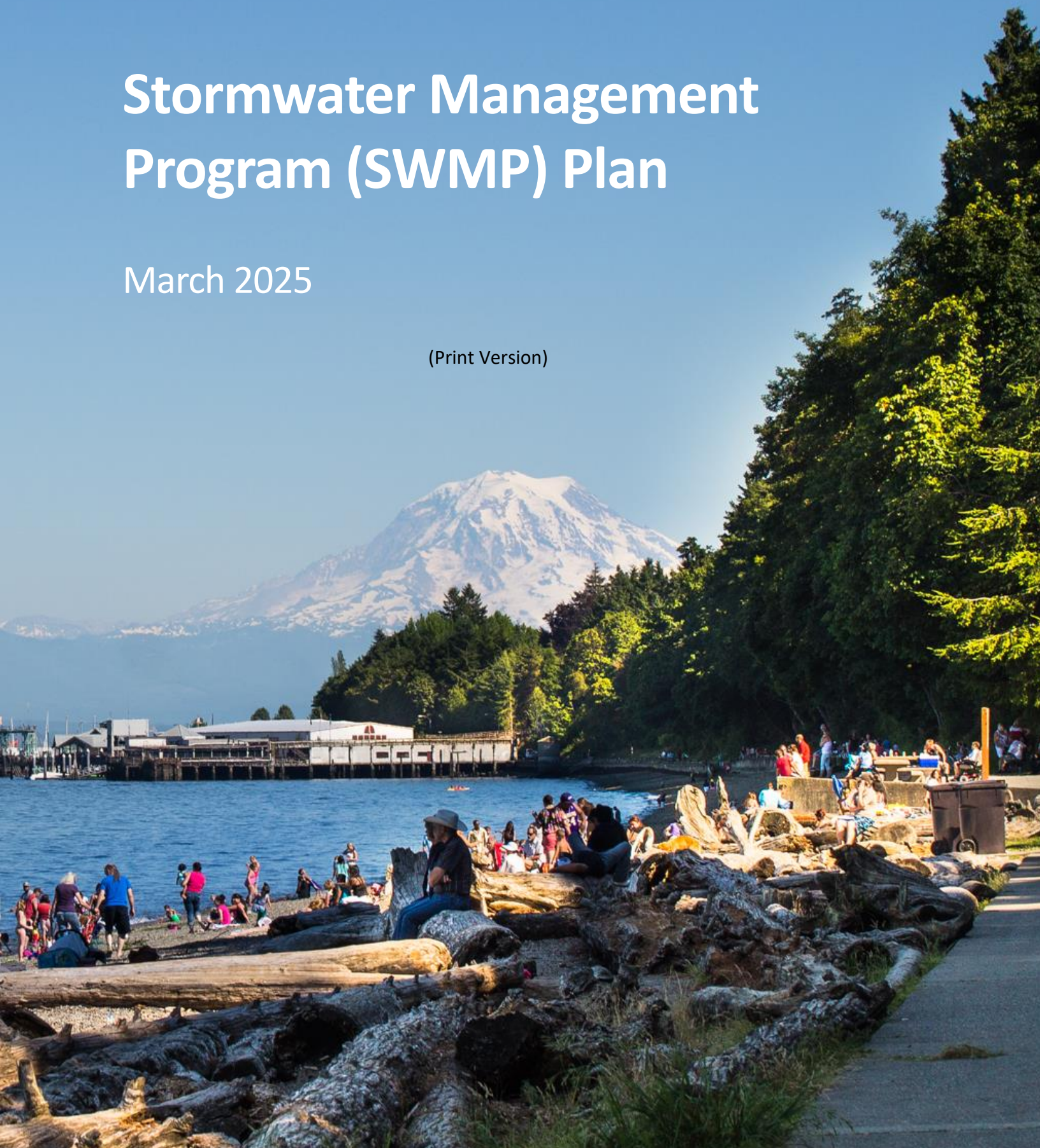
Stormwater Management Program (SWMP) Plan

March 2025

(Print Version)



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NPDES Municipal Stormwater Permit Overview

On August 1, 2024, the Washington State Department of Ecology (Ecology) issued the 2024 - 2029 Phase I Municipal Stormwater Permit (permit). This permit is issued under the authority of the National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for discharges from large and medium Municipal Separate Storm Sewer Systems (MS4s) to the City of Tacoma, City of Seattle, Pierce County, King County, Snohomish County and Clark County. The permit is available to view online at www.ecology.wa.gov/MS4.

Introduction

The City of Tacoma's (City) stormwater management priorities were established in 1995 under the first NPDES Phase I Municipal Stormwater Permit and remain essential elements of the SWMP today. The City's priorities include the following:

- Protect the health, safety, and welfare of the public;
- Manage stormwater to minimize flooding and erosion;
- Manage stormwater to minimize contact with contaminants;
- Mitigate the impacts of increased runoff due to urbanization;
- Manage runoff from developed properties and those being developed;
- Correct or mitigate existing water quality problems; and
- Restore and maintain the chemical, physical and biological integrity of the receiving waters in the City to protect beneficial uses.

The Permit regulates the discharge of stormwater from Tacoma's MS4 to surface waters and groundwaters of the State. The Permit is designed to protect and improve the water quality of receiving waters by requiring the City to implement a variety of stormwater management activities. Permits are required by federal and state laws and regulations.

Federal Laws and Regulations

The Clean Water Act is a United Stated federal law that regulates the discharges of pollutants into waterbodies. The objective of the Clean Water Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters.

The Code of Federal Regulations (CFR) is the codification of general and permanent rules and regulations developed by federal government of the United States. **Title 40** contains environmental regulations promulgated by the US Environmental Protection Agency (EPA). Subchapter D is dedicated to Water Programs and includes Part 122 – EPA Administered Permit Programs: The National Pollutant Discharge Elimination System. 40 CFR 122.26 applies to stormwater discharges. Ecology is delegated by EPA to implement the Clean Water Act in Washington State including development and enforcement of the NPDES Permits to dischargers in the state, with a few exceptions for federal properties and other recognized nations such as Tribes.

State Laws and Regulations

The Revised Code of Washington (RCW) 90.48 – Water Pollution Control Act is the state law similar to the federal Clean Water Act. Similar to the CFR, Washington State maintains the Washington Administrative Code. The NPDES Permits are codified under WAC 173-226. Discharges to groundwaters not subject to regulation under the federal Clean Water Act are authorized in this Permit only under state authorities, Chapter 90.48 RCW, the Water Pollution Control Act.

Discharges to groundwaters of the State through stormwater infiltration facilities regulated under the Underground Injection Control (UIC) program are not authorized under this permit but are authorized by rule Chapter 173-218 WAC.

The 2024 – 2029 Permit includes the following significant changes from the previous Permit:

S2.E. Authorized Discharges Under This Permit

The new permit clarifies that under the Puyallup Tribes of Indians Land Settlement Act of 1989 (25 USC §1773), the permit applies to all discharges within the Puyallup Reservation, except for discharges to surface water on land held in trust by the federal government. The City has identified outfalls located on trust lands, and has applied for permit coverage under a separate EPA NPDES Stormwater Permit for MS4 discharges to Tribal Waters.

Annual Reporting

Beginning March 31, 2027, the City must annually report estimated costs for implementing the Stormwater Management Program (SWMP) and identify the funding sources. (S5.A.2.)

S5.C.2. Mapping Requirements

By March 31, 2026: Submit outfall data in a standardized format (ESRI, Shapefile, ArcGIS, or Excel). (S5.C.2.b.i.)

By December 31, 2026: Map tree canopy on City-owned or operated properties. (S5.C.2.b.ii.))

By March 31, 2028: Submit a map and table of tributary basins draining to outfalls 24 inches or larger, including acres treated with public treatment or flow control. (S5.C.2.b.iii.)

By December 31, 2028: Create a map comparing overburdened communities with the locations of:

- Stormwater treatment & flow control facilities
- Outfalls and discharge points
- Tree canopy coverage on City-owned properties (S5.C.2.b.iv.)

S5.C.3. Coordination

By March 31, 2025: Update the existing internal coordination Executive Directive letter for General Government (GG) and Tacoma Public Utilities (TPU). (S5.C.3.a.)

S5.C.4. Public Involvement and Participation

Starting March 31, 2025:

- Annually document specific outreach opportunities for overburdened communities, particularly highly impacted communities.
- Provide public engagement opportunities for SWMP implementation through advisory councils, public hearings, watershed committees, or similar activities. (S5.C.4.a.i.)

By December 31, 2026: Document the methods used to identify overburdened communities. (S5.C.4.a.ii.)

S5.C.5. New and Redevelopment Standards

By March 31, 2025:

- Conduct twice-annual inspections of new residential developments, at least four months apart (previously six months).
- Provide developers with online registration requirements for Underground Injection Control (UIC) wells, along with Construction and Industrial Stormwater General Permit Notices of Intent (NOIs).

By July 1, 2025: Submit a draft stormwater manual (SWMM) for Ecology review.

By July 1, 2026: Adopt and implement a new stormwater manual (SWMM), ensuring compliance with the July 2024 Ecology Stormwater Management Manual for Western Washington (SWMMWW).

S5.C6. Stormwater Planning

By March 31, 2025: Continue Interdepartmental Team (IDT) meetings and annually report on watershed protection, LID policies, and stormwater-related planning strategies.

By March 31, 2027: Report on how stormwater considerations are integrated into land use and comprehensive planning, including a list of planned stormwater capital projects.

By December 31, 2028: Adopt tree canopy goals and policies, with a focus on overburdened communities and preserving mature canopy.

S5.C7. Stormwater Management for Existing Development (previously SSC)

By March 31, 2025: Describe the planning process for the SMED Program, including budgeting, public involvement, and addressing overburdened community needs.

Due Mar. 31, 2028: achieve 1,000 SMED Program Points (increased from 300), calculated per Appendix 12 guidance.

S5.C.8. Source Control

By March 31, 2025: Organize inspection counts by business type (NAICS, SIC codes) and include sites with NPDES-permitted discharges in enforcement policies. (S5.C8.c.v.)

By August 1, 2026: Update codes and ordinances for enforcement. (S5.C8.a)

S5.C.9. Illicit Discharge Detection and Elimination (IDDE)

By March 31, 2025: Ensure annual IDDE reporting follows WQWebIDDE formatting. (S5.C9)

By December 31, 2026: Coordinate with the fire department to update procedures for PFAS-containing firefighting foam notification and cleanup. (S5.C.9.d.ii.a)

By July 1, 2027: Update codes and ordinances to prohibit non-stormwater/illicit discharges, including discharges from firefighting and building washdowns (1950-1980 structures). (S5.C.9.)

S5.C.10. Operation and Maintenance

By July 1, 2027: Document the street sweeping program, prioritizing arterials, collectors, and industrial/commercial zones. (S5.C10.f)

By December 31, 2027: Update O&M policies and procedures to prevent PCB contamination from building washdowns, demolition, and renovations (1950-1980 structures). (S5.C10.e)

By March 31, 2028: Begin annual street sweeping program reporting. (S5.C10.f)

S8. Monitoring and Assessment

By June 30, 2025: Submit stormwater discharge monitoring data for August 1, 2019 – July 31, 2024. (S8.B)

By March 31, 2026: Submit an annual data and analysis report. (S8.C)

To ensure compliance with the permit and maintain an up-to-date record of the City's stormwater management efforts, the SWMP Plan has been revised and will be updated annually. The updated plan is made available for public comment annually and will guide the City's stormwater management activities throughout the permit term, from August 1, 2024, to July 31, 2029.

The City will continue to provide annual reports to Ecology to document Stormwater Management Program activities. Environmental Services (ES) Department's Environmental Programs Group is responsible for preparing the annual report and ensuring overall NPDES permit compliance. The Annual Report is submitted by March 31 of each year and has a reporting period of January 1 to December 31 of the previous year.

Secondary Permittees within the City of Tacoma

Parks Tacoma, Tacoma Community College and Port of Tacoma are Secondary Permittees under the Permit with independent coverage for discharges from small municipal separate storm sewers contained on their property. Secondary Permittees have different requirements under the Permits and are required to provide their own plans including public education and outreach, public involvement and participation, illicit discharge detection and elimination, construction site runoff controls, good housekeeping and source control requirements for operations and maintenance activities. The City will continue to coordinate SWMP activities with Secondary Permittees.

Tacoma's Stormwater Utility Functions

The City's Stormwater Utility rates pay for administration of the SWMP by the Environmental Services Department, however, the Permit applies to all departments and divisions of the City. ES coordinates with all departments and divisions throughout the City to ensure that all permit requirements are implemented. Staffing and budget are designed to meet the SWMP goals and objectives. SWMP work paid for by stormwater utility rates includes:

- Inspecting business activities and educating businesses about BMPs to reduce stormwater impacts;
- Collecting and evaluating stormwater and sediment quality monitoring data;
- Implementing a source control and illicit discharge screening program throughout the City's nine watersheds;
- Mapping, maintaining, and cleaning the City's stormwater system that includes approximately 500 miles of storm pipe, 10,000 manholes, 20,000 catch basins, four pump stations, and over 200 stormwater treatment and flow control facilities;
- Managing the City's tree canopy cover and open spaces to maximize stormwater benefits;
- Rehabilitating and replacing aging infrastructure and improving the storm system with capital projects to address identified flooding, flow control and water quality issues;
- Providing public education to target audiences including school-age children, college and trade students, homeowners, businesses, property managers, land use planners, engineers, contractors, developers, and overburdened community members about the impacts of polluted runoff, Low Impact Development (LID), and best management practices to reduce polluted runoff;
- Coordinating Tacoma's SWMP activities regionally with watershed partners, neighboring jurisdictions, tribes, and others;
- Permitting and inspecting new and redevelopment construction projects to ensure compliance with stormwater requirements including erosion control, maximizing onsite

management, use of LID, stormwater treatment, flow control, wetlands protection and ongoing maintenance; and

- Providing staff training to ensure the City activities and operations minimize impacts to stormwater and receiving waters.

SWMP Plan Components Overview

The City's SWMP contains the eleven components outlined in the Permit Section S5 and an additional section to document the stormwater monitoring and assessment requirements of Permit Section S8. The SWMP components are summarized here:

S5.C.1. Legal: The City must have the legal authority to control discharges to and from the municipal storm sewers owned by the City. Chapter 12.08 of the Tacoma Municipal Code (TMC) provides this authority.

S5.C.2. Mapping: The City's stormwater system must be mapped. This work was started under the 1995 permit and is continuing. The City's TacomaMap (tMAP) will be updated with new mapping information as it becomes available.

S5.C.3. Coordination: A written internal coordination agreement is required to facilitate internal cooperation between various City departments and divisions. The City coordinates with adjacent municipal stormwater permittees and other surrounding municipalities that have interconnected systems or which discharge into or are adjacent to the same waterbodies.

S5.C.4. Public Involvement and Participation: The City must have a process to provide opportunities for the public to be involved in the development and implementation of the SWMP, including overburdened communities. The SWMP will be posted on the City's website, and ongoing opportunities to gather public input to inform SWMP implementation will be provided.

S5.C.5. Controlling Runoff from New Development, Redevelopment and Construction Sites: This includes the City's program to prevent and control the impacts of runoff from new development, redevelopment, and construction activities. It covers private and public construction projects, including right-of-way improvements. The Permit requires compliance with the Minimum Requirements in Tacoma's Stormwater Management Manual (SWMM).

S5.C.6. Stormwater Planning: The City shall have a program to inform and assist in the development of polices and strategies as water quality management tools to protect receiving waters.

S5.C.7. Stormwater Management for Existing Development: The City shall have a program to prevent or reduce impacts to waters of the state caused by stormwater discharges. The program is intended to address impacts that are not adequately controlled by the other required actions of the SWMP. For this permit cycle, a required

level of effort must be demonstrated to earn 1,000 points of planned, designed or completed projects.

S5.C.8. Source Control: Inspections of pollutant generating sources are required for all sites that are potential pollutant sources, including most commercial and industrial properties. Sites owned by the City will also be inspected. The Permit requires compliance with the source control sections of the SWMM.

S5.C.9. Illicit Connections and Discharges: The City will maintain a program to detect, remove and prevent illicit connections and discharges, including spills into the City's separate storm sewer system. All staff who might observe an illicit discharge will be trained on what to look for and how to report illicit discharges.

S5.C.10. Operation and Maintenance: Maintenance standards and inspection programs are required for public and private stormwater facilities. Best Management Practices (BMPs) are also required to be implemented for the maintenance activities on public lands and roadways to reduce stormwater impacts. The City participates in the Regional Road Maintenance Endangered Species Act (ESA) Program. Stormwater Pollution Prevention Plans (SWPPPs) have been developed for heavy equipment maintenance and storage yards and material storage facilities owned by the City.

S5.C.11. Education and Outreach: The City is committed to engaging the community through Education and Outreach Programs designed to build general awareness, encourage behavior change, and promote stewardship opportunities. Target audiences include the general public, school-age children, college and trade students, overburdened communities, property owners, businesses, engineers, contractors, developers, and land use planners.

