

2025 Stormwater Management Program (SWMP) Plan



City of Ridgefield
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March 29, 2025

Executive Summary

2025 Stormwater Management Program (SWMP) Plan – City of Ridgefield

The 2025 Stormwater Management Program (SWMP) Plan for the City of Ridgefield is a comprehensive guide outlining the City's efforts to comply with the National Pollutant Discharge Elimination System (NPDES) Western Washington Phase II Municipal Stormwater Permit. Ridgefield, as a new permittee under the 2024-2029 NPDES cycle, is tasked with implementing measures to protect water quality and reduce stormwater pollution into nearby water bodies, including Lake River, Gee Creek, and the Columbia River. The plan ensures the City phases in the required stormwater management practices while balancing the needs of the growing community. Below is a breakdown of the major sections of the 2025 SWMP Plan.

Stormwater Planning – In 2025, the City will convene an interdisciplinary team that will assist in the development and implementation of the stormwater planning program. The team will address long-term planning needs while focusing on reducing the discharge of pollutants from new developments. Ridgefield's planning will emphasize Low Impact Development (LID) techniques, such as reducing impervious surfaces and preserving native vegetation. This section highlights the need for integrating stormwater management into the City's broader comprehensive planning efforts, ensuring that local policies are developed to protect aquatic resources and improve water quality over the permit cycle.

Public Education and Outreach – A critical component of the SWMP is the development of public education and outreach programs. The goal is to inform various target audiences—such as residents, businesses, and developers—about the importance of preventing stormwater pollution. In 2025, Ridgefield plans to launch a behavior change campaign aimed at commercial properties, focusing on proper waste management, such as closing dumpster lids to prevent pollutants from entering the stormwater system. The City will also work with regional partner groups, such as the Stormwater Partners of SW Washington, to continue providing educational materials, videos, and educational campaigns to raise awareness about stormwater impacts.

Public Involvement and Participation – The City recognizes the importance of community involvement in its stormwater management efforts. Ridgefield plans to create opportunities for public participation in the development and implementation of the SWMP, particularly in overburdened communities that may be disproportionately affected by stormwater issues. The City will also begin making the SWMP and annual reports available on its website, encouraging residents to provide feedback and participate in stormwater-related decision-making processes.

MS4 Mapping and Documentation – Ridgefield is the process of developing a comprehensive Geographic Information System (GIS) mapping system of its stormwater infrastructure, known as the Municipal Separate Storm Sewer System (MS4). This digital mapping system will help the City document the locations of outfalls, stormwater treatment facilities, and other critical infrastructure. The data collected will be used to improve maintenance activities and stormwater facility management. The City plans to continue refining its maps to support stormwater planning and operations, ensuring that all stormwater assets are properly documented and maintained.

Illicit Discharge Detection and Elimination (IDDE) – The City will expand its Illicit Discharge Detection and Elimination (IDDE) program, which is designed to identify, trace, and eliminate unauthorized discharges into the stormwater system. This section of the plan outlines steps to develop written procedures for IDDE investigations and staff training. In addition to the training of municipal staff on how to identify and report illicit discharges, Ridgefield will provide public outreach about the hazards of illicit discharges and improper waste disposal. The City will also

enhance its procedures for documenting and tracking IDDE incidents, ensuring that any illicit discharges are quickly addressed.

Controlling Runoff from New Development, Redevelopment, and Construction Sites – Ridgefield is working to ensure more stringent controls on stormwater runoff from new developments, redevelopment projects, and construction sites. The City has adopted updated engineering standards that closely align with the 2019 Stormwater Management Manual for Western Washington (SWMMWW). These standards require that site plans for development include measures to manage stormwater, reduce erosion, and ensure that permanent stormwater facilities are properly installed. The City will continue to review development plans and conduct inspections to ensure compliance, protecting local water bodies from construction-related pollutants.

Operations and Maintenance – To ensure the long-term functionality of stormwater treatment and flow control facilities, in addition conveyance infrastructure within the MS4, Ridgefield has developed an operations and maintenance (O&M) program. The City inspects and maintains its publicly-owned stormwater infrastructure, such as treatment facilities and catch basins, on an annual basis. The City also performs post-storm inspections to identify and repair any damage caused by significant rainfall events. As part of the upcoming permit requirements, Ridgefield will continue to develop and expand upon the municipal street sweeping program designed to reduce pollutants on city streets, targeting high-traffic areas to maximize water quality benefits. Additionally, the City is in the process of developing and implementing new inspection software to streamline data collection, track maintenance activities, and improve reporting efficiency.

Compliance with the Underground Injection Control (UIC) Program Rule – Ridgefield operates a small unknown quantity of Underground Injection Control (UIC) wells, which are used to manage stormwater by allowing it to infiltrate into the ground. To comply with Washington's UIC Program Rule, the City will assess existing UIC wells and ensure new wells are properly sited, designed, and maintained to protect groundwater quality. Ridgefield is also integrating its UIC program with its broader stormwater management activities to streamline compliance efforts and minimize environmental impacts.

In summary, the 2025 SWMP Plan serves as a framework for Ridgefield's stormwater management efforts, ensuring compliance with the NPDES permit and promoting sustainable practices to protect local water resources. This plan will be updated annually to reflect the City's progress and continued efforts to reduce stormwater pollution. Ridgefield is committed to maintaining compliance with stormwater regulations while fostering the long-term health and resilience of its local watersheds.

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CITY OF RIDGEFIELD

STORMWATER MANAGEMENT PROGRAM

Section A—Introduction

Overview and Background

In accordance with the National Pollutant Discharge Elimination System (NPDES) program, the City of Ridgefield manages its Municipal Separate Storm Sewer System (MS4) under the Western Washington Phase II Municipal Stormwater Permit (Permit). The Permit mandates that the City of Ridgefield prepare and submit an annual Stormwater Management Program (SWMP) Plan, which must be updated as necessary to reflect the City's actions and future plans for meeting permit requirements. The SWMP Plan for each year is due by March 31st and is submitted to the Washington State Department of Ecology (Ecology) alongside the City's Annual Report for the previous year. Both the final SWMP Plan and the Annual Report are published on the City's website by May 31st. The current NPDES permit cycle began on August 1, 2024, and will expire on July 31, 2029.

The City of Ridgefield's 2025 SWMP Plan describes actions the City plans to take this year to prevent or reduce the discharge of pollutants from the City's stormwater system into local water bodies.

This document only includes actions required by the Permit and is primarily focused on water quality and permit compliance. The City may take other actions to further the goal of protecting the environment from stormwater contamination, but those are not discussed here.

Capital improvement projects are covered in the City's 2025 Comprehensive Stormwater Management Plan, also posted on the City website.

The Permit applies to cities with populations of less than 100,000 located within, or partially within, an urbanized area that operates a MS4 which discharges to waters of Washington state. Urban Areas are defined as population centers with greater than 50,000 people based on the most recent federal census. Ecology may also designate additional entities with populations of 10,000 or more located outside urban areas as additional Permittees. Designation criteria include factors such as discharge to sensitive waters, high population density, high growth potential, contiguity to urban areas, significant pollutant contributions to waters of the United States, or ineffective or inadequate water quality protection by other programs.

Effective August 1, 2024, the City of Ridgefield was designated by Ecology as a New Permittee under the 2024 Permit. Ridgefield is located within the greater Vancouver Urban Area (see Figure 1), with stormwater discharges to surface water bodies, including Lake River, Gee Creek, and the Columbia River (see Figure 2). As a New Permittee, Ridgefield will be phased into the permit requirements over the course of the 2024–2029 Permit term. This phased implementation will allow the City time to develop and enhance its SWMP in alignment with the new regulatory expectations.

