



CITY OF FIFE
2021 STORMWATER MANAGEMENT
PROGRAM (SWMP)

NPDES Phase II Permit
WAR045007

Prepared for
City of Fife Public Works Department
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CITY OF FIFE

2021 STORMWATER MANAGEMENT PROGRAM

1. INTRODUCTION

1.1. Overview and Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for “fishable, swimmable” uses. The Federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology).

Municipalities with a population of over 100,000 (as of the 1990 census) have been designated as Phase I and must comply with Ecology’s Phase I NPDES Municipal Stormwater permit. With Fife’s 1990 census falling well below the 100,000 threshold, the City must comply with the Phase II NPDES Municipal Stormwater Permit.

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the State’s waterbodies (e.g., streams, rivers, lakes, and wetlands) as long as municipalities implement programs to protect water quality by reducing discharges of “non-point source” pollutants to the “maximum extent practicable” (MEP) through application of Permit-specified requirements. The Permit requires the City to create a Stormwater Management Program, which is organized under the following Program components:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development
- Monitoring

The Permit requires the City to report annually by March 31st on their progress of permit implementation. Reporting is comprised of two documents: the annual report which documents progress for the prior year and a Stormwater Management Program Plan (SWMPP) which describes permit requirements and current and planned program activities for the upcoming year. Implementation of the various Permit conditions is phased throughout the permit term, with each year of the permit adding new requirements and activities to be completed. Thus the SWMPP changes year to year with new requirements and programs.

In July 2019 Ecology issued its fourth Phase II permit, which Fife is currently operating under. The latest permit has a permit term of August 1, 2019 to July 31, 2024 and includes many continuations and changes to the previous Phase II permit requirements.

This document represents the City's 2021 SWMPP and outlines actions Fife will take in the coming year to gain and maintain compliance during the 2021 permit period and to reduce the discharge of pollutants from the City's stormwater system into "waters of the state," including rivers, lakes, streams, and groundwater.

1.2. Phased Permit Requirements

The current Western Washington Phase II permit is effective August 1, 2019 and will expire July 31, 2024. This 2021 SWMPP describes the City's plans for maintaining and enhancing existing programs as required by previous permits and developing new programs in compliance with requirements from the current permit.

Many of the new Permit requirements will be phased in over the term of the permit and are discussed in detail in relevant sections of this document. Some of the new requirements for this permit term include the following:

- Stormwater Management Action Planning (SMAP)
- Develop a new Behavior Change Program
- Added mapping requirements
- Develop procedures to reduce impacts from stormwater
- Initiate a Source Control Program

This SWMP document is based on review of the following documents:

- Fife's 2020 Stormwater Management Program Plan
- The current Western Washington Phase II Municipal Stormwater Permit <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>

1.3. Department Responsibilities

The Permit requirements affect departments across the City organization. Fife collaborates for the efficient use of existing resources within each department for each Permit component. Those departments include Executive, Community Development, Parks, Recreation and Aquatics, Police, Finance, and Public Works. The City Engineer provides oversight of the Permit and receives reports from each responsible City department on related activities and programs. Coordination is accomplished at interdisciplinary and team meetings and during development of the annual report.

1.4. Total Maximum Daily Load (TMDL) Compliance Issues

Stormwater discharges covered under the Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDL's when the jurisdiction is listed in Appendix 2 of the Permit. Appendix 2 lists affected jurisdictions along with specific requirements and actions that must be documented and included in the annual report.

The City of Fife is located in WRIA 10 and has not been listed in Appendix 2. Therefore, TMDLs will not be addressed further in Fife's 2021 SWMPP.

1.5. Document Organization

The content in this document is based upon Permit requirements and is organized similarly to the Permit:

- Section 2.0 addresses Permit requirements for Administration of the City's Stormwater Management Program for 2021.
- Section 3.0 addresses Permit requirements for Stormwater Planning for 2021
- Section 4.0 addresses Permit requirements for Public Education and Outreach for 2021.
- Section 5.0 addresses Permit requirements for Public Involvement and Participation for 2021.
- Section 6.0 addresses Permit requirements for MS4 Mapping and Documentation for 2021.
- Section 7.0 addresses permit requirements for Illicit Discharge Detection and Elimination for 2021.
- Section 8.0 addresses Permit requirements for Controlling Runoff from New Development, Redevelopment and Construction Sites for 2021.
- Section 9.0 addresses Permit requirements for Municipal Operations and Maintenance for 2021.
- Section 10.0 addresses Permit requirements for a Source Control Program for Existing Development for 2021.
- Section 11.0 addresses Permit requirements for the Water Quality Monitoring and Assessment section of the Permit for 2021.

Each section includes a summary of the relevant Permit requirements and a description of current and planned compliance activities.

2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

2.1. Permit Requirements

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

- Develop and implement a Stormwater Management Program and prepare written documentation (SWMPP). The SWMPP shall be updated at least annually for submittal with the annual report to Ecology by March 31st. The purpose of the Stormwater Management Program is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable (MEP), while implementing AKART, thereby protecting water quality. The Program is to include the actions and activities described in Sections 3 through 11 of this SWMPP.
- Submit annual compliance reports to Ecology by March 31st (for the previous calendar year). These reports are to summarize SWMP implementation status and present information from assessment and evaluation activities conducted during the reporting period.

2.2. Current Activities

As 2021 begins, the City has made significant progress in implementing activities and programs that meet the Permit requirements contained in Section S5 of the Permit. Activities associated with the above Permit requirements completed in 2020 include the following:

- The City developed and submitted a G20 notification of non-compliance, which was submitted to DOE on July 23, 2020. The document provided a detailed summary of programs and activities that were in non-compliance, and the city's plan for addressing this with 2020 NPDES permit implementation.
- As of December 31, 2020, the city has made improvements across all current permit requirement categories. Details are described in subsequent chapters of this document.
- The City is on track to update the SWMPP to reflect program improvements implemented in 2020, which will continue in 2021, and to submit the updated SWMPP by March 31st.
- The City has developed and will continue to improve ongoing procedures to gather, track, maintain and use information about required programs and activities to evaluate and improve Fife's Stormwater Management Program.
 - The City has enhanced its time and cost tracking app, reintroduced expectations and provided additional training to staff. Currently costs are

tracked according to the numbered sections of Section S5 of the permit in addition to general program development efforts. Labor, equipment and contracting costs are included in this summary. The dashboard generated by the program is available for viewing as requested.

- Fife is tracking the number of inspections completed, follow-up actions taken, enforcement actions and education activities.
- Fife will continue to coordinate with other Permittees and across departments within the City as required by the Permit.
- The City is on track to submit an Annual Report to Ecology with an updated SWMPP by March 31, 2021.

