THE CITY OF FIRCREST

STORMWATER MANAGEMENT PROGRAM (SWMP) PLAN

The City of Fircrest
115 Ramsdell St
Fircrest, WA 98466

2026 FINAL

Contents

Acronyms and Abbreviations

AKART	All Known and Reasonable Technologies
BMP	Best Management Practice
CESCL	Certified Erosion and Sediment Control Lead
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FC	Flow Control
FMP	Fircrest Municipal Code
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
ROW	Right-of-way
RSMP	Regional Stormwater Monitoring Program
SIDIR	Source Identification Information Repository
SMAP	Stormwater Management Action Plan
SWMMWW	Stormwater Management Manual for Western Washington
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
Unk	Unknown
USGS	United States Geological Survey
WS	Watershed
WQ	Water Quality

1 INTRODUCTION

1.1 THE STORMWATER MANAGEMENT PROGRAM PLAN DOCUMENT

This Stormwater Management Program (SWMP) Plan has been prepared to satisfy Special Condition S5 of the current Western Washington Phase II Municipal Stormwater Permit (Permit), of which the City of Fircrest is a Permittee.

Section S5.A.2 of the Permit states:

> Each Permittee shall prepare written documentation of the SWMP, called the SWMP Plan. The SWMP Plan shall be organized according to the program components in S5.C or a format approved by Ecology and shall be updated at least annually for submittal with the Permittee's annual reports to Ecology. The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year.

The current Permit became effective on August 1, 2024 and expires on July 31, 2029.

This SWMP Plan has been organized as follows:

- **Chapter 1** provides a summary of permit requirements, required program components, and an overview of the City's stormwater program including roles and responsibilities, governing code(s), and mechanisms for stormwater monitoring/assessment and annual reporting.

- **Chapters 2 - 9** address each of the SWMP Components required by the Permit per Special Requirement S5, including descriptions of specific permit requirements and planned or ongoing measures for compliance.

1.2 NPDES PHASE II MUNICIPAL STORMWATER PERMIT

1.2.1 PERMIT BACKGROUND

In 1987 the US Congress revised the Clean Water Act to include stormwater discharges in the National Pollutant Discharge Elimination System (NPDES) Permit program. The US Environmental Protection Agency (EPA) developed rules for the implementation of the new stormwater requirements and separated them into two phases. The State of Washington, through the Department of Ecology, implements these stormwater rules through the Municipal Stormwater Permit program. As an owner and operator of a small municipal separate storm sewer system (MS4), the City of Fircrest is required to be covered by, and comply with, the current Western Washington Phase II Municipal Stormwater Permit (Permit) which grants the City permission to discharge stormwater from its MS4 into waters of the State of Washington.

1.2.2 REQUIRED SWMP COMPONENTS

The Permit requires the development and implementation of a Stormwater Management Program (SWMP) to control discharge into and from the City's MS4. The SWMP includes nine (9) components that are designed to reduce the discharge of pollutants and protect receiving waters to the maximum extent practicable. SWMP components are identified below. Detailed discussion of each, including current and/or proposed measures to meet minimum performance standards, are provided in Chapters 2-9.

i) Stormwater Planning
Permittees shall 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.

ii) Public Education and Outreach
The SWMP shall include an education and outreach program designed to:
- Build general awareness about methods to address and reduce impacts from stormwater runoff;
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts; and
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

iii) Public Involvement and Participation
Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

iv) MS4 Mapping and Documentation
The SWMP shall include an ongoing program for mapping and documenting the MS4.

v) Illicit Discharge Detection and Elimination
The SWMP shall include an ongoing program designed to prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

vi) Controlling Runoff from New Development, Redevelopment, and Construction Sites
Permittees shall implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new/redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects.

vii) Stormwater Management for Existing Development
Each Permittee shall implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program shall aim to focus on strategic stormwater investments over longer planning timeframes.

viii) Source Control Program for Existing Development
The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas of existing development that discharge to the MS4. The program shall include application of source control BMPs, inspections, and enforcement.

ix) Operations and Maintenance
Each Permittee shall implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts.

1.3 FIRCREST'S STORMWATER PROGRAM

1.3.1 STORMWATER CODES

Legal authority for implementing/enforcing several components of the stormwater program is established through ordinance(s)approved by City Council and incorporated into the City of Fircrest Municipal Code (FMC), including:

FMC 20.24 – Stormwater Management
This chapter defines the required stormwater drainage requirements in the City including low impact development, and long-term operation and maintenance of stormwater facilities. This chapter also defines the City's rights to inspect permitted stormwater facilities on private property and procedures for enforcement of maintenance standards.

FMC 20.25 – Illicit Discharge Detection and Elimination
This chapter specifies substances that are prohibited from discharging into the storm drainage system, allowable discharges, and conditional discharges. This chapter also prohibits illicit (non-permitted) connection to the City's storm drainage system and describes enforcement procedures.

1.3.2 COORDINATION AND RESPONSIBILTY

Managing the stormwater program and achieving compliance with Permit mandates in Fircrest is coordinated by the Public Works Department, with program administration the responsibility of the Public Works Director. This responsibility includes:

- Implementing the SWMP (Permit Section S5.A.1)
- Preparing the SWMP Plan (S5.A.2)
- Tracking SWMP costs and funding sources for SWMP development and implementation (S5.A.3.a)
- Tracking the number of inspections, official enforcement actions and types of public education activities required by program components (S5.A.3.b)
- Continue implementation of existing stormwater management programs until they begin implementation of the updated stormwater management program (S5.A.4)
- Coordinating between other Permittees, e.g. adjacent municipalities (S5.A.5.a)
- Coordinating among departments within the City's jurisdiction to facilitate compliance (S5.A.b)

The City of Fircrest Public Works has implemented an Asset Management/Work Order program. All assets within the City's system have been GIS mapped including Storm, Water and Sewer. Yearly inspections, historic maintenance records and emergency response efforts are tracked within this system.

1.3.3 MONITORING AND ASSESSMENT

Section S8 of the Permit requires the City to:

- Provide a description of any stormwater monitoring or stormwater-related studies conducted during the reporting period
- Pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP) that includes the following components:
    - Status and trends monitoring (small stream and marine nearshore)
    - Stormwater management program effectiveness studies
    - Source identification and diagnostic monitoring to implement the Source Identification Information Repository (SIDIR)

The City of Fircrest contributes to the SAM Program $1,410 annually towards regional status and trends monitoring, effectiveness studies and source identification and the SIDIR. The City does not plan any additional stormwater monitoring or stormwater-related studies that would require reporting to Ecology.

The City of Fircrest is not required to conduct water quality monitoring for compliance with total maximum daily loads (TMDLs) pursuant to Section S7 and Appendix 2 of the Permit. Applicable TMDLs are those that have been approved by EPA on or before February 15, 2007. Currently the City of Fircrest is not subject to any TMDLs. However, the City of Fircrest was awarded a Storm Water Treatment Outfall Grant in 2020 that will require quarterly reporting to Ecology. In 2021, the City selected Parametrix Inc. to complete the design of the project (the Stormwater Pretreatment Outfall Project), which was completed in 2023.

