



City of Longview

1525 Broadway
Longview, WA 98632
www.ci.longview.wa.us

City Council

*Mayor MaryAlice Wallis
Mayor Pro Tem Michael Wallin
Council Member Ruth Kendall
Council Member Angie Wean
Council Member Spencer Boudreau
Council Member Hillary Strobel
Council Member Christopher Ortiz*

Thursday, April 28, 2022

6:00 PM

2nd Floor, City Hall

NOTICE IS HEREBY GIVEN, in accordance with RCW Chapter 42.30, that the City Council of the City of Longview, Washington, will conduct a special meeting in the Longview City Hall Council Chamber, 1525 Broadway, Longview, on Thursday, April 28th at 6:00 p.m. The topics of discussion follow. Final disposition shall be taken on no other matter.

Zoom meeting link: <https://us02web.zoom.us/j/85470220899>

Telephone options (dial any of the following numbers):

1-253-215-8782
1-346-248-7799
1-408-638-0968
1-669-900-6833
1-301-715-8592
1-312-626-6799
1-646-876-9923

Webinar ID: 854 7022 0899

The City Hall is accessible for persons with disabilities. Special equipment to assist the hearing impaired is also available. Please contact the City Executive Offices at 360.442.5004 48 hours in advance if you require special accommodations to attend the meeting.

1. CALL TO ORDER
2. ROLL CALL
3. WORKSHOP

22-000255 STORMWATER UTILITY 2022 RATE WORKSHOP

RECOMMENDED ACTION:
FOR INFORMATION AND DISCUSSION

4. ADJOURNMENT

*** Any invocation that may be offered at the Council meeting shall be the voluntary offering of a private citizen, to and for the benefit of the Council. The views or beliefs expressed by the invocation speaker have not been previously reviewed or approved by the Council, and the Council does not endorse the religious beliefs or views of this, or any other speaker.**

**NEXT REGULAR COUNCIL MEETINGS:
THURSDAY, MAY 12, 2022- 7:00 P.M.
THURSDAY, MAY 26, 2022- 7:00 P.M.**

**NEXT COUNCIL WORKSHOPS:
TUESDAY, MAY 3, 2022- 6:00 P.M.- COUNCIL RETREAT**



City of Longview

Agenda Summary

STORMWATER UTILITY 2022 RATE WORKSHOP

RECOMMENDED ACTION: **FOR INFORMATION AND DISCUSSION**

COUNCIL INITIATIVE ADDRESSED:

Continue effective financial management
Provide Sustainable Water Quality & Environmental Infrastructure

CITY ATTORNEY REVIEW: N/A

SUMMARY STATEMENT:

This workshop is to provide a background and overview on the City's Stormwater Utility along with the utility evaluation performed in 2020. The workshop will also present the recommendations for stormwater rates and a draft rate resolution.

The City implemented a stormwater utility in 1999 in order to fund the operation and maintenance of its stormwater system as well as to comply with upcoming water quality regulations. The utility currently funds a number of additional programs including street sweeping, leaf pickup, urban forestry and sidewalk repair & replacement.

The basis of the stormwater utility fee is impervious cover. Single-family residential parcels are charged a fixed 'unit' value, while commercial and other properties pay fees based on how many equivalent units of impervious cover they possess. Most parcels had their impervious cover measured in 1999 when the utility was established.

In 2020, the City retained FCS Group to undertake a Stormwater Utility Evaluation & Rate Study. This study was initiated in order to evaluate the framework of the City's stormwater utility and update impervious assessments to ensure that all properties are being billed for the correct fees. FCS Group developed a number of issue papers and preliminary recommendations that were provided to Council at a workshop in September 2020. These recommendations and the feedback provided during that workshop provided the basis to develop an updated utility framework and new rate model, which were subsequently used to develop the revenue and expenditure forecasts for the stormwater utility.

Staff Contact:

Steve Haubner, Stormwater Manager

Attachments:

1. Stormwater Utility Rate Workshop - Council Workshop 4-28-22
2. 2021-22 Stormwater Utility Programs and Budget
3. 2022 Draft Stormwater Utility Rate Resolution
4. City of Longview 2022 SWMP
5. Stormwater 101 Guide from FCS Group



Stormwater Utility 2022 Rate Workshop

City Council Workshop
April 28, 2022

City of Longview

Stormwater Utility Background

- Stormwater Utility (LMC 15.80) created by Ordinance 2757 in 1999
- Utility responsible for stormwater system and regulatory compliance, and funds a variety of city programs
- Basis of stormwater utility charge is impervious cover
- Stormwater fee inaccuracies and equity concerns raised in 2019

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Stormwater Utility Ordinance

- Stormwater Utility (LMC 15.80) created by Ordinance 2757 in 1999
- Utility has authority and responsibility for all City stormwater conveyances and facilities
- All real property in the City charged a stormwater utility fee with the exception of undeveloped parcels
- Stormwater fee billed at the same time as water and sanitary sewer.
Stormwater fees billed to owner for any improved parcel that does not receive water or sanitary sewer services.

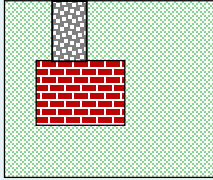
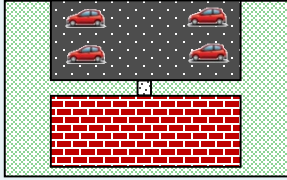
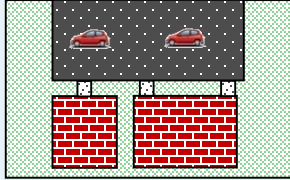
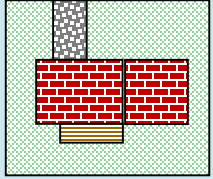
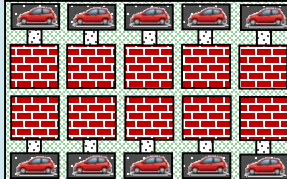
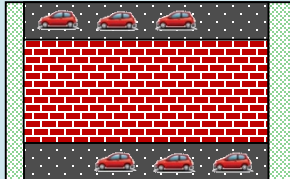
Stormwater Utility Programs

- Operations and maintenance of City stormwater infrastructure and facilities
- Stormwater capital improvements
- Regulatory compliance with NPDES municipal stormwater permit
- Development review and inspection
- City-wide street sweeping program
- Leaf pickup (fall months)
- Urban forestry program
- Sidewalk repair & replacement program

Stormwater Utility Rate Structure

- Basis of stormwater fee is impervious cover and rates are established by resolution.
- The Equivalent Residential Dwelling Unit (ERDU) is the average impervious cover on a single-family residential parcel in 1999 (determined to be approximately 2,500 square feet)
- The base rate of 1 ERDU is applied to all single-family residential properties regardless of parcel size or actual impervious cover
- Multi-family rates are the base rate times the number of dwelling units (ex. duplex = 2 ERDU)
- Non-residential properties are charged based on actual impervious cover. Stormwater fee is the total impervious cover divided by 2,500 sq ft multiplied by the base rate

Current Stormwater Rate Structure

Single-Family	Multi-Family	Commercial
1 ERDU per Parcel	1 ERDU per Dwelling Unit	1 ERDU per 2,500 Impervious Square Feet (ISF)
 Parcel with 2,000 ISF: 1 ERDU	 Fourplex 4 ERDUs	 Commercial Parcel with 7,500 ISF 3 ERDUs
 Parcel with 3,200 ISF: 1 ERDU	 10-Unit Mobile Home Park 10 ERDUs	 Commercial Parcel with 25,000 ISF 10 ERDUs

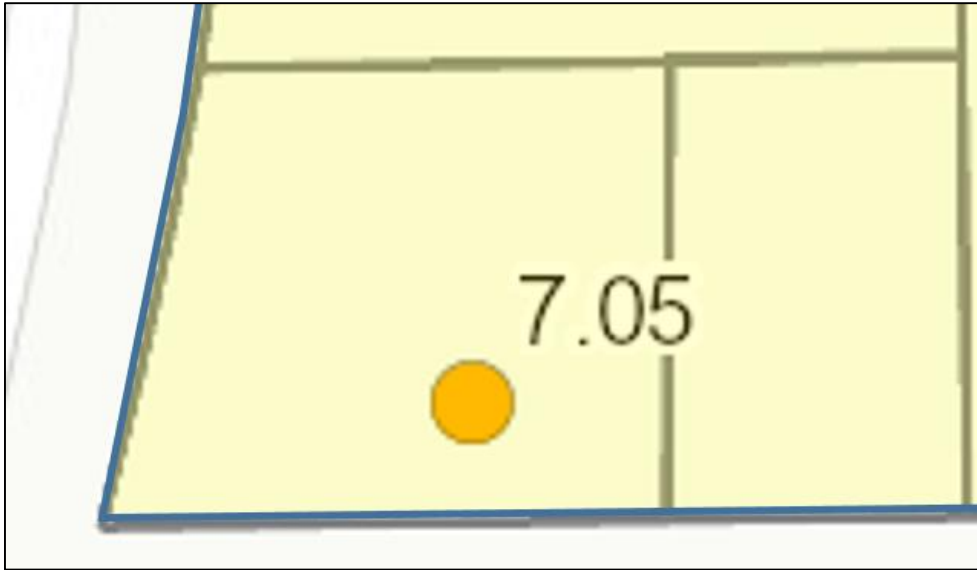
Stormwater Utility Issues

- Inaccuracies with non-residential assessments
- Residential equity concerns
- City properties not paying stormwater utility fees
- Need to evaluate/revisit stormwater utility basis