2.3. Planned Activities

To further ensure permit compliance and add any additional programs, the City has established an NPDES fund in the biennial budget to support permit compliance. This fund will be used for new employees, contractors/consultants or contracting with neighboring jurisdictions to develop, support or enhance required programs to gain full permit compliance.

In addition, Public Works staff actions recommended for continued Permit compliance in the area of Stormwater Management administration include:

Table 2-1 2021 Stormwater Management Administration Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
SWMP-1	Develop tracking system for required staff trainings that includes reminders for follow-up training.	Public Works	Ongoing
SWMP-2	Continue working with Finance Department to enhance method to track annual costs associated with SWMP implementation.	Public Works/Finance	Ongoing
SWMP-3	Fill vacant City Engineer position	Public Works	Complete by May 1, 2021
SWMP-4	Secure staff, contractors/consultants or interlocal agreements with neighboring jurisdictions/agencies to ensure continued permit compliance.	Public Works	Complete by December 31, 2021
SWMP-5	Continue to explore additional permit compliance coordination mechanisms with other organizations.	Public Works	Ongoing
SWMP-6	Provide reporting to comply with Ecology's requirements for submittal of the annual compliance report and SWMP by March 31, 2021.	Public Works	Complete before March 31, 2021

3. STORMWATER PLANNING

This section of the SWMPP describes the Permit requirements related to Stormwater Planning and addresses the requirements in section S5.C.1 of the permit.

3.1. Permit Requirements

Section S5.C.1 of the permit requires the City to:

- Convene an inter-disciplinary team to inform and assist in the development, progress and influence of this program.
- Coordinate with long-range plan updates.
- Implement Low impact development code-related requirements.
- Implement Stormwater Management Action Planning (SMAP).

3.2. Current Activities

- The City convened an inter-disciplinary team in August 2020, consisting of representatives from Public Works, Community Development, Community Relations, Parks and City Manager's office.
- City staff from public works and community development met in October to discuss how stormwater management needs and receiving water health are informing the long range planning process. Draft responses to the series of questions in this year's Stormwater Annual Report were developed and will be finalized for submittal by March 31.
- The City is continuing to require LID principles and LID BMPs when updating revising and developing new local development-related codes, rules, standards or other enforceable documents. Where feasible, the City's intent is to make LID the preferred and commonly-used approach to site development.

3.3. Planned Activities

In addition to continuing existing planning and coordination activities described above, the city will initiate work on the required Stormwater Management Action Planning (SMAP) process. This is a significant effort which the city will precede with an evaluation of how best to accomplish a useful planning process. The city will evaluate use of consultants, partnership with neighboring jurisdictions or the city may determine that the capability exists in-house to complete this work.

Table 3-1 2021 Stormwater Planning Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
SPLAN-1	Periodically re-convene inter-disciplinary team to inform and assist in development, progress and influence of the SWMP.	Public Works	Ongoing
SPLAN-2	Continue working with Community development to ensure coordination of the SWMP with long range planning documents.	Public Works/Community Development	Ongoing
SPLAN-3	Continue implementing LID requirements.	Public Works	Ongoing
SPLAN-4	Assess and document administrative or implementation barriers to LID.	Public Works	Annually
SPLAN-5	Evaluate best method to complete SMAP process	Public Works	In 2021
SPLAN-6	Complete Receiving water assessment	Public Works	Submit by March 31, 2022
SPLAN-7	Complete Receiving water prioritization	Public Works	Complete by June 30, 2022
SPLAN-8	Complete SMAP for at least one high priority catchment	Public Works	Complete by March 31, 2023
SPLAN-9	Review and revise local LID codes and make effective	Public Works	Complete by December 31, 2023

4. PUBLIC EDUCATION AND OUTREACH

This Section describes the Permit requirements related to Public Education and Outreach, including current and planned compliance activities.

4.1. Permit Requirements

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

- Implement an education and outreach program for the area served by the MS4. The program shall be designed based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. The City will consider delivering the messages in languages other than English when appropriate.
- To build general awareness, the City will select at least one target audience and one subject area from list in section S5.C.2.a.i.(a) or (b).
- To affect behavior change, the City will select at least one target audience and one BMP and follow the timeline as required in the permit (S5.C.2.a.ii) to develop, implement and evaluate the selected strategy.
- Provide and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events planned within the city.

4.2. Current Activities

The City Public Education and Outreach Plan was limited in scope in 2020 due to COVID19 considerations. The Harvest Festival, which had been the foundation of the outreach and general awareness program, was canceled. However, the city initiated new efforts to target residents and commercial businesses through the activities described below:

- To replace the canceled Harvest Festival, Fife sent out 5,105 general awareness flyers to all Fife households in September 2020. Messaging included:
 - Only rain in the drain
 - Call if you see something
 - Watch for city forces cleaning CBs
 - Get your car washed at a car wash
- Fife has an interlocal agreement with the Tacoma Pierce County Health Department (TPCHD), which includes Source Control visits and Education and Outreach tasks, including behavior change. In August 2020, TPCHD presented an opportunity to educate

business owners about parking lot maintenance and CB inserts/socks. TPCHD provides interested business owners with CB socks and discussion on why and how to use them. Follow-up visits, which document sock use and acceptance of the practice, will be the vehicle to gain feedback and evaluate the success of the program and message.

- During fall 2020, Fife initiated conversations with local car washes, including two owned by the local tribes, to partner and provide free or reduced cost car washes to Fife residents as an alternative to washing cars in driveways. In lieu of starting the program fall 2020, messaging was included in the general flyer regarding the use of car washes with the intent to launch Spring/Summer 2021.
- Per Section S5.C.2.a.ii(c) of the permit, the City has completed a document that describes a behavior change program tailored to the community and including a timeline and method to evaluate the program.

4.3. Planned Activities

Fife will continue to develop and build on the Education and Outreach program initiated in 2020 through collaboration with local organizations and other permittees. These activities are described in Fife’s Education and Outreach Strategy, January 2021, and include continuation of programs with the TPCHD and increased participation with the regional STORM group. The following table includes actions to be taken in 2021.

