

City of Federal Way

Stormwater Management Program (SWMP) Plan

March 31, 2025

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Introduction

The National Pollutant Discharge Elimination System (NPDES) Permit Program is a requirement of the Federal Clean Water Act intended to protect and restore waters for “fishable and swimmable” uses. The Federal Environmental Protection Agency delegated permitting authority to state environmental agencies. In Washington, the NPDES-delegated authority is the Washington State Department of Ecology (Ecology). The City of Federal Way (City) is regulated under the Western Washington Phase II Municipal Stormwater Permit (Permit). The EPA’s 1999 Phase II regulations requires small Municipal Separate Storm Sewer Systems (MS4) in U.S. Census Bureau defined urbanized areas to obtain NPDES permit coverage for their stormwater discharges. The first Permit was issued to the City in 2007, and the current, updated Permit was issued in July 2024 and became effective as of August 1, 2024 and expires July 31, 2029.

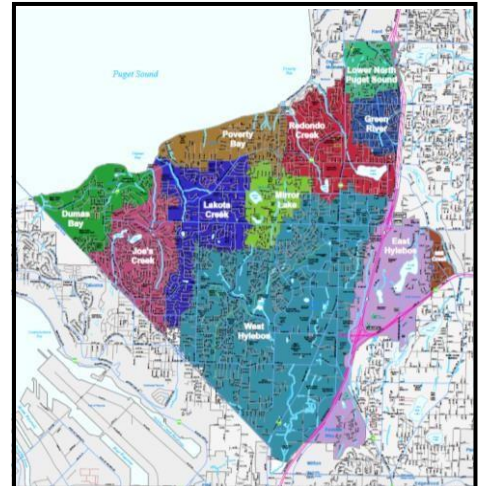
The Permit allows municipalities to discharge stormwater runoff from the MS4 into the State’s water bodies (e.g., streams, rivers, lakes, wetlands, Puget Sound, etc.) as long as municipalities implement measures to protect water quality to the “maximum extent practicable” through the application of best management practices (BMPs). As specified in the Permit, these required practices are implemented as outlined in the City’s Stormwater Management Program (SWMP). The SWMP focuses on the use of All Known and Reasonable Technologies (AKART) to reduce the discharge of pollutants into receiving water bodies, protect surface waters from water quality degradation, and conserve aquatic ecosystems.

The Permit Section S5.A.2 requires that the City detail “activities for the upcoming calendar year” in order to meet Permit requirements. These activities are documented within the SWMP, and organized according to the following program components as outlined in the Permit:

- **Stormwater Planning (S5.C.1)**
- **Public Education and Outreach (S5.C.2)**
- **Public Involvement and Participation (S5.C.3)**
- **MS4 Mapping and Documentation (S5.C.4)**
- **Illicit Discharge Detection and Elimination (S5.C.5)**
- **Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)**
- **Stormwater Management for Existing Development (S5.C.7)**
- **Source Control Program for Existing Development (S5.C.8)**
- **Operations and Maintenance (S5.C.9)**
- **Monitoring and Assessment (S8)**

Details about each of these activities follow in the rest of this Update.

The Environmental Services (ES) Division will be preparing for the new Stormwater Planning Program Permit requirements by including the applicable milestones and deadlines in the Surface Water Management Comprehensive Plan update. ES looks forward to expanding its stormwater planning efforts to better address high-priority sub-basins in Federal Way and develop actionable steps for improving watershed health in the community. The Surface Water Management Comprehensive Plan Update is slated for 2025 to prepare us for the new permit requirements through 2029.



ES staff will coordinate with the inter-disciplinary team (established August, 2020) to meet in the Fall of 2025 and as needed to discuss long range planning to address water quality, low impact development code requirements, Stormwater Management Action Planning (SMAP), and how the City will be meeting the new permit requirements.

The City will review long-range planning efforts and how they are meeting stormwater management needs. Review will include current water quality policies, water quality protection codes, and strategies to see what additional policies, codes, or strategies may be required to protect and improve local receiving waters. The City will be submitting a description of these codes, policies, and strategies to Ecology in the Annual Report due March 31, 2027.

Per the 2024-2029 Permit requirement, the City reviewed the following documents and code for LID requirements, incentives, and identify any administrative or regulatory barriers annually:



- Federal Way Revised Code (FWRC)
- King County Stormwater Design Manual (KCSWDM)
- Federal Way Addendum to KCSWDM
- 2024 Development Standards Manual
- King County Stormwater Pollution Prevention Manual (KCSPPM)
- LID Manual Puget Sound

The City will begin looking into tree canopy goals and policies to support stormwater management while considering how existing or future tree canopy can support stormwater management in water quality improvements in receiving water. The purpose is to implementing those goals and policies by December 31, 2028.

S5.C.1.d: Stormwater Management Action Planning (SMAP) and West Hylebos SMAP

An in-depth explanation of our prioritization method and process is documented in City's 2022 *SMAP: Stormwater Basin Assessment and Prioritization* document. Table below summarizes the results of our prioritization process.

Table 1-2 Basin Prioritization Rankings		
Rank	Basin	PIS
1	West Hylebos	80.12
2	Lakota Creek	62.43
3	East Hylebos	58.03
4	Joe's Creek	55.42
5	Central Puget Redondo Creek	37.20
6	Central Puget Cold Creek	36.81

In 2022-2023, ES staff developed a SMAP for the West Hylebos as our watershed of priority. The West Hylebos SMAP is updated as necessary for changes in the plan or additional actions. In 2025, ES staff will consider if the City should implement an additional SMAP for Lakota watershed or enhance the current West Hylebos SMAP. Per the Permit the City shall complete and submit a SMAP for Lakota watershed, or add on additional actions for the current West Hylebos SMAP.

Public Education and Outreach



The Environmental Services Division (ES) provides ongoing public education and outreach designed to reduce and eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. ES staff utilize a variety of approaches to inform targeted audiences about stormwater issues and provide specific actions people can follow to minimize stormwater pollution.

