2026
City of Battle Ground
Stormwater Management Plan



Gardner Pond

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Permit Term: August 1, 2024, to July 31, 2029

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1 Background and NPDES Introduction

1.1 Background

The City of Battle Ground is in Clark County, approximately 10 miles northeast of Vancouver, Washington. The City combines a small-town feel with peaceful country living and outstanding recreational opportunities. Since 1990, the City has experienced steady growth, with its population increasing by over 500 percent. As of 2024, the estimated population was 22,790[1], with a land area of 8.54 square miles. The City also serves as a commercial and social hub for north Clark County, which has a population of over 80,000.

Major transportation corridors within the City include State Route 502 and State Route 503, which provide connections to regional centers. Additionally, several miles of the Chelatchie Prairie Railroad run through the eastern portion of the City. Land use is primarily residential, with commercial and industrial development concentrated along Main Street and expanding in the southern and southeastern areas near Commerce Avenue and Eaton Boulevard.

Battle Ground's topography is generally flat, sloping gently to the south-southwest, with elevations ranging from approximately 270 to 350 feet above mean sea level. Tukes Mountain, located east of the City, is the only significant steep-sloped feature, rising above 600 feet.

The City lies within the Salmon Creek and East Fork Lewis River watersheds. Woodin Creek (sometimes called Weaver Creek), the primary stream flowing through the City, discharges to Salmon Creek, which ultimately flows to the Columbia River. Mill Creek also drains to Salmon Creek. A small portion of the City drains to the East Fork Lewis River.

Soils in the area are predominantly Dollar loam and Hockinson loam, characterized by low permeability and moderate to high corrosivity. These conditions can limit stormwater infiltration and contribute to wetland formation. Wetlands are common throughout the City and provide important water quality and storage functions.

Battle Ground is bordered by unincorporated communities within Clark County, which operates under the Phase I Municipal Stormwater Permit. Adjacent areas are regulated under Clark County's MS4 program.

1.2 Stormwater and the NPDES Program

Stormwater runoff occurs when precipitation flows over land and impervious surfaces such as roads, rooftops, and parking lots. As runoff travels across these surfaces, it can transport pollutants including sediment, oil, metals, nutrients, bacteria, and debris into local waterways.

The City of Battle Ground operates a regulated Municipal Separate Storm Sewer System (MS4) under the National Pollutant Discharge Elimination System (NPDES) program, established under the federal Clean Water Act. In Washington State, the program is administered by the Washington State Department of Ecology. Battle Ground is covered under the Western Washington Phase II Municipal Stormwater Permit.

The permit establishes requirements to reduce pollutants in stormwater discharges to the maximum extent practicable and to protect and restore receiving waters, so that they can support beneficial uses, such as fishing and swimming. Governmental and private entities must obtain NPDES Permit(s), and comply with conditions set

[1] Washington Office of Financial Management – Estimate for April 1, 2025

forth in the Permit, before discharging stormwater or wastewater to surface waters regulated by the Federal and State governments.

Receiving waters within and downstream of the City include Salmon Creek, Mill Creek, the East Fork Lewis River, and ultimately the Columbia River. Some regional waterbodies are listed as impaired under Section 303(d) of the Clean Water Act and are subject to Total Maximum Daily Load (TMDL) requirements.

The City's stormwater system consists of storm drains, conveyance pipes, detention ponds, treatment facilities, and other infrastructure designed to manage runoff quantity and quality. As the City continues to grow, increasing impervious surfaces contribute to higher runoff volumes and pollutant loading, making effective stormwater management critical. The City's Stormwater Utility is responsible for managing storm and surface water resources in a way that reduces flooding, protects water quality, protects and maintains infrastructure, and improves aquatic habitat conditions.

1.3 Western Washington Phase II Municipal Stormwater Permit

The Western Washington Phase II MS4 Permit applies to municipalities with populations under 100,000. The City of Battle Ground has been covered under the permit since 2007.

The current permit became effective August 1, 2024 and expires July 31, 2029. The City's permit number is WAR045001.

The permit requires the City to:

- Develop and implement a Stormwater Management Program (SWMP)
- Meet specified programmatic and operational requirements
- Submit annual reports to Ecology by March 31

The Phase II Permit includes nine core program elements:

1. Stormwater Planning
2. Public Education and Outreach
3. Public Involvement and Participation
4. Mapping and Documentation
5. Illicit Discharge Detection and Elimination
6. Controlling Runoff from New Development, Redevelopment, and Construction
7. Stormwater Management for Existing Development
8. Operations and Maintenance
9. Source Control for Existing Development

1.4 General Stormwater Program Permit Information

This Stormwater Management Program (SWMP) describes the planned actions the City will implement during the reporting year to comply with permit requirements.

The SWMP is updated annually to reflect planned activities and program improvements. It also includes a summary of activities completed during the previous year to provide transparency for staff, elected officials, regulators, and the public.

The permit can be viewed online at:

https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater

In 2024, the City completed a third-party gap analysis of its MS4 program to evaluate permit compliance and identify areas for improvement. Identified deficiencies are incorporated into planned corrective actions.

As Battle Ground continues to grow, the City remains committed to improving stormwater program implementation, strengthening documentation and tracking systems, and protecting local water resources through compliance with the Western Washington Phase II MS4 Permit.

Questions or comments regarding this SWMP may be directed to the City of Battle Ground Stormwater Program Coordinator.

1.5 Stormwater Contacts

Stormwater Mailing address: 109 SW 1st ST, Suite 127, Battle Ground, WA 98604

General Stormwater concerns: stormwater@cityofbg.org

After hours Stormwater Emergencies: (360) 342-5371

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2 Coordination

The Stormwater Management Program (SWMP) is administered within the City of Battle Ground Public Works Department. Permit implementation requires coordination across multiple City departments and with regional partners.

2.1 Department Responsibilities for Permit Implementation

Within the City many staff members contribute toward meeting permit requirements. Currently, the Stormwater Management Program is primarily coordinated by Public Works Engineering, with substantial implementation assistance from Public Works Operations, and Community Development.

Core stormwater staffing includes:

- Stormwater Program Coordinator
- Two Engineering Technicians
- Operations Lead Worker
- Two Operations Workers
- Seasonal/temporary operations staff

Table 1 - Overview of Responsibilities

Permit Section	Title	Responsible Department(s)
S5.C.1	Stormwater Planning	Stormwater Management Program Community Development Department
S5.C.2	Public Education and Outreach	Stormwater Management Program
S5.C.3	Public Involvement and Participation	Stormwater Management Program
S5.C.4	MS4 Mapping and Documentation	Stormwater Management Program Public Works - Engineering
S5.C.5	Illicit Discharge Detection and Elimination	Stormwater Management Program Public Works - Operations
S5.C.6	Controlling Runoff from New Development, Redevelopment and Construction Sites	Stormwater Management Program Public Works - Engineering Community Development Department
S5.C.7	Stormwater Management for Existing Development	Stormwater Management Program Public Works - Engineering
S5.C.8	Source Control Program for Existing Development	Stormwater Management Program
S5.C.9	Municipal Operations and Maintenance	Stormwater Management Program Public Works – Operations Public Works – Engineering

2.2 Internal Coordination

Below is a summary of various Departmental responsibilities within the City.

2.2.1 Public Works

Stormwater Management Program

- Develops and updates the SWMP Plan and Annual Report
- Develops Stormwater Pollution Prevention Plans (SWPPPs) and performs annual inspection
- Coordinates permit compliance tracking and documentation
- Develops and updates stormwater regulations, standards, and guidance documents
- Manages interlocal agreements and regional coordination
- Manages stormwater-related grants

- Oversees capital improvement planning and stormwater retrofit projects
- Coordinates cross-departmental permit implementation
- Conduct outfall screenings and field investigations
- Identify and trace illicit discharges or non-stormwater flows
- Coordinate spill response and containment efforts
- Lead or coordinate cleanup actions
- Provide technical assistance to responsible parties
- Document findings, corrective actions, and resolution
- Review Temporary Sediment and Erosion Control (TESC) plans for development
- Conduct construction site inspections for compliance with approved TESC plans
- Verify installation and maintenance of erosion and sediment control BMPs
- Issue correction notices and require corrective actions when deficiencies are identified
- Coordinate with Engineering and Community Development on development-related compliance
- Conduct Source Control inspections of commercial and industrial businesses
- Provide education and technical assistance to business owners
- Identify pollutant-generating activities and require corrective actions
- Document and track inspection frequency, follow-up actions, and enforcement outcomes
- Coordinate with regional partners for pollution prevention assistance
- Conduct development-related drainage review and plan review
- Review drainage control reports and permanent stormwater facility designs
- Provide technical support for stormwater facility retrofits and capital projects
- Conduct annual inspections of regulated private stormwater facilities
- Inspect municipally owned or operated stormwater facilities
- Perform catch basin and conveyance inspections per permit schedule
- Document inspection findings and identify maintenance needs
- Track maintenance deadlines in accordance with permit-required timeframes
- Conduct follow-up inspections to verify maintenance completion
- Coordinate with Operations, Engineering, and external agencies as needed

Engineering

- Oversees development, drainage plan, and construction SWPPP reviews
- Designs and manages stormwater-related capital, maintenance, restoration projects
- Performs inspections related to subsurface stormwater structures.
- Manages stormwater and engineering staff
- Responsible for spill reporting to the Stormwater Program

Operations

- Performs maintenance and documents maintenance activities of public stormwater facilities
- Implements the Enhanced Maintenance Plan, including street sweeping
- Coordinates pipe inspection
- Manages decant facility operations and disposal coordination
- Implements the Operations SWPPP
- Conducts spill response

2.2.2 Community Development

Permit Staff

- Manages development permitting
- Assists with records requests
- Assist with complaint intake and records research

Planning

- Manages City-wide comprehensive planning and zoning
- Assists with the development of codes, ordinances and other regulations
- Ensures wetland and other critical area compliance
- Administers State Environmental Policy Act (SEPA) review
- Performs floodplain management
- Manages municipal annexation activities
- Performs and assists with code enforcement related to land use and development

Building

- Performs inspections related to individual building sites, such as low point drain connections.
- Assists the stormwater team with on-site erosion control
- Provides referrals for stormwater technical assistance and enforcement
- Reports spills or discharges to Stormwater Coordinator

2.2.3 Other Departments

Information Technology

- Provides management and technical assistance related to database management, office, and field technology

Police Department

- Responds to violations of the Battle Ground Municipal Code
- Responds to incidents that may require spill response
- Reports spills or discharges to Public Works

Executive Department

- City Manager
    - Responsible for NPDES permit compliance
    - Signatory authority for NPDES permit related items
- City Clerk
    - Provides records management
    - Assists with citizen information and record requests management
- Communications Manager
    - Aids with social media posts, website development and other communication related information

Finance Department

- Provides Utility Billing services
- Assists in budgeting, accounting, and project management

2.3 External Coordination

The City coordinates with regional partners to support permit implementation, share resources, and improve consistency across jurisdictions.