Inaccuracies in Impervious Assessments for Non-Residential Accounts

Potential errors due to:

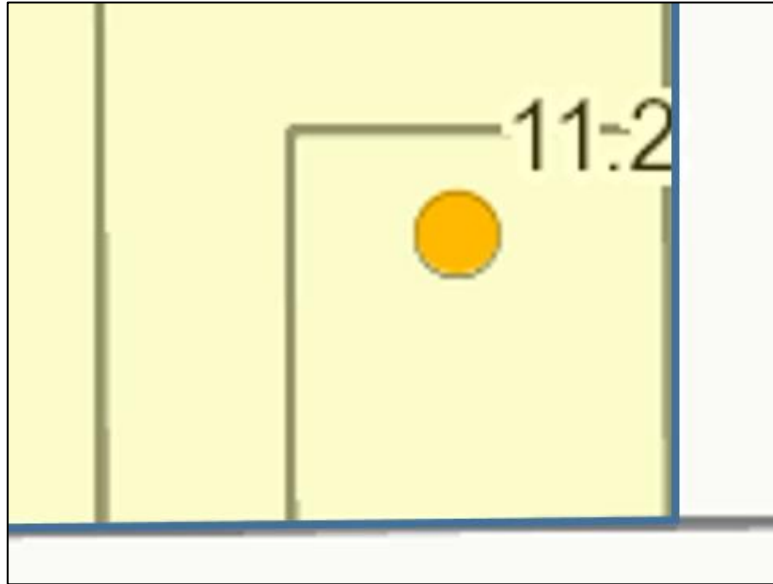
- Original assessment errors
- Not assessed after development
- Expansion or redevelopment with no subsequent reassessment
- Adjoining parcels not included in assessment
- Boundary line adjustments
- No water meter and thus no utility account for billing



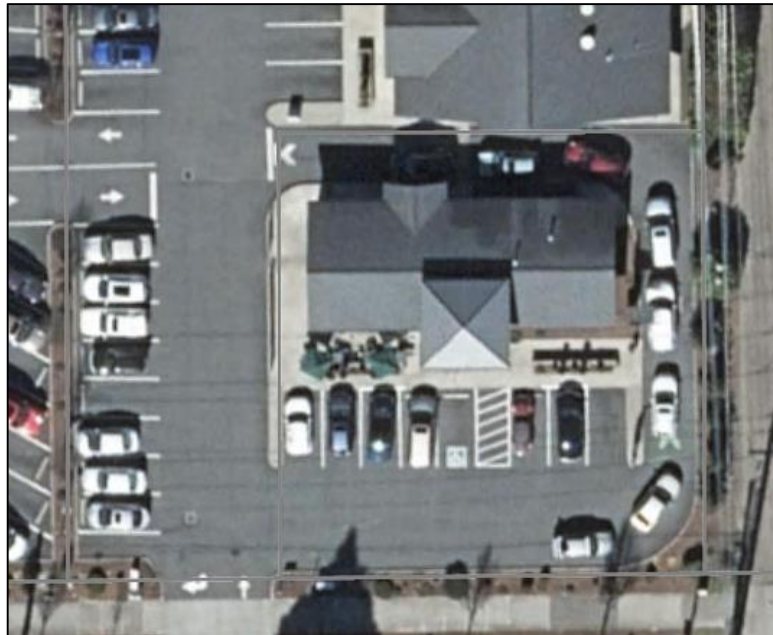
**Current
Impervious
Assessment is
7.05 ERDU**



**Actual
Assessment
should be
10 ERDU**



**Current
Impervious
Assessment is
11.2 ERDU**



**Actual
Assessment
should be
4 ERDU**

Implications

- Underassessment of stormwater utility revenues
- Potential for citizen challenge
- Deviation from equitable fee for service (RCW 35.92.020 and RCW 35.92.021)

Residential Fee Concerns

- **Residential Equity:** Small residential lots charged same as large lots that have more impervious cover
- Multi-family residential developments look more like commercial property; **rates become less equitable with increasing heights and density**

FCS GROUP STUDY WORK TASKS

- Evaluate rate structure options (impervious cover or alternatives)
- Consider different methodologies for residential assessments
 - Tiered SFR rates
 - Multi-family charged based on impervious area
- Study cost-recovery options for development review services and new source control program

FCS GROUP STUDY WORK TASKS

(continued)

- Resample/calculate average residential impervious cover
- Undertake impervious cover reassessment of non-residential properties
- Develop modern rate model
 - Revenue requirement analysis
 - Provide updated data for impervious billings estimate
 - Complete new rate model and provide training for City staff

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KEY RECOMMENDATIONS OF STUDY

- Update equivalent residential unit (ERU) to 3,000 square feet
- Use impervious cover as basis of stormwater rates for multi-family parcels with 4 or more units
- Move towards cost-recovery fees for development programs
- Utilize new rate model for developing future stormwater utility rates
- Consider future changes such as multiple tiers for single-family residential parcels

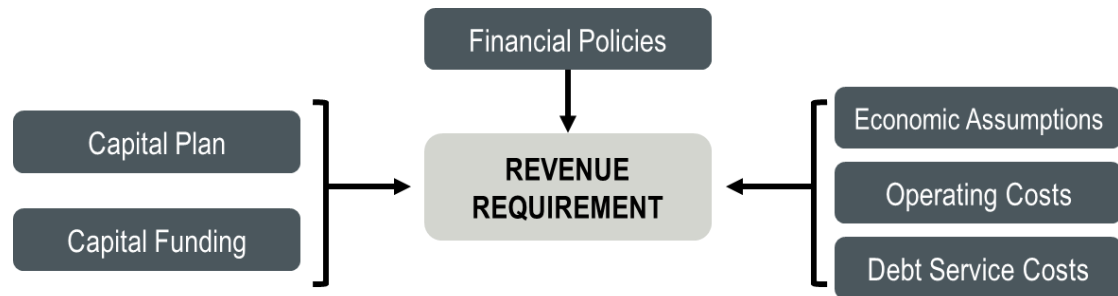
2022 Stormwater Rates

Stormwater Rate History

Year	Monthly Rate per ERDU	\$ Increase	% Increase
2006	\$3.22	\$0.56	21.0%
2007	\$3.54	\$0.32	10.0%
2008	\$3.79	\$0.25	7.0%
2009	\$4.06	\$0.27	7.0%
2010	\$4.34	\$0.28	7.0%
2011	\$5.07	\$0.73	16.8%
2012	\$5.63	\$0.56	11.0%
2013	\$6.70	\$1.07	19.0%
2014	\$7.97	\$1.27	19.0%
2015	\$9.09	\$1.12	14.0%
2016	\$10.09	\$0.49	11.0%
2017	\$11.10	\$1.01	10.0%
2018	\$12.21	\$1.11	10.0%
2019	\$13.68	\$1.47	12.0%
2020	\$14.50	\$0.82	6.0%
2021	\$14.50	\$0	0%

Rates have increased over time to fund increasing operating costs and capital improvements, driven in part by evolving NPDES permit requirements and Council funding priorities including street sweeping, urban forestry, and sidewalk programs

2022 Stormwater Rate Development



- Model determines the level of annual revenue necessary to meet all utility financial obligations of the enterprise fund
- Evaluates and develops a multi-year rate strategy

Key Assumptions

- ERU of 3,000 square feet
- Multi-family greater than 4 units billed using impervious assessments
- Operating Forecast Based on 2021-2022
- Inflation factors adjusted for 2023 and beyond
- Annual growth rate of customer base 0.5% per year
- Reserve policy is an operating reserve of 45-60 days of O&M with a minimum capital reserve of \$100,000