1.3.4 SWMP REPORTING

Section S9 of the Permit requires the City to submit the following on March 31 of each year:

- A copy of the current SWMP Plan (this document).
- Annual Report form (Appendix 3 of the Permit) describing the status of implementation of the requirements of the Permit during the reporting period.
- Notifications of any annexations or jurisdictional boundary changes.

The City will submit its Annual Report and SWMP Plan to Ecology by March 31 of each year.

2 STORMWATER PLANNING (S5.C.1)

Per Section S5.C.1 of the 2024-2029 Phase II Permit, the City shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. Minimum performance measures are as follows:

- Permittees shall convene (or continue to convene) an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Permittees shall describe how stormwater management needs and surface water protection/improvement is (or is not) informing long-range plan updates.
- Permittees shall require (or continue to require) low impact development (LID) principles and LID BMPs through the development or updating of applicable code(s) or other enforceable mechanisms.
- Comply with Stormwater Management Action Planning (SMAP) requirements in a similar process and range of issues as outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication 24-10-027) for one new priority catchment or additional actions for an existing SMAP.

2.1 STORMWATER PLANNING – 2024-2029 PERMIT REQUIREMENTS

The following is a summary of requirements and associated deadlines to satisfy Stormwater Planning performance measures under the 2024-2029 Phase II Permit:

- S5.C.1.a – Interdisciplinary Teams:
  Permittees shall continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of this program. New permittees shall convene an interdisciplinary team no later than August 1, 2025.

- S5.C.1.b – Coordination with Long-Range Plan Updates:
  The City shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report, due March 31, 2027. The Annual Report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, considering stormwater management needs or limitations.

- S5.C.1.c – Low Impact Development (LID) Code-Related Requirements:
  The City shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed. The intent shall be to make LID the preferred and commonly used approach to site development. The local development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

    - Annually, the City shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes

were updated in accordance with the 2013 Permit, and the measures developed to address the barriers.

- By December 31, 2028, each Permittee shall review, revise, and make effective their local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs.

- By 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 and water quality improvements in receiving waters and establish long-term goals for canopy, to be used for stormwater management as appropriate to the City.

- S5.C.1.d – Stormwater Management Action Planning (SMAP):
  The City shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication 24-10-027) for one new priority catchment or additional actions for an existing SMAP.

  - By March 31, 2027, Permittees shall complete and submit an SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP in accordance with S5.C.1.d(i).

2.2 STORMWATER PLANNING – 2026 PROGRAM ACTIVITY

2.2.1 INTERDISCLIPLINARY TEAM

The City's stormwater management program is maintained by an interdisciplinary team consisting of the following departments/representatives:

- Tyler Bemis – Public Works Director
- Sherry Canavan – Public Works Office Coordinator
- Jeff Davis – Utility Foreman
- Bryce Wakefield – Maintenance Lead
- [vacant] – Community Development Director
- Victor Celis – Chief of Police

Strategic discussions regarding program implementation, documentation, and emergency response activities are performed through internal coordination within the City during weekly department head meetings. Feedback and reporting are distributed among the groups for future stormwater planning and implementation. The following NPDES permit responsibilities are primarily maintained through the following City Departments:

NPDES Permit Responsibilities	City Department
Primary planning, administration, and development of the NPDES program and coordination within other divisions and departments	Tyler Bemis, Public Works Director
Inspections and Maintenance of City owned or operated stormwater facilities, as well as pollution prevention practices	Public Works Staff
Stormwater site plan review	Planning & Building Department / Public Works
Maintains and updates mapping of MS4	Planning & Building Department / Public Works
Stormwater incident response and code enforcement for violations	Planning & Building Department / Public Works
Emergency Response	Public Works Department

The City's interdisciplinary team continues to meet on a regular basis to inform and assist in the development, progress, and influence of this program.

2.2.2 LOW IMPACT DEVELOPMENT (LID) CODE-RELATED REQUIREMENTS

The Fircrest Municipal Code (FMC) continues to require LID Best Management Practices (BMPs) to the maximum extent feasible for all new development, redevelopment, and construction site activities in accordance with the Low Impact Development Technical Guidance Manual for Puget Sound and the latest edition of the Stormwater Management Manual for Western Washington (SWMMWW). Since the previous (2025) reporting period, the City has not identified any new administrative and/or regulatory barriers to the enforcement of LID principles or implementation of LID BMPs. The City continues to require LID BMPs in accordance with FMC 20.24 and the adopted technical manual(s) and guidance adopted therein.

2.2.3 STORMWATER MANAGEMENT ACTION PLANNING (SMAP)

The City has completed Stormwater Management Action Planning (SMAP) including receiving water prioritization assessment and the SMAP document under the previous (2019-2024) Phase II Municipal Permit. All areas within City limits drain to a single receiving water (Leach Creek) with three contributing area units, all of which have previously been identified. As such, the City is unable to designate a new high priority catchment under the current Permit. A review of the current SMAP is in-progress and the City intends to identify/implement additional actions for the existing SMAP as necessary per Section S5.C.1.d of the Permit.

3 PUBLIC EDUCATION AND OUTREACH (S5.C.2)

Section S5.C.2 of the 2024-2029 Phase II Permit requires the City to develop and implement a public education and outreach program designed based on local or regional (or a combination of both) water quality information and priority audience characteristics to target high priority audiences, subject areas, and/or BMPs. Program goals include:

i) Build general awareness about methods to address and reduce impacts from stormwater runoff;
ii) Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts; and
iii) Create stewardship opportunities that encourage community engagement in addressing the impacts from stormwater runoff.

Minimum performance measures and the City's activities to facilitate program goals are detailed in the following sections.

3.1 2024-2029 PERMIT REQUIREMENTS

Per S5.C.2, minimum requirements for the City's education and outreach program(s) inlcude:

i. **General Awareness** – Permittees will select, at minimum, one priority audience and one subject area from either (a) or (b). Permittees shall provide subject area information to the priority audience on an ongoing or strategic schedule:

    a. General public and businesses:
        - General impacts of stormwater on surface waters and impacts from impervious surfaces.
        - Low impact development (LID) principles and LID BMPs.

    b. Engineers, contractors, developers, property owners/managers, and land use planners:
        - Technical standards for stormwater site and erosion control plans.
        - LID principals and LID BMPs.
        - Stormwater treatment and flow control BMPs/facilities.
        - Source control BMPs for building materials to reduce pollution to stormwater, including but not limited to stormwater pollution from PCB-containing materials.

ii. **Behavior Change** – Permittees shall select, at minimum, one priority audience and one BMP:

    a. Residents, landscapers, property managers/owners, developers, school age children, college/university, trade students, or businesses (including home-based or mobile):
        - Use and storage of pesticides, fertilizers, and/or other household chemicals.
        - Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
        - Prevention of illicit discharges.
        - Yard care techniques protective of water quality.
        - Carpet cleaning.