S5.C.2.a.i: General Awareness Events and Programs

The City of Federal Way focuses its outreach efforts on building relationships in the community, planning and refining existing programs, and creating accessible ways to include residents in

programs, including virtual and multilingual options. A summary of general awareness activities that occurred in 2024 and planned for 2025 are provided below:

Storming the Sound with Salmon Program

Storming the Sound with Salmon (SSS) is a program carried out by the City in partnership with the Federal Way Public School (FWPS) District. The program began during the 2012-2013 school year and has continued since. The programs purpose is to educate students about salmon, stormwater, local history, and how they are connected.

There are several components to this program, including implementation of stormwater/salmon curriculum. Schools have the option to voluntarily raise salmon in tanks with all supplies paid for by the City. The program culminates with a multi-day Release Event where students get to release the salmon they raised. The Release Event has multiple components such as presenter led activities, nature walks through the nearby wetlands, and storytelling led by a local Native American Tribe. Below are details on for 2023-2024 school year and our plans for the 2024-2025 school year.



2023-2024 School Year

- Based on feedback from our last event survey, we planned a physical Release Event over 4 days in April/May of 2024. Environmental Services (ES) staff held the SSS kick-off meeting in July 2023, where staff took inventory of supplies, ordered supplies based on the number of participating schools, and put together tank maintenance kits.
- In September 2023, after school had started, a planning meeting was held to discuss logistics for the program.
- In October 2023, schools had their tanks set up and running. ES staff performed maintenance as necessary to ensure tanks were ready for salmon egg deliveries.
- From October 2023 to May 2024, ES and Federal Way Public School staff responded to various tank maintenance issues and concerns.
- Salmon egg pickup and delivery occurred early December 2023.
- ES staff began procuring presenters and lunch sponsors for the Release Event in January 2024. ES staff

and FWPS staff also held a Release Event planning meeting in January 2024.

- In February 2024, ES staff coordinated with various City departments to acquire park permit and schedule operational, security, and medical staff required to carry out the Release Event.
- In March 2024, ES staff began updating, creating, and gathering materials needed for the Release Event.
- Release Event was held on 4 separate days in late April/early May of 2024, April 23-24 and April 30 and May 1 at the Brooklake Community Center.
- ES and FWPS staff met May 17, 2024 to review feedback and discuss future program improvements.
- In June 2024, ES and FWPS staff met again to debrief and discuss logistics for the 24-25 school year.
- Overall, we had 34 schools participate in the program. Over 1,700 4th graders attended the Release Event.



2024-2025 School Year

- Based on feedback from our school partners, the Release Event was a success. ES Staff scheduled the SSS kick-off meeting in July 2024. ES Staff took inventory of supplies, restocked based off estimates of participating schools, and put together salmon tank maintenance kits once all items have arrived.
- In September 2024, after school had started, a planning meeting was held to discuss logistics for the program.
- By October 2024, schools should have their tanks set up and running. ES staff performed maintenance as necessary to ensure tanks were ready for salmon egg deliveries. From October 2024 to May 2025, ES and Federal Way Public School staff has responded and will continue to respond to various tank maintenance issues and concerns.
- Salmon egg pickup and delivery occurred early December 2024.
- ES staff will begin procuring presenters and lunch sponsors for the Release Event in Jan 2025.
- Planning meetings occur monthly between November 2024 until the release event in April 2025 between City of Federal Way staff and FWPS staff.
- In February, ES staff will coordinate with City departments to get the park permit and staff required to carry out the Release Event.
- In March, ES staff will begin updating, creating, and gathering materials needed for the Release Event.
- Release Event will be held on 4 separate days in late April at the Brooklake Community Center. We plan to have the event slated for April 22-23 and April 29 and April 30.
- After the Release Event, FWPS staff may send a feedback survey to the participating schools. Then ES Staff will meet with FWPS in late May or early June to go over feedback responses and how to improve the program for the following school year.

General Outreach Handout Creation and Translations:**2024:**

ES outreach staff updated general stormwater handouts to be given out to the public at community events. These handouts include common types of pollutants, helpful tips on keeping stormwater healthy, and directions on how to report illicit discharges. This was translated into the top 4 languages spoken in Federal Way (Spanish, Korean, Russian, and Vietnamese). ES staff utilized previously-made “In Language Field Outreach Binders” containing English and translated handouts to improve the reach to residents of Federal Way.

2025:

ES outreach staff plans to create at least 1 new piece of educational material and updated versions of existing materials. Due to Title VI requirements and updated city data, materials will be translated into 6 different languages: French, Korean, Russian, Spanish, Tagalog, and Vietnamese. Besides English, these are the top spoken languages in Federal Way. ES staff will continue to increase the usage of our “In-Language Field Outreach Binders” to increase access to education and

outreach for stormwater.

General Outreach Newsletters**2024:**

Outreach staff sent out 10 e-newsletters in 2024 that reached over 2,000 unique contacts with 19,601 sends. The e-newsletters highlighted household tips and tricks for community members to keep pollution out of the drain. ES staff also promoted messaging from the Puget Sound Starts Here campaign in these newsletters.

2025:

Staff will continue to produce e-newsletters that address various topics on environmental effects of stormwater pollution and pollution prevention. E-newsletters will continue to promote messages from Puget Sound Starts Here and begin promoting the Federal Way 2025 stewardship program - Adopt-a-Drain.

Social Media**2024:**

ES staff continued to utilize social media and social marketing strategies to promote stormwater messaging and events through regular posts on the City of Federal Way Facebook and Instagram pages.

2025:

Staff will continue utilizing social media and marketing strategies with a goal of posting/sharing stormwater pollution prevention topics once a month. This will include messaging from Puget Sound Starts Here, other statewide & regional collaborations, and local partners.

