required by August 15, 2009, S5.C.4.b.iv)	NA		The City of Kelso is developing this portion of the SWMP to meet permit requirements.	
61. Enforced regulations as necessary based on the inspection? (Required by August 15, 2009, S5.C.4.b.iv)	NA		The City of Kelso is developing this portion of the SWMP to meet permit requirements.	
61b. Number of enforcement actions taken during the reporting period:	0			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
62 Developed and implemented an enforcement strategy to respond to issues of non-compliance with the regulations for qualifying projects? (Required by August 15, 2009, S5.C.4.b.vi)	NA		The City of Kelso is developing this portion of the SWMP to meet permit requirements.	
63 Did the Permittee choose to allow construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2? (S5.C.4.b.vii)	NA		Language in the draft development/redevelopment ordinance allows the Erosivity Waiver.	
63b. If yes, how many waivers were allowed?		0		
64 Developed and implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities and BMPs? (Required by August 15, 2009, S5.C.4.c)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
65 Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? (Required by August 15, 2009, S5.C.4.c.i)	NA		The City of Kelso has developed a draft development/redevelopment ordinance that has yet to be adopted.	
66 Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? (Required by August 15, 2009, S5.C.4.c)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
66b. Number of sites inspected during the reporting period:		0		
66c. Number of structural BMPs inspected during the reporting period:		0		
66d. Number of enforcement actions taken during the reporting period:		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
67 Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington? (Required by August 15, 2009, S5.C.4.c.ii)	NA		The City of Kelso has developed a draft development/redevelopment ordinance that has yet to be adopted.	
68 Performed timely maintenance as per S5.C.4.c.ii? (Required by August 15, 2009, S5.C.4.c.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
68b. Attached documentation of any maintenance delays. (Required by August 15, 2009, S5.C.4.c.ii)	NA			
69 Annually inspected all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? (Required by August 15, 2009, S5.C.4.c.iii)	NA			
70 If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii? (Required by August 15, 2009, S5.C.4.c.iii)	NA			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
71 Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? (<i>Required</i> by August 15, 2009, S5.C.4.c.iv)	NA			
71b. Number of facilities inspected during the reporting period:		0		
72 Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? (<i>Required</i> by August 15, 2009, S5.C.4.d)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
73 Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y		In 2008 the City has provided copies of a Notice of Application for proposed new development and redevelopment.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74 All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (Required by August 15, 2009, S5.C.4.f)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
74b. Number of trainings provided:		0		
74c. Number of staff trained:		0		
75 Developed and implemented 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? (Required by February 15, 2010, S5.C.5)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
76 Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 <i>Stormwater Management Manual for Western Washington</i> ? (Required by February 15, 2010, S5.C.5.a)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
77 Performed timely maintenance as per S5.C.5.a.ii? (Required by February 15, 2010, S5.C.5.a.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
77b. Attached documentation of any maintenance delays. (Required by February 15, 2010, S5.C.5.a.ii)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
78b.		0		
78c.		0		
79	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
80	NA			
80b.		0		
80c.		0		
81	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
81b.		0		
81c.		0		
81d.		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
82 Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? <i>(Required by February 15, 2010, S5.C.5.f)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
83 Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? <i>(Required by February 15, 2010, S5.C.5.g)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
84 Initiated or implemented 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? <i>(Required by February 15, 2010, S5.C.5.h.)</i>	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
84b.		0		
84c.		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
85 Initiated or implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit? (Required by February 15, 2010, S5.C.5.i)	NA		The City of Kelso is currently working with its consultant to develop this portion of the SWMP.	
86 Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N			
87 Complied with the specific requirements identified in Appendix 2? (S7.A)	NA			
88 Attached status report of TMDL implementation? (S7.A)	NA			
89 Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A)	NA			
90 Took appropriate action to correct or minimize the threat to human health or the environment or otherwise stop or correct the condition of any instances of non-compliance with any of the terms and conditions of this Permit, including discharges from the Permittee's MS4 which may cause a threat to human health or the environment? (G20.A)	NA			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
90b. Attached a summary of the status of implementation of any actions taken pursuant to S4.F and any information from an assessment and evaluation procedures collected during the reporting period. (S4.F.2.d)	NA			
91 Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20.B)	NA			
92 Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G20.C)	NA			

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part A for all annual reports.