- Repair and maintenance BMPs for vehicles, equipment, and/or homes/buildings.
- Pet waste management and disposal.
- LID Principles and LID BMPs.
- Stormwater facility maintenance, including LID facilities.
- Dumpster and trash compactor maintenance.
- Litter and debris prevention.
- Sediment and erosion control.
- Source control BMPs per S5.C.8
- Locally important, municipal stormwater-related subject area.

Behavior change campaigns shall implement recommended practices and schedule(s) as outlined under S5.C.2.a(ii)(b) through S5.C.2.a(ii)(e).

iii. **Stewardship** – The City must provide and/or partner with existing organizations to encourage residents to participate in stewardship activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement.

3.2 2026 PROGRAM ACTIVITY

3.2.1 GENERAL AWARENESS

CALENDAR CAMPAIGN

The City will continue an annual educational program which encourages local elementary students' participation in developing an activities calendar including artwork with stormwater pollution prevention themes for each month. This effort is focused on generating awareness of LID principles and BMPs in both school-aged children as well as the general residential population and city employees to whom the calendar is distributed. The program runs as follows:

An entry form is supplied to each child that attends Whittier Elementary School. Children are able to select a theme from multiple categories focusing on pollution prevention.

All entries are evaluated, with the top-rated entries published in the City of Fircrest Calendar. The grand prize winner is featured on the cover with one of twelve (12) top rated entries featured each month and an additional twelve (12) "honorable mentions" featured at the end of the calendar. The grand prize winner receives pizza for their entire class and all other artists are rewarded with an ice cream social at the school. Once the calendars are produced, each child at the school receives a copy and additional copies are delivered to each residence within the City of Fircrest.

Target Audience: General Public (including school age children and property owners/managers across all communities within the City)
Date: Annual
Goals: Increase awareness of stormwater impacts on surface waters and educate students/residents on LID principles.

LID GARDENING EDUCATION

The City conducts direct outreach homeowners regarding LID principles and pollution-prevention related to gardening/landscaping at two public events: Fircrest Fun Days and National Night out Against Crime. The City distributes information and guidance including the function/benefits of rain gardens and rain barrels for homeowners at these events.

Target Audience: Property Owners
Date: Biannual
Goals: Increase awareness of private stormwater impacts on surface waters and educate students/residents on LID principles, BMPs.

YARD CARE EDUCATION

The City provides educational outreach on yard care techniques that are protective of water quality including use and storage of pesticides and fertilizers as well as pet waste management and disposal as part of the spring and fall utility billing flyers. In addition, the City publishes an educational article in one Town Topics, a local newsletter, annually.

Target Audience: Property Owners
Date: Biannually
Goals: Increase awareness of private stormwater impacts on surface waters and educate students/residents on LID principles, BMPs.

3.2.2 EFFECTING BEHAVIOR CHANGE

The City's ongoing yard care and gardening outreach campaigns outlined in Chapter 3.2.1 may also be considered part of ongoing efforts to effect behavior change through the advocation of specific BMPs including proper use and storage of pesticides/fertilizers, pet waste management, and yard care techniques protective of water quality. In addition, the City operates the following programs aimed at promoting behavior changes among the City's general public.

FISH FRIENDLY CAR WASH KITS

The City of Fircrest received a local grant from Pierce County Surface Water Program to provide "Fish Friendly Car Wash" kits which are available to check by individuals and/or organizations interested in hosting fundraising car wash events. The car wash kit is advertised on the City's website and kits are also publicly available at two events: Fircrest Fun Days and National Night out Against Crime

Target Audience: General public
Date: Ongoing
Goals: Education regarding LID principles/source controls and the use and storage of automotive chemicals including carwash soaps.

DUMPSTER LID OUTREACH CAMPAIGN

In 2025, the City launched a Dumpster Lid Outreach campaign to educate businesses on the hazards of improper dumpster use and about proper dumpster use, pending available staffing. A task force of volunteers was formed to approach businesses with educational tools and resource assistance including materials obtained through the Regional Dumpster Outreach Group (DOG) of Washington. The City will extend this program in 2026.

Target Audience: Businesses
Date: Summer 2026
Goals: Source Control Education

3.2.3 CREATING STEWARDSHIP OPPORTUNITIES

The following local stewardship opportunities will be provided in Fircrest during 2026:

THELMA GILMUR PARK HABITAT STEWARDSHIP WORK PARTIES

Monthly work parties provide opportunities for resident volunteers to help remove invasive plants near the trail system in cooperation with Pierce Conservation District. These work parties are advertised on the City's activities calendar.

Other regional stewardship opportunities exist through the following organizations:

PIERCE CONSERVATION DISTRICT

www.piercecountycd.org

Pierce Conservation District's programs focusing on water quality improvement include:

- Storm Drain Curb Marking
- Rain Garden Assistance
- Urban Tree Planting
- Habitat Stewardship Program

CHAMBERS-CLOVER WATERSHED COUNCIL

https://www.co.pierce.wa.us/1860/Chambers-Clover-Watershed-Council

Chambers-Clover Creek Watershed Council (Pierce County) promotes the protection and enhancement of the Chambers-Clover Creek Watershed, in which Fircrest is located. The Council provides an opportunity for local agencies and citizen groups to coordinate their efforts to benefit the watershed.

3.2.4 SOCIAL MARKETING CAMPAIGN

[IN-PROGRESS]

3.2.5 BEHAVIOR CHANGE CAMPAIGN EVALUATION

The City began a new effecting behavior change program in 2025 targeting dumpster pollution. City staff are currently exploring methods to monitor the effect of this behavior change campaign. Findings will be used to evaluate program effectiveness, introduce changes if/as necessary to improve ongoing campaign(s), and inform the management/implementation of future public outreach and education programs.

4 PUBLIC INVOLVEMENT AND PARTICIPATION (S5.C.3)

4.1 2024-2029 PERMIT REQUIREMENTS

Section S5.C.3 of the Permit requires the City to provide ongoing opportunities for public involvement participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. The City must comply with applicable state and local public notice requirements when developing elements of the SWMP.

Minimum performance measures are:

a. 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. Permittees shall document specific outreach measures for overburdened communities.

    i. Permittees shall document specific public involvement and participation opportunities provided to overburdened and highly impacted communities annually.

    ii. Permittees shall document methods used to identify overburdened communities by December 31, 2026

b. Post on City website the SWMP Plan and the annual report required under S9.A of the Permit no later than May 31st each year. All other submittals shall be available to the public upon request.

4.2 2026 PROGRAM ACTIVITY

4.2.1 DECISIONMAKING PROCESS OPPORTUNITIES

The City of Fircrest will notify the public of stormwater-related discussions outside of the SMAP or annual SWMP via the City website. The City is not currently aware of the presence of overburdened or highly impacted communities as it relates to this Permit. A review of relevant indicators including environmental exposures/effects, socioeconomic factors, and sensitive populations using the Washington State Department of Health Environmental Health Disparities (EHD) Maps indicates an overall EHD rank of three (3) to five (5) out of ten (10) for all areas within City limits, where a higher rank indicates the most impacted communities. If/as impacted communities are identified in the future, the City will review and modify its policies and/or processes accordingly to ensure opportunity for public engagement in decisionmaking.