Table 4-1 2021 Public Education and Outreach Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
EDU-1	Develop education and outreach strategy focused on behavior change and tailored to the community including an evaluation plan	Public Works/ Community Relations	By February 1, 2021
EDU-2	Implementation of education and outreach strategy with behavior change focus	Public Works/ Community Relations	By April 1, 2021
EDU-3	Report and evaluate the change in understanding and adoption of target behaviors from implementing the E&O strategy	Public Works/ Community Relations	By March 21, 2024
EDU-4	Use results of evaluation to continue to adjust and direct methods of ongoing behavior change programs.	Public Works/ Community Relations	Post March 21, 2024
EDU-5	Implement a general awareness campaign annually, including flyers, harvest festival and general messaging on city website	Public Works/ Community Relations	Ongoing/annual
EDU-6	Create and advertise stewardship opportunities	Public Works/ Community Relations	Ongoing/annual

5. PUBLIC INVOLVEMENT

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

5.1. Permit Requirements

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

- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the SWMP and SMAP.
- Post the SWMP document and Annual Compliance Report on the City’s website by May 31 of each year. All other submittals to Ecology shall be available on request.

5.2. Current Activities

The 2020 compliance activities associated with the above Permit requirements include:

- Provided opportunities for public involvement and comment on the SWMPP.
- Posted 2020 SWMP and Annual Report on website and requested public comments; no public comments were received.

5.3. Planned Activities

Fife will offer the public opportunities to be involved in the decision making process on stormwater issues and SWMPP development. Actions planned for 2021 will be virtual due to COVID19 precautions. Table 5-1 contains the work plan for public involvement activities.

Table 5-1 2021 Public Involvement Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
PI-1	Provide opportunities for public involvement during SWMPP development.	Public Works	Complete by March 31, 2021
PI-2	Provide opportunities for public involvement and comment as the SMAP develops.	Public Works	Ongoing
PI-3	Make SWMP document and Annual Compliance Report available to public by posting on the City website.	Public Works	Complete before March 31, 2021
PI-4	Summarize annual activities for "Public Involvement and Participation" component of Annual Report; identify any updates to Program document.	Public Works	Submit by March 31, 2021

6. MS4 MAPPING AND DOCUMENTATION

This section describes the Permit requirements related to mapping and documentation, including current and planned compliance activities.

6.1. Permit Requirements

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

- Have an ongoing program for mapping and documenting the MS4 as part of the SWMP.

6.2. Current Activities

The 2020 compliance activities associated with the above Permit requirements include:

- Continue maintaining mapping data for the features listed in S5.C.4.a.i-vii.
- Continue collecting and updating mapping data and begin collecting size and material for all known MS4 outfalls.

6.3. Planned Activities

Fife recognizes the need to continue to work on mapping and documentation of their MS4, to include required formatting by August 1, 2021. In addition, collaboration with WSDOT and other neighboring jurisdictions to combine mapping data, including connection points, will be a priority project in 2021. Table 6-1 contains the work plan for mapping and documentation activities.

Table 6-1 2021 MS4 Mapping and Documentation Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
M&D-1	Maintain and update, as needed, current GIS stormwater layer to include annexed areas and new infrastructure	Public Works	Ongoing
M&D-2	Collect size and material for all known MS4 outfalls	Public Works	Ongoing
M&D-3	Collect all connections between other jurisdictions and public entities	Public Works	Ongoing
M&D-4	Ensure all data is formatted as required in the current permit	Public Works	By August 1, 2021
M&D-5	Complete mapping of all known connections from the MS4 to a privately owned stormwater system	Public Works	By August 1, 2023
M&D-6	Make mapping available to Ecology, Tribes, Municipalities and other permittees	Public Works	Upon Request

7. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This Section describes the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE), including current and planned compliance activities.

7.1. Permit Requirements

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

- Maintain an ongoing program to prevent, detect, characterize, trace and eliminate illicit connections and discharges into the MS4.
- 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 from an interconnected adjoining 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.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges in the permittee's MS4 to the maximum extent allowable under state and federal law.
- Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connection into the MS4. The program shall include field screening and methods for identifying potential sources.
- Complete field screening for an average of 12% of the MS4 each year and annually track total percentage of the MS4 screened beginning August 1, 2019.
- Maintain a publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
- Train IDDE staff on implementation of IDDE program and maintain training records. Train general field staff on the identification of an illicit discharge or connection. Follow-up training shall be provided.
- Implement an ongoing program to address and eliminate illicit discharges into the MS4 according to the schedule and requirements of section S5.C.5.e.

- Track and maintain records of activities conducted to meet the requirements of S5.C.5g including using the format described in appendix 12 and/or WQWebIDDE.

7.2. Current Activities

Fife's IDDE program became a focus of effort in August 2020. During this time, city technicians, engineers and inspectors met to discuss IDDE means and methods, strategize the city's approach and develop a plan to meet permit requirements pertaining to IDDE. The compliance activities completed and associated with the above Permit requirements include:

- A written Standard Operating Procedures document, developed and reviewed, describing procedures to detect, screen, identify, report and eliminate illicit connections and discharges.
- An ESRI based app was developed to allow field staff to geospatially record complaints, spills, illicit connections and inspections online. Staff were trained on the app.
- The City IDDE screening program was established and consists of dry weather outfall inspections and follows methods outlined in the Herrera guidance manual, 12%, or four of the City's 30 outfalls were mapped, inspected and documented in September 2020.
- Field IDDE staff attended training via an online Ecology training session. In addition, on October 7 and 14, 2020, all field staff were provided general IDDE training consisting of "what to do when you see something".
- Staff responded to reported spills and notified Ecology in accordance with our permit.
- Fife Municipal Code 15.32.055-Illicit discharges and 15.32.090-Enforcement effectively prohibit non-stormwater, illicit discharges in the permittee's MS4 to the maximum extent allowable under state and federal law.
- The City's website lists the public hotline to report illicit discharges and/or spills.

7.3. Planned Activities

Fife will conduct illicit discharge detection and elimination activities in accordance with the Permit requirements. Table 7-1 is the proposed work plan for 2021 SWMP illicit discharge detection and elimination including previous, current and planned compliance activities.