During this permit cycle, the City will continue to enhance its focus on equitable education and outreach efforts, ensuring programs effectively serve and address the needs of overburdened communities. To guide this work, the City has developed an Equity Index Map to identify overburdened neighborhoods, allowing for more informed public outreach and program development.

S8. Stormwater Monitoring and Assessment: The City pays into a collective fund for the Stormwater Action Monitoring (SAM) Small Streams Status and Trends Monitoring. The City conducts a SWMP Effectiveness Study based on continuing stormwater discharge monitoring at seven outfalls in the Thea Foss Waterway.

S5.C.1 Legal

The City must have the legal authority to control discharges to and from the municipal storm sewers owned by the City. Chapter 12.08 of the Tacoma Municipal Code (TMC) provides this authority.

Summary of Program Component

The City's legal authority to control discharges to and from our municipal stormwater system is found in state law and the Tacoma Municipal Code (TMC). The state statutes provide the City legal authority to create, and then regulate and manage its municipal stormwater system.[1] The City also has legal authority to regulate and enforce the stormwater management-related requirements found in Chapters 12.08A and 12.08D of the TMC. The City has completed a code separation and clarification project to help make our utility code more user friendly. The past TMC 12.08 included regulations for stormwater, wastewater, and industrial wastewater pretreatment in one section. The new code has been separated into four sections:

TMC 12.08A: General Administration

TMC 12.08B: Wastewater

TMC 12.08C: Industrial Pretreatment Program

TMC 12.08D: Stormwater Management Program

Authority to Control Industrial Discharges, Prohibit Illicit Discharges, and Control Spills or Disposal of Materials other than Stormwater into the MS4 (Separate Stormwater System) (S5.C.1.b.i, ii, iii.)

TMC 12.08A.100	Authorizes the City's stormwater management staff to review land use and development permits and impose BMPs to manage stormwater impacts.
TMC12.08D.100	Authorizes the City to regulate all direct and indirect discharges to the MS4.
TMC12.08D.110	
and 12.08D.180.E	Prohibits illicit discharges to the MS4.
TMC 12.08D.110.	Outlines allowable, conditional, and prohibited discharges into the City's municipal stormwater system.
TMC 12.08D.120	Requires responsible parties to notify the City when a spill, release, or illicit discharge occurs that contributes, or is likely to contribute pollutants to the City's MS4.
TMC 12.08D.150	Outlines the City's Stormwater Program Requirements

TMC 12.08D.150.C	Requires all property owners and businesses engaged in pollution generating activities, including industrial facilities to implement and maintain operational BMPs.
TMC 12.08D.150.C.4	Authorizes the City to enforce spill prevention requirements.
TMC 12.08D.400.A	Authorizes the City to pursue an enforcement response against any person who violates Chapter 12.08D of the TMC.
TMC 12.08D.400.D.	Includes illicit connections and discharging stormwater contaminated with any of the substances prohibited under TMC 12.08D.110 as violations of the Tacoma Municipal Code
TMC 12.08D.420	Makes connection or maintenance of connections to the municipal stormwater system or any stormwater BMP/facility that is connected directly or indirectly to the municipal stormwater system without written authorization of the City a misdemeanor.

Ability to Control Inter-System Discharges Under Agreements with Other Permittees (S5.C.1.b.iv.)

RCW 35.67.300	Authorizes the City to enter into joint agreements with other cities, towns, or water districts to connect to and be served by the MS4.
RCW 35.67.310	Authorizes the City to allow persons outside the city limits to connect to and be served by the MS4. Authorizations for connections require compliance with Chapters 12.08A and 12.08D of the TMC stormwater-related requirements.
TMC 12.08A.110.B	Authorizes the City to enter joint agreements with other cities, towns, or water districts to connect to and be served by the MS4.

Require Compliance with City Regulations and Conduct Enforcement Actions

(S5.C.1.b.v, vi.)

TMC 12.08D.020.B	Places responsibility for compliance with stormwater codes on the responsible persons as defined in TMC 1.82.010
TMC 12.08D.100	Authorizes the City to regulate direct and indirect discharges to receiving waters and the MS4.
TMC12.08D.150	Authorizes the City to implement a comprehensive SWMP to control and regulate discharges to its MS4 and receiving waters.
TMC12.08D.150.F.2	Authorizes the City to conduct compliance inspections.
TMC .12.08D.300	Provides right-of-entry authority to the City.
TMC 12.08D	Establishes enforcement procedures for Chapter 12.08D of the TMC.

TMC 12.08D.400.A	Authorizes the City to enforce violations of Chapters 12.08A and 12.08D of the TMC.
TMC 12.08D.400.B	Outlines monetary penalties for violations of Chapters 12.08A and 12.08D of the TMC.
TMC 12.08D.400.C	Makes compliance to Chapter 12.08D mandatory
TMC 12.08D.400.D	Outlines certain examples of violations of TMC 12.08D.
TMC 12.08D.400.E	Makes falsely making, completing, or altering a written instruction required to be submitted pursuant to TMC 12.08D a gross misdemeanor
TMC 12.08D.400.F	Requires responsible persons to pay supplemental charges incurred by the City in response to violations
TMC 12.08D.400.G	Authorizes the Environmental Services Stormwater Compliance Policy
TMC 12.08D.400.H	Makes violation of TMC 12.08D or any permit, order, control mechanism or other written authorization or directive issued by the City a gross misdemeanor
TMC 12.08D.400.I	Outlines that enforcement actions beyond those outlined in TMC 12.08D may also be pursued by the City
TMC 12.08D.410	Authorizes the City to suspend service or discharge to the municipal stormwater system and provides the guidelines for suspension of service
TMC 12.08D.420	Makes connection or maintenance of connections to the municipal stormwater system or any stormwater BMP/facility that is connected directly or indirectly to the municipal stormwater system without written authorization of the City a misdemeanor

S5.C.2 Mapping

The City's stormwater system must be mapped.

Summary of Program Component

The overall objective of this requirement is to maintain an ongoing program to map and document the existing stormwater system and ensure that future connections and other system changes are documented and mapped.

Mapping and documentation of the stormwater system is vital to managing the resources of the City. By identifying connections to the stormwater system and understanding their relationship to overlaying drainage basins, analyses can be performed on the entire system. This information will also assist in providing service to underserved areas and development of solutions to capacity problems. The City is using mapping information in a variety of ways, including tracking sources of contamination, modeling system capacity, planning for future system upgrades, and increasing urban canopy cover.

Ongoing Mapping of Known Outfalls and Discharge Points, Receiving Waters Other than Groundwater, City-owned Structural Stormwater Treatment and Flow Control BMPs, Geographic Areas Served by the Municipal Separate Storm Sewer System (MS4) that do not Discharge to Surface Water, and Connection Points between the City's MS4 and Other Municipal Systems (S5.C.2.a.i,ii,iii,iv,vi.)

The Environmental Programs Group and Asset Management Group of ES have an existing mapping and documentation program to meet this requirement.

Mapping Public Assets

Known public assets are mapped; however, this work is ongoing. As new stormwater assets are installed, they are mapped. Many features are available to view on tacomaMap (tMAP) – the City's public GIS viewer. Other features are available upon request. Existing flow control and treatment facilities owned or operated by the City are mapped. All known separate stormwater outfalls to marine and fresh waters are mapped. All discharge points as defined in the permit, are mapped. As the City maps new public treatment and flow control facilities, the inlets, and outlets, including emergency overflows will be mapped.

A process exists to add new stormwater system features into our mapping system after they are constructed.

Process for adding newly constructed public stormwater assets and geographic areas not discharging to surface water into the City's mapping system:

- ES receives approved plans from other City departments including; Planning and Development Services (PDS), Site Development Group (for private work order permits) or from the City Project Manager (for City Capital Improvement Projects).
- The new assets, including pipes, underground facilities, above ground facilities, and geographic areas not discharging to surface water (facilities designed to infiltrate all stormwater runoff) are input into the City GIS system as "proposed" by the ES Engineering Technician.
- Before final acceptance of pipe assets, an ES Operations and Maintenance receives notification to video inspect the pipe for acceptance. At this point, the ES Engineering Technician will re-label those proposed assets as "active."
- Upon physical completion of construction of the project, the Construction Inspector will inform the ES Engineering Technician that the stormwater facilities are completed. The ES Engineering Technician will then re-label those proposed assets as "active."
- It is ultimately the responsibility of the City Project Manager to ensure that the assets related to their project are correctly mapped in the City GIS systems.

Mapping Geographic Areas Served by the City's stormwater system that do not Discharge Stormwater to Surface Water (S5.C.2.a.iv)

The scope of this requirement includes mapping areas that drain to public stormwater facilities designed to infiltrate all stormwater.

Map Tributary Conveyances of all known Outfalls and Discharge Points with a 24-Inch or Greater Nominal Diameter or an Equivalent Cross-Sectional Area for Non-pipe Systems (S5.C.2.a.v.)

The known outfalls and discharge points and connections are in the City's mapping system. Upstream tracing of each outfall and discharge point and determination of each associated contributing basin is complete. Land use is known, and conveyance pipe type, material and size are included in the City mapping system, when known.

Mapping Storm Sewer Interconnections between Municipalities (S5.C.2.a.vi)

City staff collected GIS storm system data from Fife, Pierce County, Lakewood, University Place, Ruston, Fircrest and Federal Way. All known connection points between the City separate stormwater system and other municipalities have been generated from this data, and as mapping and data collection continues or as new connections are made, the new information will be added to the City's mapping systems.

Map all Connections authorized or allowed to the MS4 (S5.C.2.a.vii.)

The City has already mapped the majority of the known private storm systems connected to the stormwater system throughout Tacoma. Newly permitted and constructed private drainage system connections will continue to be added to the mapping system. Additionally, video camera investigations occasionally discover additional smaller private pipes connected directly into the storm lines. The City continues to investigate our system for non-stormwater connections and when found, the discovered connections are investigated to identify their source. Non-stormwater connections are redirected as appropriate, and stormwater connections are mapped.

This work is continually updated as connections are added. PDS Inspectors sign off on all new storm connections through construction permits. For all projects involving connections to the stormwater system, a storm connection permit is required in order to ensure the connection is properly made and inspected. The City also has permitting requirements for wastewater connections; this ensures that wastewater services are connected to the wastewater mains and not the stormwater mains.

The process for adding newly constructed private drainage system connections into the City's mapping system includes:

- Upon final inspection of construction permits, the PDS Engineering Technician will record the private drainage system point of connection to the stormwater system and note it on the storm connection permit drawing. The storm connection permit drawing is saved in the City permitting system.

- ES Engineering Technician reviews the City permitting system and will then input the new private connection points into the mapping system as “storm private connection” and include the permit number in the point description to allow for the electronic site plans associated with that permit to be researched, if necessary.
- If the ES Inspector notes are insufficient and there is a need to field-verify the location of the private connection point, the ES Engineering Technician will assign the mapping crew to locate the connection.

The City’s database of privately owned treatment and flow control facilities is being updated to assist with annual inspections of private facilities.

Map All Known Existing Stormwater Connections with Greater than or Equal to 8-Inch Nominal Diameter and all known connection from MS4 to private systems (S5.C.2.a.viii, ix.)

The City has mapped all known existing connections greater than or equal to 8-inch nominal diameter and all know connections from the MS4 to a privately owned stormwater system.

Submit locations of all known MS4 outfalls including size and material of outfalls, where known (S5.C.2.b.i.)

The City has size and material information for all known outfalls. If new or unknown outfalls are discovered, this information will be added to the City database. An electronic application to add mapping information has been developed for field staff to use when visiting outfalls.

The city will submit all required information including locations of all known MS4 outfall, size, and material of outfalls, where known according to the standard templates provided in the Annual Report no later than March 31, 2026.

Tree canopy mapping for stormwater management (S5.C.2.b.ii.)

In compliance with the 2024-2029 NPDES Phase I Permit (S5.C.2.b.ii), the City of Tacoma will map tree canopy on Permittee-owned or operated properties using available existing data by December 31, 2026. A methodology will be developed to identify tree canopy that supports stormwater management. This methodology may be updated annually or as needed. The program is in progress, and updates will be included in the Stormwater Management Program (SWMP) annually.

MS4 Tributary Basin Mapping and Assessment (S5.C.2.b.iii.)

In compliance with the 2024-2029 NPDES Phase I Permit (S5.C.2.b.iii), the City of Tacoma will develop and implement a methodology to map and assess the acreage of MS4 tributary basins draining to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. This assessment will focus on identifying areas managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the City.

The methodology will be implemented no later than March 31, 2028. A map (.pdf) and table (.xlsx) quantifying estimated acres managed and unmanaged will be submitted with the March

31, 2028 Annual Report. Updates will be incorporated into the Stormwater Management Program (SWMP) as needed.

Mapping Overburdened Communities in relation to Stormwater Infrastructure (S5.C.2.b.iv.)

In compliance with the 2024-1029 NPDES Phase I Permit (S5.C.2.b.iv), the City of Tacoma will map overburdened communities using available existing data by December 31, 2028. This mapping effort will analyze the relationship between overburdened communities and stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

The findings will help inform equitable stormwater management decisions. Updates will be incorporated into the Stormwater Management Program (SWMP) as needed.

Provide Ecology with Mapping Data for all Requirements of S5.C.2.a. and b. above (S5.C.2.c&d.)

The City will provide fully described mapping standards similar to those described on Ecology's website and the currently available mapping information shall be provided to Ecology upon request.

Provide Mapping Information to Federally Recognized Indian Tribes, Municipalities and Other Permittees (S5.C.2.e.)

Most required stormwater mapping information is available to view on TacomaMap (tMap) – the City's public GIS data viewer. All other information is available upon request. Tribes, municipalities, and other permittees currently have access to system information. If individual requests for information are made from one of these parties, the City will work with them to provide the needed information in an agreed upon format.

S5.C.3. Coordination

A written internal coordination agreement is required to facilitate internal cooperation between various City departments and divisions. Coordination with adjacent municipal stormwater permittees is also required.

Summary of Program Component

Permit section S5.C.3 addresses coordination mechanisms among departments within the City as well as those mechanisms between the City and interconnected stormwater systems of neighboring jurisdictions covered by a municipal stormwater permit within a watershed.

The activities outlined in this section are critical to remove barriers, promote understanding of the Permit, and facilitate permit compliance within the departments of the City.

This section of the permit requires coordination between the City and jurisdictions covered by municipal stormwater permits and/or connected to the City's MS4 specifically to address a coordinated approach to stormwater policies, programs and projects within a given watershed. At its best, coordination between jurisdictions should facilitate information sharing, eliminate

duplicate efforts, and promote regional solutions to most efficiently use the City's valuable and limited resources to improve stormwater quality.

Implement Executive Directive to Facilitate Permit Compliance (S5.C.3.a.)

The City Manager and Tacoma Public Utilities Director issued a joint memorandum in the first quarter of 2025 to all City Department Directors informing them of the Permit and the need for all affected staff's cooperation and input. The internal coordination memorandum is included as Appendix B.

As previously stated, the ES Department and specifically the Environmental Programs Group acts as the City's Stormwater Permit Coordinator and Administrator. Environmental Programs Group staff compiled a list of department contacts and developed specific Stormwater Permit Coordination and Compliance Plans identifying each SWMP element involving their work group's participation, recordkeeping, and staff training requirements.

Coordination also includes meeting regularly with the Interdepartmental Team (IDT) from representatives across many City Departments to assist with Permit implementation generally and specially, Stormwater Planning. Specific tasks for intra-governmental coordination include the following:

- Identifying which permit requirements apply to each specific department and work group;
- Integrating compliance activities into each department's programs and operations;
- Providing training and technical assistance if required;
- Recordkeeping, or technical assistance for recordkeeping, as required in the Permit;
- Facilitating submittal of information for the Permit required Annual Report; and
- Conducting check-ins with staff responsible for various portions of the Permit to ensure compliance continues.

These coordination efforts ensure ongoing Permit compliance and submittal of the NPDES Annual Report by March 31st each year.

Implement Coordination Mechanisms with Other Permittees for Control of Pollutants between Interconnected MS4s and Stormwater Management Activities for Shared Waterbodies (S5.C.3.b.)

This element of the permit has two specific coordination elements:

1. Coordination between the City and the physically interconnected surrounding municipal stormwater permittees (Pierce County, Lakewood, University Place, Fircrest, Federal Way, and Fife) and secondary permittees (Port of Tacoma, Tacoma Community College, andParks Tacoma) for the control of pollutants; and
2. Coordination of activities for shared water bodies among Phase I and II Permittees to avoid conflicting plans, policies, and regulations.

City staff coordinates with surrounding Permittees and Secondary Permittees as appropriate when investigating concerns about the conveyance system; upgrading the stormwater system when it affects others, source tracing stormwater pollutants; and coordinating and communicating watershed issues. The City similarly coordinates with the Puyallup Tribe of Indians (Puyallup Tribe) for surface water, groundwater, and stormwater related issues in areas adjacent to properties held in Tribal trust. Coordination between all of these entities has provided an effective network of contacts, productive relationships, and more efficient stormwater management.