4.2.2 SWMP AND ANNUAL REPORT POSTING

This SWMP Plan document and Permit annual report is posted on the City's website in the current year prior to May 31. Copies of the SWMP will also be available to the public, upon request, in the Public Works building.

5 MS4 MAPPING AND DOCUMENTATION (S5.C.4)

5.1 2024-2029 PERMIT REQUIREMENTS

The City shall implement a program for maintaining mapping and documentation of the MS4. Minimum performance measures are:

a. Ongoing Mapping. The City shall maintain mapping data for the features listed:

   i. Known MS4 outfalls and known MS4 discharge points including outfall size and material.
   ii. Receiving waters, other than groundwater
   iii. Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
   iv. Geographic areas served by the City's MS4 that do not discharge stormwater to surface waters.
   v. Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:
      - Tributary conveyance type, material, and size where known.
      - Associated drainage areas.
      - Land use.
   vi. Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
   vii. All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
   viii. All connections from the MS4 to a privately owned stormwater system.

b. New Mapping. The City shall:

   i. No later than March 31, 2026 submit locations of all known MS4 outfalls according to standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.
   ii. No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.
   iii. No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Submit with the March 31, 2028 Annual Report a map(s) and table with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned and operated by the Permittee.
   iv. 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.

c. The required format for mapping is electronic (GIS, CAD, or other software that can map and store points, lines, polygons, and attributes), with fully described mapping standards
d. To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps depicting the information required in S5.C.4.a through c, above.
e. Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. This Permit does not preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

5.2 2026 PROGRAM ACTIVITY

The City of Fircrest's MS4 has been previously mapped including all known outfalls (including size and material) and connections to and/or from privately- owned stormwater systems as required by the current Permit. The data is available within ArcGIS Online, with fully described mapping standards, and layered in the City's Asset Management software, which is utilized while performing annual inspections. Any new catch basins and pipe diameter and materials of unknown private connections to the MS4 will also be discovered/updated, if discovered while conducting CB inspections.

6 ILLICIT DISCHARGE DETECTION AND ELIMINATION (S5.C.5)

6.1 PERMIT REQUIREMENTS

Section S5.C.5 of the Permit requires the SWMP to include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. Minimum performance measures are summarized as follows (see Permit for complete text):

a. The program shall include procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4

   Illicit connections and illicit discharges must be identified through, but not limited to: field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.

b. Permittees shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

c. Each Permittee shall implement an ordinance 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. The ordinance or other regulatory mechanism in effect as of the effective date of this Permit shall be revised, if necessary, to meet the requirements of this Section no later than July 1, 2027.

d. Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the City's MS4, including the following components:
   i. Procedures for conducting investigations of the City's MS4, including field screening and methods for identifying potential sources, implementation of a field screening methodology, and completing field screening for at least 12% of the MS4 each year.
   ii. A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
   iii. An ongoing training program for a municipal field staff.

e. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the City's MS4, including:
   i. Procedures for characterizing the nature and potential public environmental threat of an illicit discharge
   ii. Procedures for post-emergency clean-up of firefighting activities
      - No later than December 31, 2026, Permittee shall coordinate with firefighting agencies that serve areas discharging to the MS4 to be notified when PFAS-containing AFFFs are used
      - No later than January 1, 2027, Permittee shall update and implement procedures to minimize discharges to the MS4 during post-emergency cleanup and disposal activities including (but not limited to) those where PFAS-containing AFFFs have been used, diversions, and other measures that prevent

discharges to the MS4. Permittees shall deploy control measures during an emergency.

iii. Procedures for tracing the source of an illicit discharge
iv. Procedures for eliminating the illicit discharge
v. Meet the following timelines in addressing illicit discharges:
    - Immediate response to illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment
    - Investigate (or refer to appropriate agencies) within 7 days, on average, any complaints, reports, or monitoring that indicates an illicit discharge
    - Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection
    - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months

f. Train staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Provide follow-up training as needed. Document and maintain records of training.

g. Recordkeeping: Track and maintain records of the activities conducted to meet the requirements for illicit discharge detection and elimination (IDDE).

6.2 2026 PROGRAM ACTIVITY

6.2.1 IDDE ORDINANCE

Fircrest has previously adopted an ordinance that prevents illicit non-stormwater discharges into the MS4, as found in FMC 20.25. The ordinance outlines prohibited discharges, allowed discharges, conditional discharges, prohibits illicit connections, monitoring, as well as enforcement.

6.2.2 PROGRAM TO DETECT AND IDENTIFY ILLICIT DISCHARGE

The City of Fircrest will continue its existing Illicit Discharge Detection and Elimination (IDDE) program, which relies on complaints from the public or identification by City staff during system maintenance. Additionally, the City will continue to complete field screening for an average of 12% of the MS4 each year. To comply with the current Permit, the following program enhancements will be maintained for 2026. In addition, the City plans to coordinate with firefighting agencies to develop notification and cleanup/disposal procedures for PFAS-containing AFFFs, which will be incorporated into the IDDE ordinance.

Field Screening Methodology

Fircrest's IDDE program utilizes the Outfall Reconnaissance Inventory field screening methodology, as described in Chapter 11 of the Center for Urban Watershed Protection's *Illicit Discharge Detection and Elimination* guidance manual (IDDE Manual) dated October 2004. Screening methods utilize the newly implemented Asset Management software will assist in tracking historic data related to IDDE's and Spills.

IDDE Training Program

Fircrest staff involved in IDDE underwent training in 2022, 2023, 2024, and 2025. Additional training will be provided in 2026 as needed due to staff changes.

Hotline for Public Reporting of Spills and other Illicit Discharges

The City Hall telephone number listed on the City's website for reporting will be identified on the City's website specifically for reporting spills and other illicit discharges. After hours calls are communicated to and responded to by PW staff via contact from an on-call service then also emailed to PW Staff to be input into the database.

Illicit Discharge Public Education

Illicit discharge public education to inform public employees, businesses, and the public of hazards associated with illicit discharges and improper storage of waste have been integrated into the public education efforts at various community events in addition to local schools providing ecology awareness-based artwork for a Citywide calendar.

Source Control Business Inspection Program

In addition to the Source Control Programs for Existing Development that have already been implemented in previous years, the Source Control Business Inspection program is underway. The program educates and communicates with local businesses that may qualify under Appendix 8 of the Permit. Information is provided via utility billing mailers, available at the Public Works office and provided at community outreach events.