Green Living Workshops**2024:**

ES staff coordinated 5 green living workshops in 2024. 3 were virtual, 2 in-person at community sites. 2 of these events were offered bilingually in Spanish and English. Through these workshops, ES engaged new community partners to broaden the outreach audience and reached 140 residents with these offerings.

2025:

The City plans to hold quarterly Green Living Workshops in 2025. Examples include rain barrel classes during the winter, rain garden classes and shade tolerance to decrease need for fertilizers in the Spring, Coho salmon and stormwater pollution effects. ES staff will continue broadening the outreach audience through community partnerships and culturally relevant practices.

Community Events**2024:**

In 2024, Water Quality (WQ) outreach focused on stormwater pollution prevention through natural lawn care and composting outreach and education. ES staff performed outreach at 11 community events, including farmer's markets, FWPS events, and community events. 4 of the events had water-quality specific outreach, promoting messaging around pollution prevention, with hands-on elements including macroinvertebrate ID and watershed models. The events with this WQ focus were:

- STEM night at FWPS = 3600 total attendees, 800 attendees interacted with.
- Hooked on Fishing = 300 attendees
- Kid's Day = 1,000 attendees
- Red, White, and Blues = 600 attendees, gave away 1,000+ outreach items

2025:

ES staff plan to attend roughly the same number of events in 2025, with a goal of 4 events focused specifically on water quality. WQ outreach will focus on stormwater pollution prevention and how it fits into the larger scope of Environmental Services & Public Works. ES plans to work with community organizations to build partnerships, provide high-quality events, and expand the types of offered events.

SS.C.2.a.ii: Behavior Change Program: Spill Kit Outreach Program → Adopt A Drain Program

The City of Federal Way will be transitioning programs from Spill Kit Outreach to Adopt-a-Drain. This will help increase access to WQ outreach and education. The Spill Kit Outreach Program targeted businesses and addressed commercial pollution. The Adopt-a-Drain Program is accessible and available to all residents. For the Spill Kit Outreach Program, ES staff visits and surveys businesses with a high risk of spillage & potential for pollution. Staff provides education, training, and materials. A spill kit is provided free of charge to incentivize spill clean-up and responsibility. ES staff provides training on how to use the kit, proper disposal of kit materials, how to clean up spills, and who to call for follow up. Finally, ES staff collaborates with the business to create a customized spill plan. A post-survey is collected one year later in a follow-up visit to track behavior change. Additional follow-up visits performed as needed.

2024:

ES staff targeted outreach to businesses with a high potential for generating stormwater pollutants, focusing on the largest watershed in the city, the Hylebos watershed. Staff also provided training in multiple languages to employees for whom English is a learned language to better implement spill kit awareness.

- Provided 17 businesses with spill kits and spill response training
- Produced spill response training and outreach materials for businesses with limited English proficiency.

2025:

ES staff will transition away from the Spill Kit Program and begin the Adopt-A-Drain Program.

Spill Kit Outreach Program

ES staff will continue to provide stormwater education and free spill kits to businesses as needed and upon request, until supplies run out. ES staff will continue utilizing IDEE/Source Control data to identify high-pollution-risk businesses for outreach.

Adopt-A-Drain Program

"Adopt-a-Drain asks residents to adopt a storm drain in their neighborhood and keep it clear of leaves, trash, and other debris to reduce water pollution and help prevent localized flooding." (wa.adopt-a-drain.org). Volunteers sign up, maintain their adopted drain, and report an estimated total of debris collected/removed.

ES staff will start calling for participation in February 2025. ES staff will collaborate with Adopt-a-Drain regional group leaders to share resources and strategies. Adopt-a-Drain materials are currently available in English and Spanish; ES staff plans to translate materials to French, Korean, Russian, Tagalog, Vietnamese, and others as needed.

The City's 2025 goal is to get 15 drains adopted.

***55.C.2.a.iii: Provide and Advertise Stewardship Opportunities***

The City has various volunteer stewardship opportunities which includes Stream Team, curb marking, and litter pick up.

Stream Team

Stream Team involves volunteers of all ages going out to monitor the receiving waters of Federal Way. The City requires new volunteers to go through two trainings. First, an in-classroom training where they learn about the common stormwater parameters, stormwater, and the equipment they will be using. Second, the in-field training where they use the kit in the field with City staff guidance. Once they complete both trainings they are assigned to a monitoring site based on their survey. Volunteers are asked to monitor at least once a month. All materials are provided by the City.

2024:

13 volunteers were trained in 2024. 3 volunteers remained active testing local waterways from previous years.

2025:

ES Staff will continue to offer trainings to new volunteers, and evaluate the program to work on maintaining existing volunteers (may involve celebration milestones, volunteer recognition, and increased in-person opportunities). In person trainings will occur in October 2025.

ES Staff will launch and promote Stream Team Kids, a sub-program geared towards young people. The content and materials of Stream Team Kids were also developed for people (of all ages) whose primary language is not English. Stream Team Kids performs similar WQ monitoring, but without chemical reagents. Once launched, trainings and kits will be available year-round.





ES staff hosts volunteer storm drain curb marking and litter pick up events to bring awareness to stormwater and to prevent pollution. This involves ES staff scouting Federal Way to identify safe areas with a need for storm drain markers or litter pick up. During the event staff provides information to volunteers on how they are assisting with pollution prevention. Volunteers are shown what to do and given relevant supplies. For curb marking, ES staff plans routes with multiple locations where volunteers need to mark drains. For litter pickups, volunteers are provided with PPE, bags, and pickers. The City reaches out to local schools and organizations to raise interest and volunteers for future curb marking and litter pick up events.

2024:

ES staff hosted 4 curb marking and litter pickup events in various Federal Way neighborhoods and parks. Across those 4 events, 73 volunteers added 80 curb markers and picked up 214 pounds of litter.