The SEPA process also aids in coordination for specific development projects that may impact neighboring jurisdictions. Through SEPA, neighboring jurisdictions have the opportunity to review proposals and provide comments and input. The City's 2021 Stormwater Management Manual SWMM went through the SEPA process to help to facilitate review by other jurisdictions. The City also provided training opportunities for the new SWMM that was open to other jurisdictions. The 2026 SWMM update will follow the same process, including SEPA review and coordination with other jurisdictions. Training will again be offered to ensure consistency. The draft SWMM will be submitted for Ecology review by July 1, 2025, with final adoption by July 1, 2026.

The City's SWMM requires that projects that discharge to a neighboring jurisdiction's stormwater system comply with the more stringent of the two jurisdiction's stormwater requirements.

City development review staff also coordinate with the Tacoma-Pierce County Health Department (TPCHD) regarding development in the South Tacoma Groundwater Protection District (STGPD) as codified in Chapter 13.01.090 of the Tacoma Municipal Code. All requests for infiltration of runoff from pollution-generating impervious surfaces are discussed and coordinated with TPCHD. The STGPD Infiltration Policy outlines specific requirements for infiltration of pollution generating surfaces within the STGPD and procedures for staff coordination.

On a watershed level, the City currently participates in several regional coordination efforts. The City participates in the Phase I Permittees Group and assists with facilitation of the South Sound Phase II Coordinators Group and participates in this and other regional Phase II Stormwater Groups. These groups hold regular meetings to discuss issues related to NPDES Permit implementation and share information on BMPs, Permit compliance, and policies and programs. City staff also attend the Puyallup River Watershed Council, the Chambers Clover Watershed Council and WRIA 10/12 Lead Entity meetings. The City is also participating in the local integrating organizations for the Puyallup White River Puget Sound Action Area (including Puyallup/White WRIA 10) and South Puget Sound Action Area (including portions of Chambers/Clover WRIA 12) supporting the Puget Sound Partnership efforts.

The City participates in the Stormwater Work Group, a formal stakeholder group providing input to Ecology on the permit's monitoring requirements, and in the subgroups that assist with oversight and implementation of the Stormwater Action Monitoring (SAM) program,

www.ecology.wa.gov/SAM, that satisfies permit monitoring requirements. SAM is the Pooled Fund collective defined by the permit that conducts regional stormwater monitoring. Funds are provided via the permit from more than 90 cities and counties, the ports of Seattle and Tacoma, the Washington State Department of Transportation, and federal MS4 permit holders in Washington State.

The City's Environmental Compliance Inspectors have a list of contacts in various jurisdictions, regulatory programs, and organizations including the railroads, neighboring cities, Pierce County, state, and federal government, TPCHD, Parks Tacoma, Tacoma Public Schools, Tacoma Police Department, Port of Tacoma, Puget Sound Clean Air Agency, and others. These individuals are informed of spills and complaints when they cross jurisdictional boundaries.

S5.C.4. Public Involvement and Participation

The City must have a process to provide opportunities for the public to be involved in the development and implementation of the SWMP.

Summary of Program Component and Permit Compliance Measures

Public involvement is useful for identifying areas where the City may tailor its SWMP and other programs to meet neighborhood needs and priorities; identify additional tools to meet permit requirements; or identify areas where it is desirable to go beyond permit requirements.

The City's Environmental Services Commission provides an ongoing source of public input on components of the SWMP. Other opportunities for public input on SWMP updates will be scheduled as appropriate.

Public Participation Opportunities for SWMP Development and Implementation (S5.C.4.a.)

The SWMP Plan is updated and posted online annually, with public comments accepted year-round and updates are shared through the EnviroTalk listserv, including information on how to submit comments. Community members can also request additional information or provide input by emailing swnpdespermits@cityoftacoma.org.

In 2024, ES staff developed a survey to assess public priorities related to the SWMP Plan. The survey was distributed at multiple community events throughout February and early March 2024, and again with the One Tacoma Comprehensive Plan visioning workshops held in each neighborhood council district, engaging over 180 participants. The survey was translated in the 8 most spoken languages in Tacoma. Survey respondents were also provided with direct access to the full SWMP Plan and encouraged to review and comment on its contents.

Building on the 2024 engagement efforts, ES staff will update and refine the community survey for 2025 to further expand public involvement. The survey will be distributed at various community events, including four One Tacoma Comprehensive Plan Draft Review Workshops hosted in different locations across the city. This decentralized approach aims to reduce travel barriers and promote equitable participation from residents across Tacoma.

Public involvement to implement the SWMP is also included in the education and outreach actions described in SWMP Section S5.C.11.

The City's SWMM is being updated to align with the Washington State Department of Ecology's 2024 SWMMWW. The City is implementing all Ecology-mandated changes and incorporating additional updates for clarity and to reflect current City policies and procedures. The current 2021 SWMM Webbook is available as an online searchable version to aid in implementation., and will also be updated and replaced with the new 2025 SWMM on July 1, 2026.

The City's Environmental Services Commission meets regularly throughout the year and provides public input on a variety of issues affecting the Environmental Services Department's three utilities: stormwater, wastewater, and solid waste, including implementation of the SWMP. Commissioners represent a cross-section of Tacoma's residential, business, and regulatory communities. They review, advise and make recommendations to City staff and the City Council regarding:

- Residential and commercial programs and services;
- Short-term and long-range planning;
- Rates, rate structures, and rate assistance programs;
- Capital Investment Program financing structures;
- City policies directly related to utility functions.

Make SWMP Plan and Annual Report Available on the City Website (S5.C.4.b.)

The SWMP and Annual Report are currently posted and continue to be updated at the Stormwater Management Program home page located on the City website: cityoftacoma.org/stormwater.

S5.C.5. Controlling Runoff from New Development, Redevelopment, and Construction Sites

The City shall include a program to prevent and control the impacts of runoff from new development, redevelopment, and construction activities. The program covers private and public development, including right-of-way improvements.

Summary of Program Component and Permit Compliance Measures

The City has an established permitting program for new development and redevelopment projects ranging from construction of single-family homes to mixed-use developments, commercial, and industrial projects. Proposed land use actions are reviewed and conditioned as appropriate to achieve compliance with stormwater requirements. Construction projects are issued permits after appropriate review for compliance with the City's SWMM. Permitted project sites are inspected for erosion and sediment control during construction and the installation of permanent stormwater management facilities.

During this permit cycle, the City will update its SWMM to be equivalent to Ecology's 2024 SWMMWW to be in effect on July 1, 2026, as required by the Permit.

The City addresses stormwater management from development, redevelopment, and construction of private and public development including roads through regulations contained in the TMC and the SWMM.

PDS and ES are the primary work groups responsible for implementing the stormwater development and redevelopment regulations. These groups provide permit submittal review and approval as well as inspection services for private development. Publicly funded Capital Improvement Projects (CIPs) developed and managed by City staff must also meet the applicable Minimum Requirements of the SWMM. CIP construction inspections are performed by Public Works Department inspectors (for street improvements), ES inspectors (for wastewater and stormwater systems), and the Tacoma Public Utilities inspectors (for drinking water services and transmission lines, and power transmission). Private development construction inspections are conducted by PDS.

Adopt Stormwater and Erosion Control Standards Equivalent to Ecology's 2024 SWMM for Western Washington (S5.C.5.b.i. to iv.)

- The City will submit draft SWMM standards and ordinances to Ecology on July 1, 2025.
- Equivalent manual requirements, limitations and criteria of Ecology's 2024 SWMMWW will be adopted by the City by July 1, 2026.

Legal Authority to Inspect and Enforce Maintenance Standards for Private Stormwater Facilities Approved by the City (S5.C.5.b.v.)

Since the initial NPDES Phase I Municipal Stormwater Permit was issued in 1995, the City has had the necessary legal authority to establish standards and inspect and enforce standards for private stormwater facility maintenance.

TMC 12.08D.150.D requires compliance with the SWMM Minimum Requirements. MR # 9 requires an O&M Manual for permitted projects meeting specific thresholds.

TMC 12.08D.150.F.1 requires owners to inspect and maintain their facilities and provide records to the City and retain the Operations & Maintenance Manual for the facility.

TMC 12.08D.150.F.2 provides inspection authority.

TMC 12.08D.170 requires Owners of property that have private stormwater facilities to enter into a Covenant and Easement that is recorded to title with the Pierce County Auditor's Office

TMC 12.08D.300 provides right-of-entry authority in case of possible violations of TMC 12.08D or other reasonable basis.

Permitting, Plan Review, Inspection, and Enforcement of Standards Equivalent to Ecology's 2019 SWMM for Western Washington (S5.C.5.b.vi.)

A) System to Review all Plan Submittals Meeting Thresholds

The City's current program provides plan review for all projects involving land disturbing activities that meet the development thresholds specified in the Permit, which are also in the SWMM, including both private and public project sites.

B) Inspection prior to clearing and construction for Sites having High Sediment Transport Potential

Pre-clearing inspections of private development sites are accomplished by the PDS Site Development Inspectors and Plan Reviewers to meet the erosion and sediment control standards outlined in the SWMM. Project Engineers or Inspectors from ES, TPU, and Public Works complete the site inspections for the public project sites. The City complies with this section by inspecting all sites meeting the required thresholds prior to the start of construction.

C) Inspect all permitted development sites that meet development thresholds during construction to verify proper installation and maintenance of temporary erosion and sediment control BMPs

Inspections for installation and on-going maintenance of erosion and sediment control measures are currently completed by PDS, Public Works, Engineering, ES's Capital Delivery Group and Tacoma Public Utilities Inspectors. Appropriate enforcement actions are taken, when required, in accordance with the Environmental Services Stormwater Compliance Policy and appropriate sections of the TMC.

D) Inspect all permanent stormwater treatment and flow control BMPs/facilities and catch basins at least twice per 12-month period with no less than four months between inspections, in new residential developments.

The City has a program to ensure that new residential developments receive inspections at least twice per 12-month period with no less than four months between inspections until 90% of the lots are constructed or until the site is fully stabilized. Inspections are completed by the Site Development Group for projects that have open Permits.

E) Post-Construction Inspection for Permanent Stormwater Facilities

Operation and Maintenance (O&M) Manuals are required to be reviewed and approved for compliance with the requirements of the SWMM prior to permit approval for all sites that have facilities and meet the thresholds of the SWMM. For private facilities, a copy of the O&M Manual is required to be kept onsite, and a copy is kept on file by PDS Site Development Group for use during stormwater source control inspections. Responsibility for private facility maintenance falls to the property owner.

Facilities that will be part of the public stormwater system are typically the responsibility of the City. Maintenance procedures for all public flow control and treatment facilities are adopted from the Stormwater Management Manual and are stored electronically.

F) Compliance with Inspection Requirements

The City has an established program to inspect all sites involving land disturbing activities. The Permit required program goal is to achieve a minimum of 80 percent of scheduled inspections annually.

G) Recordkeeping Procedures in Place

The City currently has several databases to track all S5.C.5 required inspections and enforcement actions.

H) Enforcement Strategy for Non-Compliance Response

City inspectors have the ability to enforce compliance of S5.C.5 requirements through authorities in the TMC. Building and Site Inspectors, Code Compliance Inspectors, and Environmental Compliance Inspectors have enforcement procedures for non-compliance with permitting conditions per TMC 2.02.130 and Chapter 12.08A and 12.08D of the TMC. Environmental Compliance Inspectors implement the Environmental Services Stormwater Compliance Policy. The inspectors focus on owner education, coaching and voluntary compliance. Enforcement measures include stop work orders, Notices of Violation, fines, and Certificates of Complaint attached to the title of the property. Environmental Compliance Inspectors and Public Works Department Inspectors may refer cases to Neighborhood and Community Services Code Compliance to pursue further enforcement actions.

City capital construction projects are required to comply with construction contracts that enforce local, state and federal regulations including all Permit requirements.

Inspectors can also refer specific cases to Ecology for follow up and enforcement when cases directly impact waters of the state.

Notice of Intent (NOI) Forms for Construction and Industrial Stormwater General Permits and UIC well registration (S5.C.5.b.vii.)

The Permit requires the City to provide permit applicants for new and redevelopment sites with information describing Ecology's NPDES Construction General Permit, NPDES Industrial Stormwater General Permit, and registration requirements for Underground Injection Control (UIC) wells, if applicable to their projects. Information on these state permits and UIC registration requirements is provided, as applicable, to applicants at various times throughout the project review including pre-application meetings and permit submittal review comments. The City's electronic permitting system Accela issues a standard response email confirming receipt of the permit application which includes prompts referring applicants to Ecology's website in order to obtain coverage under the NPDES Construction General Permit and NPDES Industrial General Stormwater Permit.

Training for Development Permitting, Plan Review, Construction Inspection and Enforcement Personnel (S5.C.5.b.viii.)

ES, Public Works, and PDS staff receive ongoing training to perform plan review, inspection, and enforcement duties concerning erosion and sediment control measures and storm system design, construction and maintenance standards. Records of certain trainings are recorded online (CESCL). Other trainings are tracked through training sign-in sheets that are kept on file. Staff training also occurs through review of daily work activities and feedback from those reviews.

S5.C.6 Stormwater Planning

The City shall have a program to inform and assist in the development of polices and strategies as water quality management tools to protect receiving waters.

Summary of Program Component and Permit Compliance Measures

The permit requires the City to implement a Stormwater Planning Program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. Specifically, the permit requires: coordination to identify if stormwater management needs are included in existing long-range planning efforts, ensuring LID principles and BMPs continues to be required in code as preferred stormwater management approach, development of tree canopy goals, and continued coordination with an inter-disciplinary team.

ES is the lead department in the City on several of these stormwater planning activities. ES is developing a stormwater management specific comprehensive plan, anticipated to be completed in 2026. The stormwater comprehensive plan will evaluate all aspects of the permit-required stormwater management programs scope, scale, staffing, interconnectedness, efficiency, and funding. ES is also participating in the long-range planning update of the citywide One Tacoma Comprehensive Plan. ES has developed the urban forestry manual and participated in code development to manage the city's tree and open space assets.

ES recently developed a watershed-based prioritization plan called the Urban Watershed Protection Plan (UWP Plan), to use a watershed data-driven approach to focus stormwater management activities based on stormwater pollutant loading, neighborhood need, and other prioritization criteria. To support the UWP Plan development, with Ecology's grant funding, the City developed a GIS-based watershed data mapping tool with modeling capabilities to assess BMP performance, track potential retrofit locations, identify cost-effective strategies, and integrate water quality priorities with community-based needs.

This watershed-level focus allows ES to plan for stormwater management actions that align with the One Tacoma Comprehensive Plan goals and policies as well as coordinate with the departmental inter-disciplinary team to pursue partnerships and coordinate projects in the watershed sub-basins most in need of targeted stormwater management actions.

The UWP Plan identifies the top 25% of priority sub-basins in the City and a list of potential stormwater actions for these sub-basins based on stormwater pollution hotspots, receiving water conditions and neighborhood needs. In 2024, additional stakeholder and community engagement was used to finalize the watershed priority action list. The City will also begin to pilot priority actions and pursue funding opportunities for future water quality improvement projects starting in 2025.

Inter-disciplinary Team (S5.C.6.b.i.)

The inter-disciplinary team (IDT) includes staff from many City departments and divisions and is led by ES staff in the Environmental Programs Group. Initially the IDT was convened July 27, 2020 and has smaller groups within the IDT that have also been convened. In addition to IDT meetings, ES participate in specific planning projects, planning staff meetings and provide technical assistance and comments on long-range plans that are led by other work groups within the City.

Coordination with long-range plan updates (S5.C.6.b.i.)

Per the Permit, Comprehensive Plans and other locally initiated or state mandated long-range land use plans that are used to accommodate growth or transportation shall be reviewed for stormwater management. For these type of planning documents that are initiated or in process after August 1, 2024, the Environmental Programs Group will review and be involved throughout the development of the plans to ensure that, if appropriate, stormwater considerations are included in the plans. This coordination occurs through the IDT, small groups within the IDT, individual project managers and attending project and program meetings where these efforts are discussed. In 2024, the citywide One Tacoma Comprehensive Plan was updated with participation from ES in coordination with other City departments to ensure input on watershed and stormwater planning was incorporated.

Low Impact Development (LID) code-related requirements (S5.C.6.c.i.a)

All development codes and related regulatory requirements will be reviewed and evaluated to comply with this section. New development codes and regulatory requirements that are initiated during the current Permit term will be reviewed during development to ensure that no new barriers to low impact development are created or that the barriers are addressed to help make low impact development the preferred and commonly used approach to site development within Tacoma.

Tree Canopy goals and policies to support stormwater management (S5.C.6.c.ii.a,b)

As required by the permit, the City of Tacoma will adopt and implement tree canopy goals and policies to support stormwater management no later than December 31, 2028. These policies will consider how both existing and future tree canopy contribute to stormwater management and water quality improvements in receiving waters.

The City will establish a long-term tree canopy goal (e.g., 5, 10 years, or longer) that aligns with stormwater management strategies and is appropriate for Tacoma's jurisdiction. A great deal of work is already accomplished towards these goals in the Urban Forestry Manual. Specific considerations will include, but are not limited to:

- Maintaining or increasing tree canopy in overburdened communities.
- Preserving existing mature tree canopy to enhance stormwater benefits.
- Documenting considerations, reasoning, and rationale for established goals and policies.