6.2.3 PROGRAM TO ADDRESS ILLICIT DISCHARGES

The City utilizes the following procedures to address illicit discharges reported by the public or detected through field screening:

- When a spill or illicit discharge is reported or detected that has an obvious nature based on distinct odors, colors, or visual indicators, the Public Works Director or designee will take appropriate action to minimize the threat to human health, welfare, and/or the environment, and will comply with the reporting requirements of General Condition G3 of the Permit. If the nature of the spill or illicit discharge constitutes a threat to human health, welfare, or the environment, action will be taken immediately. Other potential illicit discharges will be investigated within 7 days.
- When an illicit discharge is detected that is not obvious in nature or threat level, indicator sampling will be carried out in accordance with Chapter 4 of *Illicit Connection and Illicit Discharge field Screening and Source Tracing Guidance Manual*, May 2013, prepared by Herrera Environmental Consultants for the Washington State Department of Ecology (IC/ID Guidance Manual). A private contractor will be utilized to perform indicator sampling, when required.
- The source of reported or detected illicit discharges will be traced in accordance with the methodologies described in Chapter 5 of the ID/IC Guidance Manual, utilizing City maintenance staff and/or private contractors, as required.
- Illicit connections, when reported or discovered, will be investigated within 21 days to determine the source of the connection, nature, and volume of the discharge through the connection, and the party responsible for the connection.
- Illicit connections will be remedied within a period as specified by the City in accordance with FMC 20.25.090.

6.2.4 ILLICIT DISCHARGE TRAINING

Fircrest Utility staff responsible for the IDDE program attended a training seminar in 2021. No changes were made to the program based on this training. Additional training was provided from 2022 through 2025, and further training will be provided in 2026 as needed due to staff changes.

6.2.5 ILLICIT DISCHARGE RECORDKEEPING

All recordkeeping associated with the City's IDDE program is maintained within an internal Asset Management/Work Order program. IDDE's and spills are reported and documented in this program, whether the request originates from a citizen or City staff. Records are kept by the Public Works department and include the following:

- Field Screening Data
- Records of all detected illicit discharges and actions taken
- Reports of all reported spills and illicit discharges and actions taken
- Records of illicit connections and actions taken

All IDDE incidences are reported to the WQ WebIDDE app for reporting to Ecology.

7 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES (S5.C.6)

7.1 2024-2029 PERMIT REQUIREMENTS

Section S5.C.6 of the Permit requires that the City implement and enforce a program to reduce pollutants in stormwater runoff to its MS4 from new development, redevelopment, and construction site activities. The program must apply to both private and public development, including transportation projects. Minimum performance targets for this program include:

a. Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.

   No later than June 30, 2027, each Permittee shall adopt and make effective a local program that meets the requirements of S5.C.6.b(i) through S5.C.6.b(iii), applicable to all applications submitted:

   i. On or after July 1, 2027.
   ii. Prior to January 1, 2017, that have not started construction by July 1, 2022.
   iii. Prior to July 1, 2022, that have not started construction by July 1, 2027.
   iv. Prior to July 1, 2027, that have not started construction by July 1, 2032.

b. The ordinance or other enforceable mechanism shall include, at a minimum:

   i. The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and variance criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances through the use of Ecology- approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.

   ii. The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the 2024 Phase I Permit), will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under chapter 90.48 RCW to apply AKART prior to discharge:
      - Site planning requirements
      - BMP selection criteria
      - BMP design criteria
      - BMP infeasibility criteria
      - LID competing needs criteria
      - BMP limitations

Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

Permittees who choose to use the requirements, limitations, and criteria above in the *Stormwater Management Manual for Western Washington*, or a Phase I program approved by Ecology, may cite this choice as their sole documentation to meet this requirement.

iii. The legal authority, though the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this section that discharge to the City's MS4.

c. The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the following standards:

i. Review of all stormwater site plans for proposed development activities
ii. Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 of the Permit, or all construction sites that meet the minimum thresholds pursuant to S.C.5.b(i), above.
iii. Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce, as necessary, based on the inspection.
iv. Each Permittee shall manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments at least twice per 12-month period, until 90% of the lots are constructed (or when the site is fully stabilized) to identify maintenance needs and enforce compliance with maintenance standards as needed.
v. Inspect all permitted developments upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility is assigned for stormwater treatment and flow control BMPs/facilities. Enforce, as necessary, based on inspection.
vi. Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term shall be determined by achieving at least 80% of required inspections. The inspections may be combined with other inspections provided they are performed using qualified personnel.
vii. The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
viii. An enforcement strategy shall be implemented to respond to issues of noncompliance.

d. The program shall make available, as applicable, the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic *Industrial Stormwater General Permit* NOI form for industrial

activity to representatives of proposed new development and redevelopment. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

e. Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must 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 PROGRAM ACTIVITY

The City of Fircrest has an ongoing program for controlling runoff from new development, redevelopment and construction sites that was expanded in 2023 and will be maintained in 2026. The following sections describe existing program elements to comply with Permit requirements, as well as specific program enhancements which were implemented in 2023 and will remain in effect in 2026.

7.2.1 STORMWATER ORDINANCE

Fircrest Municipal Code (FMC) 20.24.030 adopts the most recent version Ecology's Stormwater Management Manual for Western Washington (SWMMWW). Currently the City enforces the requirements in the SWMMWW for all new development, redevelopment, and construction sites, both public and private, including roads. By adopting the SWMMWW, the City is complying with the requirement of S5.C.4.a(ii) of the Permit to include requirements, limitations, and criteria for site planning and BMPs for protection of water quality and reduction of pollutant discharge.

The legal authority to inspect and enforce maintenance standards for private stormwater facilities through the approval process for new development and redevelopment is currently established by FMC 20.24.

7.2.2 STORMWATER PERMITTING PROCESS

The City will continue its current stormwater permitting process with plan review, inspection, and enforcement capability to ensure compliance with code requirements for both private and public projects, using qualified personnel. This includes:

- Meet with the City Planning Department to discuss impacts from new development, redevelopment, and construction sites
- Review of all stormwater site plans
- Inspection of all submitted development sites that have a high potential for sediment transport prior to clearing and construction
- Inspection of all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls with enforcement as necessary, based on the inspections
- Inspection of all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls, such as stormwater facilities and structural BMPs

- Verification that a maintenance plan has been completed and responsibility for maintenance has been assigned with enforcement as necessary, based on the inspections
- Ensuring compliance with inspection requirements by the presence and records of an established inspection program that is designed to inspect all sites and achieve at least 80% of scheduled inspections

The City will document all site inspections performed as part of the permitting process. A shared documentation process between the Public Works department the Planning Department has been established. This program, Jot Form, streamlines the permitting process and ensures the appropriate department signs off on each phase of a project.

7.2.3 ENFORCEMENT OF STORMWATER ORDINANCE FOR SITES WITH ECOLOGY PERMITS

The City will continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits by Ecology.

7.2.4 TRAINING

Public Works staff members completed CESCL training in 2022, 2023, and 2025. Additional training will be provided in 2026 if/as needed due to staffing changes. Records of staff that have received training are maintained by the Public Works Director.

