



Annual Report

Number	Permit Section	Question
1	S5.A.4.	Attach updated annual Stormwater Management Program Plan (SWMP Plan) or website address in the Comment field where it can be found. (S5.A.4.) COS SWMP 2022_Final_1_03312022131942
1.a	S5.A.4.	Cite website of SWMP if unable to attach spokanestormwater.org
2	S9.C.6.	Attach a map and copy of any annexations, incorporations, or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.C.6. Not Applicable
3	S5.A.5.a.ii.	Tracked the estimated costs of implementation of each component of the SWMP. (S5.A.5.a.ii.) Yes
4	S5.A.6.b.	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.6.b.) Yes
5	S5.B.1	Were elements of a regional program implemented to complete any part of your education and outreach program? (S5.B.1) Yes
5a	S5.B.1	If yes, list the elements, and the regional program The Water Wise social media channel messages stormwater and has a regional reach within the Spokane region. The City of Spokane is a member of the Idaho Washington Aquifer Collaborative, Spokane Joint Aquifer Board, Spokane River Forum, and Spokane River Toxics Task Force organizations. The organizations are regional, and each of them provides outreach. The City of Spokane also partners with the Spokane Regional Health District, who performs regional voluntary pollution prevention business inspections.
6	S5.B.1.a.i.-iii.	Attach description of public education and outreach programs and stewardship activities conducted per S5.B.1.a.i.-iii. COS 2021 PE&O Summary_6_03312022003508
7	S5.B.1.a.ii.	Which types of businesses were targeted per S.5.B.1.a.ii.? Restaurant, automotive repair, lodging/hospitality, property management

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8	S5.B.1.b.	Used results of measuring the understanding and adoption of targeted behaviors among at least one audience in at least one subject area to direct education and outreach resources and evaluate changes in adoption of targeted behaviors. (Required no later than December 31, 2021, S5.B.1.b.) Yes
9	S5.B.2.a.	Describe in Comments field the opportunities created for the public to participate in the decision making processes involving the development, implementation, and updates of the Permittee's SWMP. (S5.B.2.a.) The SWMP was posted online on April 1st, 2021 and accepted comments for 30 days. City provides many opportunities for public involvement and participation in its decisionmaking processes via open City Council; Public Infrastructure, Environment, and Sustainability Committee; and Planning Commission meetings on a weekly basis. Information on how to participate at City Council meetings and meeting agendas are provided on the City's City Council website prior to the occurrence of the meeting. The City publication The Gazette publishes the meeting minutes from the City Council, as well as all call for bids, which include stormwater management, infrastructure, and funding issues and projects. Examples of opportunities for public involvement include rate structured discussions, stormwater mitigation grants and projects; stormwater infrastructure improvements; joint planning of the stormwater management plans; and, ordinance creation or revisions, among others, at the Committee level and at City Council Meetings. Public involvement is a required component of the ordinance process. Involvement of any interested member of the public is encouraged through workshops, open houses and a formal public comment period. For example, an ordinance regarding the inspection of private post-construction stormwater facilities went through the City Council approval process in 2021, and included the following opportunities for the public to participate. Notifications were made to the affected property owners and to the general public: • September 2021 - Planning Commission workshop and hearing 2 public notices published in Spokesman Review • September 2021 - Public Infrastructure, Environment, and Sustainability Committee • September 2021 - City of Spokane blog post • September/October 2021 - Notification letter sent out to all affected properties • October 2021 - City Council advance briefing, first reading, and final hearing 2 public notices published in Spokesman Review Many of the stormwater activities that the city undertakes in order to meet the goal of the permit (i.e. protect water quality) goes through City Council, which as demonstrated above, inherently provides the public opportunities to participate, and the public participates.
10	S5.B.2.b.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. Yes
10a	S5.B.2.b.	List the website address in Comments field. (S5.B.2.b.) spokanestormwater.org
11	S5.B.3.a.	Maintained a map of the MS4 that includes the requirements listed in S5.B.3.a. (Updated maps required no later than August 1, 2023) No
12	S5.B.3.a.i.	Attach a spreadsheet that lists the known outfalls and discharge points, including the outfalls' size and material(s). (Required to update no later than August 1, 2023, S5.B.3.a.i.) Not Applicable
13	S5.B.3.a.ix.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.B.3.a.ix. (Required no later than August 1, 2021) Yes