NOTE: Please note in Row 1 of the table if you have no information to report.

NOTE: Please limit your entries to 255 characters per cell. You may include additional information in your Supplemental Documentation attachment and reference it below with the page number.

A. Information Collection

Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)	Who/how to contact for additional information?
1. Stormwater monitoring is not currently being performed.	Van McKay, P.E.
2.	
3.	
4.	
5.	
6.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

B. SWMP Evaluation

You are required to assess the appropriateness of the BMPs you have selected to implement your SWMP. This evaluation is necessary to evaluate whether the MEP standard set by the permit is protective of water quality in your receiving water bodies. This assessment may be entirely qualitative. Answer **NA** if you are not yet implementing BMPs for a component of the SWMP. (S8.B.2 and S9)

Question	Y/N/NA	Comments (50 word limit)
1. Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City of Kelso is currently working with its consultant to develop this portion of the SWMP.

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part C for all annual reports.

C. Changes in BMPs or objectives (S8.B)

If any of the BMPs or objectives is being changed, list the old BMP and objective, the new BMP and objective, and a justification for the change below. (S8.B.2., and S9)

NOTE: You may choose to attach additional documentation justifying Changes in BMPs or objectives. Note such attachments in the *Justification for change* field.

	Old BMP	Old Objective	New BMP	New Objective	Justification for Change
1	NA				
2					
3					
4					
5					
6					
7					

**CITY OF KELSO PHASE II MUNICIPAL STORMWATER MANAGEMENT PROGRAM
(SWMP)**

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.

PURPOSE

The purpose of this Stormwater Management Program (SWMP) Plan is to document the City of Kelso's efforts as required by the Western Washington Phase II Municipal Stormwater Permit (Permit). The City received coverage under this Permit by submitting a Notice of Intent (NOI) to the Washington Department of Ecology (Ecology) on January 2, 2007.

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EXECUTIVE SUMMARY

In 1987, Congress amended the federal Clean Water Act of 1972 and established water quality goals for surface waters (stormwater) of the United States. The National Pollutant Discharge Elimination System (NPDES) permit program is the mechanism under which these goals are implemented. The Environmental Protection Agency (EPA) administers the NPDES program nationwide and has delegated responsibility to administer the NPDES permit program to most states, including Washington.

The Clean Water Act established a two phase permit program. Phase I regulates larger and medium-sized municipalities and counties, construction site five acres or larger, and major industrial sources. Phase I was issued in 1995 to the cities of Seattle and Tacoma. In 1999, the counties of King, Pierce, Snohomish, and Clark also became regulated entities under the Phase I regulations.

Phase II regulates smaller jurisdictions, construction sites equal to or greater than one acre, and other industrial sources. In 2000, EPA finalized the NPDES Phase II rules regulating “small” municipal separate stormwater sewer systems (a.k.a. MS4s). On January 17, 2007, the Washington Department of Ecology (Ecology) issued a new Phase I and two new Phase II permits, one each for western and eastern Washington. The City of Kelso is now regulated as a MS4 under the western Washington Phase II permit.

These new requirements effectively prohibit non-stormwater discharges and require jurisdictions to apply controls to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP). Ecology is also using the permit to satisfy its own Water Pollution Control Act, RCW 90.48.

Phase II permits affect some 100 cities and 12 counties statewide, plus many other secondary and co-permittees such as diking districts, school districts, colleges, hospitals, and correctional facilities. Cities and counties covered by the permit must implement a Stormwater Management Program (SWMP). Requirements are specific and detailed with numerous compliance deadlines distributed over the five-year permit cycle.

