



2026 **DRAFT** Stormwater Management Program (SWMP) Plan



City of Des Moines
Surface Water Management
21650 11th Ave S
Des Moines, WA 9198

March 31, 2026

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Introduction:

This document has been prepared to meet the City of Des Moines' Western Washington Phase II Municipal Stormwater Permit requirement for written documentation of the City's Stormwater Management Program (SWMP).

The City's SWMP aims to reduce the discharge of pollutants from the City's Municipal Separate Storm Sewer System (MS4) to the maximum extent practicable (MEP), comply with Washington State's All Known, Available, and Reasonable methods of Treatment (AKART) requirements, and protect water quality. This goal will be achieved by incorporating all permit-required SWMP components and implementation schedules into the City's existing SWMP.

Where the City is already implementing components required by this permit, those actions or activities will continue at the existing level of implementation, regardless of the schedule outlined in this document.

The City will maintain an ongoing program to gather, track, and utilize information for evaluating SWMP development, implementation, permit compliance, and setting priorities. This document will be updated annually for submittal with the City's Annual Report to Ecology.

This document reflects the City's plans for updated compliance requirements under the 2024–2029 Permit, as issued by Ecology for the calendar year 2025.

1: SWMP MANAGEMENT AND ADMINISTRATION

The City of Des Moines is committed to fully complying with the management and administration requirements outlined in Section S5.A of the 2024-2029 NPDES Phase II Permit. These requirements include, but are not limited to:

- Developing, implementing, and updating the SWMP annually
- Tracking costs or estimated costs associated with the SWMP
- Tracking inspection, enforcement, and public education activities
- Continuation of existing programs with necessary updates
- Coordination among departments and partners

To improve communication and ensure efficient implementation, the City has established several mechanisms that facilitate inter-departmental collaboration. These mechanisms, outlined below, ensure that the responsibilities of various stakeholders are clearly defined and that there is effective tracking and reporting for permit compliance.

NPDES Coordinator Position

The NPDES Coordinator serves as the point of contact for all matters related to the NPDES permit. This role helps avoid redundant communication, ensures clarity across departments, and optimizes the implementation of SWMP activities. In addition, the coordinator is responsible for:

- Communicating the updated 2024-2029 NPDES permit requirements to relevant departments
- Ensuring that each department understands their specific duties and responsibilities under the permit
- Tracking the status of compliance efforts and providing regular updates to senior management

Training Requirements

- Permit Compliance & Reporting: Ensuring staff understand ongoing requirements under the 2024-2029 permit cycle, including documentation and reporting for inspections, enforcement, and public education.
- Best Management Practices (BMPs): Providing updated training on stormwater BMPs, including low-impact development (LID), green infrastructure strategies, and stormwater facility maintenance.
- Source Control Program (S5.C.8.b.v): Training staff conducting source control business inspections on how to identify and address pollutant-generating activities in accordance with permit requirements.

- Pollutant-Specific Training: Educating staff on pollutants of emerging concern, such as polyfluoroalkyl substances (PFAS), and best practices for source identification and mitigation.
- Interdepartmental Coordination: Ensuring that departments involved in stormwater management—such as Public Works, Community Development, and Code Enforcement—receive training to maintain compliance across all relevant activities.

Asset Management

The City of Des Moines currently uses CityWorks, but there will be a transition to a new asset management software called OpenGOV in 2026. During the transition, Des Moines will continue using CityWorks.

CityWorks is an integrated work order and inspection program that uses GIS to track and manage stormwater infrastructure and compliance activities. The system supports efficient communication between the Surface Water Management Engineering Department and Public Works field staff. Key features of CityWorks include:

- Tracking Inspections: Including IDDE inspections and operations and maintenance activities
- Data Sharing: Ensuring that staff can access up-to-date information on stormwater infrastructure and compliance efforts
- Compliance Monitoring: Facilitating tracking of program activities related to inspections, enforcement, and maintenance

For the 2024-2029 permit cycle, CityWorks will continue to play a pivotal role in tracking compliance activities and enhancing operational efficiencies while City staff also launch Respond, a new component to CityWorks, which will aid in data organization and efficiency.