The City will continue working on this requirement, with specific actions focused on evaluating existing canopy coverage, identifying priority areas, and developing policies to integrate tree canopy into stormwater management. This work will include community engagement and coordination with citywide urban forestry and resilience efforts.

As the City develops and refines these policies, updates will be provided in future SWMP updates. The final tree canopy goals and policies will be adopted and implemented by the December 31, 2028, deadline.

S5.C.7. Stormwater Management for Existing Development

The City shall have a program to prevent or reduce impacts to waters of the state caused by stormwater discharges from existing development.

Summary of Program Component and Permit Compliance Measures

The Permit requires the City to implement a Stormwater Management for Existing Development (SMED) Program to prevent or reduce impacts to waters of the State caused by discharges from the stormwater system. The Program is intended to consider impacts caused by stormwater discharges from areas of existing development and areas of new development where impacts are anticipated to occur.

Per the Permit, the goal of Section S5.C.7 is to:

- Prevent or reduce hydrologic and pollutant-related impacts from MS4 discharges.
- Address stormwater impacts not adequately controlled by other SWMP actions.
- Achieve 1,000 SMED Program Points by March 31, 2028, as defined in Appendix 12.

The Environmental Programs Group will continue to coordinate with other City departments and groups including Public Works, Asset Management, Watershed Planning, Open Space and ES Capital Delivery to help prioritize projects that will be utilized for the SMED Program. The City will ensure project types in S5.C.7.a.i are considered for use in the program and will also use project types in S5.C.7.a.ii to achieve the required SMED Program Points.

The Urban Waters Protection Plan development and implementation and Tacoma's watershed prioritization tool are being used for the SMED planning process, per S5.C.7.b. The community-vetted goals in the UWPP, which also apply to the SMED program, include:

- Clean and Healthy Ecosystems
- Healthy Neighborhoods
- Equity and Environmental Justice
- Resilient Community
- Smart Government Spending

The geographic scale of the planning process focuses on the top 25% of priority sub-basins in the UWPP. The UWPP also outlines the steps in the planning process including an overview of related regulations, watershed characterization, public involvement process, and identifying opportunities for future funding sources. The current Stormwater Utility rates and budget are being used for SMED program implementation. The City's Equity Index Map is being used to ensure that SMED project prioritization considers benefits to overburdened communities, including specifically vulnerable populations and highly impacted communities, where possible. As noted in Section S5.C.7.b.ii.g, the City will evaluate opportunities to support equitable project distribution and focus water quality improvements on low and very low opportunity neighborhoods.

As required by the Permit, the City will provide a list of planned, individual projects scheduled for implementation during the Permit term with each Annual Report.

S5.C.8. Source Control Program for Existing Development

The source control program includes inspection of pollutant generating sources at commercial, industrial and any properties suspected of being potential pollutant generating sources based on field observations or complaints.

Summary of Program Component

The Source Control Program (SCP) is based on the enforcement authority identified in the Tacoma Municipal Code Chapter 12.08D. ES inspectors work with property owners and managers to ensure applicable operational source control BMPs, structural source control BMPs or treatment facilities are implemented for pollutant generating sources, as necessary.

Implementation of Operational and Structural Source Control BMPs and Treatment BMPs on Existing Sites (S5.C.8.a)

ES/Environmental Compliance staff notifies industries and businesses of BMP requirements during standard business inspections of targeted industrial users and activities, when responding to spill complaints, and at sites discovered during the City's illicit discharge screening process. The SCP references the City of Tacoma Stormwater Management Manual (SWMM),equivalent to Ecology's SWMMWW Manual, for operational BMP standards. The SCP includes inspection, education and enforcement procedures. During the development permitting approval process, the SDG reviews site activities and ensures that appropriate controls will be installed and utilized on new development and redevelopment sites.

The SWMM, Volume 6 provides source control BMP guidance for all new and existing businesses, commercial sites, and government agencies within Tacoma.

Enforce Ordinances Requiring Source Control BMPs for Existing Land Uses and Activities (S5.C.8.a.)

The City's ordinances and enforcement documents will be updated to enforce the permit requirements no later than August 1, 2026.

The City has an established Source Control Program implemented by ES/Environmental Compliance Section to meet this requirement. Business owners and operators are informed of operational source control BMPs during regular business inspections and responses to spill complaints. The City provides informational source control materials as necessary and will follow with appropriate enforcement per the City's Stormwater Compliance Policy. Additionally, all City-owned facilities and properties that have been identified as potential pollutant generating sites are being comprehensively inspected and if necessary, appropriate enforcement per the City's Stormwater Compliance Policy is undertaken to address deficiencies in stormwater and wastewater BMPs. This effort is ongoing and will require continued coordination among City departments.

Inspection of Pollutant Generating Sources (S5.C.8.b.)

The source control program includes inspection of pollutant generating sources at commercial, industrial and any other properties suspected of being potential pollutant generating sources

based on field observations or complaints. Environmental Compliance Inspectors enforce the implementation of required BMPs to control pollution from discharging into municipal separate storm sewers owned or operated by the City.

The City began conducting stormwater business inspections prior to 1984 as part of its delegated responsibility to implement Ecology's NPDES sanitary sewer pretreatment program.

Maintain an Inventory of Potential Pollutant Generating Sites (S5.C.8.b.)

As of 2025, the inventory list of potential stormwater pollutant generating sites is 1,795 potential stormwater pollutant generating sites. City Inspectors regularly review new businesses to verify if they should be added to the list. Additionally, Tacoma's annual business license renewal forms and tax and license applications are reviewed to identify potential pollutant generating sites.

Potential pollutant generating sites include:

- Commercial, industrial and governmental sites with specific business practices that may impact stormwater quality;
- Mobile or home-based businesses with specific business practices that may impact stormwater quality; and
- Any site or facility identified through field observations or complaints as a potential pollutant generating source.

In addition to the planned source control inspections, all pollution complaint responses (inspections, spill response, complaints, sanitary sewer overflows) are investigated promptly, coordinating with other agencies as appropriate. These complaints are documented in the Environmental Compliance Section database. The database information is reviewed prior to conducting an inspection. ES/Environmental Compliance Section staff also review all new and renewed home occupational business licenses. ES/Environmental Compliance Section Inspectors survey their entire assigned areas on a regular basis to identify new potential pollutant generating sources or unusual activity that might require a source control response.

Inspect Businesses for Compliance with Source Control Requirements (S5.C.8.c.)

The ES/Environmental Compliance Section provides information on BMPs and program literature directly to businesses during site visits. Environmental Compliance Inspectors educate the general public and businesses on BMPs and City environmental programs. Direct mailings may be used to target specific business practices.

Investigation and enforcement occur in response to all credible water quality complaints. Companies determined to be potential pollution generating sites are identified in the database as Surface Water Inventory (SWI), and NAICS codes are included to help provide additional detail of business type. The inspection program annually inspects 20% of the inventory, with a goal to visit 100% of all businesses over the five-year permit term. (including follow-up compliance inspections) to ensure BMP effectiveness and compliance with source control requirements.

Updates to the inventory outside of routine inspections, include the processes listed below:

- User Survey Program - Review of Tax & Licensing records to determine the nature of existing and new businesses.
- GIS Map Assessment – Staff review EC Map that shows existing companies.
- Spill Response – When EC respond to spill events at a commercial property, they would determine if the site should be inventoried as SWI.

All SWI businesses are provided information about the City of Tacoma SWMM, Volume 6 Source Control Best Management Practices that may apply to their activities. This occurs during inspections or through mailings and emails as needed.

The ES/Environmental Compliance Section uses a custom database for tracking spills, complaints, business inspections and flooding claims. Regular updates and refinements are made to improve data management and ensure inspections are effectively categorized and tracked in compliance with NPDES Phase I Permit requirements.

Implement Progressive Enforcement Policy and Documentation (S5.C.8.d.)

Chapter 12.08D of the Tacoma Municipal Code (TMC) outlines stormwater management regulations and provides a mechanism to take enforcement actions for any code violations. Enforcement actions are based on a process outlined in the City's Stormwater Compliance Policy that was updated in 2022. Enforcement procedures may include field inspection reports, phone calls, letters, follow-up inspections, warning letters, Notices of Violation, and civil penalties.

The Environmental Compliance Inspectors contact Ecology as standard operating procedure for all source control violations that present a threat to human health or the environment. In addition, ES/Environmental Compliance Section requests assistance from Ecology with non-responsive enforcement cases to facilitate prompt compliance. The Environmental Compliance inspectors may also refer violations in the South Tacoma Groundwater Protection District to the Tacoma Pierce County Health Department (TPCHD) for follow up or work cooperatively with TPCHD for resolutions, as appropriate.

The City documents all inspection and enforcement activities in the ES/Environmental Compliance Section inspection database and business inspection files.

Application and Enforcement of Local Ordinances at Sites Including Sites that are covered by Other NPDES Permits Issued by Ecology (S5.C.8.d.v.)

Chapter 12.08A and D of the TMC outlines stormwater management regulations and provides a mechanism to take enforcement actions for any code violations. Enforcement actions are based on a process outlined in the City's Stormwater Compliance Policy. Environmental Compliance Inspectors respond to all spills and complaints including sites covered by Ecology's stormwater permits. The City has the authority to apply local ordinances to sites covered by Ecology's NPDES Construction General Permit and NPDES Industrial Stormwater General Permit

through TMC 12.08D.110, which states that Chapter 12.08D applies to all direct and indirect users of the municipal stormwater system and all discharges into receiving waters within the city.

In cases where Ecology has direct authority, such as at NPDES-permitted industrial facilities, certain underground injection control (infiltration) systems, or sites requiring a waste discharge permit, the City consults with Ecology to determine the most effective level of enforcement.

Training Program for Source Control Staff (S5.C.8.e.)

ES/Environmental Compliance Section has developed a training program for all of their inspectors that includes regularly scheduled follow-up training. The training will facilitate uniform enforcement of the applicable source control requirements listed in Chapter 12.08D of the TMC and the SWMM. Training topics include legal authority, proper use and application of source control BMPs, lessons learned and typical cases, inspection procedures and the enforcement process. The training program will be documented through training sign in sheets.

S5.C.9. Illicit Connection and Illicit Discharge Detection and Elimination (IDDE)

The City will maintain a program to detect, remove and prevent illicit connections and illicit discharges, including spills into the City's separate storm sewer system. All staff who might observe an illicit discharge will be trained.

Summary of Program Component

ES operates a robust Illicit Connection and Discharge Detection and Elimination (IDDE) program through field screening, stormwater monitoring, source control inspections, spill and complaint response, and construction inspections. This program also addresses prohibited discharges and associated source control BMPs for non-stormwater discharges as outlined in the Permit.

Include procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges (S5.C.9.a.)

The City has a database to report and track illicit connections, spills and other illicit discharges. The database ensures that reports are adequately investigated, and illicit connections are removed as appropriate. The database was updated to comply with the 2019 permit. Data base requires no significant changes and remains in compliance with the 2024 Permit and include all information required in Appendix 14 of the Permit.

Continue to implement enforcement ordinances and regulations to prohibit IDDE (S5.C.9.b.)

Chapter 12.08D of the TMC provides enforcement authority to prevent illicit connections and illicit discharges to City stormwater system and sanitary sewers. See Section S5.C.1 of this document for specific code citations.

Program for detecting and identifying illicit connections and non-stormwater discharges to the MS4 (S5.C.9.c.i, ii, iii.)

The City IDDE Field Screening Program consists of several components:

- Video inspection, of the storm sewer pipes;
- Smoke-testing and/or dye testing of the sanitary and stormwater systems; and
- Base flow sampling.

The city uses video inspection of the stormwater conveyance system. This program is used to assess pipe condition and to identify illegal connections to the stormwater system. Suspect connections identified as a part of this program are further investigated by smoke and/or dye testing and removed as appropriate.

The City also has an ongoing Sanitary Inflow and Infiltration Program. Under this program, field crews investigate sanitary connections by smoke testing the sanitary sewer. If properties appear not to be connected to the sanitary system, the stormwater system is then smoke tested to determine if there is an illicit connection from the sanitary side sewer to the stormwater system. If smoke testing cannot confirm a connection to the sanitary or storm systems, field crews then conduct dye testing to verify connections. All misdirected connections are required to be remedied.

Both the video inspection and the smoke-testing field screening data are collected and stored on the City's GIS system.

The City also conducts base flow sampling at selected outfalls to aid in identifying illicit connections and discharges in the stormwater system.

The permit requires 12 percent on average of the stormwater system to be screened each calendar year.

The City's existing IDDE program follows standard procedures based on the guidance document: Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual prepared by Herrera Environmental Consultants, (IC-ID Manual). The City began following the guidelines and procedures of the updated IC-ID manual upon its release on May 7, 2020 (wastormwatercenter.org/illicit-connection-illicit-discharge/).

Maintain Publicly Listed Water Quality Complaint Hotline (S5.C.9.c.i.a.ii)

In 2018, the City began using its own TacomaFIRST 311 as our water quality complaint line for spills and illicit discharges. TacomaFIRST 311 is used as a platform for anyone within the City to call. Residents can call 311 within the City or (253) 591-5000 from anywhere else. TacomaFIRST 311 is included in directories throughout the City, on watershed signs along major arterials, and on 311 and stormwater promotional materials. TacomaFIRST 311 can be accessed via telephone call, electronically on the City's website at www.cityoftacoma.org/stormwater, www.cityoftacoma.org/tacomafirst311, and is available as an application for mobile devices. The City expanded the TacomaFIRST 311 service to include a SEECLICKFIX app in 2022. Both, TacomaFIRST 311 and SEECLICKFIX platforms are available on the City's website.

Training Program for City wide Staff to Identify and Report Illicit Discharges and Connections (S5.C.9.c.i.a.iii)

All City staff are provided Illicit Discharge Awareness (IDA) training on how to identify and report illicit discharges. This training is now part of the City's onboarding process for all new hires. In 2021, the City updated its IDA training with a new online LinkedIn Learning video module. This new training was distributed to all staff in August 2021. All City staff are required to take the IDA training module on a biannual cycle. In 2025, the IDA training will be updated again to include If It Hits the Ground, It Hits the Sound campaign messaging and graphics.

Additional reminders such as key chain tags listing an internal-use only phone number for City staff to report illicit discharges have also been distributed. The new LinkedIn Learning training is documented in SAP, the City's Information Management System database, and the City will identify needs for follow-up training.

Response to Illicit Connections and Illicit Discharges including Spills (S5.C.9.d.)

The Permit requires the City to implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's stormwater system. The program includes procedures for characterizing, tracing, and eliminating illicit discharges, in compliance with the new permit requirements.

The ES/Environmental Compliance Section spills and complaints database is used to track the complete process of screening, investigation, referral to responsible agencies (if other than the City), and enforcement. This ensures a documented record of response actions, interdepartmental coordination, and enforcement follow-ups.

The ES Field Support Services Group and Environmental Compliance Inspection Programs work together to investigate and eliminate illicit connections within the required timelines.

Timeline (S5.C.9.d.v):

- Immediate response to illicit discharges that pose a threat to human health or the environment, per General Condition G3.
- Investigate potential illicit discharges within 7 days on average based on complaints, reports, or monitoring data.
- Initiate an investigation within 21 days of discovering a suspected illicit connection to determine its source, discharge volume, and responsible party.
- Eliminate confirmed illicit connections within 6 months using enforcement authority, ensuring full compliance with permit deadlines.

Several City departments such as Neighborhood and Community Services Code Compliance Office; ES/Science and Engineering Division; Street Operations; ES/Operations and Maintenance Division; Tacoma Water; and other agencies such as TPCHD and Ecology may be involved in both the investigation and termination of illicit connections.

In cases when an illicit connection may cause a severe threat to the environment or human health or when businesses are permitted under Ecology NPDES permits, the City may refer the case to Ecology to follow-up. If a business does not respond after ES/Environmental

Compliance Section staff makes a good faith and documented effort of progressive enforcement to terminate a violation, the City may partner with Ecology for enforcement.

The new 2024-2029 permit requirement mandates procedures to minimize discharges from firefighting activities. The City is developing a program to ensure compliance with notification and cleanup requirements by the December 31, 2026, and January 1, 2027, deadlines. The SWMP will be updated accordingly.

Training Program for IDDE Staff (S5.C.9.e.)

Annual training is provided to field staff responsible for identification, investigation, termination, cleanup and reporting of illicit discharges including topics such as: documentation and reporting process once illicit discharges are found; environmental sampling for enforcement; and BMP training. Records of training are kept via sign in sheets.

Develop and Implement Procedures to Investigate and Respond to Spills or Improper Disposal into the MS4 (S5.C.9.f.)

Potential illicit discharges are discovered and investigated by ES Environmental Compliance. ES staff investigate, document, and take corrective actions to resolve illicit discharges found through reported complaints, firsthand field observations, business inspections and stormwater monitoring information. Tacoma Public Utilities (TPU) Environmental Compliance team has an active spill response program to respond to and clean up larger spills at facilities owned and operated by Tacoma Public Utilities. TPU reports all spills to ES Environmental Compliance who then log the report into the database for tracking. When appropriate ES Environmental Compliance will provide onsite assistance for all spills. ES Environmental Compliance notifies Ecology and other required agencies of all spills, as required by the Permit.