Table 7-1 2021 Illicit Discharge Detection and Elimination Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
IDDE-1	Maintain on-going IDDE program	Public Works	Ongoing
IDDE-2	Maintain and update, current GIS stormwater layer to include annexed areas, other jurisdictions and new infrastructure	Public Works	Ongoing
IDDE-3	Continue to review and revise IDDE response process as needed to ensure response and enforcement process and procedures are adequate.	Public Works	Ongoing
IDDE-4	Continue to train field staff on the identification, investigation, termination, cleanup and reporting of illicit discharges, improper disposal and illicit connections.	Public Works	Ongoing
IDDE-5	Summarize annual activities for IDDE component of annual report, add updates to SWMPP.	Public Works	By March 31 each year
IDDE-6	Maintain visibility of appearance of hot line number on web site.	Public Works	Ongoing
IDDE-7	Track the number of illicit discharges, including spills and use the format specified in the permit. Track number of calls to the hotline.	Public Works	Ongoing
IDDE-8	Track the number of inspections for illicit connections	Public Works	Ongoing
IDDE-9	Continue field screening strategy to complete 12% average of the MS4 per year. Update program as necessary.	Public Works	Ongoing
IDDE-10	Track total percentage of MS4 inspected per year	Public Works	Ongoing

8. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

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

8.1. Permit Requirements

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

- Implement and enforce a program to reduce pollutants in stormwater runoff to the municipal separate storm sewer system from new development, redevelopment and construction site activities. The program must apply to both private and public projects, including transportation projects.
- Adopt and make effective a local program, no later than June 30, 2022 that meets the requirements of S5.C.6.b(i) through (iii).
- The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the standards listed in S5.C.6.(i) through (viii).
- Make Ecology's *Construction Stormwater General Permit NOI* for construction activity available for representatives of new and re-development projects. Enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- Provide training to staff who are implementing the program on new codes, standards, processes and procedures for permitting, plan review, construction site inspections and enforcement.

8.2. Current Activities

How development and redevelopment occur within Fife can have a significant impact on the health of City's waterways. Throughout the year, the City reviews development plans, and inspects development sites during construction to ensure stormwater facilities are maintained and functioning as designed. In addition, the City requires the use of Low Impact Development (LID) stormwater management practices and principles as required by the NPDES permit. The City plans to carry forward these policies and approaches in 2021.

Fife Municipal Code 15.32 codifies stormwater management (Drainage of Surface Water) in and includes code for construction, and stormwater infrastructure design. Chapter 15.32 authorizes the City to enforce provisions required in the NPDES permit, including the minimum requirements in the permit's Appendix 1.

The City's cross-departmental permitting process includes civil/site plan review and approval process, inspection, and enforcement to meet standards established by the permit for all qualifying new and redeveloped sites. This established approach will carry forward in 2021. The City's oversight of new and redevelopment projects occurs in phases: (1) prior to construction during the plan acceptance process; (2) before the site is cleared during an initial site construction best management practices (BMP) implementation inspection; (3) during construction via construction site inspections; and (4) post construction as part of the stormwater infrastructure acceptance inspection. Proposals for public and private projects are reviewed by licensed engineers or qualified engineering firms for compliance with DOE standards. City is currently using KPG, Inc for site plan/drainage reviews.

Current compliance activities associated with the above Permit requirements include:

- The City conducted site inspections during the pre-construction and construction phases of all new development, redevelopment and construction sites. Key inspection staff is CESCL trained and certified.
- Inspectors have been equipped with new devices containing an ESRI app, allowing them to geospatially locate and complete erosion control inspections online.
- Proposals for public and private projects are being reviewed by qualified engineering firm, KPG, Inc for compliance with permit requirements. The City has adopted Ecology's Stormwater Management Manual.
- All stormwater infrastructure, including runoff treatment and flow control facilities, are inspected post construction prior to acceptance by the City. Once this occurs on private sites, these facilities are added to the long-term inspection programs.
- The City made available copies of Notices of Intent (NOI) for construction and industrial activities in the pre-application meeting with developers and applied for NOI's for City projects.
- The City is continuing to improve the program to review, track, inspect, and verify long-term operations and maintenance of treatment and flow-control BMPs and facilities.

8.3. Planned Activities

Fife has programs to help reduce stormwater runoff from existing and new development and construction sites and is continuing to update the program to maintain compliance per the current permit.

Table 8-1 is the work plan for current and planned 2021 SWMP activities related to control of runoff from new development, redevelopment and construction sites.

Table 8-1 2021 Controlling Runoff From New Development, Redevelopment and Construction Sites Work Plan

Task ID	Task Description	Lead Departments	Schedule Notes
CTRL-1	Continue to improve and revise permitting process to implement minimum requirements	Public Works	Ongoing
CTRL-2	Continue on-going management of project record-keeping system for permitting, plan review, construction site inspections and enforcement actions.	Public Works	Ongoing
CTRL-3	Train staff responsible for implementing the program to control runoff from new development, redevelopment, and construction sites.	Public Works	Ongoing
CTRL-4	Summarize annual activities for “Controlling Runoff from New Development, Redevelopment, and Construction Sites” component of annual report, identify any updates to SWMPP.	Public Works	By March 31 each year
CTRL-5	Conduct stormwater site plan reviews for new development and redevelopment projects to ensure plans meet minimum requirements of SWMMWW Appendix 1.	Public Works	Ongoing
CTRL-6	Adopt 2019 SWMMWW and make effective a local program that meets the requirements of S5.C.6.b(i) through (iii).	Public Works	By June 30, 2022
CTRL-7	Inspect all sites prior to clearing and construction that meet the minimum thresholds adopted per S5.C.6.b.i.	Public Works	Ongoing
CTRL-8	Inspect construction phase stormwater controls at permitted sites to verify proper installation and maintenance of erosion and sediment controls during construction and every 6 months until 90% of lots are constructed. Track number of sites inspected during the year and any enforcement actions taken.	Public Works	Ongoing
CTRL-9	Inspect permitted development sites upon completion and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls, enforce regulations and track number of sites and number of sites inspected.	Public Works	Ongoing
CTRL-10	Verify a maintenance plan is completed and responsibility for maintenance is assigned.	Public Works	Ongoing
CTRL-11	Provide information and links to the notice of <i>Intent for Construction Activity and Notice of Intent for Industrial Activity</i> to representatives of proposed new development and redevelopment projects.	Public Works	Ongoing

CTRL-12	Implement current and revised annual O&M inspection program including record keeping and enforcement.	Public Works	Ongoing
CTRL-13	Achieve 80% completion of scheduled private stormwater facility inspections, including catchbasins	Public Works	Ongoing/Annual
CTRL-14	Maintain and implement an enforcement strategy to respond to issues of non-compliance	Public Works	Ongoing

9. MUNICIPAL OPERATIONS AND MAINTENANCE

This Section describes the Permit requirements related to Municipal Operations and Maintenance, including current and planned compliance activities.