The City of Battle Ground coordinates with regional partners including Clark County, the cities of Camas, Ridgefield, Vancouver and Washougal, and Stormwater Partners of SW Washington to collaboratively meet certain conditions of the Permit.

The City participates in the following regional coordination groups:

- Southwest Washington Permittee Coordinators
- SW Washington Pollution Prevention Assistance Group
- Business Inspection Group (BIG)
- Regional Operations and Maintenance (ROADMAP) Group
- APWA Northwest Stormwater Coordinators Group
- Local Interagency Networking Cooperative (LINC)
- Stormwater Outreach for Regional Municipalities (STORM)
- Clean Water Campaign
- East Lewis River Partnership

Participation in these groups supports consistent implementation of permit requirements, coordinated public messaging, regional source control efforts, and shared technical learning.

3 Stormwater Management Program S5.A

The goal of Stormwater Management Program (SWMP) is to provide a structure for administrative oversight, program development, management, financial services, tracking, and reporting on overall permit implementation and compliance. The following sections of the SWMP follow the NPDES Phase II Stormwater Permit sections. Each section includes a summary of the permit requirements, summary of actions and activities from the prior year, and the planned activities for the coming year.

The SWMP Plan serves as a strategic framework to guide the City's stormwater management actions for the coming year, ensuring compliance with permit requirements and informing City Staff and the public about planned stormwater activities.

The City of Battle Ground filed 19 notices of non-compliance with permit conditions in 2025. The SWMP has several areas of non-compliance, primarily related to planning, stormwater facility design, construction activities, Operation and Maintenance (O&M), and having a an overall training program. Details related to non-compliance are available in the G20 notice of non-compliance with permit conditions that was submitted to the Department of Ecology in April, 2025 and is available upon request. G20 corresponds to the permit section related to notification to the Department of Ecology by a permittee when they determine they are not in compliance with a permit condition. Overall, these deficiencies reflect a need for improved tracking, reporting, and program implementation to meet permit obligations and ensure effective stormwater management in the City.

3.1 Summary Permit Requirements – S5.A

In accordance with Section S5.A of the Permit, the City shall:

1. **Develop and implement a SWMP** that addresses all required program components
2. **Prepare and annually update a written SWMP Plan** that includes:
    - Planned activities for each S5.C program component
3. **Implement an ongoing tracking and evaluation program** that:
    - Gathers, maintains, and uses information to evaluate SWMP development and compliance
    - Tracks the cost or estimated cost of development and implementation of each SWMP component and funding sources
    - Provides annual average costs to implement the SWMP and TMDL requirements beginning no later than March 31, 2027
    - Tracks inspections, follow-up actions, enforcement actions, and public education activities
4. **Continue implementation of existing stormwater programs** until updated permit requirements are fully implemented according to permit schedules.
5. **Coordinate with other permittees and internally across City departments**, including:
    - Clarifying roles and responsibilities between interconnected MS4s
    - Coordinating stormwater management activities within shared watersheds
    - Establishing and documenting internal coordination mechanisms to eliminate barriers to compliance
    - Providing a written description of internal coordination mechanisms in the Annual Report due no later than March 31, 2026

The purpose of the SWMP is to reduce pollutants discharged from the City's MS4 to the maximum extent practicable (MEP) using all known, available, and reasonable methods of prevention, control, and treatment (AKART).

3.2 Summary of 2025 Activities – S5.A

In 2025, the City continued implementation of existing stormwater management programs while transitioning to updated 2024–2029 permit requirements. Key activities included:

- Updating and posting the SWMP Plan and Annual Report by the permit required timeframes.
- Initiating development of improved tracking systems for inspections, enforcement actions, and public education activities.
- Implementing Survey123 to improve inspection documentation and data consistency.
- Continuing efforts to refine and improve tracking inspections, enforcement actions, and public education activities to ensure comprehensive documentation of permit compliance.
- Beginning evaluation of cost tracking methods to prepare for 2027 reporting requirements and development of Stormwater Time Tracking Standard Operating Procedure for implementation in 2026.
- Coordinating with regional permittees on community-based social marketing (CBSM) and other permit implementation strategies.
- Participating in regional stormwater workgroups and interlocal coordination meetings.
- Continuing internal coordination meetings between Engineering, Operations, and Community Development to support permit compliance and identify and eliminate barriers to NPDES permit compliance.
- Finalized an external Gaps Analysis of the City of Battle Ground's Stormwater Management Program.
- Submitted several G20, notices of non-compliance, to the Department of Ecology related to the Gap Analysis findings along with a corrective action plan to bring the City back into permit compliance.

3.3 Planned 2026 Activities – S5.A

The City will focus on the following priority actions during 2026 to maintain compliance and prepare for upcoming permit deadlines:

- Update the City's SWMP Plan to reflect completed SWMP activities for 2025 and planned SWMP activities for 2026. This information will be submitted to ECY by March 31, 2026, and posted to the City website by May 31, 2026.
- Implement the Stormwater Time Tracking Standard Operating Procedure for tracking and evaluating costs associated with each permit requirement, with a focus on improving accuracy in staff time allocation and program expenses.
- Continue to develop and implement standard operating procedures for various aspects of Permit implementation, especially around areas of permit non-compliance.
- Continue to develop and implement policy and procedures to consistently track inspection, enforcement, and public education activities to document permit compliance.
- Continue to coordinate with other permittees on stormwater related policies, programs, and projects.
- Continue to coordinate among City departments to eliminate barriers to permit compliance.
    - Continue participation in the following regularly scheduled meetings:
        - Weekly Capital Project Update Meeting
        - Bi-weekly Engineering Update Meeting
        - Monthly Stormwater and Operation and Maintenance Meeting
        - NEW – Bi-weekly Operations check-in meeting
        - NEW – Stormwater and Engineering Development Compliance Monthly Meetings
    - Continue to encourage establishment of regularly scheduled meetings:
        - Planning/Development Projects
        - Incorporation of Stormwater in Long Range Plans
- Continue to implement existing Stormwater Programs.

In 2026, the City will continue strengthening administrative systems to improve:

- Documentation consistency
- Data reliability
- Cross-departmental coordination
- Program defensibility during audits
- Long-term financial sustainability

These efforts are intended to ensure that the SWMP remains effective, measurable, and aligned with permit requirements.

4 Stormwater Planning S5.C.1

The Stormwater Planning section focuses on integrating stormwater management into the City's broader planning efforts to protect and improve receiving water quality. These planning efforts are critical in ensuring that future growth is managed sustainably, stormwater infrastructure is effective, and water quality is protected for the long term.

The City has several needs within the S5.C.1 section that require attention. While key planning elements are in place, municipal code and internal procedure updates are needed to demonstrate and support compliance,

especially related to LID compliance. The 2024 Permit Update also introduces new items that must be addressed. The City will continue implementing permit-compliant programs and address gaps in compliance, particularly in regard to incorporating codes and policies that make LID the preferred development technique within the City.

4.1 Summary Permit Requirements – S5.C.1

In accordance with Section S5.C.1 of the Permit, the City shall:

- Convene an interdisciplinary team to inform program development
- Integrate stormwater considerations into long-range planning processes
- Continue implementation and evaluation of Low Impact Development (LID) code requirements, which must be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development, where feasible
- Adopt tree canopy goals and policies by **December 31, 2028**
- Complete and submit a Stormwater Management Action Plan (SMAP) for at least one new high priority catchment area or additional actions for an existing SMAP by **March 31, 2027**
    - The SMAP must identify retrofit opportunities, targeted implementation actions, budget sources, implementation schedules, and benefits to overburdened communities.
- Describe in the Annual Report the water quality and watershed protection policies, strategies, codes and other measures intended to protect and improve the local receiving water health through planning, considering stormwater management needs or limitations by **March 31, 2027**.

4.2 Summary of 2025 Activities – S5.C.1

During 2025, the City participated in the following activities to help meet the NPDES permit requirements:

- Continued interdisciplinary coordination to support permit implementation.
- Evaluated stormwater program gaps identified in Gap Analysis.
- Began preparing for SMAP completion by reviewing Ecology's 2024 SMAP Guidance.
- Identified documentation gaps related to LID barriers.
- Initiated discussion regarding future tree canopy policy alignment with stormwater goals.
- Updated the Stormwater Comprehensive Plan and the City's 2024-2025 Comprehensive Plan Update, which incorporated stormwater goals and objectives into the new Climate Element.
    - Stormwater staff participated in the Citizen Advisory Committee for Climate Impact portion of the Comprehensive Plan update.
- Updated Battle Ground Municipal Code to better reflect the permit requirements.
- Completed a City-wide tree canopy assessment, which included mapping of tree canopy on City owned and managed properties.