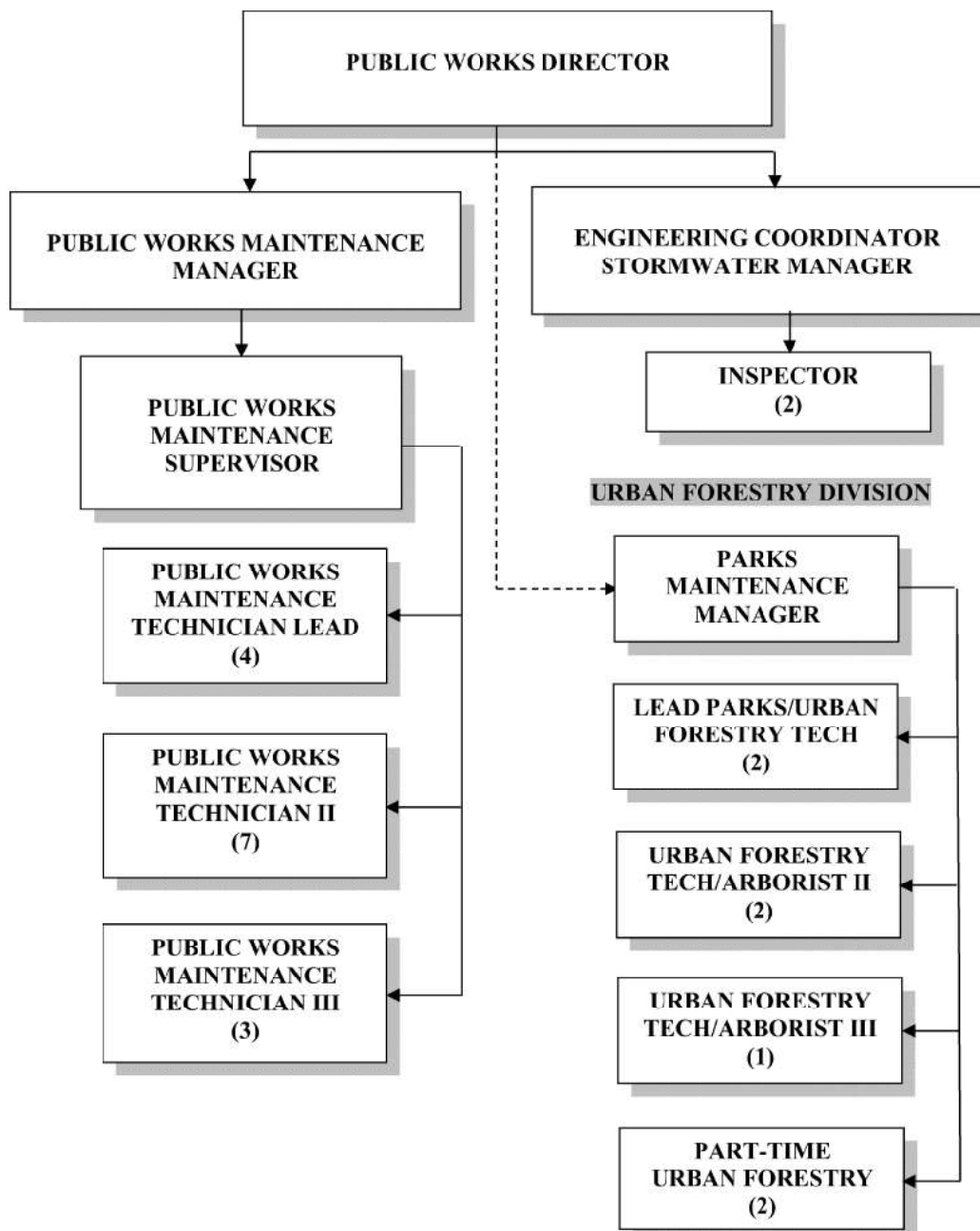
Proposed 5-Year Stormwater Rate Projection

Stormwater Rate Forecast	Existing (2021)	2022	2023	2024	2025	2026
Annual Rate Increase		0%	5.5%	3%	2%	2%
Monthly Residential Bill	\$14.50	\$14.50	\$15.30	\$15.76	\$16.08	\$16.40
Change from Prior Year	\$0	\$0	+\$0.80	+\$0.46	+\$0.32	+\$0.32

Discussion

Organization Chart

Storm Water



2021/2022 Budget

Enterprise Funds

Revenue Summary

FUND SUMMARY		Storm Water						
Enterprise Fund Title Storm Water	Department Head Responsible Ken Hash	Total Revenues	Actual	Budget	Budget	Percent	Budget	Percent
Beginning Fund Balance	\$2,370,000	By Source	2019	2020	2021	Variance	2022	Variance
2021/2022 Estimated Revenue	\$11,550,000	Taxes	\$0	\$0	\$0	0.0%	\$0	0.0%
Beginning Cash Required for Operations	\$240,710	Licenses & Permits	\$0	\$0	\$0	0.0%	\$0	0.0%
Total 2021/2022 Revenue	\$11,790,710	Intergovernmental	\$50,000	\$0	\$50,000	0.0%	\$0	0.0%
2021/2022 Estimated Expenditures	\$11,790,710	Charges for Services	\$5,141,690	\$5,407,570	\$5,741,190	6.2%	\$5,738,810	0.0%
Contribution to Ending Fund Balance	\$0	Fines & Forfeits	\$0	\$0	\$0	0.0%	\$0	0.0%
Total 2021/2022 Expenditures	\$11,790,710	Miscellaneous	\$67,490	\$10,000	\$10,000	0.0%	\$10,000	0.0%
Estimated Ending Fund Balance	\$2,129,290	Non-Revenues	\$0	\$0	\$0	0.0%	\$0	0.0%
		Other Financing Sources	\$0	\$0	\$0	0.0%	\$0	0.0%
		Beg Resources Req to Balance	\$0	\$0	\$141,830	0.0%	\$98,880	0.0%
		TOTAL REVENUES	\$5,259,180	\$5,417,570	\$5,943,020	9.7%	\$5,847,690	-1.6%
								\$11,790,710

Expenditure Summary

Storm Water							
Total Expenditures	Actual	Budget	Budget	Percent	Budget	Percent	2021-2022
By Object	2019	2020	2021	Variance	2022	Variance	Budget
Cont to End Fund Balance	\$0	\$0	\$0	0.0%	\$0	0.0%	\$0
Salaries & Wages	\$1,365,350	\$1,766,230	\$1,883,130	6.6%	\$1,921,130	2.0%	\$3,804,260
Personnel Benefits	\$642,780	\$791,780	\$982,490	24.1%	\$991,110	0.9%	\$1,973,600
Supplies	\$156,780	\$220,660	\$261,070	18.3%	\$261,070	0.0%	\$522,140
Other Services & Charges	\$1,840,260	\$1,946,710	\$2,323,430	19.4%	\$2,319,160	-0.2%	\$4,642,590
Intergovernmental	\$0	\$0	\$0	0.0%	\$0	0.0%	\$0
Capital Outlay	\$63,210	\$443,580	\$243,000	-45.2%	\$106,000	-56.4%	\$349,000
Debt Service	\$249,240	\$248,610	\$249,900	0.5%	\$249,220	-0.3%	\$499,120
Interfund Transfers	\$497,170	\$0	\$0	0.0%	\$0	0.0%	\$0
TOTAL EXPENDITURES	\$4,814,790	\$5,417,570	\$5,943,020	9.7%	\$5,847,690	-1.6%	\$11,790,710

Program Descriptions - Initiatives - Performance Measures

Stormwater Operations and Maintenance \$3,164,240

Provides for ongoing operations and maintenance (O&M) of the various components of the City's stormwater drainage, conveyance and water quality treatment systems. This program includes periodic and scheduled inspection, cleaning and maintenance of catch basins, manholes, pipes, culverts, roadside ditches and stormwater management facilities (such as stormwater ponds, bioswales, and bioretention planters). This program also includes necessary system repairs based on inspections, citizen requests, or emergency response.

continued

Stormwater Operations and Maintenance - continued

Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Inspect and maintain stormwater inlets and catch basins
- B Inspect and maintain roadside ditches and open conveyances
- C Inspect and maintain stormwater pipes and manholes
- D Inspect and maintain stormwater management BMPs/facilities
- E Inspect and maintain three stormwater pump stations
- F Address customer requests

Performance Measures	2019	2020	2021	2022
	<u>Actual</u>	<u>Target</u>	<u>Target</u>	<u>Target</u>
A Number of inlet grates cleaned during storm events	2,095	1,500	1,500	1,500
A Number of catch basins inspected and cleaned	1,576	2,000	2,000	2,000
B Linear feet of roadside ditches inspected	10,871	10,000	10,000	10,000
B Linear feet of roadside ditches cleaned	11,363	10,000	10,000	10,000
C Number of manholes inspected and cleaned	447	550	550	550
C Linear feet of stormwater pipe cleaned	864	2,000	2,000	2,000
D Number of stormwater management BMPs/facilities maintained	91	110	110	110
E Number of pump station inspections	11	18	18	18
F Completed customer requests	280	300	300	300

Urban Forestry Tree Program..... \$2,513,410

Trees are an integral part of the City's stormwater management program to protect its urban watershed, as they help to reduce runoff and protect water quality. This program manages and maintains the City's Urban Forest consisting of over 10,000 trees, and includes maintenance and replacement of trees in City's parks and within the public right-of-way.

Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Apply pesticides
- B Prune
- C Remove trees
- C Remove, root, or prune trees for sidewalk replacement plan
- D Replace and plant new trees
- E Remove brush and wood
- F Care for park nursery
- G Remove leaves from landscaped areas
- H Computer based inventory maintenance

Performance Measures	2019	2020	2021	2022
	<u>Actual</u>	<u>Target</u>	<u>Target</u>	<u>Target</u>
A Number of Certified Pesticide Applicators on staff	3	3	3	3
B Number of trees pruned, elevated, ensured clearance, cleaned	2,200	2,200	2,200	2,200
C Number of trees removed	187	150	200	200
C Number of trees removed for sidewalk repair	135	150	150	150
C Number of trees root pruned for sidewalk repair	76	100	150	200
C Number of paid removals by species list	30	30	30	30
D Number of trees planted	350	400	350	400
G Leaf clean up staff hours	950	950	950	950
H Total tree inventory	14,000	14,000	14,000	14,000
H Total number of vacant tree sites	3,500	3,300	3,500	3,300

Enterprise Funds

Urban Forestry Sidewalk Repair \$2,270,330

This Urban Forestry program repairs sidewalks damaged by the City's Urban Forest. The program is important to a livable, walkable City and to manage liability. Sidewalks are repaired by any or a combination of the following techniques: grinding offset panels; patching; removing intact panels, trimming roots and re-grading, and re-installing panels; and removing damaged and constructing new sidewalk.

Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Grind offset sidewalk panels, as needed
- B Rehabilitate sidewalks by repairing base and re-using existing sidewalk panels
- C Reconstruct sidewalks

Performance Measures

	2019 <u>Actual</u>	2020 <u>Target</u>	2021 <u>Target</u>	2022 <u>Target</u>
A Linear feet of sidewalk ground	86	1,200	1,200	1,200
BC Square feet of rehabilitated and reconstructed sidewalk panels	9,604	12,000	12,000	12,000

Street Sweeping \$1,273,810

The Street Sweeping program provides for cleaning streets, alleys, and City-owned parking lots to prevent debris and pollution from entering the City's stormwater system. Activities include year-round street sweeping and disposal of the debris, as well as collecting, hauling, and disposing of leaves from City streets during the fall months.

Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Mechanical sweeping of City streets, alleys and parking lots on a scheduled or as-needed basis
- B Removal of leaves from City streets, alleys and parking lots

Performance Measures

	2019 <u>Actual</u>	2020 <u>Target</u>	2021 <u>Target</u>	2022 <u>Target</u>
A Number of lane-miles cleaned	9,747	9,000	9,000	9,000
A Tons of debris swept (excluding leaves)	2,335	700	700	700
B Cubic yards of leaves collected	1,522	5,000	5,000	5,000

NPDES Stormwater Permit Compliance \$1,152,980

The program provides for compliance with the City's National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for operation of its stormwater drainage and conveyance system. The Permit requires the City to implement an ongoing program to reduce non-point source pollution to the MS4. It covers administration of the Permit as well as implementation of activities for public education, public involvement, illicit discharge detection and elimination (IDDE), and pollution prevention/good housekeeping for municipal facilities and field operations. It also includes Total Maximum Daily Load (TMDL) planning, sampling, and implementation activities to address impaired waters in the City.

Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Provide a stormwater education and outreach program for residents and businesses
- B Create opportunities for the public to participate in the City's stormwater management program
- C Identify, prevent, and eliminate illicit discharges to the City's MS4
- D Perform inspections of municipal facilities and train City staff on standard operating procedures for stormwater pollution prevention and good housekeeping practices
- E Inspect City-owned and maintained stormwater BMPs and infrastructure for compliance with maintenance standards
- F Inspect privately-owned stormwater BMPs and businesses to ensure maintenance and control of pollutant sources

continued

NPDES Stormwater Permit Compliance - continued

Performance Measures		2019 Actual	2020 Target	2021 Target	2022 Target
A	Undertake stormwater education and outreach activities	5	6	6	6
B	Hold regular meetings of the Longview Stormwater Advisory Committee	1	2	2	2
C	Number of MS4 outfalls inspected	24	50	50	50
C	Completed IDDE investigations	35	30	30	30
D	Stormwater pollution prevention training sessions conducted for staff	3	6	6	6
D	Number of municipal facilities (properties) inspected	6	6	6	6
E	Number of City-owned and maintained BMP's inspected	117	120	120	120
F	Number of businesses inspected for stormwater pollutant source control	0	0	100	100

Capital Projects \$848,100

This program provides for Stormwater capital improvement projects, purchase of assets and equipment, and payment of debt service on borrowing for capital improvements and equipment purchases to support the operational needs of the Stormwater Utility. Proposed capital improvements and equipment purchases are identified in the City's 5-Year Capital Improvement Program in the budget.

Stormwater Development Review and Inspection \$567,840

This program is responsible for reviewing development plans and inspecting construction sites for compliance with the City's stormwater regulations and requirements under the NPDES MS4 permit, including provisions for management of both stormwater runoff quality and quantity, and incorporation of low impact development (LID) practices. This program also includes permit-required ongoing inspections of private stormwater facilities to ensure continued maintenance.



Initiatives/Activities *(The letter in the first column refers to its related performance measure below)*

- A Review development plans for compliance with City stormwater regulations
- B Inspect construction sites for compliance with approved plans and stormwater regulations
- C Perform ongoing inspections of permitted private stormwater management BMPs/facilities

Performance Measures		2019 Actual	2020 Target	2021 Target	2022 Target
A	Number of development plans reviewed	319	250	250	250
B	Number of construction site inspections	340	300	300	300
C	Number of permitted private stormwater BMPs inspected	60	70	75	75

TOTAL FOR ALL PROGRAMS \$11,790,710

RESOLUTION NO. ~~2318~~ 2xxx

A RESOLUTION RELATING TO AND SETTING RATES AND MINIMUM CHARGES FOR STORMWATER UTILITY SERVICES, AND PROVIDING FOR AN EFFECTIVE DATE, AND REPEALING RESOLUTION NO. ~~2281~~ 2318.

WHEREAS, Pursuant to Chapter 15.80 of the Longview Municipal Code of Longview, Washington, the City Council of the City of Longview, Washington hereby enacts this Resolution to increase the rates and charges for providing stormwater utility service to cover the projected operating and capital costs of the stormwater utility.

BE IT RESOLVED by the City Council of said City that the following rates for stormwater utility service furnished by said City shall be, and are hereby established, as follows:

Section 1. Definitions:

- (1) “Equivalent Residential ~~Dwelling~~ Unit” (ER~~D~~U) means an impervious surface of a ~~non-residential~~ parcel of land consisting of ~~2,500~~ 3,000 square feet, or a major fraction thereof.
- (2) “Major fraction thereof” means ~~1,251~~ 1,501 square feet or more.
- (3) “Base Rate” means the monthly stormwater utility charge for a single-family parcel or single-family dwelling.

Section 2. ~~Residential Rates~~ for Single-Family Residential, Duplexes, Triplexes and Mobile Home Parks:

- (1) Single Family Parcels or Single Family Dwellings:
The monthly stormwater utility charge for each single-family parcel or single-family dwelling shall be the sum of \$14.50, which sum is described as the “Base Rate.”
- (2) Multiple Family Parcels or Multiple Family Dwellings:
The monthly stormwater utility charge for duplexes, multiple family parcels or multiple family dwellings of three dwelling units or less shall be the sum of \$ 14.50 (the Base Rate) times the number of dwelling units ~~within a structure~~.
- (3) Mobile Home Parks and Trailer Parks:
The monthly stormwater utility charge for mobile home parks and trailer parks shall be the sum of \$ 14.50 (the Base Rate) times the number of pads or spaces designed for temporary or permanent placement of mobile homes, trailers, recreational vehicles, campers, vans or other vehicles designed or used for human occupancy.

Section 3. ~~Non-Residential Rates~~Rates for Other Properties:

- (1) The monthly stormwater utility charge for all ~~Non-Residential~~ parcels not included in Section 2, including multiple family dwellings of four units or greater and Mixed Use Occupancy developed parcels shall be determined by calculating the total measured impervious surface area divided by the ERDU and multiplied by the Base Rate.
- (2) Notwithstanding the number of ERDU's applicable to any parcel, the minimum stormwater utility charge applicable shall be the Base Rate.

Section 4. Streets, Roads and Alleys:

Streets, Roads and Alleys, open to public travel, shall not be subject to stormwater utility fees and charges.

Section 5. Undeveloped Parcels:

Undeveloped parcels shall not be subject to stormwater utility fees and charges; provided, however, that such charges shall be applicable to undeveloped parcels at such a time as an application for water or sanitary sewer service to such parcel is approved, or as provided in LMC 15.80.060.

Section 6. Rate Adjustments:

A reduction in the Stormwater Utility rates described herein may be granted for the following reasons and purposes:

- (1) Non-residential customers in full compliance with a Washington State NPDES Industrial Stormwater General Permit may receive a twenty-five percent (25%) rate reduction. In order to be eligible for such reduction, the customer must submit an application along with the following documentation:
 - (a) A copy of the approved Washington State NPDES Industrial Stormwater General Permit applicable to such parcel.
 - (b) Additional permit-related materials such as the facility's stormwater pollution prevent plan, discharge monitoring reports, spill response reports, or other similar documentation as requested to demonstrate full compliance with the permit.
- (2) Public and Private Schools serving any combination of grades from kindergarten through 12th grade, may receive a twenty-five percent (25%) reduction for developing and administering a water quality education curriculum program. The program must include,

but is not limited to, environmental educational instruction on water quality related issues, such as safe drinking water, water use reduction, stormwater pollution and general water cycle. To qualify for the rate reduction, the education program is subject to approval by the Stormwater Division as being sufficient to meet the requirements and intents of the Federal Clean Water Act and the City's National Pollutant Discharge Elimination System stormwater discharge permit. The program must be administered annually to all students at the grade levels specified in the approved program to remain eligible for a rate adjustment.

- (3) Non-residential customers may receive a ninety percent (90%) rate reduction for discharging stormwater from the urban watershed.
- (4) The City may periodically request updated documentation to ascertain continued full compliance with the above rate reduction eligibility requirements. Lack of full compliance shall result in restoration of the full stormwater utility charge.

Section 7. Adjustment of Charges and Appeals:

Any customer who believes the charges established for his, her or its parcel are in error may request an "Adjustment/Monthly Fee Estimate" form from the Stormwater Division of the Public Works Department. Said form shall be completed by the customer and submitted to the Stormwater Division, which division shall review said form and respond to the customer in writing, setting forth its findings and decision.

Any customer who believes their parcel is eligible for stormwater rate reductions identified in Section 6 above, may apply in writing using an application form provided by the Stormwater Division of the Public Works Department. Said form shall be completed by the customer and submitted to the Stormwater Division, which division shall review said form, shall determine if the applicable rate reduction conditions have been satisfied, and shall respond to the customer in writing, setting forth its findings and decision.

Section 8. Exemptions for low income senior citizens and low income disabled citizens:

Low-income senior citizens and low-income disabled citizens, as defined by Resolution of the City Council, shall be exempt from stormwater utility charges.