9.1. Permit Requirements

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

- Implement and document a program to regulate maintenance activities and to conduct maintenance activities by the permittee to prevent or reduce stormwater impacts.
- Establish maintenance standards for the municipal separate storm water system that are at least as protective as those specified in Chapter 4 of Volume 5 of the Stormwater Management Manual for Western Washington. Develop maintenance standards for facilities that do not have them. Maintenance standards will be updated by June 30, 2022.
- Maintain stormwater facilities that are regulated by the permittee including implementing a program that includes provisions to verify long term O&M of treatment and flow control facilities that have been permitted and constructed pursuant to S5.C.6.c and maintained in accordance with S5.c.7.a. The provisions shall include an enforceable ordinance per S5.C.7.b.i.a and annual inspections per S5.C.7.b.i.b.
- Compliance with the inspection requirement above, will 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.
- 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.
- Implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control facilities and take appropriate maintenance actions in accordance with adopted maintenance standards. Inspection interval may be lengthened based on previous inspection records. Compliance shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.
- Spot check potentially damaged stormwater facilities after major storm events (10yr, 24hr). If spot checks reveal damage, inspect all facilities and repair or take appropriate maintenance actions per adopted maintenance standards.

- Perform inspection of all catch basins and inlets owned and operated by the Permittee every 2 years. Clean catch basins in accordance with adopted maintenance standards. Inspection intervals and strategy may be adjusted per S5.C.7.c.iii.
- Implement practices, policies and procedures to reduce stormwater impact associated with runoff from all lands owned or maintained by the permittee. No later than December 31, 2022, document the practices policies and procedures. Address the activities stated in S5.C.7.d(i through xv).
- Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality and address all required items per S5.C.7.e.
- 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. Update the SWPPPs as necessary no later than December 31, 2022.
- Train staff to implement the practices, policies and procedures to reduce stormwater impact, as described in the relevant SWPPP for each facility. Document any such training and provide follow-up trainings as needed.
- Maintain records of inspections and maintenance or repair activities required in this section.

9.2. Current Activities

The City has improved activities and programs that will move the City toward full compliance with the requirements of this section of the permit. The current compliance activities associated with the above Permit requirements include:

- Fife uses maintenance standards in the Ecology Stormwater Manual.
- Fife has developed an ESRI based app for online documentation of inspections, maintenance and enforcement of publicly and privately owned BMPs, including catchbasins. This app was used for all inspections starting in the fourth quarter of 2020. Any spot checks after storms can also be recorded in this app. Data will be easily compiled for annual reporting and follow-up.
- Fife was able to utilize an expired inter-local agreement with Tacoma for catchbasin cleaning. As a result, approximately half of Fife's CBs have been cleaned, inspected and documented during the fourth quarter 2020. Any necessary repairs, and the remainder of catchbasin cleaning will follow in 2021.
- Public and private BMPs were inspected and meet the target thresholds for permit compliance. Maintenance/enforcement will follow in 2021.

- SWPPPs for both the public works maintenance yard and parks maintenance facility were completed in 2020 and trainings were held at the respective facilities for all staff assigned to those locations. A hard copy of the applicable SWPPP is kept on each site.

9.3. Planned Actions

Fife performs many activities to limit storm water pollution potential related to its municipal operations and maintenance program. Table 9-1 is the work plan for planned 2021 SWMP activities related to municipal operations and maintenance activities. These tasks were developed through review of the Permit.

Table 9-1 2021 Municipal Operations and Maintenance Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
PPOM-1	Update maintenance standard as required by section S5.C.7.a	Public Works	By June 30, 2022
PPOM-2	Annually inspect 95% of all publicly owned flow control and treatment facilities and inspect catchbasins every two years	Public Works	Ongoing
PPOM-3	Track number of catch basins inspected and number cleaned for reporting period	Public Works	Ongoing
PPOM-4	Perform maintenance identified during inspection activities within the prescribed time limitations for publicly owned assets	Public Works	Ongoing
PPOM-5	Conduct spot checks of stormwater facilities after major storms	Public Works	Ongoing
PPOM-6	Inspect 80% of all regulated, privately owned flow control and treatment facilities. Conduct follow-up enforcement	Public Works	Ongoing
PPOM-7	Implement practices, policies and procedures to reduce stormwater impacts from runoff for all activities conducted on streets, parking lots, roads, building areas, parks, open space, maintenance yards and stormwater treatment and flow control BMPs/facilities	Public Works	Ongoing
PPOM-8	Document the practices, policies and procedures used to implement the task above	Public Works	By December 31, 2022
PPOM-9	Implement Stormwater Pollution prevention plan (SWPPP) for Public Works and Parks maintenance yards, conduct periodic visual inspections to evaluate effectiveness of SWPPP	Public Works	Ongoing
PPOM-10	Update SWPPP to include information in S5.C.7.f	Public Works	By December 31, 2022

Table 9-1 2021 Municipal Operations and Maintenance Work Plan

Task ID	Task Description	Lead Departments	Schedule Notes
PPOM-11	Conduct review training for O&M staff on practices, policies and procedures to reduce stormwater impacts from runoff and document trainings.	Public Works	Ongoing
PPOM-12	Summarize annual activities of Pollution Prevention and Operation and maintenance component of Annual Report, identify updates to SWMPPP	Public Works	By March 31 of each year

10. SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

This Section describes the Permit requirements related to source control for existing development, including current and planned compliance activities. Source control is a new requirement for Phase II permittees and this section describes the city's developing program.

10.1. Permit Requirements

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

- Implement a program to prevent and reduce pollutant in runoff from areas of existing development that discharge to the MS4. The programs will include application of operational and/or structural source control BMPs, inspection of pollutant generating sources and application and enforcement of local ordinances.
- Permittees shall adopt and make effective an ordinance or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities as required in the Phase II permit no later than August 1, 2022.
- 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 including businesses and/or sites identified based on the presence of activities that could be pollutant generating, or other pollutant generating sources based on compliant response, no later than August 1, 2022.
- Permittees shall implement an inspection program for sites identified pursuant to S5.8.b.ii. These inspection programs must meet the requirements in Section S5.C.8.b.iii no later than January 1, 2023.
- Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time frame per S5.C.8.b.iv.
- Permittees shall train and provide follow up training for staff who are responsible for implementing the source control program to conduct these activities as required by the Phase II permit. Training must be documented.

10.2. Current Activities

The city currently contracts with the Tacoma Pierce County Health Department for their Source Control program. The contract extends through December 31, 2022 and includes the following:

- Implement a Source Control Program by providing technical assistance to businesses within the City to prevent and reduce pollutants to the stormwater system. This includes inspections and training. TPCHD has visited 60 businesses in 2020.
- Establish an inventory of businesses and properties based on the presence of pollutant generating activities.
- Assist with the City’s education and outreach program including behavior change efforts.

10.3. Planned Activities

Fife will be working with the TPCHD to ensure that the timelines as required by the permit are met. Table 10-1 is the work plan for 2021 SWMP Source Control Program activities.