Internal Meetings

Regular internal meetings are scheduled to ensure ongoing communication regarding the status of compliance programs. These meetings will continue to include:

- Team Meetings: Weekly Engineering meetings and bi-weekly public works staff meetings to share updates and to keep everyone informed of the current status of the SWMP and any issues related to permit compliance.
- Interdisciplinary Team Meetings: Required under S.5.C.1 of the 2024-2029 permit, these meetings promote cross-departmental collaboration, ensuring that all departments understand their roles and responsibilities.

PermitTrax

PermitTrax is an online program used by the Planning and Public Works Departments to track permit review and inspections. It plays an important role in ensuring that stormwater-related permits, such as erosion and sediment control (ESC) and drainage inspections, are tracked and monitored in real-time. This platform allows:

- **Cross-Departmental Coordination:** Permittees across departments have open access to the data, facilitating information sharing and reducing delays in compliance monitoring.
- **Inspection Tracking:** Ensuring that inspections are conducted in accordance with the new requirements for construction site runoff control and post-construction stormwater management.

The system will continue to be used to ensure that inspections meet the standards required under the 2024-2029 permit cycle.

Program Evaluation and Continuous Improvement

The City will implement ongoing program evaluation to track the effectiveness of the SWMP and make improvements as needed. This includes:

- **Annual Reviews:** A review of program progress and any changes to permit requirements will be conducted annually.
- **Performance Metrics:** Identifying key performance indicators to measure success in public education, enforcement, and pollution prevention.
- **Adaptive Management:** Based on evaluation findings, the City will make adjustments to the SWMP to ensure it remains effective in meeting the goals of the 2024-2029 permit cycle.

Resources and Funding

The City will continue to fund the SWMP through a variety of sources, including the stormwater utility fees and grants. Additionally, any changes to the budget or new funding sources that arise during the 2024-2029 permit cycle will be detailed in this section to ensure that resources are available for program implementation.

2: STORMWATER PLANNING

2.1 Permit Requirements

The Permit (Section S5.C.1) 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.
- Convene an interdisciplinary team to inform and assist in the development, progress, and influence of this program.
- Coordinate long-range plan updates. Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in Des Moines.
- On or before March 31, 2027, the Permittee shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long range planning process and influencing policy.
- Assess and address barriers to Low Impact Development (LID) Principles and BMPs, ensuring integration into local development-related codes, rules, standards, or other enforceable documents.
- No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management. Establish a long-term goal of canopy.
- Stormwater Management Action Planning (SMAP). Permittees shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication no. 24-10-027) for one new priority catchment or additional actions for an existing SMAP.
- By March 31, 2027, Permittees shall complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP.
- A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations.
- Land management/development strategies and/or actions identified for water quality management.
- Focused, enhanced, or customized implementation of stormwater management actions related to the Permit sections within S5.

- Identify changes needed for local long-range plans to address SMAP priorities.
- A proposed implementation schedule and budget sources for short and long-term actions.
- Actions in the SMAP that may benefit overburdened communities.
- A process and schedule to provide future assessment and feedback to improve the planning process.

2.2 2026 Planned Activities

- Interdisciplinary Team (S5.C.1.a) The interdisciplinary team, established in 2020, will continue convening in 2026 to guide and inform stormwater planning initiatives, including updates to watershed-scale strategies and SMAP implementation.
- In 2026, the City will begin a comprehensive review of stormwater management needs to support upcoming long-range plan updates and meet the reporting requirement
- Low Impact Development Code-Enforcement (S5.C.1.c) The City will:
 - Continue enforcing LID Principles and BMPs when updating, revising, and developing local development-related codes and standards.
 - Assess and document any new barriers to LID implementation, ensuring alignment with updated BMPs and climate resilience considerations.
- With the help of a consultant, the City will continue 2025 efforts in developing and implementing a plan to meet the requirements related to long-term tree canopy goals. This effort includes identifying and prioritizing tree preservation, reforestation, and canopy enhancement strategies, with a focus on overburdened communities. As part of this work, the City and consultant will establish a set of measurable goals and an actionable framework for policy updates, strategic planning, and long-term maintenance planning.
- Begin discussions with a consultant to initiate the process for meeting the March 31, 2027, requirement to submit a SMAP for at least one new high-priority catchment area or additional actions for an existing SMAP.