2025:

ES staff plans to host quarterly curb marking and litter pickup events in 2025. 2025 events will focus on fostering community independence by educating community members, providing materials for check-out, and facilitating waste pickup. ES staff will work closely with FWPS, aiming to encourage scholar participation through community service hours and promoting community responsibility.



Public Involvement & Participation

The City encourages the public and interested parties to participate in the decision-making process involving the development and implementation of NPDES Permit related programs and surface water management rate structure.

S5.C.3.a: Create Opportunities for the Public to Participate, including Overburden Communities in the Development, Implementation, and Update of the City's SMAP and SWMP

Opportunities for public participation in the development of the SWMP update include the following:

- Continuously: We provide opportunity for the public to comment on our SWMP and SMAP at all times on our NPDES Program webpage: <https://www.federalwaywa.gov/page/npdes-program>
- March 3, 2025: Public Land Use and Transportation Committee Meeting; the annual report presented to the committee for consent to move to City Council meeting for approval.
- March 19, 2025: Public City Council meeting the annual report is presented for approval and submission to Ecology.

The City website will advertise for the SWMP and SMAP public comment in English, Chinese, French, German, Italian, Japanese, Portuguese, Russian, Spanish, Ukrainian, Farsi, Somali, and Arabic. Verbal translations of the SWMP and SMAP document is available upon request, provided by our language translation service provider LanguageLine Solutions.

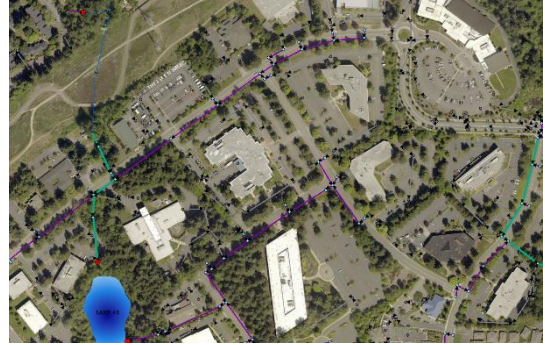
Per the Permit, the City will document methods used to identify overburdened communities before December 31, 2026.

S5.C.3.b: Post the SWMP, SMAP and Annual Report on the City's Website

The City's NPDES webpage will have PDFs to the updated SWMP, SMAP, and the Annual Report once they have been approved by City council and submitted to Ecology.

MS4 Mapping and Documentation

The City of Federal Way works to maintain the most up-to-date and accurate maps possible for the City, the MS4, and private connections (commercial and residential) into the MS4. These maps assist with stormwater system operations and maintenance, private and public stormwater system inspections, IDDE source tracing and identification, and mitigating potential downstream impacts of stormwater pollution.



S5.C.4.a: Maintain Ongoing Mapping Data

The City maintains its stormwater assets mapping data through ArcGIS. The City performs routine updates to the MS4 mapping based on the City's Video Inspection Program findings, new development or redevelopment as-builts, and field verifications from utility locates. During inspections or field work if we discover any discrepancies between observations and our GIS maps we will make notes and our Asset Coordinator will update it on GIS.

S5.C.4.b.i: Collect size and material data for all known MS4 Outfalls

We have collected material and size data on 175 of 230 known primary public outfalls. During Dry Weather Outfall Screening operation in the summer of 2025 the City will work on identifying material and size of the remaining 55 outfalls. Per the Permit the City is required to identify material and size for all known outfalls by March 31, 2026.

S5.C.4.b.ii: Mapping of Tree Canopy on City owned or operated Properties

For 2025, the City will research available existing databases of tree canopy coverage that could be integrated into our GIS database. Per the Permit the City shall use available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties and follow a methodology to intentionally identify canopy for stormwater management purposes by December 31, 2026.

S5.C.4.b.iii: Implement a methodology to map and assess acreage of MS4 Tributary basins to outfalls

After we have completed identifying material and size of all MS4 outfall, as required in S5.C.4.b.i, the City will begin developing a methodology to map and assess acreage of MS4 tributary basins with outfalls larger than 24-inch diameter. We will implement a methodology and quantify estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/ facilities by March 31, 2028.

S5.C.4.b.iv: Map Overburdened Communities in Relation to Stormwater Facilities & Tree Canopy

Per the Permit the City shall use existing data to map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy by December 31, 2028.

S5.C.4.c: Utilize Electronic Format for Mapping

The City has utilized GIS data and mapping since 1997. The City uses ESRI ArcGIS (Enterprise 10.9.1, Desktop 10.8.2, Pro 2.9.5) and AutoDesk AutoCAD (2022, Civil 3D 2022) for electronic mapping.

S5.C.4.d-e: Provide Mapping Information, Upon Request, to Ecology, Indian Tribes, Municipalities, and Other Permittees

Mapping requests from the public, Ecology, Indian Tribes, Municipalities, and Other Permittees are fulfilled on an ongoing basis through our public records request system. The City manages its Public Records Request through JustFOIA. Records can be found and request through our website on this page:

<https://www.cityoffederalway.com/page/public-records>

Illicit Discharge Detection & Elimination

Federal Way maintains a robust Illicit Discharge Detection & Elimination (IDDE) Program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. We utilize NPDESPro to manage our IDDE records according to Ecology's reporting schema.

55.C.5.a: Include Procedures for Identifying, Reporting, Correcting, and Removing Illicit Discharges and Illicit Connections in the IDDE Program

Federal Way's IDDE Field Procedures and Response Plan was last updated in December of 2024 to include more consistent and timely enforcement measures to facilitate compliance and correct illicit discharges and corrections. The City utilizes the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, May 2020 Revision*, prepared by Herrera Environmental Consultants and Aspect Consulting (see Appendix B) to supplement the City's IDDE Plan.

Throughout 2025, ES staff will plan on updating the City's IDDE Plan as necessary. This includes, but not limited to monetary penalties procedures, source control enforcement, use of NPDESPro, flowchart updates, and field response procedures.