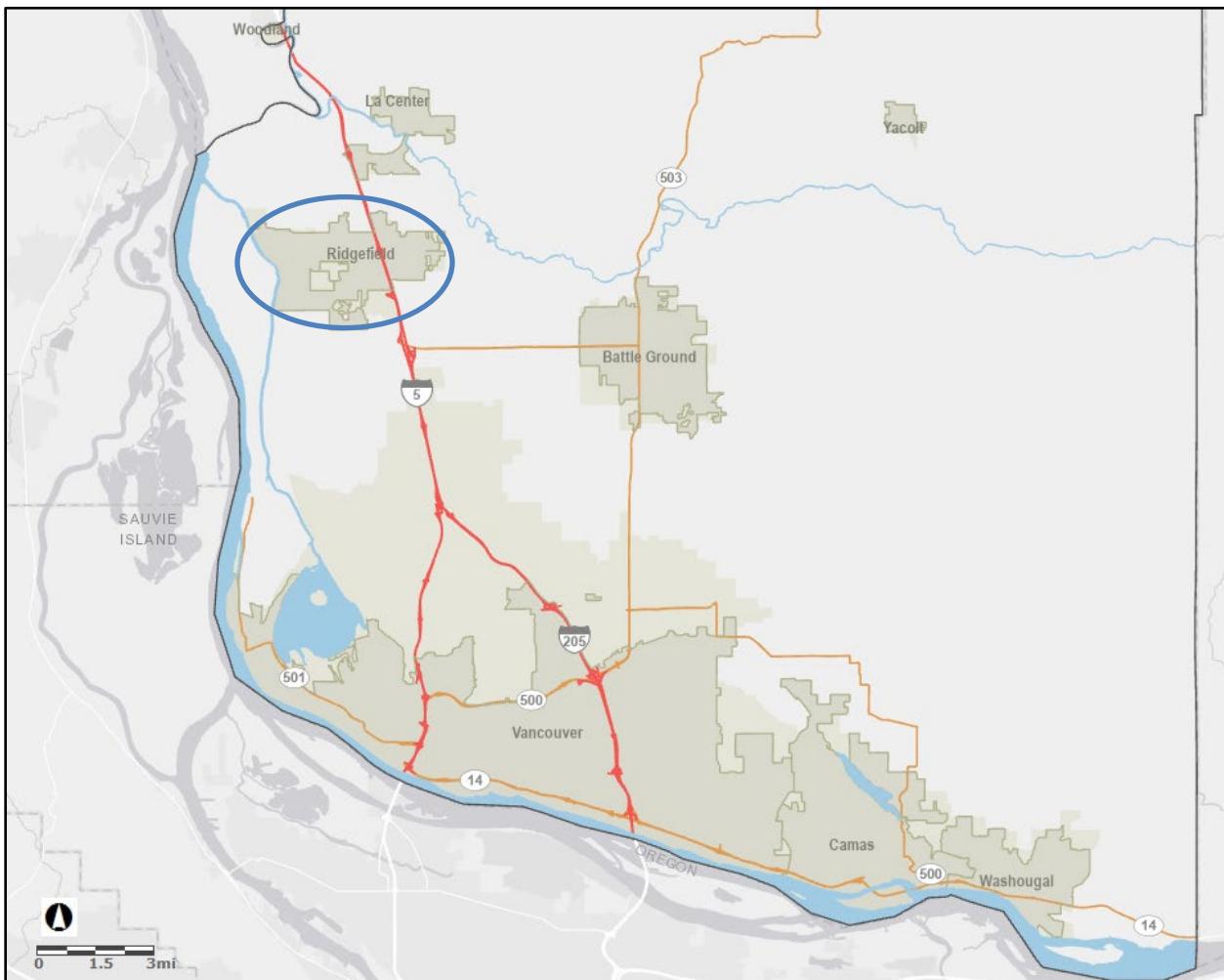


Figure 1: City of Ridgefield Located within Clark County, WA

As Ridgefield is phased into the required Permit deliverables, the City will coordinate with Ecology and other stakeholders to ensure all stormwater management efforts align with regulatory requirements and best practices for protecting water quality.

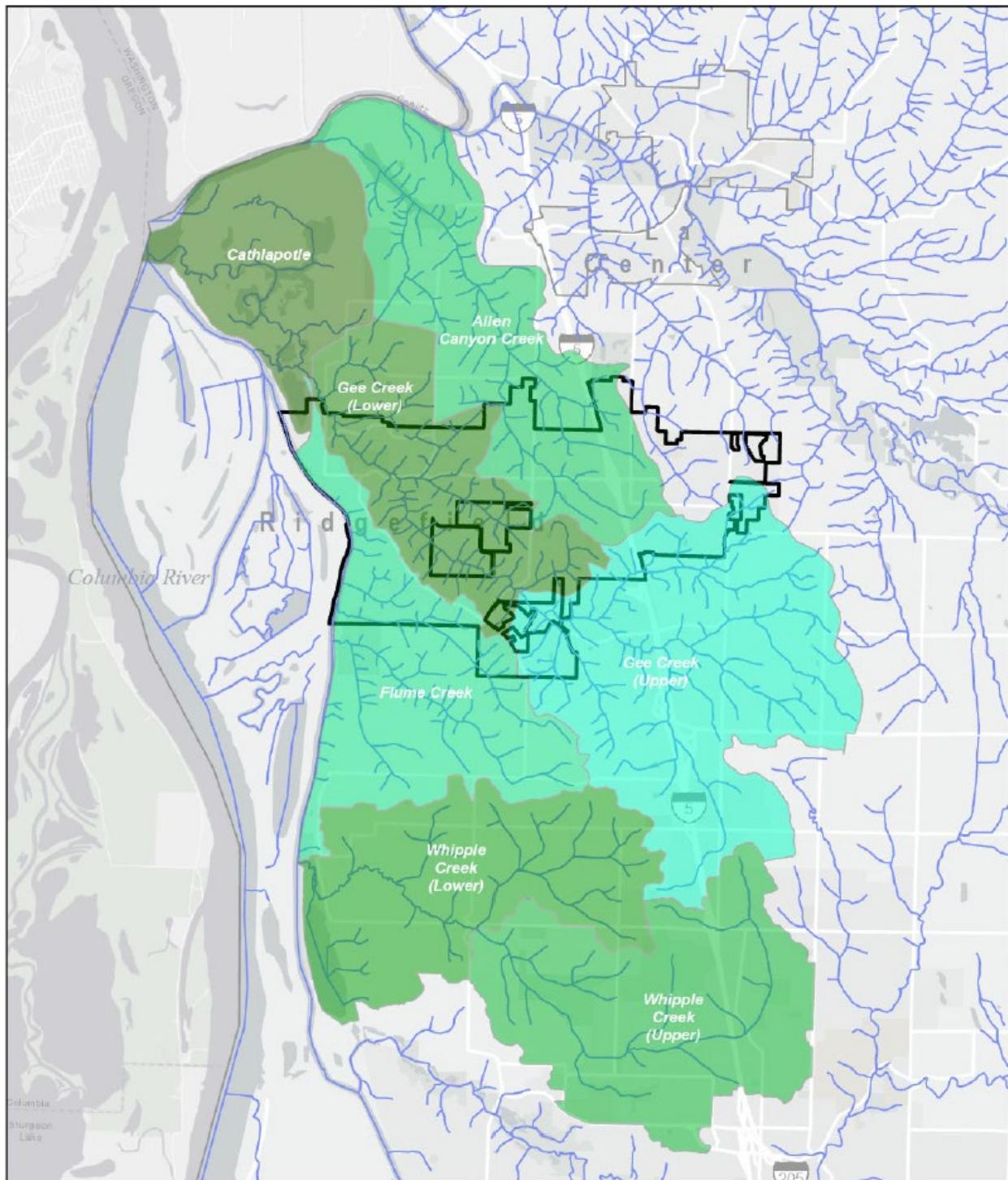


Figure 2: Subwatersheds within the City of Ridgefield Jurisdiction

Departmental Implementation and Responsibilities

The City of Ridgefield operates under a council-manager form of government. The City Council, consisting of seven elected members, holds legislative authority and establishes public policy for the City. Biennially, the Council selects one of its members to serve as mayor. The Council has fiscal responsibility for the City, including authority over the budget, the setting of fees and charges, the

levying of taxes, and the issuance of debt, all in accordance with state law. Additionally, the Council appoints the City Manager, who is responsible for overseeing the day-to-day operations of the City.

The City of Ridgefield provides a range of municipal services, including police, planning, building, streets, parks, and utilities (water and stormwater). The City operates with a budget of approximately \$86.9 million and employs 85 full-time staff members.

To meet the requirements of the Permit, various City departments collaborate and contribute to the implementation of the SWMP. The Public Works Utilities and Operations Department is primarily responsible for the SWMP and plays a central role in ensuring compliance. Its duties include development review, mapping, infrastructure and facility maintenance, spill response, illicit discharge detection and elimination (IDDE), inspection, and managing capital projects related to stormwater management.

The Community Development Department provides essential permitting, planning services, and code enforcement, supporting the City's broader stormwater management efforts. Ongoing support for the SWMP is also provided by the City Manager, Administration Department, and the Finance Department. The Finance Department handles utility billing for the stormwater utility and manages financial records related to stormwater activities, while the Administration Department assists in community events and communication coordination.

This SWMP Plan provides details on the coordination between City departments and their specific roles in meeting the Permit requirements. More detailed information can be found in Section B, Subsection 1, under Coordination, which addresses Permit requirement S5.A.5.

Document Organization

This report, the SWMP Plan, comprises written documentation of Ridgefield's SWMP that is required to be submitted with the Annual Report. In accordance with the Permit terms, the SWMP has been designed to reduce the discharge of pollutants to the maximum extent practicable (MEP); to meet all known, available, and reasonable methods of prevention, control, and treatment (AKART) requirements; and to protect water quality. The SWMP Plan is updated annually for the submittal to Ecology with the City's Annual Report due on March 31st of each year. The SWMP Plan has been written to inform the public of the current and planned activities for the upcoming calendar year.