3: PUBLIC EDUCATION AND OUTREACH

3.1 Permit Requirements

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

- Implement an education and outreach program for the City. The program shall be designed to educate a target audience about the stormwater problems and provide specific actions they can follow to minimize the problems.
- Each Permittee shall implement an education and outreach program for the area served by the MS4.
- General Awareness - Permittees shall annually select at a minimum one priority audience and one subject area as defined in the permit.
- Behavior Change – Permittees shall select, at a minimum, one target audience and one BMP from a defined list within the Permit.
 - No later than July 1, 2025, each Permittee shall implement the recommendations from the 2024 evaluation and report, incorporating social marketing practices and methods to develop an outreach campaign.
 - By September 1, 2025, each Permittee shall begin to implement the strategy developed.
 - No later than March 31, 2029, evaluate and submit a report on the changes in understanding and adoption of behaviors from implementation along with planned or recommended changes.
- Stewardship – Each Permittee shall provide, partner with or promote stewardship opportunities to encourage residents or businesses to participate in activities.

3.2 2026 Planned Activities

General Awareness (S5.C.2.a.i):

- Distribution of educational materials through various forms of media, including the City’s website (www.desmoineswa.gov), quarterly citywide newsletters, council meetings, and handout materials. Topics may include septic system maintenance, oil leak inspection, preservation of plants and trees adjacent to streams and wetlands, pet control and waste disposal, pesticide and lawn fertilizer reduction, car washing BMPs, general stormwater education, volunteer opportunities, household BMPs, business BMPs, hazardous waste disposal, public comment opportunities, and many other topics.

- Continued involvement with the Highline StormFest event for 6th graders in the Highline School District. This in-person event will take place on June 2, 3, and 4 at the Des Moines Beach Park. Students will rotate through five hands-on education stations to learn about watersheds, local wildlife, pollution sources, and stormwater solutions. This event engages teachers, families, community members, local government staff, and educational nonprofits.
- Seek opportunities to engage with the community, provide educational materials, and answer stormwater-related questions.
- Translation of key educational materials into languages that reflect the diversity of the City's population to ensure equitable access.

Evaluate Effectiveness of Ongoing Behavior Change (S5.C.2.a.ii):

- In 2026, the City will focus its behavior change efforts on stormwater pollution prevention among sixth-grade students in the Highline School District through StormFest. This initiative provides students with hands-on, experiential learning on litter prevention, storm drain stewardship, and additional BMPs such as pet waste management and Low Impact Development practices. Students participate in classroom lessons, project-based activities, and Adopt-a-Drain campaigns, receiving multilingual educational materials and guidance to encourage real-world application. Outdoor experiential learning at local receiving waters reinforces the connection between student actions and ecosystem health. Pre- and post-program surveys, teacher observations, and Adopt-a-Drain participation metrics will measure changes in awareness, behavior adoption, and pollutant prevention. Coordination with schools and partner organizations ensures sustained engagement and long-term adoption of stormwater BMPs.

Stewardship (S5.C.2.a.iii):

- The volunteer storm drain marking program will continue in 2026, advertised in the *City Currents* newsletter as well as City social media pages. Additional opportunities for volunteers will include auditing previously marked basins to determine if markings need replacement.
- The Car Wash Kit program will remain active, encouraging community car wash events to use kits available free of charge from the City's Public Works Department.
- Through collaboration with Hamline University, the City is participating in the Adopt-a-Drain program, targeting Des Moines residents to adopt and maintain storm drains in their neighborhoods. The program addresses the following BMPs: cleaning catch basins, preventing blockages, and

reducing trash and debris. Metrics for success will include the number of participants and the volume of debris removed.

- **Regional Collaboration:**

- The City will work closely with other jurisdictions and regional groups to share resources, develop cohesive messaging, and maximize the effectiveness of public education and outreach campaigns. Partnerships will include efforts to improve water quality, address equity concerns, and create unified behavior change campaigns.

- **Measurable Outcomes:**

- The City will develop specific metrics to evaluate the success of its public education and outreach efforts, such as participation rates, behavioral survey results, and the volume of debris collected through stewardship activities. Annual evaluations will guide program adjustments to improve outcomes.