55.C.5.b: Inform Public Employees, Businesses, and the General Public about the Hazards Associated with Illicit Discharges and Improper Disposal of Waste

ES staff education and outreach efforts to multiple stakeholders regarding the various hazards associated with illicit discharges and improper waste disposal through various methods. This includes:

- When we receive complaints regarding alleged illicit discharges we always send a technical assistance letter or talk a person on site regarding proper best management practices even if they are not in violation. Additionally, all IDDE and Source Control cases that result from enforcement include BMPs catered to the specific business or activity.
- At community events we mentioned in the Public Education and Outreach section, we provide educational materials to citizens about residential BMPs, such as vehicle washing and proper pet waste disposal, and notifying them about City and County programs, such as King County's hazardous waste disposal resources. Additionally, we always include an interactive activity such as our pollution model, watershed pollution demonstration, and a spin the wheel questionnaire.
- Dumpster stickers for commercial dumpsters when we observe that they are open during our inspections. We speak to staff and provide Technical Assistance letter to businesses and property owners with open dumpsters.
- Utilizing the updated *IDDE Field Procedures and Response Plan* for all incoming public employees to introduce them to the program and orient them with City procedures for investigating, identifying, enforcing, and eliminating illicit discharges and illicit connections.
- Educating participants in the City's Stream Team Program about the hazards of illicit discharges during the initial classroom training for inclusion in the program.
- Businesses are education on spill preparation, response, and stormwater when visited through our Spill Kit Outreach Program. We provide free spill kits and training on how and when to use the kit.

In 2025, ES staff will continue education the residents of Federal Way with the programs and activities list above. Many of the activities listed above are planned in the Public Education and Outreach section.

The public can use SeeClickFix also known as Eyes on Federal Way, a mobile app, to easily report issues (including spills or other water quality issues) directly from their phone. Citizens can track what they report and see other water quality issues that are reported through the software.

S5.C.5.c: Implement an Ordinance or Other Enforceable Mechanism to Prohibit Illicit Discharges into the City's MS4

City Ordinance 09-619 prohibits non-stormwater discharges into the City's MS4, and Federal Way Revised Code (FWRC) Chapter 16.50 lists prohibited, allowable, and conditional discharges into Federal Way waters and storm drainage systems. In 2025, the City will review its current code and add any additional language needed to comply with the Permit by July 1, 2027. The Environmental Services Division Water Quality Section implements escalating enforcement procedures and actions pursuant to those outlined in FWRC Chapter 1.15. In general, when doing through enforcement we generally start with a warning letter which has a deadline and that can escalate into an order to correct. Based on the situation we may skip the warning letter and issue the order to correct. As an incentive to complete the corrective action, we have monetary penalties that accrue daily after the deadline stated in the order to correct.

S5.C.5.d-e: Implement an Ongoing Program to Detect, Identify, and Address Illicit Discharges, Including Spills and Illicit Connections, into the City's MS4



Field screening procedures and methods are outline in Federal Way's Illicit Discharge Detection and Elimination Field Procedures and Response Plans and the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, May 2020 Revision*, prepared by Herrera Environmental Consultants and Aspect Consulting. In 2024, the City met the Permit requirement to screen at least 12 percent of the City's stormwater system for illicit connections and illicit discharges through recurring source control, video, and stormwater facility inspections each year.

The City has a spill hotline on the Federal Way, Surface Water Management page which includes a phone number and a link to Eye's on Federal Way where citizens can make any type of report and it will be directed to the appropriate

personnel and they can track the progress in real time.

Annually, ES staff require field staff from all divisions and the Police Department to take our IDDE training which is sent out every Spring. We track the progress through a survey that they must complete at the end of the training presentation or if it is in-person through a sign-in sheet. Staff who work on facilities that require a SWPPP are also required to take our SWPPP training and those who do maintenance that follow the King County Site Management Plan (SiMPla) must take the SiMPla training as well. These trainings are updated annually between January and February.

- Continue to inspect private commercial stormwater systems that discharge into the City's MS4 to ensure maintenance complies with standards outlined in the Permit. City staff incorporates an education and outreach program into the commercial site inspection program. This component provides advance notice and site-specific information of stormwater systems to property owners and their representatives. In addition, the outreach program provides information on BMPs targeted at each site's commercial activities and land use. City staff will continue to emphasize source control best practices, operational and structural, to help commercial property owners better understand how to prevent prohibited discharges on a short and long-term basis.
- Continue to collect and analyze data on commercial site inspection results, enforcement actions, water quality violations, and compliance timelines to better inform commercial site and source control inspections.
- Continue to utilize this annual data analysis to evaluate hot spots in the City for illicit discharges, as the analysis is broken down by type of discharge, drainage basin, and year. The results of this analysis will continue to be used in 2025 to assist staff in identifying seasonal and geographic trends in repeated water quality violations. This analysis, coupled with the evaluation of enforcement actions and compliance timelines, will allow ES Staff to better target outreach and technical assistance efforts to reduce common illicit discharges.
- Continue to use NPDESPro, a web-based data management platform, to report illicit discharges and connections, track staff response logs, and document enforcement actions. NPDESPro is only utilized for IDDE recordkeeping and tracking.
- Plan to work with South King Fire & Rescue regarding discharge of PFAS containing AFFFs and notify the City if such products as required by the Permit by December 31, 2026.
- Begin planning to draft field response procedures to minimize discharges into the MS4 during post-emergency clean up and disposal activities including immediate clean up in all situations where PFAS containing AFFFs have been used.

S5.C.5.f: Provide IDDE Staff Training

ES staff will continue to provide annual training to all field-based City of Federal Way staff and police personnel to identify illicit discharges and ensure they are reported to appropriate authorities. Additionally, all maintenance personnel, ES Water Quality staff, and SWM Inspectors are trained annually in spill response and first responder hazard awareness. ES staff will continue to review field procedures for identifying, tracing, reporting, and documenting all reported illicit discharges. In 2025, ES staff will continue to update the training material for City staff and will include training on BMPs to prevent or reduce stormwater impacts when perform maintenance activities. We will plan to conduct an in-field response training for staff on how to control spills and when to use certain devices. All spill response staff will be trained in Source Control through the Washington Stormwater Center and received CESCL training as needed to stay certified.