Table 10-1 2021 Source Control Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
SCP-1	Review potential pollution generating sites in the City and create an inventory and process for source control operations	Public Works/TPCHD	By August 1, 2022
SCP-2	Adopt an ordinance that requires the application of BMPs for pollution generating sites	Public Works	By August 1, 2022
SCP-3	Implement inspection program for local source control for the inventory determined above as required in the permit	Public Works	By January 1, 2023
SCP-4	Implement a progressive enforcement policy that requires sites to comply with S5.c.8.b.iv	Public Works	By January 1, 2023

11. MONITORING AND ASSESSMENT

This Section describes the Permit requirements related to water quality monitoring, including current and planned activities.

11.1. Permit Requirements

The Permit (Section S8) requires municipalities to conduct water quality monitoring and perform assessments during this permit term, including:

- Make a one-time payment on or before December 1, 2019 if the permittee chose the status and trends monitoring option 1 in the previous permit cycle.
- Notify Ecology in writing by December 1, 2019 of the Status and Trends Monitoring Option (a or b) the City chooses to carry out and continue to pay into these funds prior to August 15th every year if option b is chosen.
- Make a one-time payment on or before December 1, 2019 if the permittee chose the effectiveness studies option 1 in the previous permit cycle.
- Notify Ecology in writing by December 1, 2019 of the effectiveness and source identification studies option (a or b) the City chooses to carry out and continue to pay into these funds prior to August 15th every year if option b is chosen.

In addition, the city is required to provide the following monitoring and/or assessment data in Annual Reports:

- A description of stormwater monitoring or studies conducted by the City during the reporting period. If stormwater monitoring was conducted on behalf of the City, or if studies or investigations conducted by other entities were reported to the City, a brief description of the type of information gathered or received shall be included in the Annual Report.

11.2. Current Activities

- On November 26, 2013 Fife notified Ecology of City's intent to pay in for both Status and Trends Monitoring, Effectiveness Studies and RSMP SIDIR fund.
- The City continues to make required payments to Ecology to support these programs per permit requirements.

11.3. Planned Activities

The City will:

- Budget for the pay-in option in 2021 and remit payment to Ecology.
- Summarize annual monitoring activities for the annual compliance report; including updates to the SWMP document.

Table 11-1 is the work plan for previous, current and proposed 2020 SWMP monitoring activities. These tasks were developed by staff review of Section S8 of the Permit.

Table 11-1 2020 Monitoring and Assessment Work Plan			
Task ID	Task Description	Lead Departments	Schedule Notes
MNTR-1	Pay Ecology specified fees for option a implementation	City Management	Before August 15 annually

Acronyms and Definitions

APPENDIX A

ACRONYMS AND DEFINITIONS

The following definitions and acronyms are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

40 CFR means Title 40 of the Code of Federal Regulations, which is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

AKART means all known, available, and reasonable methods of prevention, control and treatment. See also State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

All known, available and reasonable methods of prevention, control and treatment refers to the State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

Applicable TMDL means a TMDL which has been approved by EPA on or before the issuance date of this Permit, or prior to the date that Ecology issues coverage under this Permit, whichever is later.

Beneficial Uses means uses of waters of the state, which include but are not limited to use for domestic, stock watering, industrial, commercial, agricultural, irrigation, mining, fish and wildlife maintenance and enhancement, recreation, generation of electric power and preservation of environmental and aesthetic values, and all other uses compatible with the enjoyment of the public waters of the state.

Best Management Practices are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by Ecology that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

BMP means Best Management Practice.

Bypass means the diversion of stormwater from any portion of a stormwater treatment facility.

Census defined urban area means Urbanized Area.

Circuit means a portion of a MS4 discharging to a single point or serving a discrete area determined by traffic volumes, land use, topography or the configuration of the MS4.

Component or **Program Component** means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees, S7 Compliance with Total Maximum Daily Load Requirements, or S8 Monitoring of this permit.

Conveyance system means that portion of the municipal separate storm sewer system designed or used for conveying stormwater.

Co-Permittee means an owner or operator of an MS4 which is in a cooperative agreement with at least one other applicant for coverage under this permit. A Co-Permittee is an owner or operator of a regulated MS4 located within or in proximity to another regulated MS4. A Co-Permittee is only responsible for permit conditions relating to discharges from the MS4 the Co-Permittee owns or operates. See also 40 CFR 122.26(b)(1)

CWA means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et .seq)..).

Director means the Director of the Washington State Department of Ecology, or an authorized representative.

Discharge Point means the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate. Entity means a governmental body, or a public or private organization.

EPA means the U.S. Environmental Protection Agency.

General Permit means a permit which covers multiple dischargers of a point source category within a designated geographical area, in lieu of individual permits being issued to each discharger.

Ground water means water in a saturated zone or stratum beneath the surface of the land or below a surface water body. Refer to chapter 173-200 WAC.

Hazardous substance means any liquid, solid, gas, or sludge, including any material, substance, product, commodity, or waste, regardless of quantity, that exhibits any of the physical, chemical, or biological properties described in WAC 173-303-090 or WAC 173-303-100.

Heavy equipment maintenance or storage yard means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored on a long-term basis.

Highway means a main public road connecting towns and cities.

Hydraulically near means runoff from the site discharges to the sensitive feature without significant natural attenuation of flows that allows for suspended solids removal. See Appendix 7 Determining Construction Site Sediment Damage Potential for a more detailed definition.

Hyperchlorinated means water that contains more than 10 mg/Liter chlorine.

Illicit connection means any infrastructure connection to the MS4 that is not intended, permitted or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3). Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.

Illicit discharge means any discharge to a MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3). *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015*
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Impervious surface means a non-vegetated surface area that either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. A non-vegetated surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to, roof tops, walkways, patios, driveways, parking lots or stormwater areas, concrete or asphalt paving, gravel roads, packed earthen materials, and oiled, macadam or other surfaces which similarly impede the natural infiltration of stormwater.

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

LID means Low Impact Development.

LID BMP means low impact development best management practices.

LID Principles means land use management strategies that emphasize conservation, use of on-site natural features, and site planning to minimize impervious surfaces, native vegetation loss, and stormwater runoff.

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

Low impact development best management practices means distributed stormwater management practices, integrated into a project design, that emphasize pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration. LID BMPs include, but are not limited to, bioretention/,rain gardens, permeable pavements, roof downspout controls, dispersion, soil quality and depth, vegetated roofs, minimum excavation foundations, and water re-use.