Section 9. Stormwater Only Accounts – Delinquent Payments:

For customers with only a stormwater utility account, all money due the City for stormwater utility services shall be due and payable within fifteen (15) days of the billing date shown on each bill, and if not paid within fifteen days thereafter, shall be deemed delinquent. In the event that the account remains delinquent beyond the thirtieth (30th) day after the bill date, a penalty charge shall be assessed in accordance with the following table of delinquent amounts. Thereafter, an additional penalty charge in accordance with the following table of delinquent

amounts plus any previous penalty charges assessed, shall be assessed for each successive 30-day period during which such bill, or any portion thereof, remains unpaid.

Delinquent Amount	Penalty Charge
\$1.00 to \$100.00	\$10.00
\$100.01 to \$500.00	\$25.00
\$500.01 and greater	\$50.00

Section 10. Severability:

If any provision of this Resolution or its application to any person or circumstance is found to be invalid, the remainder of this Resolution or the application of the provision to other persons or circumstances is not affected. If Section 10 of this Resolution is found invalid, the effective date of this Resolution and the rates established herein and all the provisions hereof shall be the date of adoption of this Resolution by the City Council of the City of Longview.

BE IT FURTHER RESOLVED that Resolution No. ~~2281~~ 2318 passed by the City Council on ~~November 15, 2018~~ January 23rd, 2020, is hereby repealed in its entirety on the date this Resolution becomes effective.

BE IT FURTHER RESOLVED that this Resolution shall take effect on ~~January~~ July 1, ~~2020~~ 2022.

PASSED by the City Council of the City of Longview, Washington, and approved by its Mayor at a special meeting of said City Council held on the ~~5th day of December 2019~~ ____, 2022.

M A Y O R

ATTEST:

City Clerk

STORMWATER MANAGEMENT PROGRAM



2022

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 discharges 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 Ditch 6 on the District's northern perimeter. As a closed watershed and managed drainage system, the City's stormwater discharges within the CDID #1 boundaries can ultimately only reach the receiving waters of either the Cowlitz or Columbia Rivers through a series of flood control pump stations.

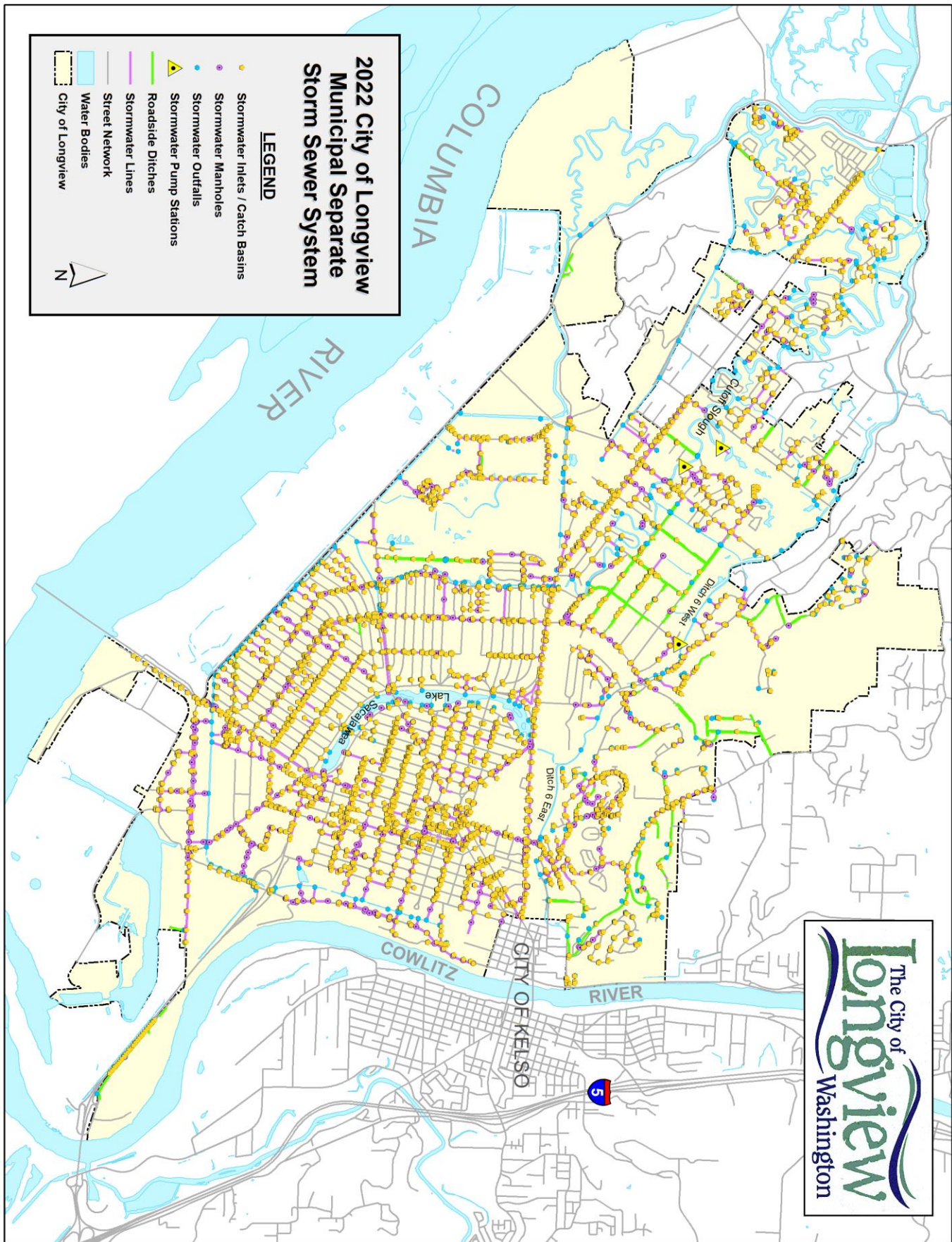
Longview's MS4 shares a border with the portion of the City of Kelso's MS4 that lies west of the Cowlitz River and Cowlitz County's MS4 that is contiguous with Longview's city limits. The City works closely with both Kelso and the County on interconnected stormwater infrastructure and common watersheds,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

Stormwater Management Program Plan

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

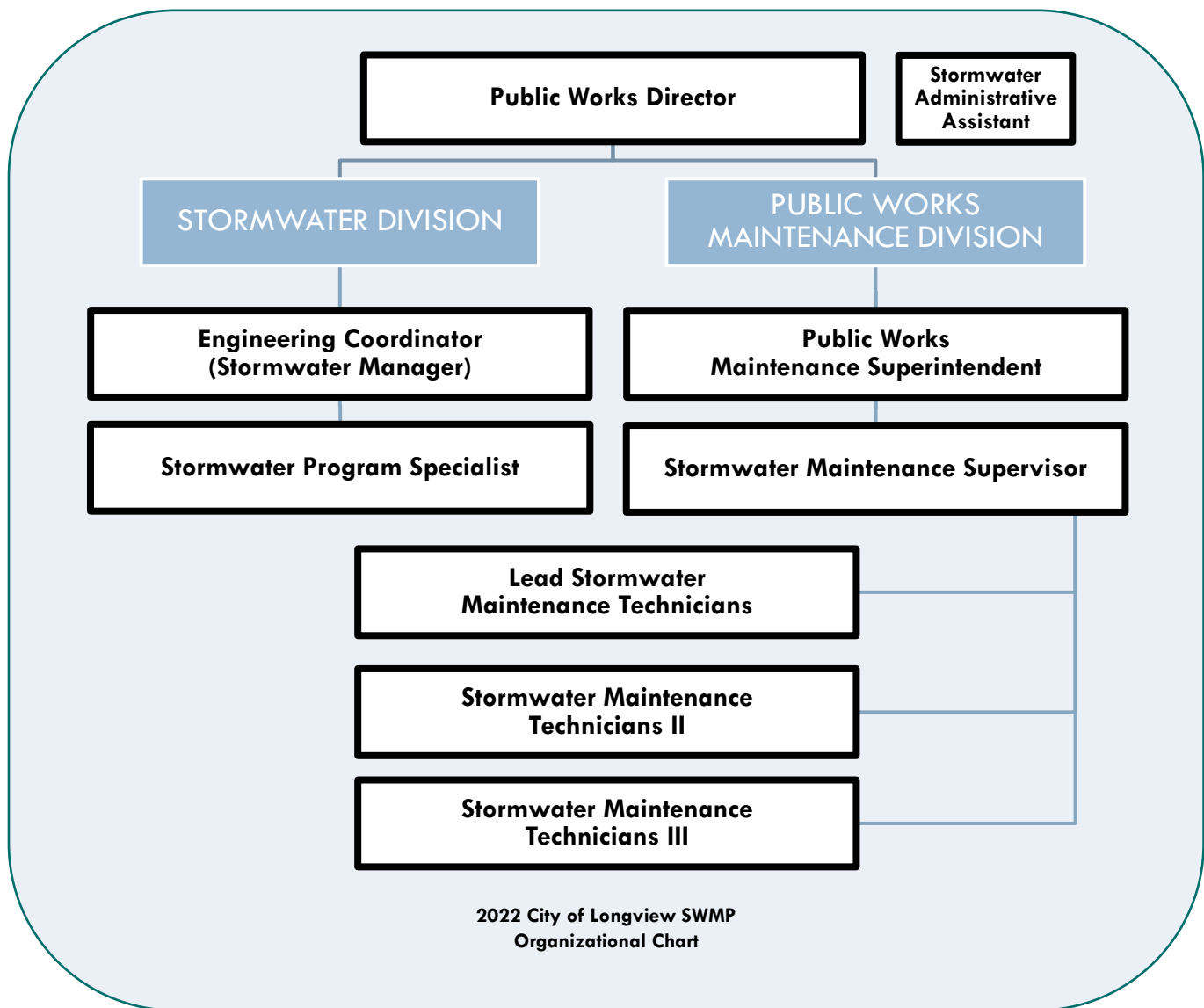
- Stormwater Planning (S5.C.1)
- Public Education and Outreach (S5.C.2)
- Public Involvement and Participation (S5.C.3)
- MS4 Mapping and Documentation (S5.C.4)
- Illicit Discharge Detection and Elimination (S5.C.5)
- Controlling Runoff From New Development, Redevelopment & Construction Sites (S5.C.6)
- 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)



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



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.
- ☒ Begin assessing 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.
- ☒ Initiated the receiving water assessment process by delineating all of the drainage basins in City and performing an initial assessment of existing water quality information for the receiving waters.