S5.C.5.g: Track and Maintain Records of IDDE Program Activities

NPDESPro tracks all reported water quality violations for IDDE/IC. Associated documents, including photographs, site maps, correspondence, legal actions, and final resolutions are stored in the Surface Water Management network drive. Commercial site inspections are tracked in Excel, and active construction sites are tracked through the City's permitting system, AMANDA. Source Control is record on ESRI's Survey123 cloud database. For 2025, City staff will continue to utilize the systems mentioned above.

Controlling Runoff from New Development, Redevelopment, & Construction Sites

Construction site runoff is a major contributor to water quality degradation in the greater Puget Sound region. To address this issue, the City code is phrased to always adopted the current King County Stormwater Design Manual, City of Federal Way Addendum to the King County Stormwater Design Manual, and the latest edition of LID Technical Guidance Manual for Puget Sound.

S5.C.6.a-b: Implement an Ordinance or Other Enforceable Mechanism to Address Runoff from New Development, Redevelopment, and Construction Sites

Federal Way Public Works Development Standards (codified under FWRC 19.135.130), and the current King County Stormwater Design Manual (as amended and adopted under City Ordinance 21-922), include minimum requirements for stormwater design and construction for the protection of water quality and the reduction of pollutant discharge.

S5.C.6.c: Apply a Permitting Process with Site Plan Review, Inspection, and Enforcement Capability for New Development, Redevelopment, and Construction Sites

In 2025, the Public Works Development Services Division will continue implementing the City's permitting process, including civil/site plan review and approval for compliance with City of Federal Way standards. Public projects in the right-of-way that trigger local permits will also continue to be reviewed by internal stormwater engineers. During construction, Public Works staff will continue to conduct weekly site inspections to ensure the implementation of proper temporary erosion and sediment control (TESC) BMPs. City inspectors have the authority to enforce TESC standards for both private and public projects to reduce pollutants in stormwater runoff to the MS4 and surface waters that originate from new development, redevelopment, and construction site activities. ES staff will also continue reviewing and approving Spill Prevention Plans (SPPs) for sites requiring them and ensure future adherence to these SPPs during subsequent inspections.

In 2025, City staff completed a revision of the Development Standards to improve clarity and update LID criteria (for example, aligning municipal roadway cross-sections with LID standards).

The City has an ongoing program to verify that long-term operation and maintenance (O&M) of post-construction stormwater facilities and BMPs are implemented. The City requirements for maintenance standards are identified under the 2021 King County Stormwater Design Manual Appendix A, *Maintenance Requirements for Flow Control, Conveyance, and Water Quality Facilities*. In 2025, Public Works staff will continue post-construction inspections prior to the release of warranty bonds and will review post-construction inspection procedures in conjunction with the Development Standards update. Furthermore, Public Works staff will work on implementing increased site assessment procedures that align with the updated Department of Ecology standards for new development, redevelopment, and construction activities on plats, single-family, and commercial sites.



S5.C.6.d: Provide Notice of Intent (NOI) for Proposed New Development and Redevelopment

The City has made available electronic links to the Construction Stormwater General Permit and the Industrial Stormwater General Permit NOIs on the City's Development Services at www.cityoffederalway.com/publicworks/development-services.

S5.C.6.e: Ensure Staff Training for Implementation of Runoff Control Program

Plan reviewers are managed by a licensed professional engineer, and all City staff responsible for approval and inspection of new development, redevelopment, or construction are certified in Construction Erosion and Sediment Control Lead (CESCL). City inspectors also complete the Washington Department of Transportation Local Technical Assistance Program (LTAP) for construction inspection and documentation training, and the American Public Works Association (APWA) Construction Inspection Training. In 2025, management will also continue researching training opportunities for inspectors regarding soil classification and analysis. Currently, the City uses Headlight inspection software for Capital Improvements projects, ROW and Sound Transit inspections to standardize reports and allow cross training and support.

Stormwater Management for Existing Development

This is a new requirement for this permit cycle. Permittees shall implement a program to control or reduce stormwater discharges to waters of the State from areas of existing development. The program will focus on strategic stormwater investments over longer period.

S5.C.7.a-d: Implement stormwater retrofits or tailored SWMP actions that meet criteria in Appendix 12 of the permit.

In 2025, City staff will review retrofit projects completed after January 31, 2023 and review potential retrofit projects that will allow the City to reach its assigned equivalent acres of 16.3. We will also review potential non-structural projects and programs that will contribute up to 25% of our assigned equivalent acres. We will continue to provide updated list of projects and program to Ecology and revise as necessary. Per the permit we are required to have fully funded, start construction, or completely implement projects that meet the assigned acreage by March 31, 2028.

S5.C.7.e: Report and project estimated acres managed by stormwater retrofits for the next permit term.

The City will project and estimated acres managed by stormwater retrofits after we have reached assigned equivalent acres for this permit term.

Source Control Program for Existing Development



This program allows ES staff to better engage business owners in conversations about stormwater pollution, provide business-specific BMPs to prevent illicit discharges, and enforce illicit discharges if found during routine inspections. This program became a requirement during the 2019-2024 permit cycle. In 2025, ES staff will continue to assess and update the program to more effectively educate business owners and managers on the causes and harmful effects of stormwater pollution, what constitutes a water quality violation, and how the City enforces such violations and operational and structural BMPs tailored to their business activities that can assist with stormwater pollution prevention.

S5.C.8.a: Permittee shall update and enforce ordinances to require application of source control BMPs for pollutant generating sources.