The Phase II permit program is structured around the following components:

- Public education and outreach program designed to measurably reduce stormwater pollution;
- Public involvement process to guide the development of the stormwater management program;

- Adoption of ordinances to control runoff from development, redevelopment, and construction activities;
- An illicit discharge detection and elimination (IDDE) program to identify and remove improper discharges into the storm sewer system; and
- An operation and maintenance program that reduces pollutant runoff from municipal operations.

Reporting requirements and detailed record-keeping are included to assess compliance and allow for making changes to improve water quality.

Permit obligations are legally binding and there are consequences for failure to comply with requirements. Ecology's approach to compliance during this first five-year permit cycle is technical assistance. However, the CWA allows third-parties (citizens) to take legal action against jurisdictions failing to comply. Violators may be subject to penalties of up to \$32,500 per day per violation.

The following SWMP Plan provides the public and Ecology with information about how the City of Kelso is implementing the various program requirements of the Phase II permit.

S5.C1 PUBLIC EDUCATION AND OUTREACH

The SWMP shall include an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff, operations staff, and other employees of the Permittee. The goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. An education program may be developed locally or regionally.

Table X-X. Public Education and Outreach: Planned Activities

Planned Activity	Future Due Dates
1 Evaluate existing public education/outreach activities	
2 Identify individual responsible for public education/outreach	
3 Conduct public education workshop	
Identify "gaps" in target audience Initiate framework for public education/outreach program Initiate development of measurable goal Conduct initial public opinion survey Evaluate results of public opinion survey	Ongoing with yearly review
4 Draft framework for public education program (including feedback mechanism)	
Prepare a formal education and outreach program document for submittal in the Annual Report	2/15/09
5 Initiate activities program defined in the public education and outreach program	
6 Initiate summary of yearly public education/outreach activities for the Annual Report	Annually

S5.C.1.a Education and Outreach

The City's stormwater program maintains a full time stormwater manager. Through the efforts of this manager, the City has built upon its existing stormwater education by enhancing its website, producing informational mailings of the Ecology stormwater permit (Phase II Municipal permit) requirements to utility customers, and labeling storm drains. City managers and Council members have received technical presentations from Ecology educating them on basic stormwater and water quality protection principles as well as the requirements and importance of the Phase II Municipal permit.

The City mailed their second informational brochure in the 4th quarter of 2008 that addressed public awareness of stormwater pollution. The contents of this brochure were developed around the results from the 2008 telephone survey.

S5.C.1.b Performance Measurement

A telephone survey was conducted in 2008 to measure the knowledge and practices regarding stormwater and pollution. Both the public and businesses were targeted. This baseline survey was a multi-agency endeavor, with Cowlitz County, the Cities of Kelso and Longview, and the Consolidated Diking Improvement District #1 all participating. A consulting firm was hired to develop and perform the telephone survey. A total of 390 surveys were completed with the adult public and 386 surveys were completed with businesses.

This survey has provided the baseline of general stormwater knowledge from which to improve. The City is using this baseline to help develop their education and outreach program. A second survey is planned for 2010 to assess improvements.

S5.C.1.c Recordkeeping

The City tracks and maintains records of public education and outreach activities in accordance with this permit. Information about many of these activities are also posted on the City's website.

S5.C.2 PUBLIC INVOLVEMENT AND PARTICIPATION

The SWMP shall include ongoing opportunities for public involvement through advisory councils, watershed committees, participation in developing rate structures, stewardship programs, environmental activities, or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing their SWMP.