Section B – SWMP

The SWMP section of this document describes the actions that the City has taken, or will take, to implement the required plan. To aid in tracking requirements, this section has been organized into sub-sections that correspond with the required SWMP components of the Permit and are outlined as follows:

- Sub-section 1 – SWMP General Requirements (S5.A)
- Sub-section 2 – Stormwater Planning (S5.C.1)
- Sub-section 3 – Public Education and Outreach (S5.C.2)
- Sub-section 4 – Public Involvement and Participation (S5.C.3)
- Sub-section 5 – MS4 Mapping and Documentation (S5.C.4)
- Sub-section 6 – Illicit Discharge Detection and Elimination (S5.C.5)
- Sub-section 7 – Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)
- Sub-section 8 – Stormwater Management for Existing Development (S5.C.7)
- Sub-section 9 – Source Control Program for Existing Development (S5.C.8)

- Sub-section 10 – Operations and Maintenance (S5.C.9)

Section C – Other Requirements

Section C of this document describes the actions that Ridgefield has taken, or will take, to comply with other stormwater requirements. These include other Special Conditions of the Permit and the requirements of the Underground Injection Control (UIC) Program rule. This section has been organized into sub-sections that are outlined as follows:

- Sub-section 1 – Total Maximum Daily Load (TMDL) Requirements (S7)
- Sub-section 2 – Monitoring and Assessment (S8)
- Sub-section 3 – Reporting & Recordkeeping Requirements (S9)
- Sub-section 4 – UIC Program Rule (WAC 173-218)

Additional Permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G24, apply to Permit holders. However, they do not result in specific program activities, nor is the SWMP Plan required to document compliance with these activities. These conditions cover topics such as who is covered by the Permit, what discharges are authorized under the Permit, non-compliance, and legal guidelines for transferring, revoking, and appealing the Permit. Penalties for non-compliance are also included in these conditions.

The UIC Program rule is not included as part of the Permit. However, to avoid redundancy, Permittees can fulfill UIC Program rule requirements by implementing a jurisdiction-wide SWMP that aligns with the Permit for areas served by municipal UIC wells. Section C outlines the specific requirements of the UIC Program rule and details the actions the City takes to ensure compliance. Although infiltration is not feasible in most areas of Ridgefield, many of the City's maintenance activities to meet UIC Program rule requirements are the same as those undertaken for Permit compliance. The activities described in Section B apply to both areas that drain to UIC wells used for stormwater management and areas that discharge to surface waters.



Section B—SWMP

1. SWMP General Requirements (S5.A)

This section describes the general SWMP mechanisms the City uses to comply with certain conditions of the Permit as required by S5.A. The Stormwater Program conducts its Permit activities using both internal and external coordination. Groups involved in meeting the specific requirements of the Permit items are listed in section 1.2.

1.1 General Permit Requirements

Section S5.A. of the Permit requires the following:

- New Permittees shall begin stormwater program cost tracking as required in S5.A.3.a, no later than **January 1, 2026**, and information shall be provided with each Annual Report, no later than **March 31, 2027**. (S5.A.3.a)
- The SWMP plan shall include coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the terms of this Permit. Permittees shall include a written description of internal coordination mechanisms in the Annual Report due no later than **March 31, 2026**. (S5.A.5.b)
 - 1) The SWMP shall include, when needed, coordination mechanisms among entities covered under a municipal stormwater NPDES permit to encourage coordinated stormwater -related policies, programs, and projects within adjoining or shared areas. (S5.A.5.a.)
- New Permittees shall fully develop and implement the SWMP in accordance with the schedules contained in this Section no later than **March 31, 2029**. (S5.A.1)

1.2 Coordination Activities

External Coordination

The City of Ridgefield is surrounded by unincorporated Clark County (a Phase I Permittee).

- The City of Ridgefield conducts external Permit coordination within the (Southwest) SW Washington Municipal Permittee meetings. The meetings are held quarterly and help regulators and stormwater managers coordinate activities, plans, and regulations throughout the SW Washington region.
- The City coordinates with the Stormwater Partners of SW Washington (Stormwater Partners) to provide a continual supply of outreach and educational programs and materials. Stormwater Partners is an independent coalition of jurisdictions, agencies, and non-profit organizations working together to protect water quality and watersheds throughout SW Washington.
- The City takes part in quarterly local interagency networking cooperative meetings where agencies throughout SW Washington come together to promote environmental awareness and provide compliance assistance. The Washington Stormwater Center usually coordinates events.
- The City and the Watershed Alliance of SW Washington (Watershed Alliance) has a contract to provide citywide restoration, volunteer coordination, and outreach activities.

Internal Coordination

- The SWMP is primarily the responsibility of the Public Works Utilities and Operations Department.

- The Public Works Utilities and Operations Department is responsible for Permit related submittals, plans, reports, records, and inspections.
- The Public Works Engineering and Capital Projects Department is responsible for engineering plan review and compliance with adopted engineering standards.
- The Administration and Finance Departments provide SWMP support with communications, accounting, utility billing, and grant writing.
- The Community Development Department provides support by conducting development reviews, compliance with Minimum Standard code enforcement, and lot-level erosion control inspections.
- Other departments assist the Public Works Utilities and Operations Department by providing direct support and clarification on regulations and policies to reduce barriers to Permit compliance.
- Coordination between departments takes place through participation in coordination groups, meetings and direct communication regarding SWMP activities.

2. Stormwater Planning (S5.C.1)

This section describes the Permit requirements, current programs, and planned activities related to Stormwater Planning.

2.1 Permit Requirements

Section S5.C.1 of the Permit requires the following:

- New Permittees shall convene an interdisciplinary team to assist in the development, progress, and influence of the Stormwater Planning Program no later than **August 1, 2025**. (S5.C.1.a)
- Permittees shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report, due **March 31, 2027**. The Annual Report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, considering stormwater management needs or limitations. (S5.C.1.b.i)
- Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of Low Impact Development (LID) Principles or LID Best Management Practices (BMPs) and the measures developed to address the barriers. This report should include mechanisms adopted to encourage or require implementation of LID Principles or LID BMPs if applicable. (S5.C.1.c.i)
- By **December 31, 2028**, New Permittees shall review, revise, and make effective their local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs. New Permittees shall conduct a similar review and revision process, and consider the range of issues, outlined in the following document: Integrating LID into Local Codes: A Guidebook for Local Governments (Puget Sound Partnership, 2012). (S5.C.1.c.ii)
- No later than **December 31, 2028**, Permittees shall adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing, or future tree canopy can support stormwater management and water quality improvements in receiving waters. Establish a long-term (e.g., 5, 10 year or longer) goal of canopy, existing or future projection, to be used for stormwater management that is appropriate to the jurisdiction. Document considerations, reasoning, and rationale for goals and policies. (S5.C.1.c.iii) Specific

considerations for canopy for stormwater management on Permittee-owned or operated lands shall include (but are not limited to):

- 1) Maintaining or increasing canopy in overburdened communities.
- 2) Maintaining existing mature canopy.

- New Permittees shall submit a summary of the results of the review and revision process with the annual report due no later than **March 31, 2029**. This summary shall be in the required format described in Appendix 5 of the Permit and include, at a minimum, a list of the participants (job title, brief job description, and department represented), the codes, rules, standards, and other enforceable documents reviewed, and the revisions made to those documents which incorporate and require LID principles and LID BMPs. The summary shall include existing requirements for LID principles and LID BMPs in development-related codes. (S5.C.1.c.ii) The summary shall be organized as follows:
 - 1) Measures to minimize impervious surfaces;
 - 2) Measures to minimize loss of native vegetation; and
 - 3) Other measures to minimize stormwater runoff.
- New Permittees are exempt from Stormwater Management Action Planning (S5.C.1.d) for the 2024-2029 Permit term.

2.2 Current Activities

Current Ridgefield activities in this area include:

- The City is in the process of establishing an interdisciplinary team to assist in the development, progress, and influence of the Stormwater Planning Program.
- As outlined in the City's 2024 Engineering Standards, the City, as a New Permittee, currently encourages the use of "Sustainable Street" concepts and Low Impact Development (LID) concepts and techniques.

2.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the Stormwater Planning Program and meet the compliance deadlines in the Permit.

Table 1—Stormwater Planning

Stormwater Planning
Purpose: Implement a comprehensive planning program to inform and assist in the development of policies and strategies such as water quality management tools to protect aquatic resources.
Applicability: Applies to all long-term plans and strategic policies.

Task Description	Schedule Notes
Annually, as part of the Annual Report, the City shall assess and document any newly identified administrative or regulatory barriers	Ongoing, annual

Task Description	Schedule Notes
to implementation of LID Principles or LID BMPs and the measures developed to address the barriers.	
Convene an interdisciplinary team to assist in the development, progress, and influence of the Stormwater Planning Program, and before March 31, 2027, begin long-range planning.	Planned; complete before August 1, 2025
Begin assessment of adoption and implementation procedures for tree canopy goals and policies to support stormwater management.	Planned; initiate in 2025 or 2026
Begin the review and proposed revision process for updating development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs.	Planned; initiate in 2025 or 2026

2.4 Lead Department and Support

The Public Works Utilities and Operations Department, in coordination with members of the interdisciplinary team, leads this section of the SWMP.