4: PUBLIC INVOLVEMENT AND PARTICIPATION

4.1 Permit Requirements

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

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, and participating in developing rate-structures or other similar activities. The Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP.
- Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the City's SMAP and SWMP.
- On or before May 31st each year, the Permittee shall post on its website the updated SWMP Plan and the annual report. All other submittals shall be available to the public upon request.

4.2 2026 Planned Actions

Opportunities for Public Participation (S5.C.3.a)

- The SWMP Plan will be posted on the Des Moines website and included in the upcoming edition of the *City Currents* to provide the public an opportunity to comment.

Availability of Documents (S5.C.3.b)

The annual report for this permit, which is due March 31st, and the SWMP Plan will be posted on the City website (www.desmoineswa.gov) no later than May 31st.

5: MS4 MAPPING AND DOCUMENTATION

5.1 Permit Requirements

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

- Maintain mapping data for: known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs, geographic areas served by the Permittee's MS4 that do not discharge to surface waters, tributary conveyances to all known outfalls with a 24" nominal diameter or larger, connections between the MS4 and other municipalities or public entities, and all connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report.
- No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop a methodology to identify canopy for stormwater management purposes, which may be updated annually.
- No later than December 31, 2028, implement a methodology to map acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater and flow control BMPs/facilities, owned or operated by the Permittee. Submit with the Annual Report a map and breakdown of acreage managed or unmanaged by stormwater treatment and flow control/BMPs/facilities.
- No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

5.2 2026 Planned Actions

Ongoing Mapping (C5.4.a):

- In 2026, the City will continue its ongoing GIS mapping of the MS4. The Stormwater field staff, who complete catch basin inspections will continue to highlight discrepancies between the map and the physical asset in the field. In addition, City staff are conducting an audit of mapped basins to

confirm the connecting pipe material types and sizes are accurately inputted.

- The City has completed a GIS-based inventory of tree canopy in partnership with Parametrix. This mapping effort assessed total canopy coverage, riparian and critical area canopy, and historical tree loss trends. The analysis focused on stormwater-related benefits such as rainwater interception and riparian shading. Input from City departments helped refine the methodology, ensuring alignment with broader urban forestry and stormwater management goals.
- The City currently maintains all MS4 mapping data electronically and is available at this web address: <https://maps.desmoineswa.gov/swm/>

6: Illicit Discharge Detection and Elimination (IDDE)

6.1 Permit Requirements

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

- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater illicit discharges into the MS4 to the maximum extent allowable under state and federal law.
- Implement procedures for reporting and correcting or removing illicit connections, spill and other illicit discharges when they are suspected or identified.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.
- Document IDDE Field Screening Methodology in the Annual Report.
- Train staff that are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills and connections. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Records shall be maintained that document training provided and staff trained.
- Track and maintain records of all activities conducted to meet the requirements of this section.
- No later than July 1, 2027, implement and update an ordinance if necessary, or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
- No later than December 31, 2026, the Permittee must coordinate with fire fighting agencies/departments that serve the area that discharge to the MS4 to be notified when PFA-containing AFFFs are used during emergency firefighting activities.

- No later than January 1, 2027, Permittees shall update and implement procedures to minimize discharges to the MS4 during post emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4.

6.2 2026 Planned Actions

IDDE Reporting & Correcting (S5.C.5.a):

- The City will continue to use the procedures currently in place for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified.

IDDE Public Awareness & Notification (S5.C.5.b):

- The City will continue to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Public employee training is accomplished through intermittent, typically annual, viewing of the video “IDDE- A Grate Concern”. The City encourages citizens to call the Public Works Department at 206-870-6523; police department non-emergency number at 206-878-3301 to report illicit discharges and spills. These phone numbers are publicly listed on the City website and through various other means of outreach.

IDDE Ordinance (S5.C.5.c):

- Existing Code language will be reviewed in 2026 for upcoming permit requirements. The City adopted an IDDE Ordinance in compliance with the permit requirement, effective September 12, 2009. This ordinance is codified as Chapter 11.20 of the Des Moines Municipal Code.