ES/Environmental Compliance staffs a 24-hour on-call Source Control Representative to respond to emergency spills and complaints. The direct call line for City staff has been included in City training for staff if they come into contact with an illicit discharge. Environmental Compliance responds to spill complaints to ensure appropriate actions are taken to mitigate damage, document events, and complete any necessary reporting. The Source Control Representative also responds to water pollution reports from the public water pollution hotline (TacomaFIRST 311 & SEECLICKFIX).

The City has existing procedures for responding to spills and improper disposal to the storm system. Some departments also participate in regional emergency response programs.

In the course of regular duties, various City staff may encounter illicit discharges or spills that are from unknown sources. City staff may also accidentally cause spills. All Permit required spills reporting is managed by ES Environmental Compliance. City staff have been trained to contact ES Environmental compliance using various communication tools. ES Environmental Compliance will investigate, responded to and report spills and illicit discharges to Ecology and other required agencies as required by the Permit.

When a major spill occurs, Ecology or other agencies may assist or manage the spill response. Tacoma will provide assistance to these agencies upon request.

IDDE Inspection, Response and Enforcement Record Keeping (S5.C.9.g.)

The ES/Environmental Compliance Section staff uses a database (ES/Environmental Compliance Section spills and complaints database) to track IDDE, spill complaints, and source control inspection activities. The database has been updated to meet the requirements stated in Appendix 14.

The City IDDE program uses the City's asset management mapping system to manage field screening and any follow-up investigation. The referral information and final enforcement outcome for each potential illicit discharge or connection is tracked in the ES/Environmental Compliance Section spills and complaints database.

S5.C.10. Maintenance and Operations Program

Maintenance standards and inspection programs are required for public and private stormwater facilities. Best Management Practices (BMPs) are required to be implemented for the maintenance activities on public lands and roadways to reduce stormwater impacts.

Summary of Program Component

This section of the SWMP contains requirements to regulate and conduct public and private operation and maintenance activities to prevent and reduce stormwater impacts.

Each City division is responsible for performing those tasks discussed under the compliance measures below that are applicable and necessary for Permit compliance. These include:

- Implementing and enforcing maintenance standards for stormwater facilities;
- Ensuring proper and timely maintenance of public and private stormwater facilities, including catch basins;
- Establishing Best Management Practices (BMPs) for reducing stormwater impacts associated with runoff from City property, parking lots, streets and highways owned or operated by the City;
- Implementing a training program for employees who have primary construction, operations, or maintenance job functions that may impact stormwater quality;
- Establishing BMPs and Stormwater Pollution Prevention Plans for reducing stormwater impacts from heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City; and
- Maintaining records of these activities.

Adopt Maintenance Standards Equivalent to Ecology's SWMM for Western Washington (S5.C.10.a.)

TMC 12.08D.150.D references the SWMM Minimum Requirements and MR #9 contains the requirement for an operation and maintenance manual including maintenance standards for proposed stormwater facilities as described in the SWMM which are equivalent to Ecology's

SWMM for Western Washington standards. Chapter 12.08D of the TMC also provides City personnel authority to enter private property to inspect and regulate the operation and maintenance of private facilities. The City requires owners of private stormwater facilities to submit an operation and maintenance manual to the City as part of the permit approval process to ensure that all current and future owners of the private stormwater facilities have operation and maintenance guidelines for regular inspection and maintenance of their permanent stormwater treatment and flow control facilities.

When maintenance is required according to the standards, the City will schedule typical maintenance to be performed within one year for all treatment and flow control facilities; within six months for all catch basins; and within two years for maintenance requiring capital construction of less than $25,000.

Maintenance of Private Stormwater Facilities Regulated by the City (S5.C.10.b.)

Inspect Private Treatment and Flow Control Best Management Practices (BMPs)/Facilities

The City requires applicants installing private stormwater facilities to enter into a Covenant and Easement agreement. The Covenant and Easement agreement between the property owner and the City is recorded to the title of the associated property prior to final permit approval. The agreement affirms a commitment on the part of the property owner to perform inspection and maintenance of the private drainage system and allow City staff access to the facilities for confirmatory inspections.

The City has an established inspection program for private storm drainage facilities. The ES/Environmental Compliance Section Inspectors provide education and training to owners of private stormwater facilities on operations and maintenance needs for their treatment and flow control facilities. Inspection and enforcement records are tracked in the ES/Environmental Compliance Section spills and complaints database. The City will provide inspection of each identified private treatment and flow control device regulated by the City. The City has analyzed the data from annual facility inspections over 6 years. Based on that analysis, a two-year inspection frequency is appropriate for the majority of private facilities. This analysis and frequency determination is allowed per Permit section S5.C.10.b.iii.

Inspection Program Shall Achieve Inspection of 80 Percent of all Sites Requiring Inspection

The City has an established inspection program designed to inspect and require maintenance of private stormwater facilities regulated by the City. The City tracks inspections in a database. The City will meet the inspection requirements described above in Section S5.C.10.b.iii., by achieving inspection of 80 percent of all known facilities requiring inspection on a yearly basis.

Catch Basin Cleaning Required where Identified by Inspection

The City has an established inspection program with the authority to inspect and require maintenance of private stormwater facilities, including catch basins, regulated by the City. TMC 12.08A.090 requires that all privately owned drainage facilities including catch basins must be regularly inspected and maintained by the owner and provides authority to the City to access private property to inspect catch basins connected to the municipal storm drainage system.

City inspectors enforce required maintenance standards for cleaning private catch basins. The maintenance standards identify conditions requiring catch basin maintenance including sediment depth, vegetation and debris accumulation, structural integrity, and safety concerns. City inspectors also require catch basin cleaning where structures have been contaminated by pollutants from accidental spills or illicit discharges.

Maintenance of Stormwater Facilities Owned or Operated by the City (S5.C.10.c.)

Inspection Schedule Established for Public Stormwater Facilities Owned or Operated by the City

ES has a program to annually inspect all City owned or operated stormwater treatment and flow control facilities and to provide necessary maintenance of these facilities. The inspection program's goal is to achieve at least 95 percent of required inspections. The list of City-owned facilities and associated maintenance procedures are documented in the SWMM and in the Environmental Compliance database.

Perform Spot Checks of Treatment and Flow Control Facilities after Major Storm Events

ES implements a flooding emergency response plan to inspect certain public stormwater facilities and potential flooding locations during major storm events, also called a "code red" event. The plan identifies potential flooding areas and assigns ES personnel to designated drainage basins within the City. These personnel are responsible for inspecting the public storm system and calling the ES/Operations and Maintenance Division to perform emergency maintenance if necessary to alleviate flooding. The flooding emergency response plan includes additional spot check inspections of potentially damaged treatment or flow control facilities during a "code red" flood response, which is triggered by a major storm event for Tacoma's storm system. The flooding emergency response plan also documents the process for communicating inspection results to the ES/Operations and Maintenance Division or ES/Science and Engineering Division for follow-up with recommended maintenance or repair activities. The plan is updated as necessary.

For the purpose of this section, a major storm event is defined as the 24-hour storm with a 10-year or greater recurrence interval. After the event occurs, additional spot checks of potentially damaged facilities will be conducted. If spot checks show widespread damage or maintenance needs, additional stormwater treatment and flow control facilities that may have been affected will also be inspected.

Maintenance of Catch Basins Owned or Operated by the City (S5.C.10.d.)

The ES/Operations and Maintenance Division inspects and maintains catch basins and inlets that are part of the public stormwater system annually per Permit section S5.C.10.d.i. A dedicated catch basin cleaning crew is assigned to inspect an all catch basins and inlets owned or operated by the City each year. Catch basin and inlet inspections can be easily entered by City staff using the City's asset management system. The asset management system then schedules any follow up cleaning or other maintenance if needed per the inspection.

Other City owned or operated catch basins, typically those on parcels, not within road right of way, will be inspected by the City department responsible for the site. Inspection results will be

transmitted to Environmental Services for entry into the catch basin inspection and cleaning tracking program.

If the inspected basins are at least 60 percent full of sediment or when debris is within six inches of the bottom of the outlet pipe, cleaning will be scheduled within six months.

Individual maintenance plans for more frequent inspection and cleaning have been developed for some catchments with especially heavy loads of sediment, prone to plugging by leaves or other debris or individual problem catch basins and inlets. These maintenance plans are contained within the City's SAP system and include specific guidelines for the type of maintenance and frequency needed and are developed as a result of observations during regular maintenance visits by staff.

The City owns and operates approved and permitted decant facilities. Disposal of decant materials from catch basin maintenance activities is in accordance with the street waste disposal procedures described in the Permit, Appendix 6.

In 2025, the ES/Operation and Maintenance Division will implement a circuit-based approach to catch basin maintenance per Permit section S5.C.10.d.i.(b). The Operations and Maintenance Division will inspect at least 25% of catch basins in each stormwater subbasin annually, including those upstream of MS4 outfalls and discharge points. Crews will clean basins as they inspect them, ensuring timely maintenance.

The City maintains a contract with Northern Environmental LLC. for inspection and cleaning of catch basins located on city-owned parcels. Catch basin repairs and any other public works cannot be performed under this contract.

Reduce Stormwater Impacts from Lands Owned and Maintained by the City and Road Maintenance Activities (S5.C.10.e.)

Practices, Policies and Procedures

ES/Operations and Maintenance Division crews maintaining City-owned treatment and flow control facilities, pipes and catch basins may reference the SWMM and the specific Operations and Maintenance plan for the facilities for operation and maintenance of all City-owned stormwater facilities. ES EPG also serves as a technical resource for this work.

Crews performing street, utility, and grounds maintenance activities follow the guidelines in the City of Tacoma Utility BMP Manual, City of Tacoma SWMM and RRMP ESA Guidelines. This includes maintenance of parking lots, streets and highways that are owned or operated by the City, as well as for the maintenance activities listed in the Permit Section S5.C.10.e including pipe cleaning, cleaning of culverts, ditch maintenance, street cleaning, road repair and resurfacing, snow and ice control, utility installation, vegetation management, dust control, pavement striping maintenance, application of fertilizers, pesticides and herbicides, sediment and erosion control, landscape maintenance, vegetation disposal, trash and pet waste management, and building exterior cleaning and maintenance. To comply with 2024-2029 Permit requirements for building exterior cleaning, maintenance, renovation, and demolition of Permittee-owned buildings constructed or renovated between 1950-1980, ES is updating

policies, practices, and procedures to incorporate Source Control BMPs that minimize pollutant-generating building materials (PEBs) from entering the MS4 (S5.C.10.e.xv, xvi). These updates will be developed and implemented in 2025.

Supervisors document use of best management practices by using a City developed tablet app. The Public Works Department, Street Operations and Tacoma Public Utilities - Grounds Maintenance Section collaborated with the Tacoma Public Schools and Parks Tacoma to write the 2011 Management Guidelines for Public Landscapes Including Integrated Pest Management. This document outlines strategies and methods for pest control used by the guideline partners.

The City typically sponsors two to three Ecology Washington Conservation Corps (WCC) crews. These crews maintain and restore the City's open space areas, mitigation and habitat restoration projects near shorelines, streams, and wetlands. All WCC crews are trained in proper operations to ensure their work does not create impacts to the stormwater system or receiving water bodies.

Municipal Street Sweeping Program

The City's Street sweeping program removes sediment and associated contaminants from the street surfaces before they enter the stormwater system. The street sweeping program is one of the BMPs the City uses to reduce stormwater impacts from roadways. The program provides street sweeping services on a scheduled rotation for major arterials, 12 business districts, and residential areas. Street sweeping services are also provided as needed in response to emergency calls, special events, and customer requests. More information is available on the City website at cityoftacoma.org/street sweeping.

To comply with 2024-2029 Permit requirements (S5.C.10.f), the City is updating the program to enhance data tracking and prioritize arterials and commercial/industrial areas. A program is under development to ensure compliance with sweeping frequency, operational procedures, street waste disposal, and reporting requirements by July 2027. The SWMP will be updated accordingly.

Additional Practices

The ES/Operations and Maintenance Division provides storm pipe cleaning services throughout the City prioritized based on pipe inspections, receiving water, spill response or other source control observations in the stormwater collection system. The allocation of maintenance resources within the stormwater utility is prioritized by the asset management program, which includes impacts to receiving waters as key criteria. Special pipe cleaning projects are prioritized in specific subbasins each year.

Implement Stormwater Pollution Prevention Plans (SWPPPs) for City Heavy Equipment Maintenance or Storage Yards and Material Storage Facilities (S5.C.10.g.)

SWPPPs have been developed by Tacoma Public Utilities, ES/Environmental Compliance Section and ES/Environmental Programs Group staff for the list of City-owned heavy equipment maintenance or storage yard and material storage facilities that meet the following criteria:

1. Not required to have coverage under the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities or another NPDES permit that covers stormwater discharges associated with the activity; and
2. Include heavy equipment maintenance and storage areas and/or material storage areas.

The list of facilities includes the following locations:

- Sewer Transmission and Maintenance Dock Street Yard (201 Puyallup Avenue)
- Sewer Transmission Cleveland Way Decant Facility (2101 Cleveland Way)
- Tacoma Fire Vehicle Maintenance Shop (3401 B South Orchard Street)
- Tacoma Power Southwest Substation Training Facility and Pole Yard (4102 South 74th Street)
- Tacoma Power Utility Center (3628 South 35th Street)
- Tacoma Water Distribution Operations Center (3506 South 35th Street)
- Traffic Signal and Street Lighting Shop (3401 A South Orchard Street)
- Street Operations Upper Yard (2335 Jefferson Avenue)
- Northeast Tacoma Storage Yard (100 Block Norpoint Way NE)
- Fleet Operations Maintenance Facility (3639 South Pine Street)
- Tacoma Power LaGrande Hydro-Project (Nisqually project headquarters), (46506 Mountain Highway East (SR 7 East – Eatonville)
- Tacoma Power South Service Center (loveland), (3022 224th Street East)
- Wilco in Gig Harbor (Potlach Trail Line), (3408 Hunt Street NW)
- Tacoma Rail (2601 Sr 509 North Frontage Road)
- McMillin Reservoir (13004 Reservoir Riad East)
- Tacoma Water Headworks – King County (37007 SE Green River)

SWPPPs for these facilities have been developed and implemented to cover operational BMPs and a visual inspection program to evaluate BMP effectiveness. SWPPP training will also be provided on an annual basis to employees staffing these facilities.

As required by the Permit, all City SWPPPS were updated by December 1, 2022, to include all Permit required components. SWPPPS are maintained and updated as necessary.

Ongoing Training Program for Employees with Primary Construction, Operations or Maintenance Job Functions (S5.C.10.h.)

ES/Environmental Programs Group coordinates a training program for City staff with primary construction, operations, and maintenance job functions that may impact stormwater quality. The training includes discussions of BMPs, policies and procedures for the maintenance

activities listed in the Permit Section S5.C.10.e (outlined above). The City developed a module-based training program that specifies appropriate BMPs based upon the activities being conducted. These modules are presented at staff meetings or other training opportunities. As part of the module-based training a City of Tacoma Utility BMP Manual was created that provides a more detailed overview of the BMPs mentioned in the training.

The training program will include regularly scheduled follow-up training, and a list of trained staff will be documented in Docebo, the city's learning management system. A half-day refresher O&M BMP training combining classroom overview and field practice was developed in 2024 and will be offered to all crews and supervisors in ES, PW and TPU beginning in 2025. Updates to the training modules to comply with 2024-2029 permit requirements are under development.

Inspection and Maintenance Records (S5.C.10.i.)

The City keeps records of all maintenance activities of City-owned and operated storm drainage facilities. Record-keeping processes and maintenance checklists are evaluated and updated as necessary.

Environmental Compliance Inspectors keep a database of all business inspections, which includes private stormwater facility inspections, maintenance, enforcement, and spill complaint information.

Maintenance activities for public facilities are tracked in SAP, the City's Information Management System database.

S5.C.11. Education and Outreach Program

The City will engage in Education and Outreach Programs to build general awareness; effect behavior change and promote stewardship opportunities. Target audiences include the general public, including school-age children, college and trade students, overburdened communities, businesses, property owners and managers, engineers, contractors, developers, and land use planners. During this permit cycle, the City will more intentionally consider the needs of overburdened communities.

Summary of Program Components

Public education and outreach is a vital component of the SWMP. Stormwater pollution is the result of ongoing activities of people and businesses. Therefore, focusing public education efforts on activities and practices that people and businesses can do to help reduce stormwater impacts to surface water quality are important. As people learn how their activities affect surface water quality, some will quickly change their behavior. Others will benefit from continuous educational opportunities and incentives.

The City has started to increase focus on more equitable education and outreach programming to serve a more diverse audience and overburdened communities as defined in the Permit. The City has translated educational materials into five of Tacoma's primarily used languages other than English including Spanish, Russian, Vietnamese, Korean and Khmer. The City has

developed its own Equity Index Map to identify overburdened neighborhoods and to better inform public outreach and program development.