3. Public Education and Outreach (S5.C.2)

This section describes the Permit requirements, current programs, and planned activities related to Public Education and Outreach (E&O).

3.1 Permit Requirements

Section S5.C.2 of the Permit requires the following:

- Implement an E&O program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The program shall be designed to educate target audiences (e.g., the general public, businesses, homeowners, students, developers, engineers, contractors, etc.) about important stormwater topics and provide specific actions they can take to minimize the problem.
- No later than **August 1, 2025**, New Permittees shall follow social marketing practices and methods to develop a behavior change program that is tailored to the community. (S5.C.2.a.ii.b)
- By **October 1, 2025**, New Permittees shall implement a Behavior Change strategy by selecting at a minimum, one priority audience and one BMP. (S5.C.2.a.ii.c)



- By **August 1, 2027**, New Permittees shall implement a General Awareness E&O program by selecting, at a minimum, one priority audience and one subject area. (S5.C.2.a.i)
- No later than **August 1, 2027**, New Permittees shall provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement. Permittees may provide, partner with, or promote stewardship opportunities created or organized by existing organizations (including non-Permittees). (S5.C.2.a.iii)
- No later than **March 31, 2029**, evaluate and submit behavior change campaign evaluation report on (S5.C.2.a.ii.d):
 - 1) The changes in understanding and adoption of behaviors resulting from the implementation of the strategy; and
 - 2) Any planned or recommended changes to the campaign to be more effective; describe the strategies and processes to achieve the results.
- Track and maintain records of Public E&O and stewardship activities.

3.2 Current Activities

Current City of Ridgefield activities in this area include:

General Awareness

- Stormwater Partners established a contract with the Watershed Alliance to identify priority audiences and opportunities to reach them, table at events, coordinate classroom presentations, develop and share outreach resources and report on activities.
- The Stormwater Partners have a website (www.stormwaterpartners.com) that is a primary resource for building general awareness on a variety of stormwater topics county wide. In 2024, the website received 17,988 page views from US users.
- Educational stormwater videos are housed on the [Stormwater Partners YouTube channel](#). In 2024, these videos were viewed more than 58,000 times.
- The City of Ridgefield Stormwater Management website provides a SWMP overview with brief details of common stormwater facility types/function, and stormwater O&M programs such as street sweeping and vacuum truck operations.
- The City provides annual stormwater general awareness tabling at the “State of City” and “City Days” events. These tabling events provide information regarding household waste disposal, stormwater facility maintenance and function, capital projects, street sweeping, O&M, and kids various kid activities.
- Annually, the Stormwater Partners hosts a Stormwater Partners Symposium. In 2024, it was located at Lacamas Lake Lodge on November 20, 2024. Forty-six people attended, representing state and local agencies and nonprofit organizations working to protect water in our region.

Behavior Change

- Stormwater Partners have initiated the Behavior Change Campaign focused on properly closing dumpster lids at commercial properties. Contracting with C+C, a consulting firm, and working with renowned social marketing practitioner Nancy Lee, we have begun to develop the initial components of the social marketing plan.
- As part of the campaign development process, the partners have identified key local collaborators including agency solid waste staff, the Pollution Prevention Assistance program,

regional source control staff and Waste Connections' commercial outreach specialist and invited them to four scheduled social marketing planning sessions.

- The City maintains 14 dog waste bag stations and distributes approximately 72,000 waste bags throughout the year.
- Distributed "Please Scoop" dog waste yard signs/stakes available to public.

Stewardship

- Annually, the Stormwater Partners hosts the Students for Clean Water Video Contest. In 2024, 100 students from 12 schools submitted 65 videos about protecting water, their personal or cultural connection to water, and environmental justice. Five \$500 first place prizes and five \$100 honorable mention cash awards were awarded via outside sponsorship funds.
- In 2024, Stormwater Partners presented the winning videos at a Movies in the Park event attended by more than 300 residents.
- The City has initiated contract talks with the Adopt-a-Drain and have secured operations funds to launch the program in 2025.
- The Stormwater Partners have established funding with the Clark Conservation District's Watershed Stewardship program for 2025. This program includes a six-week course covering local watersheds, surface and groundwater, plants, fish and wildlife, and policies and regulations. Local speakers, including Stormwater Partners will present on various topics and local organizations offering volunteering opportunities to share ways participants can get involved.
- The City contracts with the Watershed Alliance to provide volunteer events to plant native species and pull invasive ivy. In 2024, 244 community members attended events, planted 1,211 plants, and removed and properly disposed of approximately 7 yards of ivy.

The City tracks and maintains records of Public E&O and stewardship activities by a spreadsheet attached in the Annual Report and SWMP. See Appendix A: City of Ridgefield Stormwater Outreach 2024.

3.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the Public E&O program and meet the compliance deadlines in the Permit.

Table 2—Public Education and Outreach

Public Education and Outreach
Purpose: Develop an E&O program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
Applicability: Target audiences as identified. May include general public, businesses, landscapers and property managers, engineers, contractors, developers, review staff, and land use planners.

Task Description	Schedule Notes
<p>Develop a new Behavior Change Campaign tailored to the community, including development of a program evaluation plan. As described in Section 3.2, the City's Behavior Change Campaign will focus on properly closing dumpster lids at commercial properties.</p>	In progress; complete by August 1, 2025
<p>Implement a Behavior Change Campaign tailored to the community, including development of a program evaluation plan.</p>	Planned; implement by October 1, 2025
<p>As a Stormwater Partner, the City chose college/university or trade students as the priority audience for the 2025 General Awareness requirement. The awareness subject area will include general impacts of stormwater on surface waters, including those from impervious surfaces, hazards associated with illicit discharges and improper disposal of waste, LID principles, and LID BMPs.</p>	In progress; implement by August 1, 2027
<p>Implement stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community. The City will continue implementation of the Adopt-A-Drain Program.</p>	Ongoing; implement by August 1, 2027
<p>Continue to implement and report on additional General Awareness and Stewardship E&O opportunities.</p>	Ongoing; annual

3.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the SWMP, with support from the Administration Department.

4. Public Involvement and Participation (S5.C.3)

This section describes the Permit requirements, current programs, and planned activities related to Public Involvement and Participation.

4.1 Permit Requirements

Section S5.C.3 of the Permit requires the following:

- By **August 1, 2025**, New Permittees shall develop and begin to implement the requirement to create opportunities for the public, including overburdened communities, to participate in the decision-making process involving the development, implementation, and update of the Permittee's SWMP. (S5.C.3.a)
- No later than **December 31, 2026**, document methods used to identify overburdened communities. (S5.C.3.a.ii)
- Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)

- Post the SWMP Plan and Annual Report on the City's website no later than May 31 of each year. All other submittals required by Ecology shall be available to the public upon request. (S5.C.3.b)

4.2 Current Activities

Current Ridgefield activities in this area include:

- The City is in the process of determining how to identify, and solicit involvement and participation from overburdened communities.

4.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the Public Involvement Program and meet the compliance deadlines in the Permit.

Table 3–Public Involvement

Public Involvement and Participation
Purpose: Create opportunities for the public to participate in the decision-making processes involved in the development, implementation, and updating of the SWMP.
Applicability: Applies to general public, advisory council, and watershed committees.

Task Description	Schedule Notes
The City will make the SWMP Plan and Annual Report available to the public no later than May 31 of each year. Both documents will be posted on the City website with the ability to provide feedback towards the guidance of the SWMP.	Planned; complete by May 31
The City will begin to develop and implement the requirement to create opportunities for the public, including overburdened communities, to participate in the decision-making process involving the development, implementation, and update of the Permittee's SWMP.	Planned; complete by August 1

4.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the SWMP, with support from the Administration Department.

5. MS4 Mapping and Documentation (S5.C.4)

This section describes the Permit requirements, current programs, and planned activities related to MS4 Mapping and Documentation.

5.1 Permit Requirements

Section S5.C.4 of the Permit requires the following:

- No later than **March 31, 2026**, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known. (S5.C.4.b.i)
- No later than **December 31, 2026**, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed. (S5.C.4.b.ii)
- No later than **March 31, 2028**, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Submit with the March 31, 2028, Annual Report a map and table with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. (S5.C.4.b.iii)
- No later than **December 31, 2028**, using available, existing data, map overburdened communities in relation to the other GIS stormwater management data. (S5.C.4.b.iv)
- No later than **March 31, 2029**, New Permittees shall maintain ongoing GIS mapping (with fully described mapping standards) of known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee, geographic areas served by the MS4 that do not discharge to surface waters, tributary conveyances to outfalls that are 24 inches in diameter or larger, connections between MS4s, and connections to the MS4 authorized or allowed by the Permittee after February 16, 2007. (S5.C.4.a)
- Make maps of required data available to Ecology, federally recognized Indian Tribes, municipalities, and other Permittees upon request. (S5.C.4.e)

5.2 Current Activities

Current Ridgefield activities in this area include:

- The City currently maintains ongoing GIS maps of stormwater infrastructure and updates them as new developments occur and as as-builts plans are received. The City maintains an ESRI account for GIS mapping. For stormwater asset management, the City currently uses Asset Essentials software.