Planned Activities

Planned activities for 2022 include:

- ☐ Complete the receiving water assessment process, including an evaluation of the relative current and potential influence of the MS4 on each of the City's receiving waters.
- ☐ Organize the assessment information to facilitate the winnowing of receiving waters/basins to be selected for prioritization in a public process.
- ☐ Prioritize the narrowed list of receiving waters by gathering public input from citizens and stakeholders.
- ☐ Select the receiving water and the subbasin or catchment area(s) for developing a SMAP.
- ☐ Develop a SMAP for the selected subbasin/catchment area and identify specific stormwater management actions to protect water quality in your selected receiving water, 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
- ☐ Continue discussions with neighboring municipal and secondary stormwater Permittees (City of Kelso, Cowlitz County and CDID #1) on inter-jurisdictional collaboration to address the Permit's stormwater planning and SMAP requirements.

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:

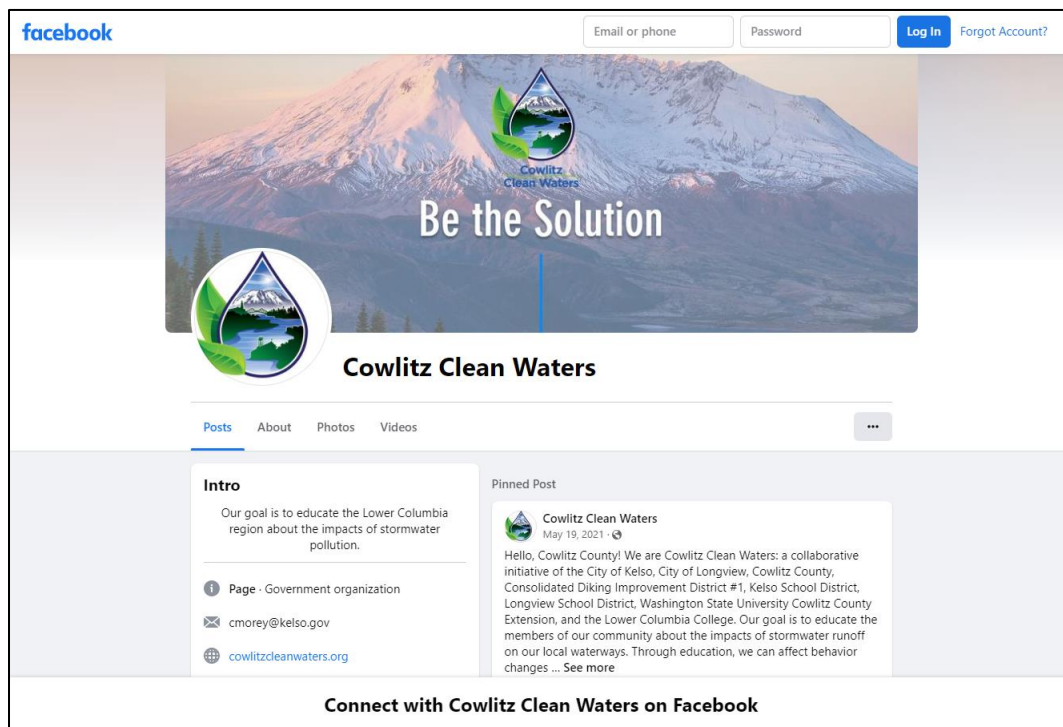
- Provide an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics. The program should build general awareness as well as effect behavior changes.
- Conduct a new evaluation of the effectiveness 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.

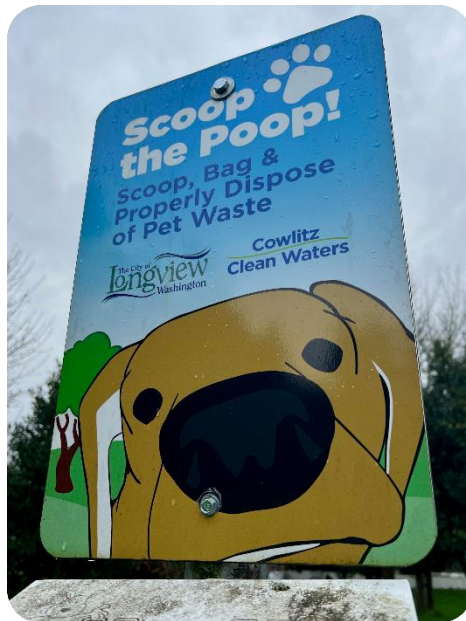
In 2019, Cowlitz Clean Waters launched its revamped website at www.cowlitzcleanwaters.org which continues to serve as the primary focal point for the regional effort and a clearinghouse of information on how to be a solution to stormwater pollution.



Cowlitz Clean Waters on Facebook

- ☑ **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.
- ☑ **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.
This program was put on hold in 2020 due to COVID-19 restrictions. The City hopes to resume the car wash program in 2022 pending local pandemic conditions.
- ☑ **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. Additional signs and pet stations were installed in 2021 in support of the behavior change campaign.



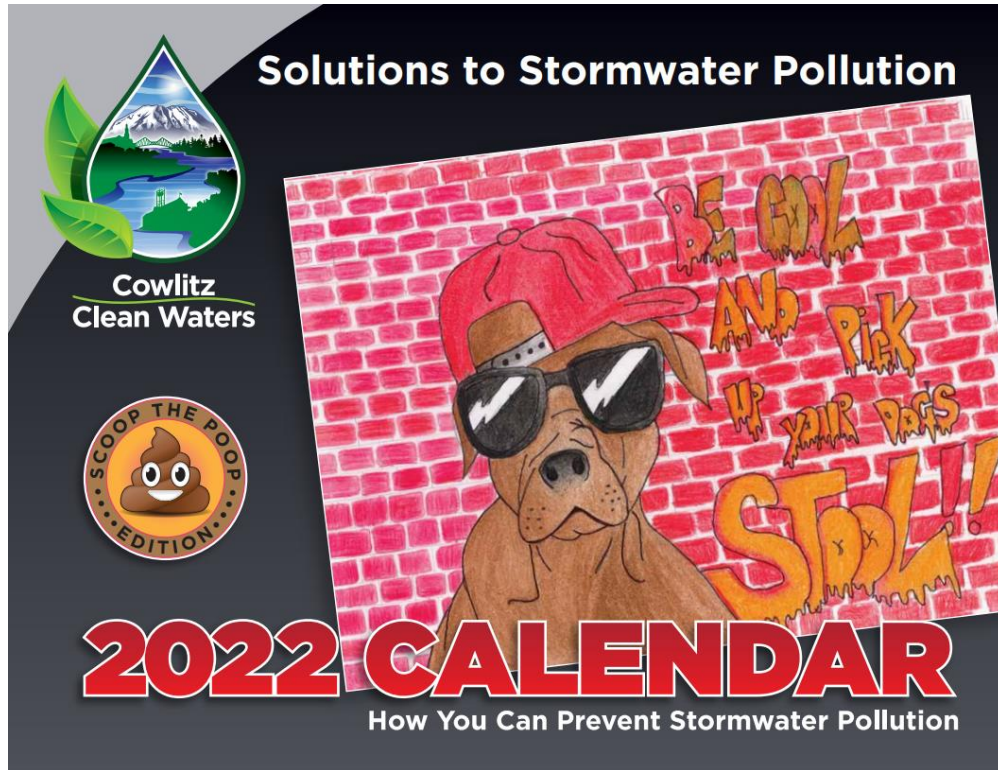
- ☑ **Public Events** – Participation in a number of public events each year with a booth or table providing information and tips on stormwater pollution prevention. These events have included Earth Day (with hands-on education activities and games for kids), the Cowlitz County Home & Garden Show, Cowlitz County Open House and Lower Columbia Contactors Association 811 Awareness Breakfast. In 2021, the City helped staff the Cowlitz Clean Water booth at the three-day Longview Go Fourth festival over the 4th of July at Lake Sacajawea where it reached over 10,000 attendees with information on stormwater pollution prevention and games for kids.

Due to COVID-19 restrictions in 2021, many other public events were cancelled in the early and latter parts of the year.