The City has various active environmental education and outreach programs and activities described in the following sections. Most of the City's surface water and stormwater education efforts are implemented by the following groups:

ES/Environmental Programs Group

Environmental Programs Group staff is responsible to coordinate all permit-mandated education and outreach. Staff coordinates with departments and divisions throughout the City. Staff develop messages, create outreach materials, and train other staff regarding outreach messages, plan events, and conduct outreach opportunities.

ES/Environmental Compliance Section

Environmental Compliance Inspectors provide education about BMPs to businesses during regular business inspections, stormwater facility maintenance inspections, and spills and complaints responses. Outreach audiences include commercial and industrial businesses, home-based and mobile businesses, landscapers, and property managers, among others. To ensure an equitable distribution of information, several of the handouts have been translated into various languages that include Spanish, Russian, Cambodian, Korean and Vietnamese.

ES/Solid Waste Management Division

Staff assists with education related to the storage and disposal of hazardous waste, education related to natural yard care, yard waste disposal and dumpster practices and maintenance.

ES/EnviroChallengers

The EnviroChallenger environmental education program delivers free lessons to elementary and middle schools, home school groups and represents ES at community events. Lessons and event activities include stormwater, wastewater, and solid waste topics. EnviroChallengers and Environmental Programs Group partner on activities and initiatives where messaging overlaps.

ES/Communications and Engagement Team

This team assists program staff with developing communications plans, messaging materials, social media posts, website updates, and engagement activity planning and implementation.

Planning and Development Services Department

Plan review staff, inspectors, planners, and regulatory compliance staff provide education about SWMM development requirements and technical standards, LID principles and BMPs, stormwater treatment and flow control BMPs, and source control BMPs to developers, engineers, contractors, property owners, and land use planners.

City Media and Communications Office

The City Media and Communications Office provides strategic marketing and communications support for all Environmental Services (ES) utilities, including surface water, wastewater, and

solid waste. Staff advise and support the Environmental Programs Group (EPG) and the Environmental Compliance Section on public and media relations opportunities while also managing relevant social media outreach efforts.

- City of Tacoma Website (cityoftacoma.org/stormwater)
- EnviroTalk
- Utility Bill Inserts
- TV Tacoma
- Stormwater Manual listserv
- Tacoma EnviroNews Listserv
- City of Tacoma Environmental Services Facebook and Instagram page

These communication efforts ensure that residents and businesses stay informed about stormwater management practices and available resources.

EnviroHouse

Until December 31, 2024, ES partnered with five City Utilities to run the EnviroHouse, a hands-on showcase of sustainable building and natural landscape ideas, materials, and techniques for a healthy home and planet. The EnviroHouse hosts tours for school-age children, college and trade school students, and other community members walking through the on-site displays of low impact development practices including rain barrels, native plants, rain gardens, pervious pavement, natural yard care techniques, and "pin" foundations. Interpretive signage and a library of additional educational materials are available regarding LID, and natural yard care strategies are available on-site. Free online and in-person workshops have been offered weekly throughout the year on a variety of sustainable practices, including stormwater-related topics such as: building healthy soils, alternatives to pesticides, native plants, composting, rain gardens, and tree care.

While the internal building of the EnviroHouse is now closed, the outdoor components remain available. Visitors can still experience the interpretive signage and participate in tours of the outdoor installations that demonstrate sustainable practices in action.

The City continues to promote sustainable practices through an ongoing partnership with the Pierce Conservation District, focusing on LID training and natural yard care education. Additionally, a library of "How To" videos and educational content is available on YouTube, ensuring that valuable information and best practices remain accessible to the public.

Outreach Engagement at Local Community Events

Stormwater messages are promoted at a variety of community events. Both the EnviroChallengers and Environmental Programs Group staff may be present at these events. Environmental Programs Group staff typically participate in four to six local community outreach events each year such as the South Sound Sustainability Expo, Welcome Back Salmon Days – Swan Creek, T-Town (city government expo), Hilltop Healthy Kids and Families Carnival, World Ocean Day, and others.

Implement a Public Education and Outreach Program (S5.C.11.a.i-vii.)

The City's public education and outreach methods are designed for a variety of target audiences and messages as required by the Permit. Per the 2024 Permit, the City's education and outreach program shall be informed by local water quality information and target high priority audiences, subject areas, and/or BMPs. The City will consider delivering its selected messages in language(s) other than English, as appropriate for the target audience.

Since 2018, the City has been developing a messaging campaign called "If it Hits the Ground, It Hits the Sound" centering art from local artist. The City also provides education for businesses and the development community focused on stormwater BMPs for both ongoing maintenance of water quality and flow control facilities and implementation of operational BMPs.

General Awareness

The SWMP shall include an education and outreach program designed to build general awareness about methods to address and reduce stormwater impacts.

Summary of Program Component

This page contains links and information on the educational programming and events the City offers to the general public (including school age children and overburdened communities), and businesses (including home-based and mobile businesses).

"If it Hits the Ground, it Hits the Sound"

As part of Tacoma Environmental Services' 2018-2025 Strategic Plan, the If it Hits the Ground, it Hits the Sound (IIHTG) campaign continues to raise awareness about the city's stormwater system and its impact on local waterways.

In 2024, the campaign led the design and installation of four murals featuring stormwater awareness messaging. Additionally, it partnered with Parks Tacoma, local artists, and students from the Science and Math Institute (SAMI) high school to create six storm drain murals near Point Defiance Marina as part of a SAMI mini-semester project. Students first learned about stormwater pollution and its environmental impacts, then developed mural designs to convey key stormwater awareness messages. These mural projects, which were featured on KOMO News, help communicate the importance of preventing stormwater pollution and protecting Tacoma's waterways.

Also in 2024, the Ground to Sound Film Festival expanded community engagement and stormwater education through a series of pop-up events leading up to the film festival. Environmental Services, in partnership with Fosters Creative and local artists, hosted interactive activities, including stormwater education poetry workshops, a photo development workshop supporting several stormwater education social media photo contests, and a musical pop-up featuring an original stormwater education song and a live cypher session. The festival, set for 2025, will showcase various artistic expressions while premiering winning films focused on stormwater education.

These efforts reinforce Tacoma's commitment to innovative public engagement strategies, ensuring that stormwater education remains accessible and impactful.

Ground to Sound Film and Arts Festival & Community Events

The IIHTG campaign launched the 2nd Ground to Sound Film and Arts Festival, using film and multimedia storytelling to further stormwater education. A series of pop-up events leading up to the festival engaged over 120 participants in activities such as poetry workshops, a photo development workshop tied to social media contests, and a live music cypher featuring an original stormwater education song. Each pop-up event incorporated stormwater education, covering topics such as pet waste management, car washing best practices, sustainable gardening practices, LID Practices/BMPs, and hazardous waste disposal best practices. In collaboration with Fosters Creative, the campaign also produced stormwater educational videos featuring community members, City employees, and local artists. These videos were widely shared across Tacoma's social media platforms and hosted on the Ground to Sound website, ensuring ongoing engagement and outreach. The film festival took place in March 2025, drawing over 400 attendees.

City of Tacoma Household Hazardous Waste Disposal Program

The ES/Solid Waste Management collects and properly disposes of large amounts of **household hazardous waste** from Tacoma residents at the Tacoma Recovery and Transfer Center. This service is free of charge for residents in order to prevent hazardous materials from entering the stormwater system, surface waters, groundwater, or general garbage stream. Solid Waste Management works to educate the public about the need for proper disposal and where hazardous wastes can be disposed of through ES publications and other communication tools, including the **Recycle Coach app**. Special assistance is also offered to businesses through the business technical assistance program.

City of Tacoma Purple Bag Program

The Purple Bag Program was launched in 2021 by Environmental Services Natural Systems Management, in partnership with Neighborhood and Community Services, to provide regular waste pickup service at homeless encampments within the City. The purple bags are distributed with ongoing outreach and resource services by our HEAL Team (Homeless Engagement Alternatives Liaison). Waste management contractors regularly pick up the full bags that are placed on the edge of the roadway adjacent to the encampments. The purple bags provide individuals experiencing homelessness with tools and services to keep their encampment area clean, so they can properly dispose of trash and contaminated objects to protect their health and downstream water quality. Currently, an average of 10,000 purple bags are distributed annually throughout the City. In 2024, the City piloted an expansion of the purple bag program to provide a mobile toilet kit with waste pick-up service to a small user group of 10 individuals. Initial user response was positive, so in 2025, the City will be testing the program on a larger group of 25 and partnering with the Neighborhood and Community Services HEAL team for distribution of the kits.

High School Job Training

The Tacoma School District Next Move Internships Program places high school students with a city staff supervisor to gain experience working with staff in Environmental Services as well as other City departments. In 2024, for the 9th cohort of Next Move internships, we hosted 21 high school students. Our cohort model allowed for shared experiences while learning 21st-century job skills.

The high school summer ES certificate job training program is designed to engage and train students from overburdened communities to gain skills needed to apply for jobs at the city or other union-supported jobs. The 13 participants earned CESCL, Flagger, OSHA, CPR, and Six Sigma White Belt certificates. They also learned tree stewardship practices, as well as other vital job skills related to stormwater management. The group participated in stormwater sampling, chain-of-custody documentation, and water quality testing while touring the Center for Urban Waters environmental labs. Three of the students from the certificate program went on to a paid experience in the CUW lab and TAGRO biosolids division throughout August.

Stormwater Education College/ University, Trade Student Connections

The City of Tacoma's Environmental Programs Group (EPG) partners with the University of Puget Sound and Clover Park Technical College to engage students through educational events and tours focused on stormwater education.

In 2024, approximately 24 students from a University of Puget Sound Environmental Law and Policy course participated in a paddleboarding field trip on the Thea Foss Waterway. City staff discussed the impacts of stormwater runoff on surface waters, the role of impervious surfaces, and the hazards associated with illicit discharges and improper waste disposal. The activity bridged classroom lessons on hazardous waste policy with an upcoming visit to the Washington Stormwater Center.

EPG also led a tour for the University of Puget Sound "What's in the Water?" class, visiting green stormwater infrastructure sites, including the Point Defiance stormwater treatment facility and bioretention installations along Pacific Avenue. The tour focused on Low Impact Development (LID) principles, BMPs, and general stormwater impacts, offering students real-world examples of sustainable urban stormwater solutions.

Additionally, EPG partners with Clover Park Technical College to support stormwater and environmental education through tours of the Flett Creek holding ponds and pump station. These tours are designed to support student projects and provide exposure to the practical application of stormwater infrastructure and management practices.

Pierce County Green Stormwater Infrastructure Workforce Training Pilot

Between October and December 2024, ten Palmer Scholars successfully completed the first pilot cohort of the Green Stormwater Infrastructure (GSI) Workforce Training Program. Sponsored by the City of Tacoma, this paid workforce training experience was designed for young adults ages 18-26 with a focus on watershed and habitat protection and sustainable stormwater strategies. Participants engaged in hands-on classroom and field training sessions,

led by environmental professionals from regional partner organizations who provided both technical instruction and personal insights into career pathways in green stormwater infrastructure.

Due to the success of this pilot, the program is now an ongoing initiative, with two graduating cohorts per year. The City of Tacoma Environmental Services leads a minimum of three in-class and field training days, featuring expert guest speakers from various stormwater-related fields. These sessions include professionals such as source control representatives, GSI maintenance crews, regulatory compliance analysts, stormwater management specialists, stormwater construction management specialists, trained IDDE (Illicit Discharge Detection and Elimination) inspectors, stormwater field sampling experts, and urban forestry specialists.

These training sessions provide participants with real-world experience, offering a comprehensive understanding of stormwater regulations, pollution prevention, and green stormwater infrastructure maintenance and implementation. The program not only enhances technical knowledge but also supports workforce development by connecting participants with environmental professionals and career opportunities in the field.

City of Tacoma Open Space Management and Urban Forestry Programs

The Open Space Management Program promotes activities to protect existing green spaces and increase Tacoma's tree cover. These activities include, but are not limited to removing overabundant weeds, erosion control, and re-vegetation. Open Space staff co-manage the City's Plant Holding Facility with Urban Forestry staff at Tacoma's Tacoma Recovery and Transfer Center. Propagation of plants, care and maintenance of the Plant Holding Facility is carried out by Washington Conservation Corps Crews. The City sponsors a **Tree Coupon Program** in partnership with local nurseries, helps sponsor an annual Green Tacoma Day/Arbor Day celebration, and supports various other related educational opportunities to successfully plant and care for trees in their yards.

City of Tacoma Business Source Control Outreach

Information is presented to business owners and property managers during source control site visits required by **Permit Section S5.C.8**. The intent is to make business owners and property managers more aware of the importance of regularly maintaining their onsite stormwater facilities and BMPs to help protect local waterways and reduce stormwater pollution. Businesses can also request to have their private catch basins marked and the City of Tacoma will supply resources. Specific business-related messaging and outreach has been translated into five languages to increase accessibility by business owners and operators.

Outreach to Business, Engineers, Contractors, and Developers

The City provides education for businesses and the development community focused on stormwater BMPs for both ongoing maintenance of water quality and flow control facilities and implementation of operational BMPs.

Dumpster Sticker BMP Outreach Program

The City of Tacoma continues its efforts to educate businesses on best management practices (BMPs) for dumpster and trash compactor maintenance through the Dumpster Sticker Outreach Program. This initiative builds on the previous behavior change campaign and reinforces proper waste management practices to prevent stormwater pollution.

As part of this program, stickers are placed on commercial dumpsters to provide a visible and ongoing educational reminder to keep lids closed, prevent leaks, and report pollution concerns. These stickers include BMP messaging and contact information for TacomaFIRST 311, the City's spill and pollution reporting hotline.

The City will update dumpster stickers for better visibility and accessibility, including a larger format and multiple languages reflecting Tacoma's most spoken languages. Solid Waste Management is responsible for applying the stickers to new dumpsters and replace worn stickers as needed.

City of Tacoma Event Participation and Sponsorship

Stormwater messages are promoted at a variety of community events. Both the EnviroChallengers and Environmental Services staff are present at these events. Environmental Programs group staff typically participate in four to 10 local community outreach events each year. Below is a list of events ES participated in during 2024.

One Tacoma Comprehensive Plan Workshops –

The One Tacoma Comprehensive Plan Workshops provide a platform for engaging Tacoma residents in discussions about environmental programs, including the Stormwater Management Program (SWMP). In 2024, these workshops were hosted in all eight neighborhood districts across Tacoma, aiming to reduce travel barriers and ensure equitable participation. To improve accessibility, community ambassadors attended select events to assist residents requiring translation services, and surveys were available in Tacoma's most commonly spoken languages.

Environmental Services staff used these workshops to share SWMP updates, educate attendees on green stormwater infrastructure, pollution prevention, and localized flooding concerns, and gather community feedback on stormwater-related programs. The Environmental Programs Group (EPG) also introduced a watershed map activity, where participants identified their watershed and marked related stormwater concerns that could be addressed through education, outreach, or existing programs. Over 200 participants contributed to the map, providing valuable insight into stormwater issues across Tacoma.

This community input will help inform targeted stormwater messaging, education, outreach, and program implementation, including initiatives such as Adopt-a-Drain, pet waste stations, Tidy Up Tacoma litter cleanups, and community Depave projects. The data collected from these workshops will be used to support ongoing efforts in public engagement and stormwater management planning.

South Sound Sustainability Expo –

The Expo connects residents and businesses with services, products, companies, and agencies that address sustainability needs in our community. The Expo is a free community event that brings together environmentally minded community members in the South Sound. In 2024, ES EPG staff partnered with the EnviroChallengers to host a booth and provide messaging on stormwater pollution prevention education and collect feedback on an interactive watershed map on neighborhood-specific stormwater concerns.

Green Tacoma Day –

Green Tacoma Day is an annual celebration of the Green Tacoma Partnership's work to restore 1,881 acres of urban green space, while Arbor Day celebrates the planting, growing, and caring of Tacoma's trees. This day of service offers great opportunities for the Tacoma community to get to know each other and their local green spaces. All are welcome, and no experience is necessary. Each year, ES EPG provides funds to sponsor Green Tacoma Day.

Some additional events attended by Environmental Services Envirochallengers include South Sound Expo, Art on the Ave., Mosaic X2 Days, Proctor Street Fair, Historic Cushman Street Fair, World Ocean Day, Salmon Homecoming (Welcome Back Salmon Days), T-Town ExpoX2, Hilltop Kids Health and Safety Fair, and Downing Community Picnic.