5.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the MS4 Mapping and Documentation and meet the compliance deadlines in the Permit.

Table 4–MS4 Mapping and Documentation

MS4 Mapping and Documentation
Purpose: Continue mapping and inventorying the MS4 in GIS format to support Operations and Maintenance, IDDE, Coordination, and other SWMP activities requiring information about the MS4.
Applicability: Applies to public and private facilities owned or maintained by the City including all known MS4 outfalls, discharge points, receiving water, stormwater treatment facilities, flow control facilities, and connections between the City's MS4 and other public and private stormwater infrastructure.

Task Description	Schedule Notes
Submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.	Planned; complete by March 31, 2026
Revise and maintain ongoing GIS mapping (with fully described mapping standards) of known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMP's/facilities owned or operated by the City, geographic areas served by the MS4 that do not discharge to surface waters, tributary conveyance to outfalls that are 24 inches in diameter or larger, connections between MS4's, and connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.	Ongoing; complete by March 31, 2029

5.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the SWMP.

6. Illicit Discharge Detection and Elimination (S5.C.5)

This section describes the Permit requirements, current programs, and planned activities related to Illicit Discharge Detection and Elimination (IDDE). Illicit discharges include dumping, spills, and illicit connections to the storm sewer system.

6.1 Permit Requirements

Section S5.C.5 of the Permit requires the following:

- No later than **March 31, 2026**, New Permittees shall develop and begin implementing the ongoing training program for all municipal field staff who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided, as needed, to address changes in procedures, techniques,

requirements, or staffing. Permittees shall document and maintain records of training provided and the staff trained. (S5.C.5.d.iii)

- No later than **March 31, 2026**, New Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. The Permittee shall document and maintain records of the training provided and the staff trained. (S5.C.5.f)
- No later than **August 1, 2026**, New Permittees shall implement an ongoing IDDE program designed to prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. (S5.C.5). Program components include:
 - 1) Documented procedures for reporting and correcting or removing identified illicit connections, spills, and other illicit discharges. Include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.
 - 2) Permittees shall inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.
- No later than **July 1, 2027**, each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum extent allowable under state and federal law. The ordinance shall be revised, if necessary, to meet the requirements and conditions of the 2024-2029 Permit. (S5.C.5.c)
- No later than **August 1, 2028**, New Permittees shall fully implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. (S5.C.5.d). Program components include:
 - 1) Documented procedures for conducting investigations of the Permittee's MS4, including field screening methodology for identifying potential sources.
 - 2) A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
- No later than **August 1, 2028**, New Permittees shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4. The following IDDE program components include:
 - 1) Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.
 - 2) Procedures for the post-emergency clean-up of firefighting activities that include:
 - a) Coordination with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.
 - b) That the Permittee shall update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4. Note that the Permittee is not expected to deploy control measures during an emergency.
 - 3) Procedures for tracing the source of an illicit discharge.
 - 4) Procedures for eliminating the discharge including notification of appropriate authorities, notification of the property owner, technical assistance, follow-up

inspections, and use of the prohibited discharge ordinance, including escalating enforcement and legal actions if the discharge is not eliminated.

- 5) Compliance and reporting timelines described in S5.C.5.e.v
- No later than **December 31, 2028**, New Permittees shall complete requirements for field screening covering at least 40% of the MS4. Afterwards, all Permittees shall complete field screening for an average of 12% of the MS4 each year.
- Permittees shall ensure proper record keeping of activities conducted to meet the requirements of this section.
- In the Annual Report, each permittee shall submit data for the illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the City during the previous calendar year.

6.2 Current Activities

Current Ridgefield activities in this area include:

- The City currently has an IDDE program that is designed to prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. Procedures have not been formalized in written documentation.
- Ridgefield Municipal Code (RMC) Chapter 13.80, adopted in September 2020, specifically prohibits illicit discharges and connections into the MS4. RMC 20.100 provides escalating enforcement procedures and actions.
- IDDE and spill response training is currently conducted on an as-need basis for staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections. Procedures have not been formalized in written documentation.
- The City maintains records of illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the City. Enforcement action records are tracked and maintained through the Accela CRM work order system.
- As part of the annual municipally operated stormwater O&M facility inspections, City stormwater staff currently inspects outfalls for damage. If an illicit discharge is detected, upstream investigation and clean up procedures are initiated.

6.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the IDDE Program and meet the compliance deadlines in the Permit.

Table 5—Illicit Discharge Detection and Elimination

Illicit Discharge Detection and Elimination
Purpose: Detect and remove illicit connections, illicit discharges, and improper disposals (including spills) into the MS4.
Applicability: Applies to the City's MS4 and areas that drain to City owned or maintained UIC wells.

Task Description	Schedule Notes
Develop and begin implementing the ongoing training program for all municipal field staff who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4.	Planned; initiate in 2025
Train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections.	Planned; initiate in 2025
Develop and implement written procedures for reporting and correcting or removing identified illicit connections, spills, and other illicit discharges. Include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.	Planned; initiate in 2025
Provide information regarding the hazards associated with illicit discharges and improper disposal of waste on the City website.	Planned; initiate in 2025 or early 2026
Begin development of written procedures for conducting investigations of the City's MS4, including IDDE field screening methodology for identifying potential sources.	Planned; initiate in 2025 or early 2026
Track and maintain records of the illicit discharge and detection elimination program. Shift recording of illicit discharges and spills from Accela CRM to the WQWebIDDE.	Ongoing; annual

6.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the program, with support from the Community Development Department which includes Code Enforcement.

7. Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)

This section describes the Permit requirements, current programs, and planned activities related to Controlling Runoff from New Development, Redevelopment, and Construction Sites.

7.1 Permit Requirements

Section S5.C.6 of the Permit requires the following:

- No later than **August 1, 2024**, Provide a link to the electronic “Notice of Intent (NOI) for Construction Activity”, “NOI for Industrial Activity”, and a link to the online registration requirements for UICs, to representatives of proposed new development and redevelopment. (S5.C.6.d)
- No later than **June 30, 2027**, New Permittees shall develop, implement, and enforce a program to reduce pollutants in stormwater runoff that enter the MS4 from new development, redevelopment, and construction site activities. The program shall apply to both private and

public projects including transportation projects. (S5.C.6) The program shall implement an ordinance and apply to all applications submitted (S5.C.6.a):

- 1) On or after July 1, 2027.
- 2) Prior to January 1, 2017, that have not started construction by January 1, 2022
- 3) Prior to July 1, 2022, that have not started construction by July 1, 2027
- 4) Prior to July 1, 2027, that have not started construction by July 1, 2032.

- As part of the program, the Permittee shall adopt an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site activities and includes, at a minimum, the Minimum Requirements, thresholds, and definitions in Appendix 1 of the 2024 Permit, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10 of the 2024 Permit, or an equivalent approved by Ecology. (S5.C.6.b.i)
- The program shall include the following requirements, limitations, and criteria: Site planning requirements, BMP selection criteria, BMP design criteria, BMP infeasibility criteria, LID competing needs criteria, and BMP limitations. Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements. Permittees who choose to adopt the 2024 Stormwater Management Manual for Western Washington (SWMMWW) may cite this choice as their sole documentation to meet this requirement. (S5.C.6.b.ii)
- The program shall include the legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the program that discharge to the Permittee's MS4. (S5.C.6.b.iii)
- The program shall include a permitting process applied to all sites that meet the minimum thresholds with site plan review, inspection and enforcement capability using qualified personnel, and the program shall (S5.C.6.c):
 - 1) Review all stormwater site plans for proposed development activities.
 - 2) Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review, or Permittees may choose to inspect all construction sites that meet the minimum thresholds.
 - 3) Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls.
 - 4) Manage maintenance activities to inspect all stormwater treatment and flow control facilities and catch basins, in new residential developments at least twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.
 - 5) Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities.
 - 6) Compliance shall be determined by achieving at least 80% of the required inspections annually. The inspections may be combined with other inspections provided they are performed using qualified personnel.
 - 7) Keep records of inspections and enforcement actions by staff including inspection reports, warning letters, notices of violations, and other enforcement types.
 - 8) Implement an enforcement strategy to respond to issues of non-compliance.

- No later than **December 31, 2027**, ensure that staff that are responsible for controlling stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction sites inspections, and enforcement, are trained to conduct these activities. (S5.C.6.e)
- Track and maintain records and activities associated with the regulation of new development, redevelopment, and construction sites. Summarize these activities in the Annual Report.