The City recognizes that formal documentation of LID barrier assessments and long-range planning integration will need to be strengthened before the 2027 reporting deadline.

4.3 Planned 2026 Activities – S5.C.1

The City will focus on the following priority actions during 2026 to maintain compliance and prepare for upcoming reporting deadlines:

- Continue to hold meetings around key topic areas that have cross-departmental responsibilities, mostly related to policies and regulations associated with planning and land development.
    - Assess barriers to implementing permit requirements and create a path forward to fully documented permit compliance.
    - Assist in guiding how to incorporate low impact development (LID) principles, water quality and watershed protection, and stormwater BMPs into long range plans.
- The City will continue to coordinate long-range plan updates and describe how stormwater management needs and protection/improvement of receiving water heath are or are not informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies.
- The City will assess and document any identified administrative or regulatory barriers to the implementation of LID Principles or LID Best Management Practices (BMPs). Then the City will develop measures to address any identified barriers. The report will describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.
    - Update the Battle Ground Municipal Code (BGMC) to integrate 2019 and 2024 permit LID requirements, including provisions for reducing impervious surfaces, enhancing native vegetation retention, and requiring LID BMPs for new developments
    - Native vegetation preservation: Research similar city municipal codes for measures to preserve native vegetation and consider incentives such as expedited plan review.
    - Increase measures to minimize impervious surfaces such as developing a maximum percentage of allowable impervious surface based on land-use zoning and incorporate them into the BGMC.
- By **December 31, 2028**, adopt and implement tree canopy goals and policies to support stormwater management. This year the City will focus on evaluating policy frameworks from similar jurisdictions to guide implementation to help develop Tree Canopy Plan that establishes measurable goals for stormwater management and water quality improvement.
    - Tree list update: Update the City's approved Tree List to align with stormwater management goals and the tree canopy plan. Make the list publicly available.

5 Public Education and Outreach S5.C.2

The goal of the education and outreach program is to increase awareness of stormwater runoff impacts, encourage behavior changes that reduce pollution, and foster community stewardship to protect and improve receiving water quality.

The City meets most requirements under S5.C.2 through collaboration with Stormwater Partners of Southwest Washington. Stormwater Partners helps reach a broader audience by funding the development and distribution of educational materials, community events and workshops, and developing and implementing a CBSM Program. While the City's reliance on this partnership is practical, there are areas where further enhancement of outreach efforts could be beneficial.

5.1 Summary Permit Requirements – S5.C.2

The Permit (Section S5.C.2) requires the City to fulfill the following actions:

- Implement an ongoing Public Education and Outreach (E&O) program designed to build general awareness, effect behavior change, and create stewardship opportunities.
- Base the program on local and/or regional water quality information and priority audience characteristics; consider non-English language delivery where appropriate.

- Annually select at least one priority audience and one subject area for General Awareness and provide information on an ongoing or strategic schedule.
- Select at least one priority audience and one BMP for a Behavior Change campaign.
- By **July 1, 2025**, develop a behavior change campaign using social marketing practices and methods, including a program evaluation plan and a strategy and schedule to improve, expand, or create a campaign.
- By **September 1, 2025**, begin implementation of the developed behavior change campaign strategy.
    - Evaluate effectiveness and refine messaging over time.
- By **March 31, 2029**, evaluate and submit a report documenting:
    - Changes in understanding and adoption of behaviors,
    - Planned or recommended improvements to the campaign, and
    - The strategies and processes used to achieve results.
- Use evaluation results to inform and adapt the ongoing behavior change program.
- Provide, partner with, or promote stewardship opportunities such as stream teams, storm drain marking, volunteer monitoring, riparian planting, or habitat improvement.
- If participating in a regional program, implement the adopted elements locally and participate in coordinated messaging and strategies.
- Track types of education activities conducted.

5.2 Summary of 2025 Activities – S5.C.2

During 2025, the City participated in the following activities to help meet the NPDES permit requirements.

- The City and other NPDES permittees in Clark County collaborated on Education and Outreach through the interlocal agreement, Stormwater Partners. Each jurisdiction contributes financially to the partnership to fund Education and Outreach activities throughout Clark County.
- **Behavior Change Campaign**
    - Stormwater Partners developed an RFP and hired an external consultant, PointNorth to implement and evaluate the “Shut the Lid” dumpster campaign.
    - PointNorth in collaboration with Stormwater Partners started to implement a new social marketing campaign for the 24-29 permit cycle by September 1, 2025.
    - The Pilot program runs through spring 2026, where we will then evaluate the program and move into full implementation.
- **General Awareness**
    - In collaboration with Stormwater Partners, the City provided general awareness education through the following:
        - The Watershed Alliance of SW WA
            - Audience: College/university and trade students
            - Topic: General stormwater awareness and stormwater related careers
            - The Watershed Alliance of SW WA provided 6 different outreach efforts to classrooms or career tabling events, that reached over 60 students.
        - Stormwater Partners of SW Washington Website
            - The County maintains the Stormwater Partners’ website (www.stormwaterpartners.com), which is a primary resource for building general awareness on a variety of stormwater topics.

        - The website is structured so users can find relevant information based on the audience segment they identify with, topic of interest or program.
        - Audience segments include residents, businesses, schools, contractors and a newly added section for property managers.
        - Topics of interest include stormwater facilities and construction and erosion, and programs include the student video contest, Explore Your Watershed story map, Follow the Water, Don't Drip and Drive and Canines for Clean Water.
        - Partners also added information related to PCBs in building materials including links and graphics from Ecology to the contractors and property managers pages.
        - In 2025, the website received 16,379 pageviews from US users.
- **Stewardship Opportunities**
    - In collaboration with Stormwater Partners the City helped implement:
        - Watershed Stewards of Clark County Program - Clark Conservation District
            - Over six weeks, the course covers local watersheds, surface and groundwater, plants, fish and wildlife, and policies and regulations. Local subject matter experts, including Stormwater Partners, present on the topics.
            - Local organizations join classes to share local stewardship volunteering opportunities.
            - To complete the program, participants attend all six classes, record stewardship commitments and are encouraged to volunteer with organizations that shared opportunities.
            - Eleven people attended these classes; additional recruitment strategies will be considered to improve participation.
        - Students for Clean Water Video contest
            - 100 students from 8 high schools submitted 32 videos about protecting water, their personal or cultural connection to water and environmental justice.
            - Community viewed students' videos more than 23,000 times.
    - Continued implementation of the Adopt-a-Drain program in Battle Ground.
        - 9 catch basins were adopted in the City of Battle Ground in 2025, bringing our total to 18 adopted catch basins.
        - Adopt-a-Drain Washington also provided a behavior change questionnaire to all Washington Participants to gather feedback on the program and its implementation success.
- Stormwater Partners hosted the annual Stormwater Symposium for SW Washington
    - This is a half day conference that highlights stormwater and water quality projects and program in Clark County.
- Battle Ground Staff assisted with Students in the Watershed at the Gardner Pond
    - Around 110 students participated in 4 events in 2025
    - Students evaluate the pond water for pH, turbidity, nitrates, phosphates, temperature and dissolved oxygen.
    - Students also complete a biological assessment and if they are lucky, they learn some cool benthic macroinvertebrate dances from Rainy Rau, with the City of Vancouver, who is the lead on the Students in the Watershed Program.

- Clark County Staff created an annual report which summarizes the work completed by Stormwater Partners and is available as an attachment to the annual report.

5.3 Planned 2026 Activities S5.C.2

The current and planned activities for 2026 include:

- Evaluate the pilot study results from the initial, "Shut the Lid" campaign.
    - Adapt the campaign as necessary and move into the full implementation of the campaign.
- The City will continue to participate, leverage, and partner with various regional educational groups to implement general awareness of stormwater management in the City. This includes:
    - Stormwater Partners – providing consistent stormwater messaging and educational opportunities in Southwestern Washington.
    - Students in the Watershed – water quality monitoring with Maple Grove Elementary School.
    - Watershed Stewards – general stormwater and water quality best practices
        - Implemented by Clark Conservation District for Stormwater Partners.
    - Continuing to develop and implement the Adopt-a-Drain program in our jurisdiction.
- The City also plans to fund the Backyard Habitat Program starting mid-2026.
    - Implemented by Columbia Land Trust and the Bird Alliance of Portland
    - Provide resources for residents to encourage removal of invasive species and plant native species that encourage habitat for wildlife and pollinators to help protect water quality.
- Continue to consider developing a local community group to promote stewardship, enhance public education by offering more city-specific events, such as stormwater workshops, volunteer opportunities, or interactive public sessions.

6 Public Involvement and Participation S5.C.3

The City provides opportunities for community members to participate in the development, implementation, and evaluation of the Stormwater Management Program (SWMP). Public involvement supports transparency in program implementation and provides mechanisms for residents, businesses, and community stakeholders to provide feedback on stormwater management priorities, policies, and activities.

The City's goal for public involvement and participation is to actively engage residents, business owners, property owners, and contractors in surface and stormwater utility, broadening the sense of responsibility and understanding of the health of our watersheds throughout the community.

While current efforts meet basic permit requirements, it would be beneficial to enhance engagement, particularly with overburdened communities. Moving forward, the City aims to develop a strategy for identifying and engaging the community, expand outreach methods beyond council meetings, and improve transparency in public feedback collection. These efforts will help build a more inclusive and informed approach to stormwater management while strengthening community stewardship.