Ongoing IDDE Action Program (S5.C.5.d):

- IDDE Field Screening: In November 2020, the City updated their field screening methodology for illicit connections using “*The Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*”, Herrera Environmental Consultants, May 2020. This field screening methodology will be documented in the Annual Report. The City has developed a program to meet the field screening requirements, at least 12% of the MS4 will be screened in 2026. The methodology of catch basin/manhole inspections with the routine maintenance approach will be utilized to complete this requirement.
- The City will maintain the ongoing IDDE Action Program. The City is currently using IDDE procedures from the “*Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*” to characterize the nature and environmental threat posed by illicit discharges and also to trace the source of illicit discharges. When

the City or the investigations agency determines surface water quality pollution has occurred, a notice is sent to the property owner stating the problem shall be remedied within a time frame listed in our code. The cleanup and enforcement depend on the severity of the spill.

- City staff have begun coordination with South King Fire on the current usage and supplies of PFAS containing AFFF's.

Training (S5.C.5.f):

- The City's NPDES Coordinator is the lead for identification, investigation, termination, cleanup, and reporting illicit discharges; including spills, improper disposal and illicit connections. IDDE training is currently accomplished through the EXCAL VISUAL training video "IDDE: a grate concern". The City will continue to implement IDDE training as needed in 2026. Follow-up training will be provided as needed to address changes in procedures, techniques or requirements. All training records (including course information and the staff training) will be documented and maintained in Microsoft Excel. Stormwater staff meetings, which include engineering and maintenance staff, are conducted on a bi-weekly basis to discuss projects and share feedback.

Recordkeeping (S5.C.5.g):

- The City will track and maintain records of the activities conducted to meet the requirements of this section. City staff will continue to evaluate and improve the IDDE program based on experience, lessons learned, and feedback from public education efforts. The Cityworks asset management program is used as the primary record keeping platform for spill response. In addition, the City utilizes the Department of Ecology's Water Quality Permitting Portal (WQWebPortal) to streamline annual reporting requirements for spill response. Microsoft Excel is used as the primary record-keeping platform for training records.

7: CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

7.1 Permit Requirements

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

- Implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects.

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.
- Each Permittee shall adopt or revise and make effective a local program, no later than June 30, 2027, that meets the requirements set forth in the Permit.
- The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the Permit conditions.
- This program shall include a permitting process with site plan review, inspection and enforcement capable of meeting the standards listed in S5.C.6.c.(i)-(iv) For both private and public projects. At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i.
- The program shall make available, as applicable, a link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity, and a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.
- The Permittee shall ensure that all staff whose primary job duties fall within this section are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

7.2 2026 Planned Actions

Ordinance (S5.C.6.b.iii):

- The City will maintain the existing program designed to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction site activities while also reviewing the code to meet future permit requirements in 2027. The City adopted the 2021 King County Surface Water Design Manual (KCSWDM) as the Surface Water Design Manual for the City of Des Moines: DMMC 16.10.350.

Local Program for New Development (S5.C.6.c):

- The City will maintain the existing permitting process with plan review, inspection, and enforcement capability to meet the standards listed in (i) through (viii), in the permit under section S5.C.6.c, for both private and public projects, using qualified personnel.
- The City will continue to conduct all construction-related inspections that deal with drainage improvements and erosion control within the City.

Long-term Operation and Maintenance (S5.C.6.c.iv):

- The City will maintain the existing program to ensure inspection and maintenance of private facilities in new residential developments are being performed.

Availability of NOIs (S5.C.6.d):

- The City's Community Development Department will continue to make available copies of the "Notice of Intent for Construction Activity" and copies of the "Notice of Intent for Industrial Activity" to representatives of the proposed new development and redevelopment. The City enforces local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology. The City will continue to provide copies of the NOI upon request. The electronic forms for both the Construction Stormwater General Permit NOI & the Industrial Stormwater General Permit are available on the City website at the following link: https://www.desmoineswa.gov/departments/public_works/surface_water_management/water_quality_npdes

Training (S5.C.6.e):

- The existing training program per S5.C.6.e will be maintained. Trainings will be conducted in house and by other agencies, such as the Department of Ecology and the Washington Stormwater Center.