Federal Way Revised Code 16.55.010 allows the City to enforce and require BMPs stated in the King County Stormwater Pollution Prevention Manual and/or the King County Surface Water Design Manual.

S5.C.8.b: Implement a program to identify publicly or privately owned sites that have potential to generate pollutants to the MS4 and update inventory every 5 years.

For 2025, City staff will update the source control inventory list as needed based on routine site inspections and perform source control inspection for all complaints.

S5.C.8.c: Implement an inspection program by qualified personnel.

In 2024, ES staff inspected 203 of 813 sites covering 24.9% of our inventory list. In 2025, ES staff will continue conducting regular source control site inspections and documenting inspections on the Surface Water Management network drive and ESRI survey123 database. Our Survey123 is formatted to include all required information for the annual report including, but not limited to business type, address, business contact information, and type of action taken such as technical assistance and/or enforcement.

ES staff will continue to assess and update the program to more effectively educate business owners and managers on the causes and harmful effects of stormwater pollution, what constitutes a water quality violation, and how the City enforces such violations and operational and structural BMPs tailored to their business activities that can assist with stormwater pollution prevention.

S5.C.8.d: Implement a progressive enforcement policy that requires site to comply with requirements within a reasonable time period.

The City's Source Control enforcement process is similar to our IDDE/IC program, and is up to our inspector's discretion on when to pursue enforcement on a case by case basis. We do enforcement when pollution is imminent. Source Control records for enforcement and technical assistance are saved in our Surface Water Management network drive.

Operations and Maintenance

SWM has an ongoing program to reduce stormwater impacts associated with the maintenance and operations of City streets, facilities, and properties. The program applies to drainage infrastructure, which includes catch basins, pipes, open channels, residential and regional retention/detention ponds and facilities, filter vaults, coalescing plates, dams, vortexes, snouts, bioswales, Filterra units, modular wetlands, pervious surface cleaning, flex storm inserts and tanks.



S5.C.9.a: Implement Maintenance Standards

In 2025, SWM maintenance personnel will continue to implement maintenance standards as outlined in the amended and adopted 2021 King County Stormwater Design Manual, which includes Appendix A: *Maintenance Requirements for Flow Control, Conveyance, and Water Quality Facilities*. All inspection forms utilized in routine stormwater system inspections are created using Appendix A as a guide.

S5.C.9.b: Maintain Stormwater Facilities Regulated by the Permittee

SWM staff have implemented a Private Commercial Site Inspection Program to ensure inspections of private storm facilities that discharge into the MS4 are within compliance of the KCSWDM. Before private commercial site inspections, the property owners are sent a preliminary notice letter detailing when we plan to arrive for inspection, what to expect, and how to prepare. During the inspection all stormwater structures are inspected to ensure they're in compliance of the KCSWDM. If no issues are found, property owners are sent a letter that they have passed inspection. If they fail the inspection, then they are sent a 30-day Maintenance Correction letter that details the required corrections, deadline, a map of the facility outlining which structures need maintenance, and a waste tracking form to ensure materials are disposed of properly. If corrections are not completed after the deadline, they are sent a 10-day Maintenance Correction letter to remind them that they need to complete corrections and states a deadline. If they do not complete the corrections after the 10-day letter deadline, the case is sent to the Water Quality team to issue a formal Notice and Order to Correct, that gives them 14 days to bring the site into compliance after which monetary penalties will begin to accrue daily. Private Commercial Site inspections are recorded in the City's network drive and tracked on Excel. Follow up inspection are conducted on a case-by-case basis. Generally, submittal of the Waste Disposal Tracking form is sufficient.

In 2025, SWM will continue to inspect stormwater treatment and flow control facilities regulated by the City, as required by the Permit. Facilities permitted by the City that discharge to the City's MS4 are inspected and maintained annually to verify long-term maintenance if the City was designated as the maintenance provider following construction completion. Any required repairs are recorded and scheduled in the City's asset tracking system, VUEWorks, as well as in the Surface Water Management Division's Operations & Maintenance network folder.

S5.C.9.c: Maintain Stormwater Facilities Owned or Operated by the Permittee

- In 2025, SWM will continue to inspect known municipally owned and operated stormwater treatment and flow control facilities as required by the Permit. Control structures, retention/detention ponds, tanks, vaults, flex storm inserts, snouts, filter vaults, and bioswales are inspected and maintained annually. Any required repairs are recorded and scheduled in VUEWorks, the City's asset data management system or on Eyes on Federal Way, an application built off SeeClickFix.

- SWM uses tablets to allow for more efficient and effective electronic recording, filing, and scheduling of inspections and inspection results. It also supports more accurate measuring and tracking of catch basin sediment levels during the annual catch basin inspections. SWM staff utilize ArcCollector to better manage catch basin inspection data. In conjunction with the City's Asset Management Coordinator, SWM staff are continually working to identify additional features that can be added for inspection documentation within GIS ArcCollector. In 2025, SWM staff will continue using GIS ArcCollector for inspections and inputting required maintenance into VueWorks.
- In 2025, SWM Inspectors will continue to use the Video Inspection Program as a tool to proactively manage the stormwater system to prevent flooding, drainage problems, and other water quality concerns. The program also supports several NPDES-related activities, including ongoing comprehensive mapping of the system, evaluation of management practices, and the improvement of the ability to trace spills and identify illicit connections to the MS4. In 2025, SWM Inspectors will continue to assess and identify stormwater system maintenance needs based on the structural scoring system utilized through the program. In 2025, SWM will continue with an implemented recurring schedule for video inspections to ensure infrastructure maintenance needs are fully supported.
- SWM staff will continue to inspect facilities vulnerable to surface water related problems before, during, and after major storm events to ensure the systems are functioning properly, and to determine/conduct any maintenance or repair needs.
- SWM will continue to inspect and clean (when necessary) catch basins owned by the City. SWM incorporated an annual assessment into the City's catch basin inspection program. Annual assessments include a review of the City's circuit schedules, actual inspection results, cleaning and maintenance records, new development or redevelopment schedules, changes in commercial use, and an evaluation of the previous year's snow and ice operations. SWM will use this assessment to adjust the City's circuits to comply with the requirements of an alternate inspection schedule under this Permit cycle.
- Upon reviewing historical inspection program data in 2019, SWM staff concluded that Permit requirements could be better met with a new inspection program that separates the City into Northern and Southern circuits, each containing approximately half of the City's total number of arterial and non-arterial catch basins. North Circuit Inspections fall on odd numbered years, while South Circuit Inspections fall on even numbered years. In 2025, SWM will continue inspecting all catch basins in the North Circuit.
- Under the catch basin inspection program implemented in 2020, SWM inspected, cleaned, and maintained arterial catch basins within the city's Southern half in 2024. In 2025, SWM will continue to inspect, clean, and maintain the arterial catch basins within the respective circuits of the City (including the border streets).
- In 2024 SWM procured a new CCTV Inspection Truck. This truck will be utilized to inspect public storm drainage facilities within city right-of-way and drainage easements. Inspections are designated to individual schedules which targets drainage pipes on arterial, collector, and local roadways. The CCTV truck is also utilized for video inspections of the stormwater infrastructure within the planned 2025 overlay project schedules.