8 STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT (S5.C.7)

8.1 PERMIT REQUIREMENTS

Section S5.C.7 of the Permit requires that the City implement a program to control or reduce stormwater discharges to waters of the State from areas of existing development. The program should aim to focus on strategic stormwater investments over longer planning timeframes. Minimum program requirements include the following:

a. Permittees shall implement stormwater facility retrofits or tailored SWMP actions that meet the criteria described in Appendix 12 of the Permit, using one or more of the following strategies:

    i. Strategic stormwater investments identified in the Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d), or similar stormwater planning process; and/or
    ii. Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.

b. With each Annual Report, Permittees shall provide a list of planned, individual projects scheduled for funding or implementation during this Permit term for the purpose of meeting the assigned equivalent acreage as calculated per Appendix 12. The list shall include at a minimum the information and use the formatting specified in Appendix 12 (.xlsx format).

c. No later than March 31, 2028, Permittees shall fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report during the same year.

    i. Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required.
    ii. Permittees may contribute to meeting an overall regional goal to satisfy this permit requirement as described in S5.C.7.d.
    iii. Permittees that completely implement stormwater facility retrofit projects by the expiration date of this Permit that will exceed the area required for this Permit term may apply the excess as a credit to be used for the next Permit term (e.g., 2029-2034 Permit), not to exceed 50% of the next permit's requirement.
    iv. Permittees shall report which projects may provide Tribal benefits and benefits to overburdened communities including specifically Vulnerable Populations and Highly Impacted Communities.

d. Permittees may collaborate to meet a regional goal.

    i. Each Permittee is required to manage at least 0.5 equivalent acres within their own jurisdiction but may receive acreage credit for contributing to meeting an overall regional goal outside their defined MS4 Permit coverage area. For Permittees assigned 0.5 acres, participation and in-kind services to regional collaboration projects may count as the contribution for this Permit term if there is regional agreement on the strategy.
    ii. Permittees may contribute to a regional goal, that is the sum of Phase II partners

assigned acreage from Appendix 12. Projects may be implemented outside of Permit coverage areas to meet their individual requirement as part of a regional goal where benefits to receiving waters within the Permit coverage areas are identified and anticipated.

e. Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (e.g., 2029-2034). This report shall be submitted to Ecology no later than March 31, 2028.

8.2 2026 PROGRAM ACTIVITY

The City is in the process of developing its SMED program, including determination of equivalent acreage requirements and identification of strategic and/or opportunistic retrofit opportunities in accordance with this Permit and associated appendices, including a review recently completed projects which may qualify for credit. The City intends to further internal discussions regarding this program through 2026 to remain on track for satisfying forthcoming (2028) funding and/or construction deadlines.

9 SOURCE CONTROL PROGRAMS FOR EXISTING DEVELOPMENT (S5.C.8)

9.1 2024-2029 PERMIT REQUIREMENTS

The City shall maintain a program to prevent and reduce pollutants in runoff from areas which discharge to the MS4. The program will include the application of source control BMPs, inspection, and enforcement. Minimum performance measures for this program are as follows:

a. Permittees shall enforce ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollution-generating sources associated with existing land uses and activities

   Permittees shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirements of this Section no later than August 1, 2027.

   The requirements of this subsection are met by using the source control BMPs in the SWMMWW, or a Phase I Program approved by Ecology. In cases where the manual(s) lack guidance for a specific source of pollutants, the Permittee shall work with the owner/operator to implement or adapt BMPs based on the best professional judgement of the Permittee.

   Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs, provided that formal enforcement authority is available to the Permittee and is used as determined necessary by the Permittee, in accordance with S5.C.8.d.

b. Permittees shall implement a program to identify publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory must be updated at least once every 5 years. Inventory shall include:

   i. Businesses and/or sites identified based on the presence of activities that are pollutant generating per Appendix 8; and
   ii. Other pollutant generating sources, based on complaint response, such as home-based businesses and multi-family sites.

c. Permittees shall implement an inspection program for sites identified pursuant to S5.C.8.b.ii, above.

   i. All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the permit term to allow for tailoring and distribution of the

information during site inspections.

ii. 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. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.

iii. Each Permittee shall inspect 100% of sites identified through credible complaints.

iv. Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.

v. Annual reporting of inspections shall be organized by business type or activities with potential to generate pollutants to the MS4. Standard Industrial Code (SIC), Major Group, and NAICS numbers may be provided for reference.

d. Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:

i. If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.

ii. When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s), the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.

iii. Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.

iv. A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.

v. Application and enforcement of local ordinances at sites identified pursuant to S5.C.8.a(i), including sites with discharges authorized by a separate NPDES permit.

e. Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

9.2 2026 PROGRAM ACTIVITY

Existing ordinances related to enforcing source control for existing development are under FMC 20.24 and FMC 20.25. In 2022, the City revised section 20.24 of the Fircrest municipal Code to allow the City to inspect and enforce source control BMPs at existing developed sites.

The City has already implemented a program to identify commercial and industrial sites which have the potential to generate pollutants to the MS4 in accordance with the 2022 deadline established by the previous (2019-2024) Permit. The City is aware of all commercial sites and home businesses within City limits which may impact the MS4. Currently, there are no inventoried commercial sites that would produce pollutants to the MS4.

Once the assessment was completed, the City developed a source control inventory of all businesses and properties identified as conducting activities that are pollutant generating and may impact the MS4. Identified sites included governmental sites, mobile or home-based businesses, and sites that received complaints indicating it may be pollution-generating. The City will update its inventory at least every 5 years in accordance with Permit requirements and will continue its stormwater inspection/progressive enforcement program including ongoing training and recordkeeping.

10 MUNICIPAL OPERATIONS AND MAINTENANCE (S5.C.9)

10.1 2024-2029 PERMIT REQUIREMENTS

Section S5.C.7 of the Permit requires that the City document and implement a program to regulate maintenance activities from municipal operations to prevent or reduce stormwater impacts. Required program components are summarized as follows (see Permit Section S5.C.9 for full text).

a. Each Permittee shall implement maintenance standards that are as protective, or more protective, of facility function than those specified in *Stormwater Management Manual for Western Washington* or Phase I program approved by Ecology. For facilities which do not have maintenance standards, the City is required to develop a maintenance standard. Current maintenance standards are required to be updated no later than June 30, 2027 to meet the following requirements:

    i. The purpose of the maintenance standard is to determine if maintenance is required.
    ii. When an inspection identifies an exceedance of the maintenance standard, maintenance is required to be performed:
        - Within 1 year for typical maintenance of facilities, except catch basins
        - Within 6 months for catch basins
        - Within 2 years for maintenance that requires capital construction of less than $25,000

    Circumstances beyond the Permittee's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.

b. Maintenance of stormwater facilities regulated by the Permittee

    i. The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.9.a.

    The provisions shall include:

    (a) Implementation of an ordinance or other enforceable mechanism that:
        - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.9.a.
        - Requires inspection of facilities in accordance with the requirements in (b), below.
        - Establishes enforcement procedures.