Table X-X. Public Involvement and Participation: Planned Activities

Planned Activity	Future Due Dates
1 Evaluate existing public involvement/participation activities	Ongoing
2 Identify individual responsible for public involvement/participation	
3 Develop ongoing public involvement/participation strategy	Ongoing
Create opportunities for public involvement	
Post the Annual Report and SWMP document on the City website	Annually on 3/31
Identify public involvement venues	Ongoing
4 Reporting	
Initiate summary of public involvement/participation activities for the Annual Report	
Identify Annual Report attachments if needed	
5 Plan public involvement/participation activities and responsibilities	Annually on or before 3/31
Initiate SWMP document update if necessary	
Post the SWMP related documents on the City's website along with an email address for public involvement	
Initiate planning of future public involvement/participation activities	

S5.C.2.a Public Participation

The Kelso Stormwater Advisory Committee (KSAC) was formed in 2008 as an avenue for public participation. The KSAC meets on a monthly basis and has 7 appointed members who represent different interests related to stormwater in the City. The KSAC is presently working on the various requirements of this permit, including the IDDE Ordinance and Construction and Post-Construction Ordinance. People with interest in the City's stormwater are welcome to participate as a KSAC member when positions become available, can talk with current KSAC members, or attend a KSAC meeting.

People can also participate through involvement with the City's Planning Commission, City Council, or the region's Watershed Committee (Grays-Elochoman & Cowlitz Watershed Planning Unit – WRIA 25/26).

S5.C.2.b Reporting

Kelso maintains a website that includes posting of various stormwater documents, including those required by this permit. This website is <http://stormwater.kelso.gov>.

S5.C.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The SWMP shall include an ongoing program to detect and remove illicit connections, discharges as defined in 40 CFR 122.26(b)(2), and improper disposal, including any spills not under the purview of another responding authority, into the municipal separate storm sewers owned or operated by the Permittee. Permittees shall fully implement an ongoing illicit discharge detection and elimination program no later than 180 days prior to the expiration of the Permit.

Table X-X. Illicit Discharge Detection and Elimination Plan: Planned Activities

Planned Activity	Future Due Dates
1 Evaluate existing illicit discharge detection and elimination program	Ongoing with annual review
2 Develop Illicit Discharge Detection and Elimination Program Develop and implement screening procedures Review and update illicit discharge response/source control procedures if necessary Review and update tracking/documentation procedures if necessary Review and supplement public education/outreach efforts if necessary (coordinate with the City's public education and outreach program) Develop inspection plan and enforcement team	8/19/2011
3 Update storm sewer system map Define conveyance system and outfalls Define drainage areas and catchments Map structural BMPs Document permit-required attributes Develop procedures for additions and updates	8/15/2011
4 Update ordinances Determine inspection and enforcement procedures Update City Municipal Code to address illicit discharges if needed	8/15/2009
5 Evaluate and update current hotline procedures if necessary	2/15/2009
6 Develop training program Review current training with respect to illicit discharges Identify additional training if necessary Draft framework for training program	8/15/2009
7 Reporting Initiate summary of prior year's IDDE activities for each Annual Report Identify Annual Report attachments if needed	Annually 3/31
8 Plan future year's IDDE activities and responsibilities Initiate SWMP document update if necessary Initiate planning of next year's IDDE activities	

S5.C.3.a Mapping

The City began locating all storm drains via Global Positioning Unit (GPS) in 2008. This data is being developed to map these storm drain locations. The City is currently 75% complete with this effort. The overall goal is to develop a municipal storm sewer system map. This map will provide locations of all known municipal separate storm sewer outfalls and receiving waters and structural BMPs owned, operated, or maintained by the City. This map will be updated as additional information becomes available or new additions or deletions made to the existing infrastructure. The map is available on the City's website.

S5.C.3.b Regulatory Mechanism

The City is currently developing their Illicit Discharge, Detection, and Elimination Stormwater Ordinance. A draft ordinance has been created and approved through the KSAC and is presently under review by various City departments. The process of creating this ordinance is on schedule per the Permit requirements. The City plans to formally adopt this ordinance by the Permit deadline of August 15, 2009.