Stewardship

The SWMP shall include an education and outreach program designed to create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

The City currently sponsors programs to encourage stewardship activities including Make a Splash small grants and, the following stewardship opportunities available to volunteers throughout the City of Tacoma:

Adopt-A-Storm Drain (AAD)

Adopt-A-Storm Drain (AAD) provides a free, year-round, stewardship opportunity for residents by encouraging regular and sustained actions to prevent flooding and reduce runoff pollution by adopting storm drains/catch basins in their neighborhood and committing to keep them clear of leaves, trash, and other debris. Participants use a web application to adopt and un-adopt catch basins in their area. The web application allows users to track amount and type of debris collected and directs users to contact the TacomaFIRST 311 hotline if an illicit discharge is discovered. Increased awareness of catch basin condition and what is going down the drain provides a bridge to educating about several other BMPs aside from litter and debris disposal such as yard care protective or water quality, car washing, pet waste, proper use and disposal of household chemical/cleaners as well as facilitates the City's source control efforts. In 2024, Tacoma coordinated with several Western Washington jurisdictions to run a Spanish Language AAD Campaign. This campaign included poster creation and distribution, Spanish social media toolkit, TV commercials and radio ads. All materials were created and distributed using the 2023 AAD Spanish Speaking Focus Group input.

2024 Impact:

- 33 new adopters
- 46 new drains adopted
- 196 total participants
- 389 drains adopted
- Over 1,227 pounds of debris collected

Pet Waste Bag Station Sponsorship Program

In 2015, Environmental Services (ES) piloted the Pet Waste Station Sponsorship Program to support responsible pet waste management in Tacoma. Through this program, participants apply to sponsor a pet waste station, and ES provides the station along with an initial supply of bags. Sponsors are responsible for monitoring the station and replenishing bags as needed. The program is available to residential neighborhoods and multi-family housing units.

To address concerns about the cost of replacement bags—especially following the City's shopping bag ban—the Environmental Programs Group (EPG) now provides free replacement bag rolls to sponsors.

Educational outreach on proper pet waste management and disposal is integrated into multiple City communications, including:

- The City's website, social media, and utility bill inserts.
- The EnviroTalk newsletter and environmental education lessons by the EnviroChallengers.
- Community events, where the Scoopy Doo mascot and Poo Toss game help engage residents.

In 2024, the EnviroChallengers and EPG led an action-based project at a Crescent Heights Elementary School, focusing on pet waste pollution prevention. As part of the lesson, students:

- Conducted a pet waste count on their school grounds.
- Evaluated their findings and discussed the environmental impact of pet waste.
- Created letters or posters advocating for pet waste stations on their school grounds.

This initiative provided students with hands-on learning while promoting community-driven solutions to reduce pet waste pollution and protect local waterways. Students were also encouraged to talk to their parent about sponsoring a pet waste station.

Additionally, the Environmental Compliance (EC) Source Control team supports the program by recommending pet waste station sponsorship to multi-family properties and businesses where excessive pet waste has been identified as a concern. Beginning in 2025, the Pet Waste Station Sponsorship Program will partner with Tacoma community gardens to expand station placements. The City will work with community garden groups to assess their potential to sponsor and maintain pet waste stations, helping to further reduce pet waste pollution in shared public spaces.

Seven new community members joined the Pet Waste Station Program, resulting in the installation of seven new pet waste stations in 2024.

Make A Splash Grant and Green Stormwater Mini-Grant Program

The city partners with the Pierce Conservation District to offer awards of up to $4,000 are available for projects promoting surface water education, protection, and restoration. Grant applications are accepted in the fall and awarded in January each year. Grants are awarded for projects that have a strong stormwater pollution prevention message or provide a stormwater benefit, including rain gardens, urban habitat, rainwater cisterns and Depave projects. Submitted projects must meet at least one of the program goals of education, surface water protection, or habitat restoration and tree planting. Over 70 projects have been funded since 2013. K-12 educators apply for either one-time project funding or repeat funding to support lessons or activities about the impacts of stormwater pollution on water quality and the health of the aquatic ecosystem. In 2024, a total of five projects were funded. Funded projects included urban habitats, depaving and developing community walkways, development of an ecology park in the Hilltop neighborhood, and a rain garden. These projects were completed by December 31st, 2024.

Sustainability Small Grant Program

Through the Sustainability Small Grant Program, reimbursable awards of up to $5,000 are available to individuals or groups interested in helping educate residents and/or businesses about the environment and sustainable practices. Priority consideration is given to proposals that have surface water benefits by keeping pollutants out of local receiving waters or prevent polluted runoff. Examples of funded projects include planting trees or encouraging transit use and other sustainable transportation options. The Sustainability Small Grant brochure also includes program information in Spanish, Vietnamese, and Khmer.

City of Tacoma Open Space Management and Urban Forestry Programs

The City owns and stewards approximately 515 acres of open space properties for goals of healthy tree canopy, ecosystem function, and biodiversity. This stewardship is primarily conducted by two Washington Conservation Corps crews. The crews lead ecological restoration efforts primarily in Environmentally Critical Areas, such as steep slopes and wetlands, as well as areas missing a community stewardship presence. Stewardship is also supported by community volunteer stewardship. Six volunteer work parties took place in 2024, with 86 participating volunteers contributing 258 volunteer hours. Beginning in 2025, the Open Space Management is partner with Pierce Conservation District in order to grow the volunteer stewardship program, which will include training habitat stewards, onboarding more volunteer sites, and hosting regularly scheduled volunteer events in Tacoma's open spaces.

Additionally, the City holds a lead role in the Green Tacoma Partnership, established in 2005, which promotes restoration and community stewardship in urban natural areas. In 2024, the partnership grew to 12 participating organizations, including Pierce Conservation District, Tacoma Tree Foundation, Washington Conservation Corps, Parks Tacoma, Port of Tacoma, Tahoma Bird Alliance, University of Washington Tacoma, Washington State University, Clover

Creek Technical College, South End Neighborhood Council, and Pierce County Parks. In 2024, 169 volunteers participated in 12 different Green Tacoma Day events hosted by the partnership, contributing 493 volunteer hours, distributing 250 free trees to community members, planting 666 trees and plants, removing 1550 sq ft of weeds, and mulching 4830 sq ft.

Depave

Tacoma staff works with Pierce Conservation District to coordinate Depave (removal of hard surfaces like concrete and asphalt) events in public locations throughout Tacoma to promote reduction in impervious surfaces, increase stormwater filtration and increased green spaces. The Depave program has supported projects in partnership with the Proctor Business District, Green Blocks Program, Grit City Trees Program, South End Neighborhood Council tree planting and placemaking project, Bethlehem Baptist Church, and a variety of Pierce Conservation District Green Stormwater Mini-Grant projects. In 2024, the Depave program helped community members remove over 3,800 square feet of pavement and compacted gravel and replace them with trees and plants.

Neighborhood Greening programs

The City of Tacoma Environmental Services provides and promotes stewardship opportunities that support watershed habitat improvement, urban forestry, and community-based environmental education. These programs encourage active participation from residents and businesses through tree planting, training, and volunteer events.

In partnership with the Tacoma Tree Foundation and Pierce Conservation District, Tacoma offers multiple urban forestry programs focused on increasing tree canopy including:

- Grit City Trees: Free street trees, planting supplies, and assistance.
- Green Blocks: Group-based neighborhood plantings with support.
- Community Tree Program: Equity-focused tree giveaways and education.
- Urban Tree Sale: Discounted trees with training for long-term care.
- Tree Coupon Program: Tree discounts at local nurseries.

2024 Impact:

- 747 trees distributed
- 292 households received trees
- 79% of trees planted in neighborhoods of focus
- 5.1 acres of mature canopy added
- 168 volunteers engaged
- 672 volunteer hours contributed
- 13 outreach events attended
- 51 residents trained

These efforts advance the city's goal to increase urban tree canopy from 20% to 30% by 2030 while building long-term community stewardship.

Catch Basin Marking Program

Tacoma engages volunteers in the Catch Basin Marking Program to raise awareness about stormwater pollution. Catch basin markers serve as a visible reminder that only rain should go down storm drains, helping to prevent pollutants from entering local waterways.

Storm drain marking events are conducted in collaboration with the Environmental Programs Group (EPG) and EnviroChallengers, engaging college, trade, and high school students. These events take place through the Environmental Services Certificate Program, Green Stormwater Infrastructure (GSI) workforce training, Next Move Internship, and other ES workforce development initiatives. Participants gain hands-on experience in environmental stewardship while learning about stormwater management and pollution prevention.

The City provides marking supplies, promotes the program, and ensures that marked catch basins are mapped in the City's GIS system.

Low Impact Development Rate Reduction Program

The City has implemented a **Low Impact Development** Surface Water Rate Reduction program. Property owners may qualify for a surface water rate reduction if they choose to utilize permanent LID BMPs beyond what is required per the SWMM for development, redevelopment or as a retrofit for stormwater management. Tacoma Municipal Code (TMC) 12.08D.250 outlines the program requirements. In order to qualify for the LID surface water rate reduction, all BMPs must be permanent LID BMPs per the SWMM, as approved by the ES Department.

Private Stormwater Facility Maintenance

This program assures property owners have access to their drawings and operation and maintenance instructions for privately owned stormwater facilities and provides technical assistance to homeowners and business owners, as requested.

Rain Garden Technical Assistance

ES partners with Pierce Conservation District (PDC) to provide residents with Rain Garden building technical assistance. PCD staff visit with interested homeowners upon request to evaluate the potential of raingarden installation on their property and provide free design services.

Behavior Change (S5.C.11.a.ii)

The SWMP shall include, an education and outreach program designed to effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.

For the 2025-2029 permit cycle, the City of Tacoma has selected the Adopt-A-Drain (AAD) program as its behavior change strategy to address litter and debris in stormwater runoff. The program targets residents as the priority audience, focusing on preventing surface water pollution and promoting best management practices (BMPs) to reduce non-point source pollution. AAD is part of a comprehensive storm drain care approach that connects and

reinforces upstream pollution prevention behaviors. The AAD program was originally developed by Hamline University's Center for Global Environmental Education using community-based social marketing (CBSM) principles to drive long-term behavior change.

The Environmental Programs Group (EPG) conducted a survey to identify stormwater-related concerns across Tacoma. The survey results indicated that litter and debris were the top stormwater issues identified by residents. In response, the City selected AAD as a behavior change strategy to encourage residents to adopt storm drains, remove debris, and prevent pollutants from entering the stormwater system.

To refine the priority audience for the selected behavior change strategy, City staff, including representatives from the Operations & Maintenance Division (street sweeping program) and the Source Control program, provided localized knowledge of neighborhoods experiencing chronic litter and debris accumulation around storm drains. These areas were identified as having the highest need for community-based storm drain care and the greatest potential to improve downstream water quality through resident engagement. While the Adopt-A-Drain (AAD) program is available citywide, the behavior change campaign will prioritize outreach to residents within these identified areas of concern to maximize the effectiveness of the intervention and achieve measurable improvements.

Behavior Change Strategy and Evaluation Plan S5.C.11.a.ii(b)

To comply with S5.C.11.a.ii(b) of the Phase I Municipal Stormwater Permit, Tacoma will implement AAD as a behavior change campaign following social marketing best practices. The City will:

- Develop a strategy and schedule (by July 1, 2025) to expand AAD participation among residents in priority watersheds, utilizing targeted outreach and engagement tactics.
- Implement the behavior change campaign (by September 1, 2025) through targeted outreach, partnerships, promotion on street sweeper cards, and digital engagement.
- Evaluate program effectiveness (by March 31, 2029).
- Use evaluation results to refine and improve AAD outreach strategies for continued effectiveness under an adaptive management approach.

S8. Monitoring and Assessment

Summary of Program Components

The stormwater monitoring program consists of Regional Status and Trends Monitoring and Stormwater Management Program Effectiveness and Source Identification Studies. The Permit allows Permittees to either pay into these collective funds or to conduct studies relevant to these topics. The City has chosen to pay into the Regional Status and Trends Monitoring fund and conduct a Stormwater Management Program Effectiveness and Source Identification Study. These choices are the same as were chosen in the 2013 and 2019 permit cycles.

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also referred to as Superfund, contaminated bottom sediments were remediated in the Thea Foss and Wheeler-Osgood Waterways in Tacoma, Washington, under the oversight of the Environmental Protection Agency (EPA) at a cost of $105M. Based on the success of the cleanup, EPA has initiated the process of delisting the Thea Foss and Wheeler-Osgood Waterways from the National Priorities List as part of the Commencement Bay Superfund Site. It is unknown at this time when the delisting will be completed.

Regional Status and Trends Monitoring (S8.A)

The City notified Ecology of the choice to pay into the collective fund for the regional stream status and trends monitoring prior to the December 1, 2024, deadline. Payments into this collective fund are due on August 15th of each year. This program is implemented by Ecology through the Stormwater Action Monitoring Group (SAM). The City of Tacoma has been implementing a comprehensive monitoring and source control strategy in the Foss Waterway Watershed since 2001. Stormwater monitoring is required to be conducted under a Stormwater Work Plan Addendum to the Thea Foss Waterway Consent Decree (CD) with EPA and currently by Section S8.C of the National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Discharges from Large and Medium Municipal Separate Storm Sewer Systems (Permit), which supersedes previous NPDES requirements.

Provide SWMP Effectiveness and Source Identification Studies (S8.B and C)

The City has chosen to meet this requirement by continuing to monitor stormwater discharges at seven outfalls to the Thea Foss Waterway. The City notified Ecology of the choice to monitor the Thea Foss Waterway outfalls prior to the December 1, 2024, deadline. The Quality Assurance Program Plan for the outfall monitoring was provided for Ecology review prior to the February 1, 2025, deadline. Monitoring results will be reported annually with the NPDES Annual Report due on March 31st of each year.

Click the link to view the entire 2024 monitoring report **Thea Foss and Wheeler-Osgood Waterways 2024 Source Control and Water Year 2024 Stormwater Monitoring Report.** **A link to the 2024 Thea Foss and Wheeler-Osgood Monitoring Report will be posted in the final SWMP Plan available no latter than May 31, 2025.**

LIST OF ABBREVIATIONS

AAD	Adopt-A-Drain
BMP	Best Management Practice
CIP	Capital Improvement Project
City	The City of Tacoma
CHB	Communities for a Healthy Bay
DART	Development Assistance and Review Team
EC	Environmental Compliance
ESA	Endangered Species Act
EPG	Environmental Programs Group
ES	Environmental Services
GIS	Geographical Information Systems
G2S	Ground 2 Sound (Film Festival)
IDDE	Illicit Connection and Illicit Discharge Detection and Elimination
IDT	Inter-Disciplinary Team
IIHTG	"If It Hits the Ground, It Hits the Sound"
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
OEPS	Office of Environmental Policy and Sustainability
O&M	Operation and Maintenance
PCD	Pierce Conservation District
PDS	Planning and Development Services
PSSH	Puget Sound Starts Here
RCW	Revised Code of Washington
RRMP	Regional Road Maintenance Program
SAP	The City's Information Management System database
SEPA	The Washington State Environmental Policy Act
SCP	Source Control Program

STGPD	South Tacoma Groundwater Protection District
SAM	Stormwater Action Monitoring
SWMM	Stormwater Management Manual
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
STRAP	Stormwater Rapid Assessment Program
SSC	Structural Stormwater Controls
TMC	Tacoma Municipal Code
TPU	Tacoma Public Utilities
TPCHD	Tacoma-Pierce County Health Department
TESC	Temporary Erosion and Sediment Control
Ecology	Washington State Department of Ecology
QAPP	Quality Assurance Project Plan
WCC	Washington Conservation Corps
WRIA	Water Resource Inventory Area

Appendix A
Chapter 12.08A and12.08D of the Tacoma Municipal Code

For the most current version of Chapter 12.08A and 12.08D of the Tacoma Municipal Code go to: Tacoma Municipal Code Title 12.08

Appendix B
NPDES Internal Coordination Memorandum

City of Tacoma

TO: General Government Department Directors
TPU Deputy Directors and Superintendents

FROM: Elizabeth A. Pauli, City Manager
Jackie Flowers, Tacoma Public Utilities Director

Initial: EAP DS: JF

SUBJECT: City of Tacoma Compliance with Ecology Phase I Municipal Stormwater Permit

DATE: March 28, 2025

On August 1, 2024, the new Washington State Department of Ecology Phase I Municipal Stormwater Permit (Permit) under the National Pollutant Discharge Elimination System (NPDES) became effective (see PhaseIPermit.) This Permit covers stormwater discharges from large and medium municipal separate storm sewer systems (MS4s), including the City of Tacoma's stormwater system, into Waters of the State such as creeks, rivers and Puget Sound.

Environmental Services - Environmental Programs Group (EPG) administers and interprets the Permit. The Permit provisions apply to the City of Tacoma's MS4, which includes the system of conveyances owned or operated by the City of Tacoma, including General Government departments and the Department of Public Utilities (TPU.) The MS4 is located on City-owned properties or within easements and rights-of-way within the City of Tacoma and may include conveyances owned or operated by the City of Tacoma on City-owned properties or within easements within Phase I Municipal Stormwater Permit jurisdictions, currently Pierce County and King County or Western Washington Phase II Municipal Stormwater Permit jurisdictions. This area of coverage may evolve over time.

Permit requirements and general responsibilities are outlined in the Stormwater Management Program Plan (SWMP) available at www.cityoftacoma.org/stormwater. EPG can assist other departments with training and technical assistance as needed or requested.

This memorandum directs the coordination efforts expected from all General Government and TPU staff to meet the requirements for cross-departmental coordination under Section S5.C.3 of the Permit.