7.2 Current Activities

Current Ridgefield activities in this area include:

- The City of Ridgefield Engineering Standards for Public Works Construction (Engineering Standards) were updated in October 2024 to adopt the 2019 SWMMWW with amendments, in order to guide stormwater management for new development and redevelopment projects and
- make LID the encouraged approach for site development.
- Completed before August 1, 2024, and available on the City of Ridgefield Stormwater webpage, links were provided to applicants of proposed new developments and redevelopments for the 'Notice of Intent (NOI) for Construction Activity,' 'NOI for Industrial Activity,' and the registration requirements for UIC systems.
- Per the 2019 SWMMWW, the City applies a permitting process to all new development, redevelopment, and construction sites that meet the minimum thresholds in the adopted standards. The permitting process includes the following required elements:
 - 1) Review of all stormwater site plans for proposed development activities.
 - 2) Inspection, prior to clearing and construction, of all permitted development sites that meet the minimum thresholds.
 - 3) Inspection of all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls.
 - 4) Inspection of all stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every six months until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.
 - 5) Inspection of all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.
 - 6) Verification that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities.
 - 7) Implementation of an enforcement strategy to respond to issues of non-compliance.



- Implementation of a voluntary program to inspect and provide technical assistance to private stormwater facilities owners/operators that were permitted and constructed prior to the City adopting provisions equal to S5.C.6.a and b.
- The City ensures that all stormwater staff receive Certified Erosion and Sediment Control Lead (CESCL) training. New staff receive CESCL certification during initial training, and current staff recertify every three years.

7.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the program to control runoff from New Development, Redevelopment, and Construction Sites and meet the compliance deadlines in the Permit.

Table 6—Controlling Runoff from New Development, Redevelopment, and Construction Sites

Controlling Runoff from New Development, Redevelopment, and Construction Sites
Purpose: Establish a program to reduce pollutants in stormwater runoff from new development projects, redevelopment projects, and construction sites. Apply the minimum technical requirements of Appendix 1 of the Permit (or equivalent).
Applicability: Applies to all new development, redevelopment, and construction sites that disturb one acre or greater and smaller projects that are part of a larger development plan.

Task Description	Schedule Notes
Continue to implement the permitting process defined in the 2019 SWMMWW and Engineering Standards to all new development, redevelopment, and construction sites that meet the minimum thresholds in the adopted standards.	Ongoing
As part of the interdisciplinary team (section 2.1), develop a plan to ensure that staff that are responsible for controlling stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction sites inspections, and enforcement strategies and mechanisms, are trained to conduct these activities	Planned; initiate in 2025
Initiate the development of inspection forms in CloudCompli to verify the proper installation and maintenance through construction of stormwater facility infrastructure, ESC BMPs, and the condition of facilities upon final approval.	Planned; initiate in 2025
Tracking and maintenance of records and activities associated with the regulation of new development, redevelopment, and construction sites. Summarize these activities in the Annual Report.	Ongoing; annual

7.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the program, with support from the Community Development Department which includes Code Enforcement.

8. Stormwater Management for Existing Development (S5.C.7)

This section describes the Permit requirements, current programs, and planned activities related to the control or reduction of stormwater discharges to waters of the State from areas of existing development.

8.1 Permit Requirements

New Permittees are exempt from S5.C.7 for the 2024-2029 Permit term.

9. Source Control Program for Existing Development (S5.C.8)

This section describes the Permit requirements, current programs, and planned activities related to the prevention and reduction of pollutants in stormwater runoff that discharge to the MS4 for existing land uses and activities by requiring operational and/or structural BMPs to protect stormwater from contamination.

9.1 Permit Requirements

Section S5.C.8 of the Permit requires the following:

- No later than **August 1, 2026**, New Permittees shall adopt and make effective ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. (S5.C.8.a)
- No later than **August 1, 2027**, New Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. (S5.C.8.b).
- No later than **December 31, 2027**, New Permittees shall develop and implement a training program for staff who are responsible for implementing the source control program. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed. (S5.C.8.e).
- No later than **January 1, 2028**, New Permittees shall implement an inspection program, performed by qualified personnel, for sites identified in the established source control inventory. (S5.C.8.c). Program components shall include:
 - 1) All identified sites with a business address shall be provided, at least once in the Permit term, information about activities that may generate pollutants and the source control requirements applicable to those activities.
 - 2) The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements.
 - 3) Each Permittee shall inspect 100% of sites identified through credible complaints.

- 4) Annual Reporting of inspections shall be organized by business type or activities with potential to generate pollutants to the MS4.
- No later than **January 1, 2028**, New Permittees shall implement a progressive enforcement policy, as defined in S5.C.8.d, that requires sites to comply with stormwater requirements within a reasonable time period.
- Permittees shall document and maintain records of training provided, the staff trained, inspections conducted, and enforcement actions taken.

9.2 Current Activities

No activities have been completed for this section.

9.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the Source Control Program for Existing Development and meet the compliance deadlines in the Permit.

Table 7—Source Control Program for Existing Development

Source Control Program for Existing Development
Purpose: Develop, implement, and enforce a source control program to prevent and reduce pollutants in runoff from existing development.
Applicability: Applies to existing land uses and activities including publicly and privately owned institutional, commercial, and industrial properties in the Permit area with a potential to generate pollutants to the MS4.

Task Description	Schedule Notes
Initiate development of an effective ordinance that requires the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.	Planned; initiate in 2025

9.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the program, with support from the Community Development Department which includes Code Enforcement.

10. Operations and Maintenance (S5.C.9)

This section describes the Permit requirements, current programs, and planned activities related to Operations and Maintenance (O&M).

10.1 Permit Requirements

Section S5.C.9 of the Permit requires the following:

- No later than **June 30, 2027**, New Permittees shall implement maintenance standards that are as protective, or more protective, of publicly and privately owned/operated stormwater facility function than those specified in the 2024 SWMMWW (S5.C.9.a). Include the following elements in the program:
 - 1) Unless there are circumstances beyond the Permittee's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed:
 - a) Within 1 year for typical maintenance of facilities, except catch basins.
 - b) Within 6 months for catch basins.
 - c) Within 2 years for maintenance that requires capital construction of less than \$25,000.
 - 2) For stormwater treatment and flow control facilities regulated by the Permittee, the program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control facilities that are permitted and constructed pursuant to S5.C.6.c, that include (S5.C.9.b):
 - a) An ordinance that clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.9.a, and that requires inspection of facilities in accordance with the applicability requirements stated in this section.
 - b) Establishment of enforcement procedures.
 - c) Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6.c.
 - d) Achieving at least 80% of required inspections annually
 - e) A procedure for keeping records of inspections and enforcement actions by staff, qualified personnel, and qualified third parties, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
 - 3) For stormwater treatment and flow control facilities owned or operated by the Permittee, the Permittee shall (S5.C.9.c):
 - a) Annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities and implement appropriate maintenance action(s) in accordance with the adopted maintenance standards.
 - b) Spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24-hour storm event with a 10 year or greater recurrence interval - S5C.9.c.ii) and conduct repairs or take appropriate maintenance action in accordance with the maintenance standards established, based on the results of the inspections.
 - c) Permittees shall achieve at least 95% of the required inspections of this section.
- No later than **June 30, 2027**, implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City. No later than **December 31, 2027**, document these practices, policies, and procedures. (S5.C.9.d) The following activities shall be addressed:
 - 1) Pipe cleaning.
 - 2) Cleaning of culverts that convey stormwater in ditch systems.
 - 3) Ditch maintenance.
 - 4) Street cleaning.

- 5) Road repair and resurfacing, including pavement grinding.
- 6) Snow and ice control.
- 7) Utility installation.
- 8) Pavement striping maintenance.
- 9) Maintaining roadside areas, including vegetation management.
- 10) Dust control.
- 11) Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides and using alternatives that minimize environmental impacts.
- 12) Sediment and erosion control.
- 13) Landscape maintenance and vegetation disposal.
- 14) Trash and pet waste management.
- 15) Building exterior cleaning and maintenance.
 - a) For Permittee-owned buildings built or renovated between 1950- 1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB-containing materials.
- 16) Preparing Permittee-owned buildings for renovation or demolition.
 - a) Update policies, practices, or procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

- No later than **June 30, 2027**, implement a Stormwater Pollution Prevention Plan (SWPPP) per the guidelines stated in S5.C.9.f for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity. (S5.C.9.f)
- No later than **June 30, 2027**, develop and implement an ongoing training program for employees of the City whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, street sweeper operations, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. The City shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course description, and names and position of staff in attendance. (S5.C.9.g)
- No later than **July 1, 2027**, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to the receiving waters (S5.C.9.d). Program elements shall include:
 - 1) Priority areas shall include curbed municipal streets that discharge to outfalls and meet any of the following criteria:
 - a) High traffic streets, such as arterials or collectors.
 - b) Streets that serve commercial or industrial land use areas.