    (b) Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6.c, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits, unless there are maintenance records to justify a

different frequency. Inspections shall be conducted by qualified personnel.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

ii. Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections.

iii. The program shall include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

c. Maintenance of stormwater facilities owned or operated by the Permittee.

i. Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities, and taking appropriate maintenance actions in accordance with the adopted maintenance standards.

Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature.*

ii. Perform spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events (24 hour storm event with a 10 year or greater 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 established above, based on the results of the inspections.

iii. Each Permittee shall inspect all catch basins and inlets owned or operated by the Permittee no later than December 31, 2025 and every two years after. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *Stormwater Management Manual for Western Washington*.

The following alternatives to the standard approach of inspecting all catch basins every two years may be applied to all or portions of the system:

(a) The catch basin inspection schedule of every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency.

(b) Inspections every two years may be conducted on a "circuit basis" whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include an inspection of the catch basin immediately upstream of any MS4 outfall, discharge point, or connections to public or private storm systems, if applicable.

(c) The Permittee may clean all pipes, ditches, and catch basins and inlets within a circuit once during the permit term. Circuits selected for this alternative must drain to a single point.

iv. Compliance with inspection requirements in S5.C.9.c i-iii, above, is determined by the presence of an established inspection program designed to inspect all sites and achieving at least 95% of inspections.

d. Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the control of the City. No later than December 31, 2022, document the practices, policies, and procedures. Lands owned or maintained by the Permittee include, but are not limited to streets, parking lots, roads, highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. The following activities shall be addressed:
    i. Pipe cleaning
    ii. Cleaning of culverts
    iii. Ditch maintenance
    iv. Street cleaning
    v. Road repair and resurfacing, including pavement grinding
    vi. Snow and ice control
    vii. Utility installation
    viii. Pavement striping maintenance
    ix. Maintaining roadside areas, including vegetation management
    x. Dust control
    xi. Application of fertilizers, pesticides, and herbicides according to the instructions for their use including reducing nutrients/pesticides and using alternatives to minimize environmental impacts
    xii. Sediment and erosion control
    xiii. Landscape maintenance and vegetation disposal
    xiv. Trash and pet waste management
    xv. Building exterior cleaning and maintenance, including policies and procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is suspected or confirmed to have PCB-containing materials
    xvi. Preparing Permittee-owned buildings for renovation or demolition including policies and procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 during renovation or demolition

e. No later than July 1, 2027, 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. Programs should include:

   i. Priority areas: Apply program to curbed municipal streets that discharge to outfalls and meet the following criteria:

      (a) High traffic streets such as arterials and collectors.

      (b) Streets that serve commercial or industrial land use areas.

   ii. Program timing: Sweep priority areas at least once between July and September each year and at least two additional times per year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required between July and December:

      (a) Compliance during this Permit term shall be determined by records of a sweeping program designed to sweep all priority areas identified and sweeping at least 90% of priority areas each sweeping event.

      (b) Permittee may document reasoning for alternative sweeping timing and frequency based on local conditions (e.g., climate) and estimated pollutant deposition quantities. Documentation shall also be based on actual maintenance experience and be certified in accordance with G19 – Certification and Signature.

   iii. Operational Procedures: Procedures to follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.

   iv. Street Waste Disposal: Dispose of sweeper waste material in accordance with Appendix 6 of the Permit.

   v. Reporting: No later than March 31, 2028, submit with the Annual Report the following information about the priority areas:

      (a) Priority areas swept identified on a map.

      (b) Sweeping dates.

      (c) Sweeping frequency.

      (d) Type of sweeper.

      (e) Total curb miles of priority areas and curb miles swept.

      (f) Approximation of street waste solids removed for each sweeping event.

f. Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity. SWPPPs shall include the following information, at a minimum:

    i. A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed. BMPs selected shall be consistent with the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology. The SWPPP shall be updated as needed to maintain relevancy with the facility.

    ii. At minimum, annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections shall be documented in an inspection report or check list.

    iii. An inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to precipitation or runoff and could result in stormwater pollution.

    iv. A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.

    v. A plan for preventing and responding to spills at the facility which could result in an illicit discharge.

g. Implement an ongoing training program for City employees whose primary construction, operations or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided and the staff trained.

h. Maintain records of the activities conducted to meet the requirements of this Section.

10.1.1 OPERATIONS AND MAINTENANCE OF PERMANENT STORMWATER FACILITIES PROGRAM

The City requires property owners to maintain, inspect and clean their privately maintained facilities. City staff is not responsible for inspecting private systems. New construction as-built records are available in the Public Works building.

10.2 2026 PROGRAM ACTIVITY

The City of Fircrest has an established program for municipal operation and maintenance, which will continue in 2026. The following sections describe current program elements to comply with Permit requirements.

10.2.1 MAINTENANCE STANDARDS

The City utilizes the maintenance standards specified in Appendix V-A of the 2024 *Stormwater Management Manual for Western Washington* for operation and maintenance of the City's stormwater systems. Any future updates to maintenance standards provided in the *Stormwater Management Manual for Western Washington* will be subsequently adopted.

10.2.2 INSPECTION OF MUNICIPAL STORMWATER FACILITIES

In 2022, inspections of 100 percent of the municipal stormwater system took place, and cleaning took place within 6 months for structures that did not pass inspections. The following procedures were performed in 2023-2025 and will be continued in 2026:

Annual Inspections: There are currently two publicly maintained stormwater treatment and flow control facilities in the City of Fircrest that require annual inspection. One LID BMP also exists, permeable pavement sidewalks along Emerson Street, which will continue to be inspected annually.

Spot Checks: Spot checks will be performed at culvert crossings along Leach Creek after each major storm event (10-year, 24-hour storm event). The two City-maintained treatment and flow control facilities will also be checked if the potential for damage is suspected.

Catch Basin Inspections and Cleaning: City staff will continue to inspect and clean all catch basins at least once every two years, with half of the City completed in each year of the two-year cycle. Decant water from the catch basin cleaning effort will be disposed of in accordance with the requirements set forth in Permit Appendix 6, Street Waste Disposal.

10.2.3 STORMWATER IMPACT REDUCTION PROCEDURES

The City has implemented the following practices, policies, and procedures to reduce stormwater impacts:

CITY PARKS:
City of Fircrest Parks and Recreation Department operates six park sites. Practices, policies, and procedures to reduce stormwater impacts at these sites consist of the following, which will be continued in 2026:

- Use fertilizers, pesticides, and herbicides according to the manufacture's specifications. All

applications follow state and local and guidelines and are used only after consultation with the Management Team and Public Works Department.

- Regularly consult with the Management Team and Public Works Department and receive specific guidelines from Pierce Conservation District regarding landscape maintenance and vegetation removal.
- Use environmentally friendly cleaning solutions for all exterior cleaning and maintenance.

ROAD MAINTENANCE AND STREET SWEEPING:

The City of Fircrest performs street sweeping of major streets monthly, weather permitting. This program will continue in 2026 and the City will update the program if/as necessary to comply with forthcoming reporting requirements per S5.C.9.e(v) of the Permit.