Cowlitz Clean Waters Booth at the 2021 Go Fourth Festival

- ☑ **Behavior Change Campaign** – Dog owners and pet waste were selected as the new target audience for a planned regional effort to meet the behavior change program requirements from the 2019 permit. The permittees developed a comprehensive outreach strategy and plan to focus on this audience beginning in 2020. In 2021, the permittees began implementation of the following campaign elements:
 - Pre-campaign polling of audience awareness and attitudes
 - Installation of new pet waste signage and bag posts/stations in Longview, Kelso and unincorporated Cowlitz County
 - Development of a new pet waste fact sheet and brochure
 - Design of internet banner ads for online media campaign
 - Pet waste was the focus of the 2022 *Solutions to Stormwater Pollution* student calendar contest held in the fall of 2021



"Scoop the Poop" Theme for the 2022 Cowlitz Clean Waters Calendar



Student Artwork for the 2022 Calendar

Planned Activities

Planned activities for 2022 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 such as the Cowlitz County Earth Day Festival (*as pandemic restrictions allow*)
- ☐ Continue implementation of the regional behavior change program focused on dog owners and picking up after their pets in conjunction with Cowlitz County and the City of Kelso.
- ☐ 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 (*as pandemic restrictions allow*).
- ☐ 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 2022 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 2020 NPDES Permit annual report to www.mylongview.com no later than May 31, 2022.
- ☐ 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 2023 SWMP.
- ☐ Track and document all public involvement and participation efforts.

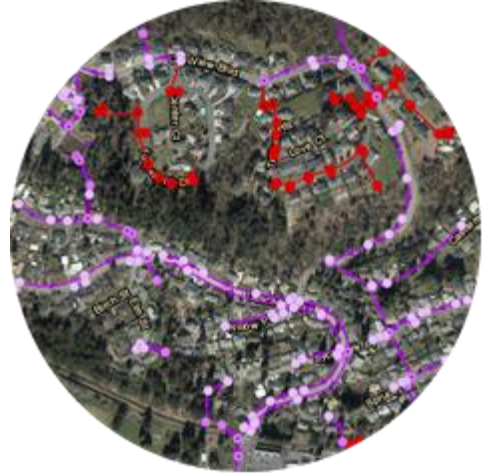


Longview City Council Meeting in 2021

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 2021 on updating the City's stormwater GIS datasets, including as-built information from City projects and private development.

Planned Activities

Planned activities for 2022 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.
- ☐ Continue to update available information on connections between the MS4 and privately-owned stormwater systems.



The City Continues to Update Information on Connections to the MS4 from Privately-owned Drainage Systems

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 2021 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 a City Alley

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.
- ☑ **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 2022 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.



Filterra Bioscape Vault Installed at a New Residential Subdivision in 2021

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 50% were of the total number of catch basins in the City were inspected and cleaned in 2020.

- ☑ **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 lot. 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 operated 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 2022 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 a 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 operated 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.



Maintaining a City-owned Stormwater Treatment Vault in 2021

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.

Planned Activities

Planned activities for 2022 include:

- ☐ Hire a new stormwater specialist who will develop, implement and manage the City's source control strategy and program.
- ☐ Adopt local ordinance requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
- ☐ Complete an inventory to identify publicly and privately owned institutional, commercial, and industrial sites that have the potential to generate pollutants to the MS4.
- ☐ Develop educational training materials for local businesses as well as industrial and institutional entities on general stormwater pollution source control as well as business, industry and activity-specific topics.
- ☐ Implement a source control inspection program, including a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.



The Source Control Program will Inspect Commercial & Industrial Properties for Potential Sources of Stormwater Pollution

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 2022 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.

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 2022 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 HSTM 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.



Indian Creek in Longview, which is sampled as part of the Regional Status and Trends Monitoring Program

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STORMWATER 101 GUIDE

STORMWATER OVERVIEW

Stormwater Background

Stormwater is now the primary cause of water pollution in the United States, resulting in numerous federal, state and local regulations. Quite simply, stormwater is runoff that flows into pipes, ditches, streams, and other receiving water bodies. Conversion of natural areas to urbanized or developed areas increases flows and water pollution, and threatens properties with flooding. Impervious surfaces such as roofs, roads, parking lots and sidewalks prevent water from potentially soaking into the ground or being taken up by vegetation.



Stormwater Regulatory Environment

Although many regulations affect the practice of stormwater management, the primary driver is the Clean Water Act (CWA), first adopted in 1972, which sets the policy and regulatory framework for stormwater pollution control in the nation. The purpose of the CWA is to “...restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The CWA uses the National Pollutant Discharge Eliminate System (NPDES) permit as the primary instrument to control urban stormwater.

The State of Washington was delegated authority by the U.S. Environmental Protection Agency (EPA) to implement the NPDES permit program. The Washington State Waste Discharge Act contains state regulations regarding stormwater. The State Department of Ecology combined the federal requirements of the CWA with the State requirements of the State Waste Discharge Act and initiated the first stormwater NPDES permit program in 1995 for jurisdictions having population greater than 250,000. King, Pierce, Clark, and Snohomish Counties, as well as the Cities of Tacoma and Seattle, became the first Phase I permittees along with the Washington State Department of Transportation. In 2007, Ecology issued the Phase II permits to jurisdictions that owned or operated municipal separated storm sewer systems (MS4s). Today there are more than one hundred MS4 permits issued statewide. These permits are on a five year renewal cycle. The State legislature acted in the 2011 session to set the next issuance date of MS4s in 2013.

The permits include requirements for inventorying stormwater facilities; inspecting and maintaining facilities; reducing pollutants at their sources; public education; reporting NPDES permit compliance, and applying protective design standards to new development of impervious surfaces. The protective design standards are found in the State Stormwater Manual, first adopted in 1992 and updated in 2005 for western and eastern Washington. Phase I permits contain additional requirements for water quality monitoring and retrofits.

The Stormwater NPDES permit (Sections S4 and S5) states:

- ◆ The NPDES permit “...does not authorize a violation of Washington State surface water quality standards...ground water quality standards...sediment management standards...”
- ◆ Requires that the permittee “...shall reduce the discharge of pollutants to the maximum extent practicable (MEP).”

- ◆ Requires “all known, available, and reasonable methods of prevention, control and treatment (AKART) to prevent and control pollution of waters of the State of Washington.”
- ◆ Additional requirements may exist in areas that have an established Total maximum Daily Load (TMDL).

Best Management Practices (BMPs) are considered minimum requirements to meet MEP and AKART. The NPDES permits require adoption of the State Stormwater Manual, which is presumed to meet AKART. According to the Manual, these presumptive practices do not guarantee that stormwater discharges will meet receiving water quality standards. The combining of the CWA and State Waste Discharge Act requirements in a single permit provide the opportunity for third parties to sue dischargers if water quality standards are violated.

Other State laws affecting stormwater management include the Growth Management Act and its requirements for land management such as Shoreline (Shoreline Management Act) and Critical Areas requirements. At the federal level additional laws impacting stormwater management are the Comprehensive Environmental Recovery and Compliance Act (CERCLA) and the Endangered Species Act (ESA). Finally the federally recognized tribes are co-managers of the water resources in Washington State (Boldt decision, 1974).

STORMWATER FUNDING

A need for funding has accompanied the need for stormwater management. Stormwater utilities, supported by ongoing rates, are the largest local funding source for stormwater control in Washington State.

The Utility Concept

A stormwater utility is a stand-alone entity, usually set up as an enterprise fund, within the governmental structure. It is defined as being financially and organizationally self-sufficient, and can be designed to furnish a limited or comprehensive set of services related to stormwater quantity and quality management. A "city" utility operates under the purview of the city legislative authority.

The following is a summary of the utility concept:

"A stormwater utility provides a reliable, dedicated source of revenue and an organizational structure that is dedicated to stormwater concerns. As a utility, a stormwater management program can be carried out as a "stand alone" operation, with its own budget, implementation plan, and employees dedicated solely to stormwater system operation, maintenance, administration, and education. Also, creating a utility is often more acceptable politically, as many communities tend to resist the creation of new programs using special districts. Creating a utility has the added benefit of freeing up tax dollars from the local government's general fund that would normally be used for stormwater concerns, and this "extra" money can be applied toward other needs."¹

Legal Authorization

Revised Code of Washington (RCW) section 35.67.020 authorizes cities to “to fix, alter, regulate, and control the rates and charges for their” systems of sewerage, defined in RCW 35.67.010 to include stormwater management.

Other important RCW sections include 35.67.025, which specifies that all public property “shall be subject to rates and charges for storm water control facilities to the same extent private persons and

¹ Stormwater Program Guidance Manual for the Puget Sound Basin.