- In 2022, SWM purchased a Vactor truck to assist with cleaning and maintenance of stormwater infrastructure within the City's MS4. For 2025, SWM will continue to utilize the Vactor truck and our contractor, Action Service, to do necessary storm structures maintenance for permit compliance.

S5.C.9.d: Implement Practices, Policies, and Procedures to Reduce Stormwater Impacts Associated with Runoff from All City Owned or Maintained Lands, and City-Controlled Road Maintenance Activities

In 2022, the City adopted the 2021 King County Site Management Plan (KC SiMPla) to reduce stormwater impacts associated maintenance of all lands owned and maintained by the City. In 2025, training on utilization of the KC SiMPla will be included in the annual IDDE and SWPPP training.

S5.C.9.e: Develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters. (No later than July 1, 2027).

Below is Federal Way's 2024 sweeping program statistics. In 2025, City staff will review the permit's street sweeping requirements and identify any potential deficiencies to meet the permits street sweeping program requirements.

2024 Federal Way Street Sweeping Program	
Type of Street	Miles Swept
Major Arterial	280.44
Minor Arterial	111.96
Collector Arterial	646.08
State Routes	184.56
Residential	591.76
Total	1,814.80

S5.C.9.f: Implement a Stormwater Pollution Prevention Plan for All Heavy Equipment, Maintenance, or Storage Yards, and Material Storage Facilities Owned or Operated by the Permittee

- In 2025, ESD staff will review and update the Stormwater Pollution Prevention Plan (SWPPP) and its appendices for the Public Works/Parks Maintenance Yard Annex located at 31130 28th Avenue South. These appendices include a drainage map of the Yard, a map of material storage locations in the Yard, and Excel worksheets that document staff responsibilities, inspection results, spill events, material storage locations, associated BMPs, and staff training. The Maintenance Yard is currently under construction for expansion therefore the Maintenance Yard SWPPP will have limited updates.
- In 2025, ES staff will update the SWPPP for the Federal Way Community Center. In addition to the Public Works/Parks Maintenance Yard Annex and Community Center, we also have SWPPPs for Celebration Park, Steel Lake Park, and City Hall.
- In 2025, ES staff will perform inspections of all sites with SWPPPs and update the annual SWPPP training to include sites with new SWPPPs. Training updates are usually completed between January to February and trainings are hosted in the Spring.

S5.C.9.g: Ensure Staff Training for Operations and Maintenance Personnel

City field staff are trained annually in IDDE/spill response procedures, SWPPP, and KC SiMPla. In 2025, personnel will be trained in IDDE and Spill Responses. In the few weeks following the training maintenance personnel will have discussions on utilizations of spill response materials. Licensed maintenance personnel are trained annually for pesticide/herbicide application, and this program will continue in 2025. In 2025, personnel will also be trained on how, when, and where to utilize the KC SiMPla to reduce stormwater impact during maintenance operations.

S5.C.9.h: Maintain record of the activities conducted

City staff maintain records of all operations and maintenance activities in our Surface Water Management network drive, ArcGIS database, and the City's Intranet. Older paper files are underway to be scanned and digitized into our network drive as time allows.

Monitoring

A collaborative monitoring program is paid for by Western Washington NPDES Permittees, administered by Ecology, and designed to monitor and evaluate the effectiveness of the best management practices specified in the Permit. The goal of the monitoring program is to provide an unbiased assessment of whether stormwater management actions are resulting in genuine progress towards regional water quality targets. The City will continue to pay into the Stormwater Action Monitoring (SAM) collective funds for the following projects:

- Implement regional water status and trends monitoring of either: small streams and marine nearshore areas in Puget Sound, or urban streams in Clark and Cowlitz Counties in the Lower Columbia River basins, depending on the Permittee's location.
- Stormwater Management effectiveness studies to provide widely applicable information about what best management practices work, or don't work, and how to improve stormwater management; and
- Source Identification Information Repository designed to share information about source identification and elimination methods and identify opportunities for regional solutions to common illicit discharges and pollution problems.

Conclusion

Links to the 2025 Annual Report and SWMP update are posted under “News and Updates” on the City’s Surface Water Management Division website at: <http://www.cityoffederalway.com/surfacewater>.

If at any time the City is unable to comply with the terms and conditions of the Permit, staff must notify Ecology within 30 days of becoming aware that non-compliance has occurred. Written notification must include a description of the non-compliance issue and steps planned or taken to achieve compliance. The City remains in compliance with the Permit and is using all known, available, and reasonable methods of prevention, control, and treatment to prevent pollution into the surface waters of Washington State.