6.1 Permit Requirements - S5.C.3

The Permit (Section S5.C.3) requires the City to fulfill the following actions:

- Provide ongoing opportunities for public involvement and participation in stormwater decision-making processes (e.g., advisory groups, public hearings, watershed committees, rate discussions).

- Create opportunities for the public, including overburdened communities, to participate in development, implementation, and updates of the SWMP and SMAP.
- Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities.
    - By **December 31, 2026**, document methods used to identify overburdened communities.
- Post the SWMP Plan and the Annual Report on the City's website by **May 31st** of each year.
- Make all other permit-related submittals available to the public upon request.

6.2 Summary of 2025 Activities – S5.C.3

During 2025, the City participated in the following activities to help meet the NPDES permit requirements.

- The City provides ongoing opportunities for public participation through regularly scheduled City Council and Public Works meetings, which are open to the public.
    - These meetings provide a forum for residents and stakeholders to offer comments on municipal programs, policies, and projects, including those related to stormwater management, water quality protection, and infrastructure investments.
    - The City provides language assistance and accessibility accommodation for public meetings and materials upon request, consistent with broader City policies intended to support inclusive participation in municipal programs and decision-making processes.
- Stormwater-related topics may be presented to City Council or other public bodies when updates to codes, policies, capital improvement projects, or permit requirements are considered. These presentations provide an opportunity for public awareness and input on stormwater management decisions.
- The City participates in regional stormwater outreach and education campaigns coordinated across Clark County, which help deliver consistent stormwater pollution prevention messaging and reach a broader and more diverse audience across the region.
- The City supports community stewardship opportunities and volunteer activities, including watershed stewards and other environmental volunteer programs that provide residents with opportunities to participate in protecting local water resources.
- In March 2025, the City posted the draft Annual Report and SWMP to the City's website and provided a two-week public comment period to allow interested community members to review program activities and provide feedback.
- The City posted the final Annual Report and SWMP to the City's website prior to May 31, 2025, ensuring public access to program documentation and reporting as required under the NPDES permit.
- The City responded to public records requests relating to stormwater documentation.

6.3 Planned 2026 Activities S5.C.3

The City will continue to maintain and expand opportunities for public participation in stormwater program implementation. Planned activities for 2026 include the following:

- The City will continue to provide opportunities for the public to participate in stormwater-related discussions through City Council meetings, public hearings, and other public meetings, where residents may provide comments or ask questions regarding stormwater policies, programs, and infrastructure investments.

- Public Works and Stormwater Program staff may provide presentations to City Council or other public bodies regarding stormwater permit requirements, code updates, capital projects, or program implementation activities as needed. These presentations provide an opportunity for public awareness and input on stormwater management decisions.
- The City will continue to provide language assistance and accessibility accommodation for public meetings and materials upon request to ensure residents are able to participate in City decision-making processes.
- The City will continue to support equitable access to stormwater program information and engagement opportunities for all residents while continuing to evaluate available environmental justice screening tools and local data sources to better define highly impacted or overburdened communities for our jurisdiction.
- The City will continue to participate in regional stormwater outreach campaigns and collaborative education efforts across Clark County to expand the reach of stormwater pollution prevention messaging.
- The City will continue to support community stewardship and volunteer opportunities that provide accessible ways for residents to participate in watershed protection and stormwater pollution prevention.
- The City will evaluate opportunities to expand public participation and engagement strategies, including identifying additional outreach approaches that may improve community awareness and participation in stormwater program activities.
- The City will continue to provide public access to stormwater program information by publishing the final Annual Report and SWMP to the City's website prior to May 31, 2026.
- The City will continue to respond to records request both to maintain NPDES permit compliance as well as the Freedom of Information Act requirements.

7 MS4 Mapping and Documentation S5.C.4

The SWMP includes an ongoing program for mapping and documenting the MS4. Mapping helps track and trace illicit discharges, identify illicit connections and ensure the City has a robust and complete Inspection, Operations, and Maintenance program.

The City continues to refine its MS4 mapping program to enhance stormwater management, ensure compliance with NPDES requirements, and support effective storm system maintenance and enforcement. While progress has been made in standardizing stormwater data, the City recognizes existing compliance gaps, including incomplete documentation of tributary areas for 24" outfalls and fully described mapping standards. Efforts are underway to address these gaps. Moving forward, the City will focus on meeting current and upcoming permit timeframes, improving mapping accessibility, and incorporating overburdened community data to assist with stormwater planning efforts.

7.1 Summary of Permit Requirements S5.C.4

The Permit (Section S5.C.4) requires the City to fulfill the following actions:

- Maintain ongoing mapping of the MS4 including:
    - Known MS4 outfalls and discharge points and receiving waters
    - Stormwater treatment and flow control BMPs/facilities owned or operated by the permittee

    - Geographic areas that do not discharge stormwater to surface water
    - Authorized MS4 connections after February 16, 2007
    - Interconnections with other MS4s
    - Known connections to privately owned stormwater systems, and
    - tributary conveyances (24" diameter and larger) to outfalls and discharge points with the following features:
        - tributary conveyance type
        - material and size where known
        - associated drainage areas and land use
    - Maintain a digital format for mapping with fully described mapping standards.
    - Provide mapping information to Ecology and the public, as appropriate.
- New mapping requirements for this permit cycle include:
    - By **March 31, 2026**, submit locations of all known MS4 outfalls according to the standard templates and format.
    - By **December 31, 2026,** map tree canopy on City owned property using available, existing data.
    - By **March 31, 2028**, implement a methodology to map and assess acreage of the MS4 tributary basins to 24" or larger outfalls that have stormwater treatment and flow control BMPs/facilities owned or operated by the City and submit a map and table quantifying managed and unmanaged acres.
    - By **December 31, 2028**, map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points and tree canopy on City owned or operated properties.

7.2 Summary of 2025 Activities – S5.C.4

During 2025, the City participated in the following activities to help meet the NPDES permit requirements.

- The City engaged Consor Consultants in 2024 and Windsor Consultants in 2025 to support standardization of existing stormwater data. Work is ongoing, and some permit-related items, such as mapping land use for tributary areas of 24" outfalls and identifying areas without surface water discharge, remain in progress.
- In 2025, the City made numerous enhancements to its GIS dataset and GIS program, including hiring a GIS Specialist to oversee GIS and asset management systems.
    - Efforts are ongoing to standardize data and ensure all information required for permit compliance is complete and maintained.
- Currently the City has data available for the following permit required areas:
    - Known MS4 outfalls and discharge points and receiving waters
    - Stormwater treatment and flow control BMPs/facilities owned or operated by the permittee
    - Interconnections with other MS4s
    - Tributary conveyances (24" diameter and larger) to outfalls and discharge points with the following features:
        - tributary conveyance type
        - material and size where known
    - Initial draft of fully described mapping standards.

- Inspection staff implemented the use of Survey123 for inspections of catch basins, public and private permanent stormwater facilities, and source control site visits.
- The City worked with PlanitGeo to map tree canopy in the City as part of Battle Ground's Comprehensive Plan Update, which includes existing tree canopy on City owned or operated properties.

7.3 Planned 2026 Activities for S5.C.4

The current and planned activities for 2026 include:

- Continue to develop the ongoing mapping requirements of the permit, including better defining data management processes to continue to update and improve our mapping capabilities.
- Continuing to work with the GIS specialist to better ensure compliance with the existing stormwater mapping requirements.
    - Continue to address areas of known permit non-compliance:
        - Areas that do not discharge stormwater to surface water.
        - Verify that the tributary areas appear accurate based on known outfalls that are 24" or greater.
        - Land-use for the tributary areas.
        - All connections to the MS4 authorized or allowed by the permittee after February 16, 2007, and
        - All known connections from the MS4 to privately owned stormwater systems.
        - Develop fully described mapping standards that accurately reflect our processes.
    - The City is working to develop a timeline for fully developing and implementing the mapping requirements.
- Continuing to collect and update various stormwater asset data, including:
    - The size and material information for all known MS4 outfalls
    - Developing a standard procedure for ensuring inclusion into GIS data of new stormwater infrastructure.
- The City is also working to develop the use of EAM Asset Management software.
- Continuing to make any existing mapping available upon request to interested parties, and explore options for online public access, where appropriate.

8 Illicit Discharge Detection and Elimination S5.C.5

An illicit discharge means "any discharge to a MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this permit (S5.C.3)" and illicit connection means "any infrastructure connection to the MS4 that is not intended, permitted, or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this permit (S5.C.3). Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4."

The SWMP must include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. The City continues to refine its Illicit Discharge Detection and Elimination (IDDE) program to enhance stormwater quality, comply with NPDES requirements, and improve response efficiency. While existing procedures ensure compliance with most permit requirements,

improvements are needed in documentation and tracking to fully capture complaint resolution and follow-up actions.

8.1 Summary of Permit Requirements S5.C.5

The Permit (Section S5.C.5) requires the City to fulfill the following actions:

- Implement an ongoing program to prohibit, prevent, detect, characterize, trace, and eliminate illicit discharges and illicit connections to the MS4.
- Maintain procedures for reporting, investigating, correcting, and eliminating illicit discharges, including those from interconnected MS4s.
- Inform City employees, businesses, and the public about hazards of illicit discharges.
- Maintain or revise ordinance/regulatory mechanism to prohibit non-stormwater discharges; **revise as necessary no later than July 1, 2027**, including escalating enforcement provisions.
- Complete field screening for an average of **12% of the MS4 each year** and document methodology in the Annual Report.
- Maintain a publicly listed hotline for reporting spills and illicit discharges.
- Provide ongoing training for municipal field staff and IDDE staff; document and maintain records.
- Immediately respond to illicit discharges that threaten human health, welfare, or the environment.
- Investigate potential illicit discharges within **7 days on average**.
- Initiate investigation of suspected illicit connections within **21 days**.
- Eliminate confirmed illicit connections within **6 months**, using escalating enforcement as needed.
- **No later than December 31, 2026**, coordinate with firefighting agencies to be notified when PFAS-containing AFFFs are used.
- **No later than January 1, 2027**, update and implement post-firefighting cleanup procedures to minimize PFAS or other illicit discharges to the MS4.
- Track and maintain records of the activities conducted to meet the requirements of the Permit Section, as specified in Appendix 13, and included as part of the annual report.