S5.C.3.c Procedures

The City of Kelso's Public Works Department implements the City's IDDE program. The program goal is to provide for the health, safety, and general welfare of the citizens of the City through the regulation of non-stormwater discharges to the storm drainage system. The objectives of this program, per the IDDE Ordinance, are:

1. To regulate the contribution of pollutants to the stormwater drainage system by stormwater discharges by any user;
2. To prohibit illicit connections and discharges to the municipal separate storm sewer system; and
3. To establish legal authority to carry out all inspection, surveillance, and monitoring procedures necessary to ensure compliance with the Ordinance.

The specific procedures for IDDE program implementation are described in the Ordinance. Such procedures cover discharge prohibitions, suspension of stormwater drainage system access, industrial or construction activity discharges, inspection and sampling, use of best management practices, protection of water bodies, notification of spills, and enforcement.

The City is planning to build upon current IDDE activities to create a more identifiable program that includes:

- Procedures for locating priority areas likely to have illicit discharges;
- Procedures for tracing the source of an illicit discharge;

- Procedures for removing the source of the illicit discharge;
- Training for City staff on IDDE awareness; and
- Further public education of IDDE awareness.

S5.C.3.d Public Involvement

Public involvement opportunities to comment on the development of this ordinance are scheduled for this spring. Three public meetings will be conducted as part of the City's normal ordinance adoption process. During this time period, the public is offered the opportunity to review and comment on the ordinance.

The City has developed a hotline for people to call to report unlawful discharges into stormwater. This hotline phone number is (360) 578-0900. Additionally, the City posts a "citizen concern form" on their website for people to provide input to the Public Works Department.

S5.C.3.e Program Evaluation

As the IDDE program progresses through creation and maturity, the City will be evaluating its effectiveness on an on-going basis. The annual review and reporting requirements per the Permit ensure that these efforts are compiled and summarized at least annually.

S5.C.3.f Training

The City is in the process of developing a formal training program for its staff related to the IDDE requirements. The City intends to develop the approach to training by the Permit deadline of August 15, 2009.

S5.C.4 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

Each Permittee shall develop, implement, and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment, and construction site activities. This program shall be applied to all sites that disturb a land area one acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale. The program shall apply to private and public development, including roads.

Table X-X. Controlling Runoff from New Development, Redevelopment, and Construction Sites: Planned Activities

Planned Activity	Future Due Dates
1 Evaluate existing runoff control program	Annually
2 Review and update KMC to address permit requirement, if necessary Required thresholds and minimum requirements Site planning and BMP selection criteria that protect water quality, meet MEP, and satisfy AKART Legal authority to inspect new facilities Provisions for LID (or equivalent) Application of erosivity waiver	8/15/2009
3 Plan review, inspection, and enforcement Review and update plan review if necessary Develop inspection procedure plan Identify staff inspection team Update enforcement strategy if necessary Identify enforcement team Update KMC if necessary Develop mechanisms to track plan review, inspection, and enforcement actions Document NOIs for construction and industrial activities	8/15/2009
4 Operation and maintenance Update process for accepting new facilities or inspecting private facilities (keep private or go public) Document new stormwater systems for inspection, operation, and maintenance Update KMC to include long-term operation and maintenance requirements for phased construction Review BMP inspection frequency	8/15/2009
5 Staff trained in plan review, inspections, and enforcement related to stormwater Define training needs (who and what) Identify supplemental training needs	8/15/2009

Table X-X. Controlling Runoff from New Development, Redevelopment, and Construction Sites: Planned Activities

Planned Activity	Future Due Dates
Develop training schedule Track training and summarize for Annual Report	
6 Reporting	
Initiate summary of plan review, inspection, and enforcement activities for Annual Report Identify Annual Report attachments, if any	Annually
7 Plan next year's runoff control activities and responsibilities	
Initiate SWMP document update if necessary for Annual Report Initiate planning of future runoff control activities	Annually

S5.C.4.a Regulatory Mechanism

The City is currently updating their Construction Ordinance. A draft ordinance has been created and approved through the KSAC and is presently under review by various City departments. The process of creating this ordinance is on schedule per the Permit requirements. The City plans to formally adopt this ordinance by the Permit deadline of August 15, 2009.