8: Stormwater Management for Existing Development

8.1 Permit Requirements

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

- Implement and document a Program to control or reduce stormwater discharges to waters of the State from areas of existing development.
- Implement stormwater facility retrofits, or tailored SWMP actions that meet criteria described in the permit.
- Annually, every year by March 31, Permittee shall provide a list of planned, individual projects scheduled for funding during this Permit term that will go toward the equivalent acreage found in Appendix 12.
- No later than March 31, 2028, then annually thereafter, Permittees shall fully fund, start construction or completely implement project(s) that meet the criteria in Appendix 12 and submit documentation with the Annual Report, due on March 31, 2028.
- Projects that started construction after January 1, 2023, may be included.
- Credit will be given for exceedance of the requirement as described in Appendix 12 and may be applied in the 2029-2034 Permit term up to 50% of the next Permit term's requirement.
- Permittees shall report which projects may provide Tribal and overburdened community benefits.

- Permittees may collaborate to meet a regional goal under conditions set forth in Appendix 12.
- No later than March 31, 2028, Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (2029-2032).

8.2 2026 Planned Actions

- City staff have begun discussions, planning, and implementation for the SMED program, focusing on establishing program objectives, implementation strategies, and compliance with permit requirements.
- Implement a tracking system to monitor project status and equivalent acreage treated.
- Begin identifying potential projects that will meet the March 31, 2028 requirement to fully fund, start construction, or implement retrofits that comply with Appendix 12.

9: SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

9.1 Permit Requirements

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

- Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include application of operational source control BMPs and, if necessary, structural BMPs. Inspection of potential pollutant generating sources at publicly and privately owned institutional and commercial sites. Application and enforcement of local ordinances at identified sites. And practices to reduce polluted runoff for the application of pesticides, herbicides and fertilizers from identified sites.
- No later than August 1, 2027, Permittees shall adopt and update to make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
- Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4. The inventory shall be updated every 5 years.
- Permittees shall continue an inspection program for identified sites.
- The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. On or before January 1, 2023, implement an inspection program for the sites identified above that inspects 20% of listed sites annually and 100% of sites identified through legitimate complain

- Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.
- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities.

9.2 2026 Planned Actions

Conduct Inspections to Prevent & Reduce Pollutants (S5.C.8.a)

- Trained City staff will conduct 40 Source Control Inspections and receive language and technical assistance from BEA Environmental as needed.

Ordinance (S5.C.8.b.i)

- The City has authority to establish a Source Control Program under DMMC 11.20.070 and 11.20.070– Requirements to prevent, control, and reduce stormwater contamination by use of BMPs.

Site Inventory (S5.C.8.b.ii)

- City staff have compiled an inventory of all potential pollution-generating sites within the City based on business activities listed in Appendix 8 and based on complaints for home-based businesses and multi-family sites. The inventory is updated on a regular basis as businesses apply for licensing in the City.

Source Control Inspection Program (S5.C.8.b.iii)

- City staff have been trained to lead and conduct the source control inspection program. The City has identified 40 potential pollution-generating businesses that will be reached out to in 2026.

Progressive Enforcement Policy (S5.C.8.b.iv)

- An existing ordinance with the City, codified as DMMC 11.20.090 – Violations and enforcement, satisfies the requirement for a progressive enforcement policy.

Training (S5.C.8.b.v)

- City staff responsible for source control inspections will receive annual training on illicit discharge detection and elimination (IDDE), source control BMPs, and regulatory updates to ensure effective program implementation and compliance with permit requirements.

10: OPERATIONS AND MAINTENANCE

10.1 Permit Requirements

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

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in Chapter 4 of Volume V of the SWMMWW.
- Perform annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, and take appropriate maintenance actions in accordance with the adopted maintenance standards.
- Conduct spot checks of potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events (greater than 10-year, 24-hour recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards.
- Inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the SWMMWW. Decant water shall be disposed of in accordance with Appendix 6 – Street Waste Disposal.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all land owned or maintained by the City, and road maintenance activities under the functional control of the City. No later than December 31, 2027, document the practices, policies and procedures.
- No later than July 1, 2027, and ongoing thereafter, the Permittee shall develop and implement a street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.
- No later than March 31, 2028, Permittee shall document, and report mapped priority areas swept, sweeping frequency, type of sweeper curb miles swept and approximate amount of waste removed.
- Implement an ongoing training program for employees of the City whose construction, operations or maintenance job functions may impact stormwater quality. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements,

or staffing. The Permittee shall document and maintain records of training provided and staff trained.