8.2 Summary of 2025 Activities – S5.C.5

During 2025, the City participated in the following activities to help meet the NPDES permit requirements.

- Continued to regulate discharges to the storm system and prohibit illicit discharges or illicit connections.
- Continued to maintain the illicit discharge 24-hour contact number (360) 342-5071.
    - The City improved the location on the website and more clearly included stormwater concerns (in addition to wastewater and drinking water concerns).
- Continued responding to complaints related to stormwater, flooding, and water quality concerns.

IDDE Program Summary

- Continued implementing an IDDE program, which included field screening of 12% of the MS4 outfalls in 2025. Staff did perform the outfall evaluation into the wet season. Several of the outfalls appeared to either have flow or be submerged in water during the inspection. Staff did not properly evaluate these flows and appears to needs additional guidance and training related outfall screening when there is flowing water. While there were observed flows, no flows were characterized in 2025.

    - The City used the outfall screening method as outlined in the *Illicit Connection and Illicit Discharge Filed Screening and Source Tracing Guidance Manual* prepared for Washington State Department of Ecology by Herrera Environmental Consultants to meet this requirement.
    - The City collected outfall screening inspection information in Survery123.
    - The City has identified 217 outfalls throughout the City.
    - In 2025, 26 outfalls were inspected.
    - 5 (19%) of the outfalls were open channel, 21 (81%) were closed pipe outfalls.
    - 11 (42%) of the outfalls were inspected during dry weather.
    - 12 (46%) of the outfalls were submerged in water, 1 (4%) was impacted by sediment
    - 5 outfalls were identified as needing maintenance, vegetation and/or sediment removal
- Continued to follow the established procedures to respond, investigate, refer, and resolve illicit discharges.
- Continued to ensure opportunities for City Staff to receive training about proper identification and response to illicit discharges, illicit connections, and spill response.
- The Operations Manager, Stormwater Supervisor, Stormwater Lead Maintenance Worker and the Stormwater Maintenance workers all attended an IDDE/Spill Response Training at Municon in May 2025.
- Started to develop a draft Stormwater Training Plan, which will address overall training expectations for all permit required trainings.
- Coordinated with the cities of Camas, Ridgefield and Washougal on development of an in person IDDE training for all municipal field staff presented by CWT to be offered in early 2026.

Complaint Site investigation Summary

In 2025, the City investigated 10 complaints, of which 9 (90%) were valid. Of these, 7 complaints impacted the City's MS4. Common pollutant concerns included fuels (4 sites), food-related oil/grease, wastewater, paint, and soap and cleaning chemicals. The City required follow-up actions at 9 sites.

8.3 Planned 2026 Activities for S5.C.5

In 2026, the City will focus on refining reporting processes and documentation practices. By proactively addressing these areas, the City aims to further reduce illicit discharges and strengthen environmental protections.

The current and planned activities for 2026 include:

- Continue to regulate discharges to the stormwater system and prohibit illicit discharges and illicit connections.
- Continue to maintain the illicit discharge 24-hour contact number (360) 342-5071 and website form for stormwater concerns.
- Continue to respond to citizen's complaints related to stormwater, flooding, and water quality concerns.
- Continue to implement an IDDE program, which includes field screening of 12% of the MS4 outfalls annually, using the outfall screening method as outlined in the *Illicit Connection and Illicit Discharge Filed Screening and Source Tracing Guidance Manual* prepared for Washington State Department of Ecology by Herrera Environmental Consultant.4
- Develop and implement staff training on improved standard operating procedures, especially around outfall flow characterization and the importance of dry weather investigations.

- Continue to follow the established procedures to respond, investigate, refer, and resolve illicit discharges.
    - All illicit discharges, including spills, which may constitute a threat to human health, welfare, or the environment are investigated immediately.
    - All other investigations, or referring of investigations, will occur within 7 days of receiving a complaint, report or monitoring information indicating an illicit discharge.
- Continue to train City staff about proper identification and response to illicit discharges, illicit connections, and spill response.
    - Host an IDDE/Spill Response training for all municipal field staff in early February, 2026.
- Finalize the Stormwater Training Plan to explicitly state the training expectations for staff to meet permit requirements.
- Evaluate, and update as needed, processes and procedures around documentation, tracking and record keeping for the IDDE program, ensuring that all information specified in Appendix 12 is collected and reported.

9 Controlling Runoff from New Development, Redevelopment, and Construction Sites S5.C.6

The goal of this section is to implement and enforce a program to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction site activities. This section applies to private and public development, including transportation projects.

The City currently implements programs and activities intended to meet Permit requirements. Through the Gaps Analysis, the City identified several permit required deficiencies. A G20 Notice of Non-Compliance was submitted in April, 2025 for these items. While the City has taken some actions to begin addressing these issues, there is still more work that needs to be completed to ensure the City is properly implementing and able to document permit compliance.

The City will continue implementing existing programs while taking corrective action to address identified deficiencies and achieve permit compliance.

9.1 Summary of Permit Requirements S5.C.6

The Permit (Section S5.C.6) requires the City to fulfill the following actions:

- Implement and enforce a program regulating runoff from new development, redevelopment, and construction (public and private projects).
- **No later than June 30, 2027**, adopt and make effective a local program meeting S5.C.6.b requirements.
- Apply updated requirements to project applications according to permit timelines (including July 1, 2027 applicability triggers and vesting provisions through 2032).
- Use Appendix 1 (or 2019 Appendix 1 as amended by Appendix 10) Minimum Requirements, thresholds, and definitions, including infeasibility and competing needs criteria.
- Maintain legal authority to inspect and enforce maintenance standards for private stormwater facilities.
- Review all stormwater site plans using qualified personnel.
- Inspect construction sites:
    - Prior to clearing

    - During construction for erosion and sediment controls
    - Twice per year in new residential developments until 90% buildout (with ≥4 months between inspections)
    - At completion prior to final approval/occupancy
- Achieve at least **80% of required inspections annually**.
- Maintain inspection and enforcement records.
- Implement an enforcement strategy for noncompliance.
- Provide links to Ecology's Construction Stormwater General Permit, Industrial Stormwater General Permit, and UIC registration process.
- Ensure staff implementing this program are properly trained and maintain documentation of training.

9.2 Summary of 2025 Activities – S5.C.6

During 2025, the City participated in the following activities to help meet the NPDES permit requirements.

- Continued to implement the ordinance that addresses runoff from new development, redevelopment, and construction site projects.
    - Battle Ground Municipal Code (BGMC) Title 18 adopts by reference the applicable stormwater manual and incorporates the minimum thresholds and definitions set forth in Appendix 1 of the Permit.
    - Title 18 establishes the City's legal authority to inspect and enforce maintenance standards for private stormwater facilities.
    - Although previously adopted by reference, BGMC was amended to incorporate specific permit language specifying applicable timeframes for manual updates. In addition, the city incorporated additional Permit language addressing variances and exceptions and the requirement to obtain formal approval when applicable into BGMC.
- The City continued evaluation of its Construction Site Stormwater Inspection and Enforcement Program in 2025, and continues to develop the following:
    - Although the City amended the BGMC to incorporate Permit language related to variances and exceptions, additional work is needed to establish formal internal and external procedures to ensure consistent implementation within the permitting process. Development of these procedures is planned as part of ongoing program improvements.
    - The City further evaluated its development review process related to stormwater and the City still needs to develop and implement formal documentation of stormwater review procedures to ensure permit compliance with the manual. Engineering reviews continue to be performed by an outside consultant. It is unclear if the review person has appropriate training or knowledge in the Stormwater Permit requirements. The City has identified the need to strengthen internal verification processes to ensure compliance with Permit requirements and Manual standards.
    - The City identified that certain development projects were approved based on an interpretation of Permit requirements that did not align with current Permit requirements. As a result, some newly permitted sites appear to not meet applicable current Permit requirements. Corrective actions and process improvements are being developed to address these deficiencies and prevent recurrence.
    - In 2024, the City determined that permanent facilities were not being inspected during construction. City Staff meet to discuss roles, responsibilities and record keeping. While the City

created a verbal plan to address this in 2025, it does not appear that these inspections have been completed or if they have they have not been documented. Additional work to develop standard operating procedures that clearly outline inspection expectations including documentation is ongoing.
    - In 2024, the City, identified concerns related to documentation of final stormwater system conditions before bond release that demonstrate that they have been maintained and function as designed. Stormwater staff was more actively engaged in bond release inspections in 2025. However, it is unclear how those inspections have been documented. Private facilities do not have performance or maintenance bonds. Additional work to develop standard operating procedures that outline inspection and documentation expectations is ongoing.
- Construction site inspection process improvements.
    - Conducted Temporary Sediment and Erosion Control (TSEC) inspections before, during, and at final stabilization to ensure proper stormwater management and sediment/erosion control.
    - Ensured proper installation and maintenance of TSEC, escalating enforcement when necessary.
- Staff Training
    - Continued to ensure internal staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities.
    - Ensured appropriate stormwater, engineering and operations inspection staff have CESCL certification.
    - Drafted a Stormwater Training Plan that will encompass all areas of permit-related training.