In conjunction with the development of this Ordinance, the City is re-writing applicable portions of their design manual. This process ensures consistency between the Construction Ordinance and design manual. Additionally, this will allow the City to refer to the design manual in the Ordinance for easy user reference.

S5.C.4.b Permitting

The City's permitting process includes plan review, inspection, and enforcement capabilities and is implemented through the Public Works and Planning Departments. Additional permitting requirements are being updated through the Construction Ordinance adoption process and will comply with this Permit by the deadline of August 15, 2009.

S5.C.4.c Maintenance Inspection (Private)

The City is in the process of developing maintenance requirements for new private facilities as well as training for its staff related to protection of stormwater quality at privately-owned properties. This includes proper operations and maintenance measures.

S5.C.4.d Recordkeeping

The City maintains inspection and enforcement records on permitted activities within the City boundaries. These records are located within both the Public Works and Planning Departments.

S5.C.4.e Notice of Intent

The “Notice of Intent for Construction Activities” and “Notice of Intent for Industrial Activities” are available at City Hall. The address for City Hall is 203 S. Pacific Avenue, Kelso, WA 98626.

S5.C.4.f Training

The City is in the process of developing a formal training program for its staff related to the construction and post-construction requirements. The City intends to develop the approach to training by the Permit deadline of August 15, 2009.

S5.C.5 POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

Within three years of the effective date of the Permit, each Permittee shall develop and implement an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing polluted stormwater runoff from municipal operations.

Table X-X. Pollution Prevention and Operation and Maintenance Program: Planned Activities

Planned Activity	Future Due Dates
1 Evaluate existing pollution prevention and operation and maintenance program	Ongoing with annual review
2 Update inspection and maintenance program Define and quantify system for maintenance (e.g. type and size)	Ongoing
Catch basins	All inspected by 2/15/2012 on a 5-year schedule thereafter
Stormwater treatment and flow control facilities	All inspected by 2/15/2012 on a 1-year schedule thereafter
Streets, roads, and highways	
Parks, open spaces, right-of-way	
Determine system maintenance for water quality	
Evaluate frequency of inspections	Ongoing, due 2/15/2010
Develop resource needs assessment for maintenance	
Fund and staff maintenance plan (not a SWMP requirement)	
Develop tracking mechanisms for inspections, maintenance, and repairs	
3 Training of operation and maintenance staff	
Identify operation and maintenance training needs (who and what)	
Update current training if necessary	2/15/2010
Develop ongoing training program	
Document training	
4 Reporting	
Initiate summary of the Pollution prevention and Operation and Maintenance activities for the Annual Report	
Identify Annual Report attachments, if any	Annually
5 Plan the Pollution prevention and O&M activities and responsibilities	
Initiate SWMP document update if necessary	
Initiate planning of 2009 Pollution Prevention and O&M activities	

S5.C.5.a Maintenance Standards

S5.C.5.b Maintenance Inspection (Public)

S5.C.5.c Spot Checks

S5.C.5.d Catch Basin Maintenance

S5.C.5.e Compliance

S5.C.5.f Road Maintenance

S5.C.5.g Public Land Maintenance

S5.C.5.h Training

The City is in the process of developing training for its staff in pollution prevention of its municipal operations and maintenance programs. This training program component will be established by the Permit deadline of February 15, 2010.

S5.C.5.i Stormwater Pollution Prevention Plans (SWPPP)

S5.C.5.j Recordkeeping

The City will maintain recordkeeping of their pollution prevention activities within the Public Works Department.