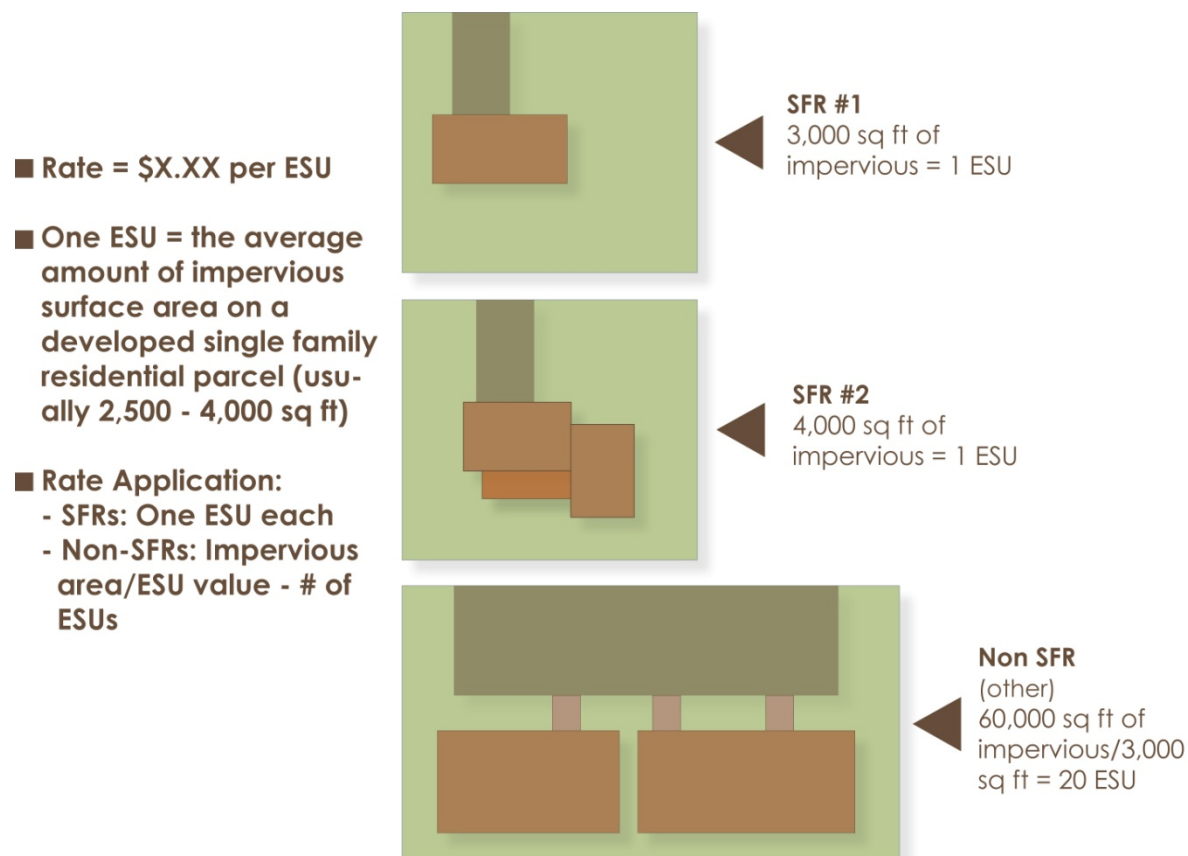
private property are subject to such rates and charges,” and 90.03.525, which limits the imposition of stormwater rates and charges on State highways.

Stormwater Utility Rates

The overwhelming majority of stormwater utility rates are based on impervious surface area. Impervious surface area is widely accepted as an appropriate measure of a property’s contribution of runoff, providing a clear relationship, or “rational nexus,” to service received from a stormwater program.

To minimize administrative and data collection costs, stormwater utilities typically develop a uniform rate for single family residential customers based on an estimated average amount of impervious surface area per developed residential parcel. The charge basis for all other customer types is generally actual measured impervious surface area by parcel. The charge itself is most commonly calculated as a dollar amount per unit of impervious surface area, or an equivalent unit of service. For example, one equivalent service unit (ESU) may equal 3,000 square feet of impervious surface area.

As illustrated below, under such a structure, single family residences are charged for one ESU, and other developed property is charged for its measured impervious surface area – expressed as the number of ESUs.



Stormwater rates, in combination with other funding sources, pay for capital construction of stormwater systems and controls to prevent flooding and improve quality; maintenance and operations; and implementation of NPDES permit programs.

Alternative approaches to stormwater rates include density of development, usually distinguished by rates for different percentages of impervious coverage applied to the lot size. Both King County and the City of Bellevue utilize forms of the density of development approach.

Charging for Streets

Many cities in the State charge their own streets for stormwater service. The streets, while providing stormwater conveyance, are often large contributors of stormwater runoff.

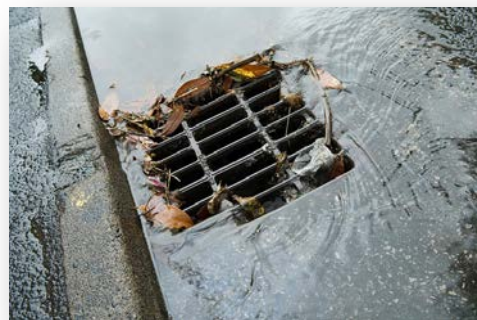
The State of Washington similarly authorizes (in RCW 90.03.525) the charging of state highways for their impacts on local systems. Rates charged are limited to “thirty percent of the rate for comparable real property”, with some exceptions. Revenues from the State for highway impacts “must be used solely for storm water control facilities that directly reduce state highway runoff impacts or implementation of best management practices that will reduce the need for such facilities.” Local jurisdictions must submit both a “plan for the expenditure of the charges for that calendar year” as well as a progress report “on the use of charges assessed for the prior year” in order for the State to pay the charges.

It is important to note that a subsequent 1997 agreement between the Washington State Department of Transportation (WSDOT) and State municipalities transferred responsibility for state highways in local jurisdictions to those jurisdictions – retaining WSDOT responsibility only for limited access state highways. The effect of that agreement has further limited cost recovery by local jurisdictions to the impact of limited access state highways.

Other Funding Sources for Stormwater Management

There are other funding sources available, with varying degrees of applicability, for stormwater management.

- ◆ The street fund. City street funds and County road funds have historically provided sources of funding for stormwater management. The use of these funds for stormwater purposes has been justified on the basis that portions of many drainage systems have been built by street and road departments and maintenance in the right of way may be provided by the department, as well.
- ◆ The general fund. Property tax revenues have been the primary source of general fund resources in Washington cities and counties. Use of general fund money is usually unrestricted, and thus could be used to fund stormwater management. General fund resources are subject to many competing demands, and cannot usually be considered a reliable source for ongoing funding.
- ◆ Special assessments / local improvement districts. Most commonly structured as local improvement districts (LIDs), these funding mechanisms assess individual properties benefited or served by a specific capital improvement for a share of the cost of that facility. Special benefit must be demonstrated by an increase in assessed valuation due to the improvement, often a difficult linkage to demonstrate for stormwater improvements.



- ◆ Special fees. Direct charges / fees may be used to recover the direct costs for services performed for a customer or class of customers not generally related to the overall service charge – such as development inspections.
- ◆ Capital facilities charges. Capital, or general, facilities charges are authorized for cities under RCW 35.92.025. Authorization is less straightforward for county stormwater utilities authorized under either RCW 36.89 or 36.94. Capital facilities charges are one-time charges imposed as a condition of development, and are designed to recover from growth an equitable share of the cost of capital investment incurred by the Utility. Revenues from such charges are dependent on growth and are available for capital purposes only.
- ◆ Conventional debt instruments. The most commonly used long-term debt instruments are revenue and general obligation bonds. Bond anticipation notes are available for short-term "interim" capital financing. These sources are available for capital funding only, not operations.

- Revenue bonds are the most common source of funds for construction of major utility improvements. There are no statutory limitations on the amount of revenue bonds a utility can issue; however, utilities are required to meet yearly net operating income coverage requirements, commonly 1.25 times the annual debt service. In fact, to issue new debt, it may be necessary to demonstrate coverage in excess of this level based on a market-driven target, possibly in the range of 1.5 to 2.0.

Revenue bond debt service is paid out of rate revenues. The terms on revenue bonds are not as favorable as general obligation bonds, but carry the advantage of leaving the city's debt capacity undisturbed. Interest rates vary depending on market conditions.

- General obligation bonds are secured by the taxing power of the city, are typically paid through property tax revenues, and may be subject to a public vote. Cities and counties often choose to repay the debt from other (rate) revenues, and increase property taxes only if the rates fail to meet debt obligation.

The financing costs of general obligation bonds are lower than revenue bonds due to (1) lower interest rates available, (2) no coverage requirements, and (3) no reserve requirements.

- Short-term "interim" financing mechanisms are also available for capital costs. Bond anticipation notes can provide interim financing during construction, while allowing flexibility in the choice of long-term financing instruments. Typically, bond anticipation notes have lower interest rates than bonds, but add to issuance costs.
- ◆ Special grants and loans. Some state and federally administered grant and loan opportunities are available for capital funding only.
 - Department of Ecology Grants and Loans - The Washington Department of Ecology (Ecology) administers an integrated funding program for three state and federal financial assistance programs to improve and protect water quality. Each funding cycle begins in the fall when Ecology accepts project applications. Ecology rates and ranks applications based on the highest-priority needs: Projects include stormwater control and treatment, nonpoint



pollution abatement and stream restoration activities, and water quality education and outreach. The amount of available grant and loan funding varies from year to year based on the state's biennial budget appropriation process and the annual congressional federal budget. The three sources of funding for water quality projects are

- Centennial Clean Water Fund Grant Program,
 - Federal Clean Water Act Section 319 Nonpoint-Source Grant Program, and
 - Washington State Water Pollution Control Revolving Fund Loan Program.
- Public Works Trust Fund – Cities, towns, counties and special purpose districts are eligible to receive loans. Water, sewer, storm, roads, bridges and solid waste/recycling are eligible and funds may be used for repair, replacement, rehabilitation, reconstruction and improvements including reasonable growth (generally the 20-year growth projection in the comprehensive plan).

PWTF loans are available at interest rates of 0.5%, 1% and 2% with the lower interest rates given to applicants who pay a larger share of the total project costs. The loan applicant must provide a minimum local match of funds of 5% towards the project cost to qualify for a 2% loan, 10% for a 1% loan, and 15% for a 0.5% loan. The useful life of the project determines the loan term up to a maximum of 20 years.