9.3 Planned 2026 Activities for S5.C.6

To address identified gaps and further improve compliance, the City will implement the following activities in 2026:

- Enhance Construction Site Stormwater Inspection and Enforcement Program
    - Develop and implement a defined permit tracking and documentation process.
        - The City currently uses EnerGov for permit tracking and is moving to all electronic document review.
    - Develop and implement a defined permit tracking process for variances and exceptions.
    - Establish a structured stormwater review process to ensure compliance with permit requirements and the Stormwater Management Manual for Western Washington.
    - Ensure that all permit requirements are properly implemented, tracked, and documented.
    - Develop standardized stormwater design checklist(s) or other tools to ensure plan review consistency.
    - Improve document retention protocols to ensure all required stormwater-related permitting documents, including Low Impact Development (LID) requirements, are properly stored and accessible.
    - Conduct semi-annual inspections of permanent stormwater facilities during construction and verify compliance before issuing final occupancy.
    - Ensure that stormwater facilities are inspected and maintained throughout construction and the bond period, with a documented final inspection before bond release.

    - Promote non-structural preventative actions, including LID techniques, minimization of impervious surfaces, and reduced disturbance of native soils and vegetation.
- Ordinance Compliance and Updates
    - Continue enforcement of BGMC Title 18 to ensure regulatory compliance and legal authority for stormwater inspections and maintenance enforcement.
    - Additional BGMC updates as needed to address items identified in the Gaps Analysis or other new permit requirements.
- Permitting and Compliance Procedures
    - Ensure the permitting process includes all requirements and criteria from the Stormwater Manual.
    - Conduct thorough reviews of development plans for compliance with stormwater standards.
    - Continue inspections before, during, and after construction to verify proper stormwater management.
    - Maintain sediment and erosion control enforcement procedures, including escalating actions as needed.
    - Verify long-term operation and maintenance (O&M) of post-construction stormwater facilities and best management practices (BMPs).
- Links to Ecology Resources
    - Maintain active website links for the Notice of Intent for Department of Ecology Construction, UIC wells, and Industrial NPDES Permits.
- Staff Training
    - Ensure all staff involved in stormwater management, permitting, plan review, inspections, and enforcement receive regular training.
    - Develop or identify the use of a standardized training module focusing on LID requirements in development projects.
    - Maintain detailed training records, including documentation of staff participation and topics covered.
    - Finalize and implement the draft Stormwater Training Plan.

10 Stormwater Management for Existing Development S5.C.7

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

10.1 Summary of Permit Requirements S5.C.7

The Permit (Section S5.C.7) requires the City to fulfill the following actions:

- Implement a program to control or reduce stormwater discharges from existing development, focusing on strategic long-term investments.
- Implement stormwater facility retrofits or tailored SWMP actions meeting **Appendix 12** criteria using:
    - SMAP-identified projects, and/or
    - Opportunistic investments outside SMAP areas.
- Submit annually a list of planned projects scheduled for funding or implementation during the Permit term to meet assigned equivalent acreage.

    - Battle Ground has been assigned **3.5 equivalent acres** for stormwater retrofit.
- **No later than March 31, 2028**, fully fund, start construction, or completely implement project(s) meeting the assigned equivalent acreage and submit required documentation with the Annual Report.
    - Projects started on or after January 1, 2023 may count.
    - Excess acreage may be credited to the 2029–2034 term (up to 50%).
    - Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next permit term.
- Report which projects provide Tribal benefits and benefits to overburdened communities, including Vulnerable Populations and Highly Impacted Communities.
- At least **0.5 equivalent acres must be managed within the jurisdiction**, though regional collaboration is allowed per permit conditions.
- **No later than March 31, 2028**, report projected equivalent acres anticipated for the next Permit term (2029–2034).

10.2 Summary of 2025 Activities – S5.C.7

This is a new permit section. The City has been working on developing designs for two retrofit facilities:

- the old town/downtown core retrofit and
- the railroad ditch retrofit.

Each design is funded through grants from the Department of Ecology. The City is continuing to work with consultants on the design phase for each of these projects.

10.3 Planned 2026 Activities for S5.C.7

In 2026, the City will:

- Advance the design development of the Old Town and Railroad Ditch Retrofits, including feasibility assessments, engineering, and funding strategies.
    - Railroad Ditch Retrofit is expected to be at 90% design completion this year.
- Apply for Ecology grants for stormwater retrofit construction.
- Track stormwater retrofit projects per the requirements of Appendix 12 and provide updated information in the annual report.
- Identify additional retrofit opportunities that align with the SMAP or other infrastructure projects.
- Develop a monitoring and reporting process to ensure compliance with the equivalent acreage requirement and long-term tracking of project effectiveness.

11 Source Control for Existing Development S5.C.8

The purpose of this section is to prevent and reduce pollutants in runoff from commercial and industrial businesses that discharges to the Municipal Separate Storm Sewer System (MS4) by implementing pollution control measures at the source.

The City currently implements activities and programs to meet the Permit requirements. The City will continue to implement these programs and activities.

11.1 Summary of Permit Requirements S5.C.8

The Permit (Section S5.C.8) requires the City to fulfill the following actions:

- Enforce ordinance(s) requiring application of source control BMPs for pollutant-generating sources associated with existing land uses and activities.
    - Operational BMPs shall be required for all pollutant-generating sources.
    - If operational BMPs are insufficient to prevent illicit discharges or violations of water quality standards, then structural BMPs, treatment BMPs, or other onsite practices shall be required.
- **No later than August 1, 2027**, update and make effective source control ordinance(s) as necessary to meet permit requirements.
- Implement an inspection program, performed by qualified personnel, to prevent and reduce pollutants in runoff from areas that discharge to the MS4.
    - Maintain and update (at least every 5 years) an inventory of publicly and privately owned institutional, commercial, and industrial sites with pollutant-generating activities.
    - This inventory includes businesses identified based on pollutant-generating activities (Appendix 8) and other sources discovered through complaints (e.g., home-based businesses and multi-family sites).
    - Provide source control information to all identified businesses/sites.
    - Encourage pollution reduction practices for pesticides, herbicides, and fertilizers at inventoried sites.
    - Annually inspect **20% of inventoried sites** (may include follow-ups and complaint-based inspections).
    - Inspect **100% of sites identified through credible complaints**.
    - Implement progressive enforcement procedures, escalating when BMP deficiencies persist.
    - Maintain documentation of inspections, denied entry attempts, warning letters, NOVs, and enforcement actions.
- Organize annual reporting by business type/activity (Appendix 8 categories).
- Train staff responsible for implementing the source control program and maintain training records.

11.2 Summary of 2025 Activities – S5.C.8

During 2025, the City undertook the following actions to meet NPDES permit requirements:

- Regulated business pollution through technical assistance and enforcement.
- Required implementation of source control BMPs, and where necessary, structural BMPs or treatment facilities.

Source Control Inspection Summary

The City of Battle Ground partners with Clark County's Pollution Prevention Assistance Program to conduct source control inspections. Clark County Public Health performs educational inspections, while the City handles follow-up and enforcement. The City of Battle Ground also performs many of its own business inspections.

- 2025 was the City's third year performing source control inspections.
- In 2022, the City identified 220 businesses for its business inspection list. This equates to a requirement to perform 44 inspections annually (20% of our business inspection list).

- In 2025, the City focused on businesses along the Main Street corridor from NW 20th AVE into the Woodin Creek catchment area.
- The City inspected 27 businesses and Clark County Public Health inspected 6 businesses.
- There were 57 source control inspections performed in 2025. The City performed a total of 49 inspections and Clark County Public Health performed 8 inspections.
- Most businesses that were inspected by the City were restaurants (38%) and automotive related businesses (9%), while Clark County Public Health inspected nail salons and dry cleaners.
- City performed inspections identified the need for additional BMPs or maintenance of existing BMPs
    - 23 re-inspections were performed to achieve compliance at City inspected sites.
    - 2 sites needed 3 inspections to reach compliance.
    - The City used enforcement at 2 sites in order to achieve compliance.
- BMPs referenced/shared with sites
    - S454 and S455 were shared with all the businesses that the City inspected
    - Additional BMPs referenced: S409, S427, S454,S455,S456, S457, and S458.

11.3 Planned 2026 Activities for S5.C.8

In 2026, the City will continue implementing and refining the source control program by:

- Enforcing ordinances requiring source control BMPs for pollutant-generating activities.
- Conducting inspections of at least 20% of inventoried businesses, ensuring BMP effectiveness and compliance.
    - Updating the business inventory (last updated in 2022) by 2027 per permit requirements.
- Continuing to target the Old Town/Downtown Core along Main Avenue for inspections.
    - This area was prioritized in the Stormwater Management Action Plan (SMAP) due to the potential for stormwater pollution from older developments.
    - Woodin/Weaver Creek, which flows through this area, currently receives untreated stormwater discharge.
- Using progressive enforcement to ensure appropriate BMPs are installed.
    - Continue to evaluate and update the escalating enforcement policy as needed.
- Enhancing outreach and technical assistance to reduce the use of pesticides, herbicides, and fertilizers at pollution-generating sites.
- Maintaining a 100% complaint response rate for all source control issues.
- Finalize the Draft Stormwater Training Standard Procedure to address all staff required trainings related to the NPDES permit requirements.
    - Continue to provide ongoing staff training.

12 Operation and Maintenance S5.C.9

The City's goal is to ensure that stormwater management facilities are inspected and maintained to function as designed, prevent, or reduce pollutant runoff from activities, minimize the occurrence and impact of spills, and ensure staff are properly trained to identify and respond to pollutant generating activities.