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City in areas subject to this Permit that are not required to have coverage under an Industrial Stormwater General Permit.
- Maintain records of inspections and maintenance or repair activities conducted by the City.

10.2 2026 Planned Actions

Maintenance Standards (S5.C.7.a):

- Existing maintenance standards will remain established in 2026. The City has adopted the 2021 King County Surface Water Design Manual (KCSWDM) for maintenance standards for all stormwater facilities: DMMC 16.10.350.

Maintenance of Stormwater Facilities regulated by the Permittee (S5.C.7.b):

- The City will continue to inspect and require timely maintenance of stormwater treatment and flow control BMPs/facilities that fall under this permit section.

Maintenance of Stormwater Facilities owned by the Permittee (S5.C.7.c):

- The City plans to maintain its ongoing program for annual inspection and maintenance of municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. No changes or additions will be made to the post-storm inspection program in 2026. The City plans to inspect half of all known catch basins and inlets owned by the City in 2026. City crews are inspecting with iPads in the field and scheduling required maintenance as needed. They will also be checking for evidence of illicit discharges or illicit connections during regular inspections. The City will continue to use its asset management program, Cityworks, to track inspections associated with this section of the permit.
- Begin research on PCB BMP's for City owned building cleaning, maintenance, renovation and demolition.
- Documentation of practices, policies and procedures will be under review to reduce stormwater impacts associated with runoff from all lands owned or operated by the City.

Reducing Stormwater Impacts (S5.C.7.d):

- The City will continue to use the adopted King County Site Management Plan as the City's practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City.

- The City will be evaluating the existing street sweeping program to ensure consistency with upcoming permit requirements/objectives.
- Street sweeping documentation will be reviewed as a step in the process to meet the March 31, 2028 requirement.

Training (S5.C.7.e):

- Training under this section will continue on an as-needed basis.

Stormwater Pollution Prevention Plan (SWPPP) (S5.C.7.f):

- The City's Public Works Department developed and implemented a Stormwater Pollution Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City. The SWPPP includes periodic visual observation of discharges from the facility to evaluate the effectiveness of BMPs. The City will continue to implement this plan during 2026.

11: MONITORING AND ASSESSMENT (Section S8)

- **Reporting:**
The City will provide any monitoring or stormwater-related studies conducted during the reporting period in the annual report, including relevant findings from regional programs.
- **Regional Monitoring Participation:**
The City will continue to support regional status and trends monitoring of small streams and marine nearshore areas in Puget Sound through its annual contribution to the collective fund with Ecology.
- **Effectiveness and Source Identification Studies:**
The City's annual contribution also supports stormwater effectiveness studies and source identification efforts, including monitoring for per- and polyfluoroalkyl substances (PFAS).

12: REPORTING REQUIREMENTS

- No later than March 31, 2026, the City will submit an annual report. The reporting period for the annual report will be from January 1, 2025, through December 31, 2025. The City will submit annual reports electronically using Ecology's WQWebDMR.
- The City will continue to keep all records related to the Permit and the SWMP for at least five years.
- The City will continue to make all records related to the Permit and the City's SWMP available to the public at reasonable times during business hours. The City will provide a copy of the most recent annual report to any individual or entity upon request.

- **The 2025 annual report for the City will include the following:**
 1. A copy of the City's current SWMP Plan as required by S5.A.2.
 2. Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of the permit during the reporting period.
 3. Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of this permit during the reporting period. Refer to Appendix 3 for annual report questions.
 4. If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under this permit.
 5. Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.
 6. A notification of any annexations, incorporations, or jurisdictional boundary changes resulting in an increase or decrease in the City's geographical area of permit coverage during the reporting period.
 7. Stormwater Retrofit Reporting: In accordance with S5.C.7, the City will begin tracking stormwater facility retrofits and equivalent acres managed under Appendix 12. By March 31, 2028, and annually thereafter, the City will include this data in its annual report.