Material Storage Facilities means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

Maximum Extent Practicable refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

MEP means Maximum Extent Practicable. *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015 Page 72 of 76*

MS4 means municipal separate storm sewer system.

Municipal Separate Storm Sewer System means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

(i) Owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of Washington State.

(ii) Designed or used for collecting or conveying stormwater.

(iii) Which is not a combined sewer;

(iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.; and

(v) Which is defined as “large” or “medium” or “small” or otherwise designated by Ecology pursuant to 40 CFR 122.26.

National Pollutant Discharge Elimination System means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington State Department of Ecology.

Native vegetation means vegetation comprised of plant species, other than noxious weeds, that are indigenous to the coastal region of the Pacific Northwest and which reasonably could have been expected to naturally occur on the site. Examples include trees such as Douglas Fir, western hemlock, western red cedar, alder, big-leaf maple; shrubs such as willow, elderberry, salmonberry, and salal; and herbaceous plants such as sword fern, foam flower, and fireweed.

New development means land disturbing activities, including Class IV General Forest Practices that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of hard surfaces; and subdivision, short subdivision and binding site plans, as defined and applied in chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development. Refer to Appendix 1 for a definition of hard surfaces.

New Permittee means a city, town, or county that is subject to the *Western Washington Municipal Stormwater General Permit* and was not subject to the permit prior to August 1, 2013. *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015 Page 73 of 76*

New Secondary Permittee means a Secondary Permittee that is covered under a municipal stormwater general permit and was not covered by the permit prior to August 1, 2013.

NOI means Notice of Intent.

Notice of Intent means the application for, or a request for coverage under a General Permit pursuant to WAC 173-226-200.

Notice of Intent for Construction Activity means the application form for coverage under the *Construction Stormwater General Permit*.

Notice of Intent for Industrial Activity means the application form for coverage under the *General Permit for Stormwater Discharges Associated with Industrial Activities*.

NPDES means National Pollutant Discharge Elimination System.

Outfall means a point source as defined by 40 CFR 122.2 at the point where a discharge leaves the Permittee's MS4 and discharges to enters a surface receiving waterbody or surface receiving waters of the State. Outfall does not include pipes, tunnels, or other conveyances which connect segments of the same stream or other surface waters and are used to convey primarily surface waters (i.e., culverts).

Permittee unless otherwise noted, the term "Permittee" includes city, town, or county Permittee, Co-Permittee, New Permittee, Secondary Permittee, and New Secondary Permittee.

Physically Interconnected means that one MS4 is connected to another storm sewer system in such a way that it allows for direct discharges to the second system. For example, the roads with drainage systems and municipal streets of one entity are physically connected directly to a storm sewer system belonging to another entity.

Project site means that portion of a property, properties, or right-of-ways subject to land disturbing activities, new hard surfaces, or replaced hard surfaces. Refer to Appendix 1 for a definition of hard surfaces.

QAPP means Quality Assurance Project Plan.

Qualified Personnel means someone who has had professional training in the aspects of stormwater management for which they are responsible and are under the functional control of the Permittee. Qualified Personnel may be staff members, contractors, or volunteers.

Quality Assurance Project Plan means a document that describes the objectives of an environmental study and the procedures to be followed to achieve those objectives.

RCW means the Revised Code of Washington State.

Receiving waterbody or **receiving waters** means bodies of water or naturally and/or reconstructed naturally occurring surface water systems to which surface runoff is discharged via a point source of stormwater or via sheet flow. Receiving bodies, such as creeks, streams, rivers, lakes, wetlands, estuaries, and marine waters may also be, or ground water, to which surface runoff is directed by infiltration a MS4 discharges.

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

1 for a definition of hard surfaces. *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015 Page 74 of 76*

Regional Stormwater Monitoring Program means, for all of western Washington, a stormwater-focused monitoring and assessment program consisting of these components: status and trends monitoring in small streams and marine nearshore areas, stormwater management program effectiveness studies, and a source identification information repository (SIDIR). The priorities and scope for the RSMP are set by a formal stakeholder group. For this permit term, RSMP status and trends monitoring will be conducted in the Puget Sound basin only.

Regulated Small Municipal Separate Storm Sewer System means a Municipal Separate Storm Sewer System which is automatically designated for inclusion in the Phase II stormwater permitting program by its location within an Urbanized Area, or by designation by Ecology and is not eligible for a waiver or exemption under S1.C.

RSMP means Regional Stormwater Monitoring Program.

Runoff is water that travels across the land surface and discharges to water bodies either directly or through a collection and conveyance system. See also “Stormwater.”

Secondary Permittee is an operator of a regulated small MS4 which is not a city, town or county. Secondary Permittees include special purpose districts and other public entities that meet the criteria in S1.B.

Sediment/Erosion-Sensitive Feature means an area subject to significant degradation due to the effect of construction runoff, or areas requiring special protection to prevent erosion. See Appendix 7 Determining Construction Site Sediment Transport Potential for a more detailed definition.

Shared water bodies means water bodies, including downstream segments, lakes and estuaries that receive discharges from more than one Permittee.

SIDIR means Source Identification Information Repository.

Significant contributor means a discharge that contributes a loading of pollutants considered to be sufficient to cause or exacerbate the deterioration of receiving water quality or instream habitat conditions.

Small Municipal Separate Storm Sewer System means an MS4 that is not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Source control BMP means a structure or operation that is intended to prevent pollutants from coming into contact with stormwater through physical separation of areas or careful management of activities that are sources of pollutants. The *SWMMWW* (2012) separates source control BMPs into two types. Structural Source Control BMPs are physical, structural, or mechanical devices, or facilities that are intended to prevent pollutants from entering *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015 Page 75 of 76*

stormwater. Operational BMPs are non-structural practices that prevent or reduce pollutants from entering stormwater. See Volume IV of the *SWMMWW* (2012) for details.

Stormwater means runoff during and following precipitation and snowmelt events, including surface runoff, drainage or interflow.

Stormwater Associated with Industrial and Construction Activity means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, or associated with clearing, grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

Stormwater Management Program means a set of actions and activities designed to reduce the discharge of pollutants from the MS4 to the MEP and to protect water quality, and comprising the components listed in S5 (for cities, towns, and counties) or S6 (for Secondary Permittees) of this Permit and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 *Compliance with TMDL Requirements*, and S8 *Monitoring and Assessment*.

Stormwater Treatment and Flow Control BMPs/Facilities means detention facilities, treatment BMPs/facilities, bioretention, vegetated roofs, and permeable pavements that help meet Appendix 1 Minimum Requirements #6 (treatment), #7 (flow control), or both.