Roadside area and vegetation are maintained while minimizing the use of herbicides or pesticides. Road repair and resurfacing is performed by contractors in accordance with requirements for construction stormwater pollution prevention as documented in the 2024 SWMMWW. Fircrest performs snow and ice control as required, using manufacturer's application rate for minimally environmentally toxic deicing chemicals. See Appendix B for documentation on the policies, practices, and procedures the City has adopted to reduce stormwater impacts from City-owned or maintained lands to meet section S.C.9.a of the Permit.

10.2.4 TRAINING

Field staff receive monthly training in Operations & Maintenance that is relevant to each department. Pollution prevention training will be continued by sending appropriate staff to training courses when needed due to staff change or to increase knowledge.

10.2.5 STORMWATER POLLUTION PREVENTION PLANS (SWPPP)

A SWPPP has been prepared for the City's main maintenance/storage facility located on Ramsdell Street. A copy is kept on-site and was updated in December 2022.

10.2.6 MUNICIPAL O&M RECORDKEEPING

The Public Works Director or designee will continue to maintain records of all inspections and maintenance activities.

Figure 1 – City of Fircrest Public Works Department Staff

APPENDIX A

CITY OF FIRCREST SMAP RECEIVING BASIN PRIORITIZATION

A-1 Overview

A receiving water assessment was performed for the City of Fircrest to assess and document the existing information and conditions related to local receiving waters and contributing areas. The purpose of the assessment is to aide in identifying the receiving waters that would most likely benefit from stormwater management planning.

The NPDES permit requires a watershed inventory, provided as a table, to be submitted no later than March 31, 2022, and a brief description of the receiving waters that are in Fircrest. A single waterbody, Leach Creek, with three contributing area assessment units, was identified a receiving water for the City of Fircrest. Assessment was performed using 303(d) listing information, Environmental Justice Screening and Mapping Tool, Puget Sound Watershed Characterization Project, and the Coastal Atlas Map.

A-2 Receiving Water and Assessment Unit Areas

The City has a single receiving water, Leach Creek, a sub-watershed of the Clover-Chambers Creek watershed. Leach Creek is over 2 miles long and the contributing watershed area consists of 1,867 acres, of which 40% is residential, 37% is commercial, 20% is open space, and 3% is Industrial. The existing stormwater pipe network of Fircrest, University Place, and Tacoma discharges to Leach Creek holding basin. Discharges from Leach Creek holding basin, as well as stormwater runoff from Fircrest, University Place, and Lakewood, supply flows to Leach Creek downstream of the holding basin prior to confluence with Chamber Creek. The lower reaches of Leach Creek contain salmonid spawning habitat.

A 303(d) listing, per Section 303(d) of the federal Clean Water Act, exists for Leach Creek for mercury and bacteria.

Three assessment unit areas, as defined by Puget Sound Watershed Characterization Project, exist within Fircrest. The southwestern corner of Fircrest lies within basin 12003 and contributes runoff to Lower Leach Creek prior to confluence with Chambers Creek. The total area of basin 12003 is 1,189 acres. The City of Fircrest comprises 24 acres, or 2% of this basin. Lower Leach Creek has the designated use of anadromous fishery. The Water flow assessment revealed moderate surface storage for this area and the basin has a “moderate” ranking for water flow importance for Leach Creek. Water quality assessment review showed moderate-to-high levels of sediment, phosphorous, metals, nitrogen, and pathogens for this basin.

Basin 12004 represents the area that contributes runoff to Upper Leach Creek, downstream of the Leach Creek Holding Basin. The total area of Basin 12004 is 1,959 acres. Fircrest makes up 35%, or 690 acres of this basin. Upper leach creek has the designated use of anadromous fishery. The Water flow assessment revealed moderate surface storage for this area, with high degradation of water flow. Additionally, this basin is rank “high” for water flow importance to Leach Creek. Water quality assessment review showed moderate-to-high levels of sediment, phosphorous, metals, nitrogen, and pathogens for this basin.

The northernmost watershed of Fircrest, Basin 12005, contains the contributing area that drains to Leach Creek Holding basin in Tacoma. This basin the most upstream basin of the three basins in Fircrest. The total area of this watershed is 1,774 acres, of which 290 acres, or 16%, are within Fircrest City Limits. The Leach Creek Holding basin is used as a regional stormwater management facility. The Water flow assessment revealed low surface storage for this area; however, this basin also has a designation of

“low water flow importance.” Water quality assessment review revealed moderate-to-high levels of sediment, phosphorous, metals, nitrogen, and pathogens for this basin.

A-3 Stormwater Management Action Plan Assessment Table

The following table summarizes the results of the watershed inventory assessment for the City of Fircrest.

APPENDIX B

S5.C.9 DOCUMENTATION

Memorandum

Tyler Bemis – Project Manager
City of Fircrest

Re: City of Fircrest Documentation of Policies, Practices, and Procedures to reduce SW impacts from permittee land

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This memorandum documents the City of Fircrest practices, policies and procedures to reduce stormwater impacts from all City owned and maintained lands in accordance with S5.C.7.d and S5.C.7.e of the Phase II NDPES permit.

Practices, policies, and procedures

The Phase II permit requires the City to develop and implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City. Lands owned or maintained by the City to which this requirement applies include, but are not limited to parking lots, streets, roads, highways, buildings, parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

The City's practices, policies, and procedures mentioned above must address the following activities: pipe cleaning; cleaning of culverts that convey stormwater in ditch systems; ditch maintenance; street cleaning; road repair and resurfacing, including pavement grinding; snow and ice control; utility installation; maintaining roadside areas, including vegetation management; dust control; pavement striping maintenance; application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts; sediment and erosion control; landscape maintenance and vegetation disposal; trash and pet waste management; and building exterior cleaning and maintenance.

The City departments that have custodial responsibility related to the activities above are Public Works and Parks & Recreation.

The City of Fircrest maintains practices for reducing stormwater impacts associated with runoff from all lands owned or maintained by the City including road maintenance activities under the functional control of

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the City. These practices and policies were developed through combined efforts implemented by the City and Pierce County.

The City has adopted the following guidelines for inspection and maintenance activities:

- WSDOT Regional Road Maintenance Endangered Species Act Program Guidance
- Applicable source control BMPs listed in the Stormwater Management Manual for Western Washington, Volume IV
- Condition Assessment Manuals, developed by Pierce County (need list, should include vegetation or pest management if available)
- Integrated Pest Management Plan, developed by Pierce County Conservation District
- Stormwater Pollution Prevention Plans (SWPPPs) developed for S5.C.7.f or other site-specific SWPPPs by other applicable NPDES stormwater permit guidelines.

Training

Ongoing training for with primary operations or maintenance job functions that may impact stormwater quality are trained in topics relevant to their job descriptions. Instructions including the above guidelines is provided, as relevant to their duties and roles, with follow up training, as needed, along with IDEE and CECSL training. Records of training provided including dates, activities or course descriptions, and names and positions of staff in attendance are kept in the Public Works office.