Pursuant to Permit Section S5.C.3, a written Stormwater Permit Coordination Plan (Plan) has been developed for each City department and TPU which has key staff roles and responsibilities for facilitating compliance with the Permit and reducing stormwater impacts on receiving waters from Tacoma's MS4. Links to these Plans are available on the Environmental Services Science and Engineering NPDES SharePoint site https://cityoftacoma.sharepoint.com/sites/ES-ScienceEng/SitePages/NPDES.aspx. The Plans document the applicable Permit requirements and how EPG staff may interact with each City Department, which may vary depending on the operating group job function. Environmental Programs Group needs your support and involvement in meeting our Permit requirements.

For any questions or concerns, contact:

General Government	Tacoma Public Utilities
Shauna Hansen, Stormwater Management Program Coordinator (253) 281-5206 Shansen2@cityoftacoma.org Sharepoint Site: Environmental Services, Science and Engineering, NPDES	Ramiro Sanchez, TPU Environmental Compliance Stormwater Programs Manager (253) 392-4258 Rsanchez1@cityoftacoma.org Sharepoint Site: TPU Environmental Compliance

All of our efforts together play an important role in protecting local wetlands, streams, rivers, lakes, and Puget Sound. Thank you in advance for your assistance with this important program.

www.cityoftacoma.org

Appendix C
Department Coordination and Compliance Plans

Department Coordination and Compliance Plans

The City of Tacoma maintains a National Pollutant Discharge Elimination System Phase I Municipal Stormwater Permit (Permit). This Permit allows the City of Tacoma to discharge stormwater to receiving waterbodies. The City is required by the Washington State Department of Ecology to maintain this Permit. Nearly every department within the City of Tacoma plays a role in Permit implementation.

Starting in 2020, Tacoma determined it would be helpful to create specific Coordination Plans for each department that owns or operates sites with stormwater facilities. These plans are intended to clarify Permit requirements for departments that may not be as familiar with the Permit. The majority of Coordination Plans were completed in 2022 and updated in 2025 to include current permit requirements. Additional Coordination Plans are being developed as the need arises.

Each Coordination Plan describes the Permit sections that are most relevant to that department, department roles and responsibilities to fulfill those Permit requirements, and processes in place to meet Permit compliance. This information is meant to evolve over time and to be a tool to aid in internal coordination. Department specific plans are available for the groups in Table 1 and Table 2, below.

If you do not see a Coordination and Compliance Plan for a department that should have one in Table 1 or Table 2 below, or have questions about a group's role in Permit implementation, please contact swnpdespermits@cityoftacoma.org

Table 1 – City of Tacoma General Government Completed Department Coordination and Compliance Plans

Department	Group
Environmental Services	Open Space
Environmental Services	Solid Waste
Environmental Services	Transmission O&M
Fire	Tacoma Fire
Library	Facilities
Neighborhood and Community Services	Neighborhood and Community Services
Public Works	Fleet Services
Public Works	Facilities Maintenance
Public Works	Parking Enforcement
Public Works	Streets and Grounds Maintenance
Venues and Events	Venues and Events

Table 2 – City of Tacoma Public Utilities Completed Department Coordination and Compliance Plans

Department	Group
Power	Power Nisqually Project
Power	Power Substations
Power	TPU Grounds Maintenance
Power	TPU Headquarters Site
Power	TPU Environmental Compliance
Power	Southwest Service Center
Power	Power Shared Services Craft Shops
Power	North Service Center
Rail	Rail
Water	Water Headquarters Site
Water	Water Supply and Transmission (Water Pumps and Storage)
Water	McMillin Reservoir
Water	Green River Headworks

Appendix D
Stormwater Management Program for UIC Wells

Stormwater Management Program (SWMP) for UIC Wells

March 2025

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1.0 Introduction

The purpose of this document is to outline the necessary steps to comply with the regulations regarding class V UIC wells owned or operated by the City of Tacoma (City) as regulated by the Washington State Department of Ecology (Ecology) and set forth in the 2024 Stormwater Management Manual for Western Washington (SWMMWW) and Chapter 173-218 of the Washington Administrative Code (WAC). For more details on the full UIC requirements, see the following reference material;

1. Ecology's Underground Injection Control (UIC) Stormwater Management Program (SWMP) Components: https://apps.ecology.wa.gov/publications/summarypages/2110024.html
2. Ecology's SWMMWW for full details on UIC (I-2.9, and I-4)
3. Chapter 173-218 WAC https://apps.leg.wa.gov/WAC/default.aspx?cite=173-218
4. Link to Ecology's UIC information page: https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program
5. City of Tacoma SWMP: Stormwater Management Program - City of Tacoma
6. Stormwater Management Manual July 2021 Edition (SWMM): 2021TacomaSWMM.20210819.pdf (cityoftacoma.org)

Ecology's goals for the UIC Program are to:

1. Ensure that UICs are constructed, operated, and maintained in a manner that meets UIC program requirements and protects groundwater.
2. Emphasize management actions that prevent, minimize, and treat pollutants in stormwater before they can be discharged to a UIC.
3. Ensure that UICs that are identified as non-compliant are operated, modified, or decommissioned in a manner that brings them into compliance.

Pursuant to Chapter 90.48 RCW, WAC 173-218 requires owners of Class V injection wells (underground drywells and infiltration trenches with perforated pipes that dispose stormwater into the ground) to comply with regulations designed to protect groundwater quality. The City currently owns 21 wells that are regulated under this rule.

1.1 Compliance Pathway

The City has elected to use the presumptive approach for compliance. Tacoma has developed this UIC SWMP to meet the presumptive approach.

Per Ecology's UIC SWMP Components dated June 2021, Tacoma is required to:

1. Register all UIC Wells
2. Complete or have completed well assessment for UIC wells in use prior to 2/3/2006.
3. Site, design, construct, operate and maintain new UIC wells according to the 2019 SWMMWW, Section I-4 Underground Injection Control Wells.

2.0 New and Existing City UIC wells

Table 2.1
UIC Class V Infiltration Trench List

UIC ID	Status	Area	Description	Construction Date	Approx. Latitude and Longitude
SWFA-100420	New	South Tacoma Channel	Rain garden; includes 100-ft long, 12-in perforated PVC pipe withcatch basins	1/15/2015	47.212204°, -122.473811°
SWFA-100421	New		Rain garden; includes 100-ft long, 12-in perforated PVC pipe with catch basins	6/15/2015	47.213357°, -122.473750°
SWFA-100422	New		Contech Stormfilter and rain garden; includes 170-ft long, 12-in perforated	6/15/2015	47.211858°, -122.474253°
SWFA-102019	New	Cheney Stadium	210-ft long, 12-in perforated pipe, within 30-ft wide underground	1/1/2013	47.237138°, -122.498696°
SWFA-100412	Existing	Northeast Tacoma	274-ft long, 12-in perforated pipe within 3-ft wide trench	1/1/1979	47.284668°, -122.388357°
SWFA-102487	Existing		80-ft long, 12-in perforated pipe within 5-ft washed drain rock trench, catch	1/1/1999	47.273747°, -122.365042°
SWFA-103108	Existing	Flett Wetland	100-ft long, 6-in perforated pipe in 30-in wide by 3-ft deep washed drain rock	1/1/1997	47.189071°, -122.482819°
SWFA-100294	Existing	Hilltop Neighborhood	60-ft long by 40-ft wide by 2.33-ft deep infiltration trench with 4 rows of 60-ft	7/7/2005	47.247349°, -122.451081°
SWFA-101708	Existing	South Tacoma Channel	660-ft long, 15-in perforated pipe in 5-ft gravel trench	3/12/1979	47.213664°, -122.489114°
SWFA-100545	Existing		2,827-ft long, 12 to 36-in perforated pipe in 5-ft gravel trench	3/12/1979	47.210511°, -122.487544°
SWFA-102485	Existing	South East Tacoma	50-ft long, 21-in perforated pipe in 4-ft wide washed drain rock trench	1/1/1980	47.171101°, -122.460347°
SWFA-102486	Existing		88-ft long, 21-in perforated pipe in 4-ft wide washed drain rock trench	1/1/1980	47.171108°, -122.458613°
SWFA-103707	Existing	South Tacoma	CB with grate with sump with 20 feet of perf pipe running west	1900s	47.19438011°, -122.50459233°

Table 2.2
UIC Class V Infiltration CB List

UIC ID	Status	Area	Description	Construction Date	Approx. Latitude and Longitude
SWFA-103701	Existing	North Tacoma	CB with grate with no bottom	1900s	47.29409311°, -122.52436539°
SWFA-103711	Existing	South Tacoma	CB with grate with no bottom	1/1/2006	47.22829867°, -122.4885942°
SWFA-103704	Existing		CB grate with perforated cylinder vault	1900s	47.18663972°, -122.47120779°
SWFA-103691	Existing	South Tacoma (S Mason Ave)	CB with grate with perforated sides	1900s	47.19450346°, -122.49400934°
SWFA-103693	Existing		CB with grate with perforated sides	1900s	47.19522526°, -122.49401263°
SWFA-103689	Existing		CB with grate with perforated sides	1900s	47.19901426°, -122.49952887°
SWFA-103690	Existing		CB with grate with perforated sides	1900s	47.19918847°, -122.49952211°
SWFA-103692	Existing		CB with grate with perforated sides	1900s	47.19476101°, -122.49388881°

3.0 UIC Program Requirements and Implementation

Tacoma is choosing to develop and implement a separate UIC SWMP in areas served by Class V UIC wells. The City's overall SWMP will be in effect in these areas as well and this UIC SWMP will be in addition to the SWMP activities.

1. Pursuant to the Safe Water Drinking Act and Chapter 90.48 RCW, WAC 173-218 requires new UIC-regulated stormwater disposal wells, also called Class V injection wells, to be registered with the Washington State Department of Ecology prior to construction
    a. Register all UIC wells, including existing (in use before 2/3/2006) and new UIC wells with Ecology, unless already registered. Registration is only required once for each UIC well.
        i. New wells must be registered 60 days prior to construction.
    b. For privately-built projects (Work Order Permits) that include new UICs that will be owned or operated by the City, the applicant shall coordinate with the UIC Program Manager and the Site Reviewer to have the UIC Program Manager register the UICs with Ecology. For all such UICs, the City shall be designated as the owner on the registration form. Registration materials must be submitted to Ecology 60 days prior to construction.
2. Complete the well assessment for UIC wells in use prior to 2/3/2006, if not already completed. For information on a well assessment, go to the UIC section, Well Assessment subsection, Volume I - Chapter 4 of the SWMMWW.
    a. A well assessment was completed for 12 UIC wells on June1, 2022. See Appendix A for the Technical Memorandum from Landau Associates.
    b. A well assessment was completed for the remaining 9 UIC wells on May 18, 2023, see Appendix B for the report.
3. Site, design, construct, operate, and maintain new UIC wells according to the specifications in SWMMWW Section I-4 Underground Injection Control Wells and the SWMM.
    a. See SWMM Volume 4 Chapter 10 for Best Management Practices (BMP) design requirements.
    b. All new UIC wells will be reviewed by either the City's Planning and Development Services – Site Development Group or Environmental Services - NPDES Compliance Group and the UIC Program Manager to ensure regulatory compliance.
    c. Prior to installation, maintenance plans are developed for all new City owned stormwater facilities by the Environmental Services – Asset Management Group.
4. Fulfill the source control requirements for new and existing (in use before 2/3/2006) municipal UIC wells.
    a. These requirements are listed in I-4.11 and I-4.13 of the SWMMWW. The City meets these requirements through its Source Control Program.
    b. For additional details regarding Tacoma's Source Control Program See S5.C.8 of the City's SWMP Plan. The Source Control Program includes Implementation of Operational and Structural Source Control BMPs and Treatment BMPs on Existing Sites, Inspection of Pollutant Generating Sources, Application and Enforcement of Local Ordinances at Sites Including Sites that are covered by

other NPDES Permits Issued by Ecology, Practices to Reduce Pollutants Associated with Pesticides, Herbicides and Fertilizers.

5. Operate and maintain new and existing wells according to the specifications in SWMMWW Section I-4 Underground Injection Control Wells and Tacoma's SWMM Volume 4 Appendix C Maintenance Standards.
    a. All City owned or operated, UIC wells will be inspected annually as stormwater facilities owned or operated by the City.
    b. For additional details regarding the City's Operation and Maintenance Program see S5.C.10 of the SWMP which includes the following sections: Implementing and enforcing maintenance standards for stormwater facilities, Ensuring proper and timely maintenance of public and private stormwater facilities, including catch basins, Establishing BMPs for reducing stormwater impacts associated with runoff from City property, parking lots, streets and highways owned or operated by the City, Implementing a training program for employees who have primary construction, operations, or maintenance job functions that may impact stormwater quality, Establishing BMPs for reducing stormwater impacts from heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City, and Maintaining records of these activities.
    c. For more information on specific BMP Maintenance see the SWMMWW BMP Maintenance Table V-A.3: Maintenance Standards – Infiltration, also see the City's SWMM Volume 4 Appendix C Maintenance Standards for Infiltration Trenches, for Catch Basins/Manholes, and for Downspout Infiltration Trench or Drywell.
6. Provide source control activities (including targeted education and outreach) that are well-suited for the land uses associated with your UIC wells and to the specifications in the 2019 SWMMWW and SWMM.
    a. Source control activities are accomplished through the City's Source Control program. See S5.C.8 of the City's SWMP Plan for Source Control Program details.
    b. Source control education and outreach is met through the City's ongoing Education and Outreach programs See S5.C.8 and S.5.C.11 of the City's SWMP for Education and Outreach Program details.
7. Provide illicit discharge detection and elimination (IDDE) programs in areas served by UIC wells to prevent pet wastes from contaminating stormwater and to control other sources of pathogens.
    a. This requirement is satisfied through the City's ongoing IDDE programs. See S5.C.9 of the City's SWMP Plan for IDDE Program details.
    b. The City has a variety of programs to educate the public about proper disposal of pet waste, including a pet waste station program to assist in proper pet waste management. Refer to Section S5.C.11 of the SWMP Plan for additional information regarding public education and outreach.
    c. Tacoma's IDDE program actively works to identify and eliminate all sources of contamination from entering the stormwater system and BMPs, including UIC BMPs.

4.0 City UIC Well Registration Procedures

Public UIC wells may be constructed as capital improvements by the City's Environmental Services Capital Delivery Group and Public Works Engineering/Special Projects Group. UIC wells that are or will become public may also be constructed by private developers as part of required Right of Way improvements and City Departments that are developing fee simple parcels as required stormwater mitigation.

UIC Program Manager: Kyle Amoroso, kamoroso@cityoftacoma.org, (253) 325-1159.

The UIC Program Manager is responsible for ensuring that all relevant City staff are aware of the registration requirements and that registration is done accurately and in full.

To meet the registration requirement that new UIC wells must be registered 60 days prior to construction, the City has the following procedures:

4.1 Capital Improvement Projects

When an infiltration facility or UIC well project is constructed under a Capital Improvement by a City department:

1. The Project Manager or Design Engineer will contact the UIC Program Manager as soon as they begin the design process for any infiltration BMP to determine if the BMP will be classified as a UIC well.
2. If the BMP will be classified as a UIC well, the design engineer will review the design requirements in the SWMM and the SWMMWW to ensure that the BMP meets all applicable design requirements.
3. The Project Manager or Design Engineer will coordinate with the City's UIC Program Manager throughout the design process.
4. The design will be reviewed and approved by either SDG or ES EPG staff.
5. The Project Manager or Engineer will coordinate with the City's UIC Program Manager to ensure that the UIC is registered a minimum of 60 days prior to construction.

4.2 Site Development

When a public infiltration facility is proposed by a private developer through the City's Planning & Development Services Permitting Process:

1. The Site Reviewer for the project shall coordinate with the UIC Program Manager to determine if the proposed facility is an Underground Injection Control facility, which is subject to Washington State Department of Ecology review and registration, as soon as a public infiltration BMP design is submitted. See the SWMMWW for definition and examples of UIC wells.
2. The Site Reviewer shall advise the applicant of Ecology's UIC program and registration requirements using the standard review comment, which shall include the requirement to register 60 days prior to construction..
3. The Site Reviewer shall advise the UIC Program Manager of the proposed project, including the Accela Permit No. and Applicant's Design Engineer contact information.
4. In addition to the SWMM design requirements for the proposed infiltration BMP, the Site Reviewer will review the proposed design to determine if the SWMMWW requirements are met.
5. The Site Reviewer and UIC Program Manager will coordinate with the applicant to obtain any information required for registration.
6. The Site Reviewer shall document the date of the Ecology Registration application submittal date in the Accela permit record and add a Permit Condition that restricts start of construction of the facility no sooner than 60 days after application, or upon receipt of Ecology approval.
7. The UIC Program Manager shall provide a copy of the Ecology UIC approval to the Site Reviewer.
8. The Ecology UIC approval shall be added to the permit record Documents by the Site Reviewer.

4.3 City Departments installing an infiltration facility or UIC on a parcel of land owned or operated by the City

1. When the project will be issued a construction permit by the City of Tacoma, follow Section 4.2.
2. When the project will not be issued a construction permit by the City of Tacoma, follow Section 4.1.