SWMMWW or Stormwater Management Manual for Western Washington means *Stormwater Management Manual for Western Washington (2005).as amended in 2014)*

SWMP means Stormwater Management Program.

TMDL means Total Maximum Daily Load.

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

Tributary conveyance means pipes, ditches, catch basins, and inlets owned or operated by the Permittee and designed or used for collecting and conveying stormwater.

UGA means Urban Growth Area.

Urban Growth Area means those areas designated by a county pursuant to RCW 36.70A.110.

Urbanized Area is a federally-designated land area comprising one or more places and the adjacent densely settled surrounding area that together have a residential population of at *Western Washington Phase II Municipal Stormwater Permit – August 1, 2013 Modified January 16, 2015*
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least 50,000 and an overall population density of at least 1,000 people per square mile. Urbanized Areas are designated by the U.S. Census Bureau based on the most recent decennial census.

Vehicle Maintenance or Storage Facility means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.

Water Quality Standards means Surface Water Quality Standards, chapter 173-201A WAC, Ground Water Quality Standards, chapter 173-200 WAC, and Sediment Management Standards, chapter 173-204 WAC.

Waters of the State includes those waters as defined as "waters of the United States" in 40 CFR Subpart 122.2 within the geographic boundaries of Washington State and "waters of the state" as defined in chapter 90.48 RCW which includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and water courses within the jurisdiction of the State of Washington.

Waters of the United States refers to the definition in 40 CFR 122.2.

APPENDIX B

2021 City of Fife Stormwater Education and Outreach Plan and Schedule



CITY OF FIFE
Education and Outreach Strategy
for
General Awareness, Behavior Change and Stewardship Opportunities
January 2021

Year 2020 marks an increased awareness of stormwater runoff and the pollutants it carries into Fife’s storm system and receiving waters. Several programs have been strengthened within Fife’s stormwater management program including increased documentation, inspection and maintenance. Of specific relevance, are the results of the newly reinitiated catchbasin cleaning program, in which greater than expected amounts of sediment and debris were removed. As a result of this program and other anecdotes regarding the public’s practices regarding catchbasins, the City of Fife will focus Education and Outreach programs on what has gone, or what will go into the over 3,000 public and private catch basins located in Fife.

With many opportunities available for programs and partnerships, city staff have developed a strategy that capitalizes on and coordinates with existing efforts, including additional programs that may be added through the current permit term. This document provides a discussion of Fife’s planned Education and Outreach program with implementation schedule, as well as programs that may be added in the future.

Although this document discusses Fife’s full Education and Outreach program, including Stewardship and General Awareness, the specific purpose of the document is to satisfy the requirements of Section S5.C.2.a.ii.(c) of the Western Washington Phase II Municipal Stormwater Permit. The permit requires development of a behavior change program tailored to the community and including development of a program evaluation plan. Per Section S5.C.2.a.ii.(c)3 of the current Phase II Stormwater Permit, Fife will focus efforts on developing a strategy and schedule for a new target audience and BMP behavior change campaign.

FOCUS: Only Rain in the Drain

Program Elements from previous years

- Fife Harvest Festival - October 2020 event canceled
 - Target Audience – General Public
 - Subject Area – General Impacts of stormwater on surface waters

This has been the foundation of the general awareness program in past years. Fife and TPCHD staff meet and hand out information to Fife residents. This festival was canceled for 2020. This program will resume when safe.

Program Elements initiated in 2020

- General Awareness
 - Target Audience – General Public
 - Subject Area – General Impacts of stormwater on surface waters

To replace the canceled Harvest Festival, Fife sent out 5,105 general awareness flyers to all Fife households in September 2020. Messaging included:

- Only rain in the drain
- Call if you see something
- Watch for city forces cleaning CBs
- Get your car washed at a car wash

- Behavior Change
 - Target Audience – Property managers/owners
 - BMP – Stormwater facility maintenance/prevention of illicit discharges
 - Evaluation – via follow-up visit

Fife has an Interlocal Agreement with the Tacoma Pierce County Health Department (TPCHD), which includes education and outreach tasks, including behavior change. TPCHD presented an opportunity to educate business owners about parking lot maintenance and CB inserts/socks. TPCHD provides interested business owners with CB socks and discussion on why and how to use them. Follow-up visits, which document sock use and acceptance of the practice, will be the vehicle to gain feedback and evaluate the success of the program and message. This program will be continued through the permit term or until all businesses are contacted.

- Behavior Change
 - Target Audience – Residents
 - BMP – Prevention of illicit discharges
 - Evaluation – tabulation of coupons used

During Fall 2020, Fife initiated conversations with local car washes, including one owned by the local tribe, to partner and provide free or reduced cost car washes to Fife residents as an alternative to washing cars in driveways. In lieu of starting the program Fall 2020, messaging was included in the general flyer regarding the use of car washes with the intent to launch Spring/Summer 2021. Details of the program will be finalized Spring 2021, with the anticipated start date of July 2021. Once the program ends, returned coupons will be tabulated and the program evaluated. Follow-up conversations with car wash operators will attempt to determine if there is any increase in car wash usage during the program.

Methods of outreach will include mailers with coupons and information and general promotion through the city's website, newsletters and social media.

Additional Program Opportunities

The city recognizes that its Education and Outreach Program will evolve over time. Depending on the success or otherwise, the programs described above may be enhanced or eliminated depending on the benefits gained and the effort expended. The programs listed below are alternatives that may be added in the future.

- Stewardship opportunities
 - Target Audience – Businesses participating in CB sock program

For those businesses interested, the city could provide CB markers with the message “Drains to Puget Sound” or other. These could be placed on private CBs by property managers/owners.

- Stewardship opportunities
 - Target Audience – Interested groups of residents

CB markers as described above could be provided to interested groups (with adult leadership) and placed onto city CBs (or the curbs near them).

- Behavior Change
 - Target Audience – Businesses

The city may wish to join the regional dumpster group. This could be easily added to the effort around CB socks. The regional program would provide informational flyers. This is a proactive program and would not replace the business inspection/enforcement requirement.

- Behavior Change/Stewardship
 - Target Audience – Business and Residents

The Adopt-a-Storm Drain program is launching in Seattle and may provide a future opportunity for both Stewardship and Behavior Change. The program is handled by a college in Minnesota providing a turnkey program for a fee. Adopters pledge to keep leaves and debris off the CB and tabulate and report quantities removed. There is also a yard sign involved for adopters.

- Pet Waste stations
 - Target Audience – Residents

This type of program is well established in other jurisdictions. Pet waste stations with bags are provided and behavior change is calculated by how many bags are used.