- 2) Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the Permittee to provide additional water quality benefits. For the calendar year 2027, only one sweeping event is required between July and December.
 - a) Compliance during this Permit term shall be determined by records of a sweeping program designed to sweep all priority areas identified and sweeping at least 90% of priority areas each sweeping event.
- 3) Follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.
- 4) Dispose of sweeper waste material in accordance with Appendix 6 – Street Waste Disposal.
- 5) No later than **March 31, 2028**, submit with the Annual Report the following information about the priority areas:
 - a) Priority areas swept identified on a map (i.e., streets that are considered high traffic (estimated number of vehicles served/or arterials or collectors, and streets serving commercial or industrial land use).
 - b) Sweeping date(s).
 - c) Sweeping frequency.
 - d) Type of sweeper.
 - e) Total curb miles of priority areas and curb miles swept.
 - f) Approximation of street waste solids removed for each sweeping event (indicate unit of measurement and wet or dry weight, where available).

- No later than **December 31, 2028**, New Permittees shall inspect and, if needed, clean all catch basins and inlets owned or operated by the Permittee, and repeat every two years after. Permittees shall achieve at least 95% of the required inspections. (S5.C.9.c.iii)
- Maintain records of the activities conducted to meet the requirements of this section.

10.2 Current Activities

Current Ridgefield activities in this area include:

- As of October 2024, the City has voluntarily adopted the 2019 SWMMWW maintenance standards.
- The City conducts annual inspections and maintenance activities of publicly owned and operated water quality and flow control facilities. Inspections and maintenance tasks are currently recorded via Accela CRM for work orders and Asset Essentials for asset management.

- After major storm events (currently defined as 1-inch of rain in 24 hours), City stormwater staff perform spot checks of stormwater treatment and flow control facilities for potential damage. Necessary repairs or maintenance actions are taken based on the findings.
- Annually, the City inspects all municipally operated catch basins and inlets to the MEP. Maintenance deficiencies are identified and performed for catch basins and inlets that have exceeded the adopted maintenance standard.
- For municipally owned stormwater treatment and flow control facilities, inspection and maintenance records are maintained digitally. The City is currently under contract with CloudCompli, a comprehensive GIS-integrated inspection software, to ensure that maintenance deficiencies identified during inspections are accurately recorded and resolved per the required standards and timeframes of the SWMMWW.
- Upon request, the City will inspect private stormwater facilities and provide the results to the HOA or property owner to address the identified maintenance deficiencies.
- Annually, the City conducts inspections and performs maintenance on all municipally owned and operated catch basins, in accordance with the SWMMWW maintenance guidelines. These records are recorded in Asset Essentials.
- The City implements practices, policies, and procedures to reduce stormwater impacts associated with runoff from lands owned or maintained by the City, and road maintenance activities under the functional control of the City. These operational BMPs are available in the latest version of the Comprehensive Stormwater Management Plan.
- The City implements a municipal street sweeping program that accounts for seasonal variations, prioritizes high-traffic areas, and divides the City into quadrants for efficient scheduling. Records are maintained annually.



10.3 Planned Activities for 2025

The following table outlines the implementation plan to achieve the goals and objectives of the Operations and Maintenance Program and meet the compliance deadlines in the Permit.

Table 8—Operation and Maintenance

Operation and Maintenance
Purpose: Develop, implement, and document a program to regulate maintenance activities and to conduct maintenance activities to prevent or reduce stormwater impacts.

Operation and Maintenance

Applicability: Applies to all stormwater treatment and flow control facilities, catch basins, streets and roadways, and non-roadway public properties owned, operated, or regulated by the City.

Task Description	Schedule Notes
Initiate the development of inspection forms in CloudCompli to verify proper O&M of existing stormwater treatment and flow control facilities and catch basins to ensure alignment with the 2024 SWMMWW maintenance standards.	Planned; Initiate in 2025
Review, revise (if needed), and continue to implement a municipal street sweeping program in preparation for S5.C.9.d deadline.	Ongoing
Continue to conduct annual inspections and maintenance activities of publicly owned and operated water quality and flow control facilities.	Ongoing
Continue to perform spot checks of stormwater treatment and flow control facilities for potential damage after major storm events, and conduct repairs or maintenance as needed.	Ongoing
Continue to inspect all municipally owned and operated catch basins and inlets to the MEP. Maintenance deficiencies are identified and addressed for catch basins and inlets that exceed the adopted maintenance standards.	Ongoing
Upon request, continue to provide inspections for privately owned and operated stormwater facilities and offer guidance and inspection results to the HOA or property owner to address the identified O&M deficiencies.	Ongoing
Review and revise the practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City and road maintenance activities under the control of the City.	Planned; Initiate in 2025 or 2026

10.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the program.

Section C—Other Requirements

1. Total Maximum Daily Load Requirements (S7)

This section describes the Permit requirements related to Total Maximum Daily Load (TMDL) Requirements as outline in Special Condition S7 and Appendix 2 of the Permit. Applicable TMDLs have been approved by EPA on or before the issuance of the Permit or prior to the date that Ecology issues coverage under this permit, whichever is later. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still safely meet water quality standards. Ecology determines the reduction of pollutant discharge needed to be compliant with water quality standards.

The City of Ridgefield is not affected by any TMDLs currently. For all other applicable TMDLs, compliance with the Permit is considered compliance with the TMDL, and no additional SWMP documentation or action is required currently.

2. Monitoring and Assessment (S8)

This section describes the Permit requirements and planned activities related to water quality monitoring and assessment. As a New Permittee, Ridgefield is not listed in Appendix 11 of the Permit; the City is exempt from S8 for the 2024–2029 Permit term.

3. Reporting Requirements (S9)

The Permit (Special Condition S9) requires the City to fulfill the following reporting requirements:

- Submit an Annual Report electronically no later than March 31 of each year using Ecology's Water Quality Permitting Portal (WQWebPortal).
- Keep all records related to the Permit and the SWMP for at least five years.
- Make all records related to the Permit including the SWMP and the most recent Annual Report available to the public at reasonable times during business hours.
- Each Annual Report shall include the following:
 - 1) A copy of the current SWMP Plan, as required by S5.A.2.
 - 2) Submittal of the Annual Report form as provided by Ecology, describing the status of implementation of the requirements of the Permit during the reporting period.
 - 3) Attachments to the Annual Report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of the Permit during the reporting period, or as a required submittal.
 - 4) If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under the Permit.
 - 5) Certification and signature, and notification of any changes to authorization.
 - 6) A notification of any annexations, incorporations, or jurisdictional boundary changes resulting in an increase or decrease in the geographic area of Permit coverage during the reporting period.

4. Underground Injection Control Program Rule

This section describes the requirements, programs, and planned activities related to the Underground Injection Control (UIC) Program rule, Chapter 173-218 of the Washington Administrative Code. The UIC Program rule applies to Class V wells that receive stormwater regardless of whether a UIC well is located in a jurisdiction covered under the Permit or not. The rule is intended to protect groundwater by regulating the discharge of stormwater into UIC wells to satisfy the requirements of the Federal Safe Drinking Water Act (SDWA) and the Washington state Water Pollution Control Act.

Ecology incorporated the UIC Program guidance into the 2019 SWMMWW to help define site suitability, treatment requirements, and design criteria for discharges to UIC wells. The guidance was intended to prevent redundancy between the MS4 Permits and the UIC Program rule. The UIC Program rule allows jurisdictions that own or operate Class V UIC wells and are also covered under an MS4 Permit to satisfy the UIC requirements by the presumptive approach. To use the presumptive approach, jurisdictions have the option of applying a SWMP that complies with their MS4 Permit to the areas served by their municipal UIC wells in the jurisdiction; or use the other approaches or combination of approaches as listed below:

- 1) Have a single jurisdiction-wide Stormwater Management Program (SWMP) that combines requirements for both the municipal UIC wells and the municipal separate storm sewer system (MS4); and/or
- 2) Have a separate and distinct SWMP developed specifically for the municipal UIC wells in the jurisdiction; and/or
- 3) Create a Stormwater Site Plan (SSP) for the area served by each municipal UIC well and complete a well assessment for each municipally owned existing (in use before 2/3/2006) UIC well.

The City of Ridgefield has opted to implement a combined SWMP that addresses the requirements of both the MS4 Permit and the UIC Program rule. This section describes the requirements of the UIC Program rule and specific activities the City takes to comply with those requirements. Where appropriate, the City's activities described in Section B of the SWMP Plan apply to areas of the City that drain to UIC wells and areas that discharge to surface waters.

4.1 Rule Requirements

All areas served by municipally owned and operated UIC wells must be included in a SWMP that ensures appropriate siting, treatment, design, operation, and maintenance of new municipal UIC wells as well as source control activities (including targeted education and outreach) that are well-suited for the land uses in these areas. To comply with the UIC Program rule, jurisdictions must implement all of the following activities and include them in their SWMP:

- Complete the well assessment for existing UIC wells. If a UIC well is considered a high threat to groundwater, and the assessment determines that sufficient best management practices are not provided under current conditions, retrofitting is required to protect groundwater quality. Any assessment that identifies a high threat to groundwater must include a retrofit schedule.
- Register all UIC wells, including existing wells that meet the non-endangerment standard and new wells with Ecology, unless they are already registered. Registration is only required once for each UIC well. For new wells, applicants must submit the registration form 60 days prior to construction.
- Site, design, construct, operate, and maintain new UIC wells according to the specifications throughout Volume I, Chapter 4, UIC Program, of the 2019 SWMMWW. Fulfill the source control and operation and maintenance requirements for new and existing municipal UIC wells by:

- 1) Operation and maintenance of existing wells according to the specifications throughout Volume I, Chapter 4, UIC Program, of the 2019 SWMMWW.
- 2) Provide source control activities (including targeted education and outreach) that are well-suited for the land uses associated with the UIC wells and to the specifications in the 2019 SWMMWW.
- 3) Provide illicit discharge detection and elimination programs in areas served by the UIC wells to prevent pet wastes from contaminating stormwater and to control other sources of pathogens.