The gap analysis highlighted deficiencies in documentation and compliance tracking. While the City appears to be maintaining stormwater structures per permit requirements, there is no centralized electronic system for managing records. Additionally, compliance with the maintenance standards is unclear. To comply with permit

requirements, the City needs to significantly improve its tracking and record keeping, to better ensure that facilities are maintained within the permit required timeframes. The City is committed to improving documentation and tracking efforts to ensure compliance with NPDES permit requirements.

12.1 Summary of Permit Requirements S5.C.9

The Permit (Section S5.C.9) requires the City to fulfill the following actions:

- Implement maintenance standards at least as protective as the Stormwater Management Manual for Western Washington or an approved Phase I program.
- **By June 30, 2027**, update maintenance standards as needed.
- Perform maintenance when standards are exceeded:
    - Typical facilities: within 1 year
    - Catch basins: within 6 months
    - Capital maintenance < $25,000: within 2 years
    - Capital maintenance > $25,000: City to determine timeframe for completion
    - Document circumstances beyond Permittee control if timelines are exceeded.
- Private stormwater facilities (per S5.C.6):
    - Ensure long-term O&M responsibility, inspections, and enforcement authority.
    - Inspect annually
    - Achieve **≥80% of required inspections annually**.
    - Maintain inspection and enforcement records.
- Permittee-owned stormwater facilities:
    - Inspect all municipally owned treatment and flow control BMPs/facilities annually.
    - Conduct spot checks of potentially damaged facilities after major storm events.
    - Inspect all catch basins and inlets by **Dec 31, 2025** and every 2 years thereafter
    - Achieve **≥95% of required inspections annually**.
    - Dispose of decant water and street waste per Appendix 6.
- Municipal operations:
    - **By Dec 31, 2027**, document practices, policies, and procedures to reduce stormwater impacts from Permittee-owned lands and road maintenance.
    - Address activities such as: pipe/ditch cleaning, street cleaning, snow/ice control, vegetation management, dust control, erosion control, building cleaning, demolition prep, and PCB source controls for buildings 1950–1980.
- Street sweeping program:
    - **By July 1, 2027**, develop and implement sweeping program for priority areas (high traffic, commercial, industrial).
    - Sweep priority areas at least once between July–Sept each year, with at least two additional sweeps annually.
    - For 2027 only: one sweep July–Dec is required.
    - Achieve **≥90% coverage of priority areas per sweeping event**.
    - **By March 31, 2028**, report sweeping data in Annual Report (maps, dates, frequency, sweeper type, curb miles, solids removed).
- Stormwater Pollution Prevention Plan (SWPPP) for municipal maintenance/storage yards not covered by ISGP:

    - Annual inspections, BMP evaluations, maintenance, site maps, material inventories, and spill response plans.
- Municipal staff training:
    - Train staff whose work may impact stormwater quality on O&M, inspections, BMPs, street sweeping, SWPPPs, and reporting.
    - Document training dates, course descriptions, and staff names/positions.
- Maintain records of activities conducted to meet the requirements of this section.

12.2 Summary of 2025 Activities – S5.C.9

During 2025, the City continued implementing and refining its Operations and Maintenance (O&M) program to support compliance with the Municipal Stormwater Permit. Efforts focused on improving information sharing and communication between Stormwater Inspection Staff and Operations Maintenance Staff, enhancing maintenance tracking and refining data management systems to support long-term compliance with permit inspection and maintenance standards.

Record-Keeping and Asset Management Improvements

- The City continued improving stormwater inspection documentation and data management practices.
- Stormwater Inspection Staff continued collecting public and private stormwater facility inspection data using ESRI Survey123, improving consistency, accessibility, and electronic documentation of inspection data.
- Maintenance staff documented maintenance activities manually and entered records into an Excel spreadsheet due to limited access to Survey123. These processes helped ensure maintenance activities were documented while the City works toward integrating inspection and maintenance tracking systems. Staff was then able to use this information to better determine permit compliance with the maintenance standards.
- Staff significantly improved upon both maintenance tracking and ensuring that maintenance was performed within the permit required timeframes, particularly related to the previously noted deficiencies around the six-month maintenance requirement for catch basin clean out.
- The City initiated tracking of maintenance categories associated with inspection results to better evaluate compliance with permit-required maintenance timeframes.
- The City continued to develop processes and procedures for use of the EAM Asset Management System (formerly Lucity) to improve work order management and maintenance tracking. When fully implemented, the system will integrate inspection data collected through ESRI tools with maintenance work orders used by Operations staff.

Facility Inspections and Maintenance

- Inspection results included documentation of sediment accumulation, structural condition, accessibility constraints, and maintenance needs.
- Inspection data identified maintenance needs including sediment removal, typical maintenance activities, and structural repair needs such as riser repairs.
- Inspection results also identified several structures requiring additional evaluation to determine appropriate maintenance actions.
- The City completed inspections of 380 regulated stormwater facilities, including:

    - 98 publicly owned facilities
    - 282 privately owned facilities
- The City currently has 3,193 catch basins identified. The City inspected approximately 50 percent of municipally owned catch basins, inspecting 1,619 structures as part of the ongoing catch basin inspection program.
    - 1,619 catch basins (50.7%) were inspected as part of the biannual MS4 permit inspection requirements.
    - Sediment levels ranged from 0-80 cm (about 31”). The average sediment depth level in the sump was 16.11 cm (about 6.3”).
    - Riser repairs were identified as a need for 8 different structures.
    - 1,600 catch basins’ overall condition was average, 3 were good,7 were fair and 3 were identified as poor condition.
    - 1,146 (70%) catch basins were determined to not have maintenance needs. 350 (22%) were determined to need sediment clean out, 50 (3%) were determined to need typical maintenance (which must be performed within 1 year from the inspection), 39 were determined to need more than typical maintenance, which the City must determine the estimated costs of potential repairs to determine whether these need to be completed within 2 years or by a City determined timeframe. In addition, staff identified 6 catch basins with potential illicit discharges.
- In addition, staff identified several catch basins with potential illicit discharge concerns, which were referred for follow-up investigation.
- Routine mowing and vegetation maintenance was conducted at City stormwater facilities between one and three times during the year. While mowing activities were routinely performed, the City identified the need to improve documentation of additional maintenance tasks such as sediment removal, vegetation management, and structural repairs.
- The City documented several maintenance activities performed at stormwater facilities, including sediment removal, regrading, vegetation removal, and conveyance maintenance.
    - The City hired outside contractors to perform more extensive restoration work on the Mallard’s Landing East Pond and the Railroad Ditch, which included vegetation and sediment removal and regrade and stabilization.

Street Sweeping and Material Tracking

- The City continued to use the Samsara platform for street sweeper data collection, improving the ability to track sweeping routes, priority basin maintenance, and operational activity.
- Staff continued efforts to quantify the volume of materials collected through street sweeping and vactor operations to support improved reporting and program evaluation.
- Sweeper and vactor wastes were decanted at the City’s permitted decant facility, with solids disposed of at the Cowlitz County Headquarters Landfill in accordance with applicable disposal requirements.

Storm Event Monitoring

- Following the significant precipitation event in December 2025, staff conducted visual inspections of several stormwater outfalls and facilities to assess system performance and identify potential maintenance concerns.

Municipal Operations and Facility Management

- The City continued implementing established practices, policies, and operational procedures intended to reduce stormwater runoff and pollutant discharge from City-owned properties including streets, parking lots, parks, buildings, open space areas, and maintenance facilities.
- Staff conducted the annual Stormwater Pollution Prevention Plan (SWPPP) inspection for the City's Operations Facility, identifying site improvements relative to the previous year and identifying maintenance needs for onsite catch basins and an oil water separator.

Employee Training and Compliance

- Stormwater Operations Staff attended an Illicit Discharge Detection and Elimination Training provided at Municon in May, 2025.

12.3 Planned 2026 Activities for S5.C.9

During 2026, the City will continue improving its Operations and Maintenance program to strengthen compliance with permit inspection and maintenance requirements and to prepare for upcoming new permit requirements.

Operations and Maintenance Program Documentation

- The City will begin review and updating of its comprehensive Operations and Maintenance program framework to document practices, policies, and procedures used to reduce stormwater impacts from municipal operations and maintenance activities, consistent with permit requirements scheduled for completion by 2027.
- The program will address operational activities including street maintenance, conveyance cleaning, vegetation management, erosion control, building maintenance, and other municipal activities that may affect stormwater quality.

Inspection and Maintenance Program Improvements

- The City will continue conducting annual inspections of regulated stormwater facilities and municipally owned treatment and flow control BMPs.
- The City will continue inspecting approximately 50 percent of catch basins annually, ensuring that the entire system is inspected at least once every two years.
- Staff will continue improving tracking of inspection results and maintenance needs through integration of inspection data and maintenance work orders within the EAM Asset Management System.
- The City will improve documentation of maintenance activities beyond routine mowing, including sediment removal, structural repairs, vegetation management, and conveyance maintenance.

Street Sweeping and Enhanced Maintenance Planning

- The City will continue expanding the use of Samsara data systems to improve tracking of street sweeping activities and priority basin maintenance.
- Staff will continue developing methods to estimate and document the volume and weight of materials collected through sweeping and vactor operations, supporting future permit reporting requirements.
- The City will continue to decant liquid stormwater waste from routine maintenance activities at the City's permitted decant facility, with solids disposed of at the Cowlitz County Headquarters Landfill.
- Staff will begin evaluating priority sweeping areas and operational data to support development of the street sweeping program required by the current permit.
- Staff will begin to evaluate the need for a new sweeper.

Storm Event Response and Spot-Check Program

- The City will continue conducting spot inspections of stormwater facilities following significant storm events to identify potential damage, maintenance needs, or system performance concerns.
- Staff will evaluate approaches for documenting storm event inspections and identifying facilities that may require additional follow-up inspections or maintenance.

SWPPP Compliance for Municipal Facilities

- The City will continue implementing and refining the Operations Facility Stormwater Pollution Prevention Plan (SWPPP).
- Annual SWPPP inspections will be conducted, and corrective actions will be documented and tracked to completion.

Training and Staff Development

- The City will continue providing training for staff whose work may impact stormwater quality, including training on stormwater BMPs, inspection procedures, illicit discharge detection, and maintenance practices.
- The City will finalize a formalized training framework to better document training expectations, training frequency, and staff participation.
- Training records will continue to be maintained, including course descriptions, attendance records, and staff roles.

13 Compliance with TMDL requirements S7

The City does not currently have to comply with any TMDL requirements.

14 Monitoring and Assessment S8

14.1 Summary of Permit Requirements S8

The Permit (Section S5.C.8) requires the City to fulfill the following actions:

- Permittees are required to conduct monitoring in the following categories: Regional Status and Trends Monitoring, Stormwater Management Program Effectiveness and Source Identification Studies.
- Permittees can pay into a collective fund that is managed by the Department of Ecology or conduct monitoring individually.

14.2 Summary of 2025 Activities – S8

- The City has chosen to annually pay into the Regional Status and Trends Monitoring collective funds for urban stream monitoring in Clark and Cowlitz Counties in the Lower Columbia River basin and the Regional Effectiveness and Source Identification Studies.
- The City participated in a SAM study that is looking at 6PPD-q street wastes.

14.3 Planned 2026 Activities for S8

- The City will continue to annually pay into the Regional Status and Trends Monitoring collective funds for urban stream monitoring in Clark and Cowlitz Counties in the Lower Columbia River basin and the Regional Effectiveness and Source Identification Studies.

- The City will provide information when requested for the Effectiveness and Source Identification Studies.

15 Reporting Requirements S9

15.1 Summary of Permit Requirements S9

- Submit an annual report to Ecology by March 31 of each year. The Annual Report shall include the SWMP, Annual Report form, and notification of jurisdictional boundary changes that affect the geographic area of Permit coverage, together with any implications for the SWMP.
- Plan to maintain all records related to the Permit and SWMP for at least five years from the expiration of this permit. Submit records to Ecology upon request.
- Make records related to the Permit and SWMP available to the public at reasonable times during business hours. Provide a copy of the most recent annual report to any individual or entity upon request.

15.2 Summary of 2025 Activities – S9

- The City submitted an annual report to Ecology by March 31, 2025.
- The City maintained created records.
- They City posted the SWMP and Annual Report to the City's Website by May 31, 2025.

15.3 Planned 2026 Activities for S9

- The City will continue to submit annual reports and SWMPs to the Department of Ecology by March 31 and post the annual report and SWMP to our website by May 31 each year.
- The SMAP will lead the activities in the priority watershed sub-basin.
- The City will continue to manage and implement all NPDES required programs to educate and engage with the public.
- The City will maintain all records created under this permit (starting from August 1, 2024), until at least July 31, 2034.

16 Final Summary

The City of Battle Ground remains committed to implementing and continually improving its Stormwater Management Program (SWMP) to achieve compliance with the Western Washington Municipal Stormwater Permit and to protect local water resources. Effective stormwater management is particularly important within the City due to local watershed characteristics, drainage patterns, runoff behavior, and development conditions. These natural features play an important role in watershed health but also present unique challenges for stormwater management and infrastructure planning.

The City recognizes that protecting water quality and managing stormwater runoff requires both effective municipal programs and active participation from the community. As a result, the City is committed to providing opportunities for residents, businesses, and community partners to stay informed and involved in protecting local waterways.

Moving forward, the City will continue to refine program implementation by improving documentation and data management practices, strengthening inspection and maintenance processes, and identifying opportunities to enhance public participation and stewardship. Through these ongoing efforts, the City aims to meet regulatory requirements while supporting sustainable development and protecting the health of local watersheds.

Definitions and Acronyms

This section defines commonly used acronyms and abbreviations to improve readability and accessibility of the Stormwater Management Program document.

AKART – All Known, Available, and Reasonable methods of prevention, control, and Treatment

BMP – Best Management Practice. The schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices, that when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to Waters of Washington State.

CESCL - Certified Erosion and Sediment Control Lead. An individual who has current certification through an approved erosion and sediment control training program that meets the minimum training standards established by Ecology. A CESCL is knowledgeable in the principles and practices of erosion and sediment control. The CESCL must have the skills to assess site conditions and construction activities that could impact the quality of stormwater and the effectiveness of erosion and sediment control measures used to control the quality of stormwater discharges. Certification is obtained through an Ecology approved erosion and sediment control course. Course listings are provided online at Ecology's website.

City – City of Battle Ground

CIP – Capital Improvement Program

CWA - the federal Clean Water Act (formerly referred to as the federal Water Pollution Control Act or federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97117, 33 U.S.C. 1251 et seq.).

EAM – Enterprise Asset Management system (City system used to track infrastructure assets, inspections, and maintenance activities; formerly Lucity) - A digital platform used by organizations to track, manage, and optimize physical assets throughout their entire lifecycle, from acquisition to disposal.

ECY / Ecology – Washington State Department of Ecology

EJ – Environmental Justice

EPA – United States Environmental Protection Agency

ESC – Erosion and Sediment Control

ESRI – Environmental Systems Research Institute; provider of GIS software used by the City

G20 – refers to NPDES permit section, related to permit non-compliance notification requirements

GIS – Geographic Information System; mapping system used to track stormwater infrastructure and spatial data

Hard surface - An impervious surface, a permeable pavement, or a vegetated roof.

IDDE – Illicit Discharge Detection and Elimination

Illicit Connection - any infrastructure connection to the MS4 that is not intended, permitted or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this Permit (S5.C.5

and S6.D.3). Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.

Illicit Discharge - any discharge to an MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this Permit (S5.C.5 and S6.D.3).

Impervious surface - A non-vegetated surface area which either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. A non-vegetated surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to, roof tops, walkways, patios, driveways, parking lots or storage areas, concrete or asphalt paving, gravel roads, packed earthen materials, and oiled, macadam or other surfaces which similarly impede the natural infiltration of stormwater. Open, uncovered retention/detention facilities shall not be considered as impervious surfaces for the purposes of determining whether the thresholds for application of Minimum Requirements are exceeded. Open, uncovered retention/detention facilities shall be considered impervious surfaces for purposes of runoff modeling.

Land Disturbing Activity - any activity that results in a change in the existing soil cover (both vegetative and non-vegetative) and/or the existing soil topography. Land disturbing activities include, but are not limited to clearing, grading, filling and excavation. Compaction that is associated with stabilization of structures and road construction shall also be considered land disturbing activity. Vegetation maintenance practices, including landscape maintenance and gardening, are not considered land disturbing activity. Stormwater facility maintenance is not considered land disturbing activity if conducted according to established standards and procedures.

LID – Low Impact Development; a stormwater and land use management strategy that strives to mimic pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration by emphasizing conservation, use of on-site natural features, site planning, and distributed stormwater management practices that are integrated into a project design.

MS4 – Municipal Separate Storm Sewer System; a publicly owned stormwater system that collects and conveys stormwater that is not combined with the wastewater sanitary sewer system

New Development - land disturbing activities, including Class IV General Forest Practices that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of hard surfaces; and subdivision, short subdivision and binding site plans, as defined and applied in Chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development.

NPDES – National Pollutant Discharge Elimination System; federal permit program regulating stormwater discharges

O&M – Operations and Maintenance

Permit – Western Washington Phase II Municipal Stormwater Permit issued by Ecology

Pervious Surface - Any surface material that allows stormwater to infiltrate into the ground. Examples include lawn, landscape, pasture, native vegetation areas, and permeable pavements.

RCW – Revised Code of Washington

Redevelopment - on a site that is already substantially developed (i.e., has 35% or more of existing hard surface coverage), the creation or addition of hard surfaces; the expansion of a building footprint or addition or replacement of a structure; structural development including construction, installation or expansion of a building or other structure; replacement of hard surface that is not part of a routine maintenance activity; and land disturbing activities.

Replaced hard surface - for structures, the removal and replacement of hard surfaces down to the foundation. For other hard surfaces, the removal down to bare soil or base course and replacement.

Replaced impervious surface - for structures, the removal and replacement of impervious surfaces down to the foundation. For other impervious surfaces, the removal down to bare soil or base course and replacement.

Samsara – Fleet and equipment tracking system used by the City to monitor street sweeping and maintenance activities

SMAP – Stormwater Management Action Plan

SMMWW – Stormwater Management Manual for Western Washington

Survey123 – ESRI mobile data collection application used for stormwater inspections

SWMP – Stormwater Management Plan

SWPPP – Stormwater Pollution Prevention Plan

TAPE – Technology Assessment Protocol – Ecology's process for evaluating stormwater treatment technologies.

TMDL – Total Maximum Daily Load; regulatory limit for pollutants in a waterbody. A calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL (also known as a Water Cleanup Plan) is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the waterbody can be used for the purposes the State has designated. The calculation must also account for seasonal variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each waterbody, for example, drinking water supply, contact recreation (swimming), and aquatic like support (fishing), and the scientific criteria to support that use. The Clean Water Act, section 303, establishes the water quality standards and TMDL programs.

WAC – Washington Administrative Code

WQ – Water Quality