- Adopt the 2024 SWMMWW maintenance standards for the MS4 by **June 30, 2027**, which include updated maintenance standards for UIC wells.

Compliance with these requirements differs slightly for new and existing wells. The UIC Program rule considers UIC wells constructed on or after February 3, 2006, to be “new” wells. Wells constructed prior to February 3, 2006, are considered “existing.”

4.2 Current Activities

Current Ridgefield activities to meet the UIC Program rule requirements include:

- Stormwater Staff are currently in the process of determining the number of known existing UICs located in the City’s jurisdiction.
- The City currently applies the same IDDE protocols and maintenance standards to areas discharging to UICs as it does to areas discharging into the MS4.
- On the City website, a link has been posted for online registration requirements for UICs, to representatives of proposed new development and redevelopment.

4.3 Planned Activities

The following table outlines the implementation plan to achieve the goals and objectives of the UIC Program.

Table 9—UIC Program

UIC Program
Purpose: Implement a program to construct, operate, and maintain municipal UIC wells in a manner that protects ground water quality.
Applicability: Applies to municipal UIC wells used to manage stormwater runoff.

Task Description	Schedule Notes
Shall manage the UIC Program as part of the MS4 SWMP and integrate all known existing municipal UICs into the City’s routine stormwater O&M schedule.	Planned; initiate in 2025

Task Description	Schedule Notes
E&O campaigns shall cover the impact of stormwater pollution on groundwater via UIC wells.	Planned; initiate in 2025
Conduct a comprehensive UIC well assessment once existing municipal UICs have been identified.	Planned; initiate in 2025 or 2026
Include UICs in the development of the SWMP and related code for the IDDE and Source Control Programs. Adopt the 2024 SWMMWW which will include standards to site, design, construct, operate, and maintain new UIC wells.	Planned; due June 30, 2027

4.4 Lead Department and Support

The Public Works Utilities and Operations Department leads this section of the program, with support from the Community Development Departments which includes Code Enforcement.

Section D—Conclusion

This SWMP Plan has been prepared to demonstrate efforts and compliance with the requirements of the current NPDES Permit. The current Western Washington Permit expires on July 31, 2029. The SWMP Plan is a living document that will be updated annually to reflect progress in implementing the stormwater management program components required for compliance with the Permit.

Appendix A: City of Ridgefield Stormwater Outreach 2024

General Awareness

SUB-CATEGORY	DATE	PROGRAM NAME	DESCRIPTION	TOPIC / MESSAGE	TARGET GROUP	PARTICIPANTS
Priority Audience for General Awareness	Ongoing	Stormwater Partners Coordinated Regional General Awareness	As a Stormwater Partner, the City chose college/university or trade students as the priority audience for the 2025 General Awareness requirement. The awareness subject area will include general impacts of stormwater on surface waters, including those from impervious surfaces, hazards associated with illicit discharges and improper disposal of waste, LID principles, and LID BMPs. A contract with the Watershed Alliance has been established to identify opportunities to reach the priority audience.	General Impacts of Stormwater on Surface Waters	College/ University or Trade Students	Unknown
Media & General Outreach	Ongoing	Stormwater Partners of SW Washington Website	SW Washington Stormwater Partners website includes an interactive watershed map, interactive stormwater facility map (with links to stormwater maintenance videos and guides), environmental services providers list, glossary, and links to environmental projects, environmental organizations, partner agencies and environmental programs.	Stormwater Facility Maintenance, Stormwater Management, Pollution Prevention, and Water Quality Outreach	General Public	17,988 page views
Media & General Outreach	Ongoing	City of Ridgefield Stormwater Website	City of Ridgefield's stormwater website hosts information on the stormwater program, City contacts, links to pertinent guidance documents, the annual SWMP, the annual report, and maintenance guides.	Stormwater Facility Maintenance, Stormwater Management, Pollution Prevention, and Water Quality Outreach	General Public	N/A

General Outreach	7/19/2024	Stormwater Education Tabling	The Stormwater Partners of Southwest Washington used a City of Vancouver Movies in the Park event to present the winners of the Students for Clean Water Video Contest while also distributing information regarding stormwater partners and stormwater education.	Stormwater Outreach and Education	Students (grades 6-12)/Families; General Public	1,000+ individuals
General Outreach	3/19/2024	State of the City	The City hosted the State of the City event, showcasing information and maps of both current and upcoming Stormwater Capital Projects. Attendees received stormwater facility maintenance fact sheets, and the City presented updates on the revised street sweeping schedule. City personnel were available to answer questions about stormwater pollution concerns, while also educating the public on the importance of stormwater health and offering practical tips on preventing pollution from entering local waterways.	Pollution Prevention/General Stormwater Outreach	General Public	150 individuals
Media & General Outreach	Ongoing	Stormwater Facility Maintenance Outreach Materials	The Stormwater Partners of SW Washington have created 13 facility maintenance handouts with a folder handout; these are used for HOA and facility maintenance contractor consultations; digital forms have been added to the Stormwater Partners of SW Washington's website.	Stormwater Facility Maintenance	General Public/HOA Representative	N/A

General Outreach	11/20/2024	Stormwater Partners Symposium	Annual Stormwater Partners Symposium with representation from state and local agencies and nonprofit organizations working to protect water in our region. Presentation topics included: MS4 Permit Overview, Adopt-Drain Program, Legacy Lands Program, updates to the Water Resources Education Center, and Level Up Your Lawn.	Stormwater Outreach and Education	State and local agencies and nonprofit organizations	46 individuals
General Outreach	8/3/2024	City Days	The City hosted a stormwater education table at the City Days event with giveaways and pollution prevention outreach flyers. City personnel answered questions regarding stormwater pollution concerns while educating the youth on how stormwater health affects us all and ways that pollution can be prevented from entering waterways. A kid activity was provided to identify stormwater infrastructure in downtown Ridgefield. Various stormwater facility functions were discussed with the public.	Pollution prevention/general stormwater outreach	General Public	500 individuals

Behavior Change

DATE	PROGRAM NAME	DESCRIPTION	TOPIC / MESSAGE	TARGET GROUP	PARTICIPANTS
Ongoing	Pet Waste Bag Stations	Maintained 14 dog waste bag stations and distributed approximately 72,000 waste bags throughout the year.	Pollution Prevention - Pet Waste Management and Disposal	Resident & Pet Owners	Unknown
Ongoing	Please Scoop Yard Signs	Distributed "Please Scoop" dog waste yard signs/stakes available to public.	Pollution Prevention - Pet Waste Management and Disposal	Resident & Pet Owners	Unknown
Ongoing	Close the Dumpster Lid Campaign	The Stormwater Partners have initiated the Behavior Change Campaign focused on closing dumpster lids at commercial properties. Contracting with C+C, a consulting firm, and working with renowned social marketing practitioner Nancy Lee, we have begun to develop the initial components of the social marketing plan.	Pollution Prevention - Closing the Dumpster Lid Campaign	Commercial Property Owners	Unknown

Stewardship Opportunities

DATE	PROGRAM NAME	DESCRIPTION	TOPIC / MESSAGE	TARGET GROUP	PARTICIPANTS
Ongoing	Adopt-a-Drain	The City has initiated contract talks with the Adopt-a-Drain Program and have secured budget to launch the program in 2025.	Pollution Prevention and Proper O&M	General Public	N/A
Ongoing	City of Ridgefield and Watershed Alliance Volunteer Planting Events	Planting event jointly coordinated with Watershed Alliance to restore Horn's Corner and engage community members in stewardship activities. We also received additional private funding to hold ivy removal events in Abrams Park. 1,211 trees were planted and 244 community members engaged. Provided links to Watershed Alliance of SW Washington's volunteer events on City's stormwater webpage.	Stormwater Facility Replanting, Community Education/Involvement	General Public and High School Students	244 individuals
April – June 2024	Students For Clean Water Video Contest	The Stormwater Partners of Southwest Washington hosted a student video contest that encouraged students (grades 6-12) to create videos that fall under one of the following themes: Protecting Water in our Community, Community Storytelling, and Clean Water for All. Sponsors and stakeholders were involved in advertising, fact checking, judging, and award presentation.	General Stormwater Education/Pollution Prevention	Students (grades 6-12)	100 Student participants