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14	S5.B.3.b.	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.B.3.b. Yes
15	S.5.B.3.b.vii.	Updated ordinance or regulatory mechanism to meet the requirements of this permit, if necessary. (Required no later than February 2, 2023, S.5.B.3.b.vii.) Not Applicable
16	S5.B.3.b.vi.	Implemented a compliance strategy, including informal compliance actions as well as enforcement provisions of the regulatory mechanism described in S5.B.3.b. (S5.B.3.b.vi.) Yes
17	S5.B.3.c.	Implemented procedures for conducting illicit discharge investigations in accordance with S5.B.3.c. Yes
18	S5.B.3.c.iv.	Percentage of MS4 coverage area screened in reporting year per S5.B.3.c.iv. (Required to screen 12% on average each year, S5.B.3.c.iv.) 92
18a	S5.B.3.c.iv.	Cite field screening techniques used to determine percent of MS4 screened. Routine maintenance and inspections of catch basins, swales, outfalls, and drywells by fulltime stormwater crews and inspectors. Routine maintenance and inspections of stormwater pipes by TV van operators. Response to illicit discharge reports made to the City by the public and Ecology.
18b	S5.B.3.c.iv.	Percentage of total MS4 screened from permit effective date through end of the reporting year. 98
19	S5.B.3.c.v.	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.B.3.c.v.) The hotline number 625-7999 is published on public education flyers that were handed out by at events before the 2020 pandemic but are still valid. Spokane Regional Health District the Pollution Prevention Program provides flyers with the hotline number as part of their information packet during their facility inspections. During response to illicit discharges the wastewater inspectors provide educational flyers to the public they interact with. The websites for the City of Spokane, Spokane Kootenai Waste Directory, and Spokane Riverkeeper have the City of Spokane illicit discharge number posted. Neighborhood council meetings were attended and a presentation given that cited the hotline number, and brochures were handed out that displayed 625-7900 as the contact number for anything stormwater related, which leads the public to the same departments as the hotline. The hotline number is listed on drain markers citywide.
20	S5.B.3.c.vi.	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.B.3.c.vi. Yes

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21	S5.B.3.c.vii.	<p>Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.B.3.c.vii.)</p> <p>City of Spokane partners with the Spokane Regional Health District, and public education flyers with a focus on illicit discharges were provided to Spokane Regional Health to include with the information packet provided to businesses participating in the Pollution Prevention Program inspections. During response to illicit discharges the wastewater inspector provides educational flyers to the persons they engage. The City of Spokane provides support for the Spokane Kootenai Waste Directory whose mission is to provide guidance to the community on the proper disposal of wastes. Brochures focusing on illicit discharges and how to properly manage common stormwater impacting wastes were handed out at neighborhood council meetings.</p>
22	S5.B.3.d.	<p>Implemented an ongoing program designed to address illicit discharges, including spills and illicit connections into the MS4 per S.5.B.3.d.</p> <p>Yes</p>
23	S5.B.3.e.	<p>Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program, as described in S5.B.3.e.</p> <p>Yes</p>
24	S5.B.3.f.	<p>Attach a report with data describing the actions taken to investigate, characterize, trace and eliminate each illicit discharge found by or reported to the permittee. The submittal must include all of the applicable information and must follow the format and timelines described in Appendix 7. (S5.B.3.f.)</p> <p>COS Annual Report IDDE 2021_Fi_24_03312022132326</p>
25	S5.B.4.a.	<p>Implemented an ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.</p> <p>Yes</p>
26	S5.B.4.a.i.-iv.	<p>Adopted ordinance or other regulatory mechanism and enforcement procedures for construction site stormwater runoff control as described in S5.B.4.a.i.-iv. (Required no later than December 31, 2022)</p> <p>Yes</p>
26a	S5.B.4.a.i.-iv.	<p>Cite code reference.</p> <p>SMC Chapter 17D.090 Erosion and Sediment Control</p>
27	S5.B.4.b.	<p>Reviewed site plans for all new development and redevelopment projects as described in S5.B.4.b.</p> <p>Yes</p>
27a	S5.B.4.b.i.	<p>Number of site plans reviewed during the reporting period. (S5.B.4.b.i.)</p> <p>143</p>
27b	S5.B.4.b.i.	<p>The number of construction sites that provided their intent to apply for the "Erosivity Waiver" during the reporting period as described in S5.B.4.b.i.</p> <p>0</p>

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27c	S5.B.4.b.i.	The number of complaints investigated about sites that have received an "Erosivity Waiver" . (S5.B.4.b.i.) Not Applicable
28	S5.B.4.	Implemented procedures for site inspection and enforcement of construction stormwater pollution control measures. (S5.B.4.) Yes
28a	S5.B.4.c.i.	Number of permitted construction sites inspected during the reporting period. (S5.B.4.c.i.) 62
28b	S5.B.4.f.	Number of enforcement actions taken during the reporting period based on construction phase inspections at new development and redevelopment projects. (S5.B.4.f.) 1
29	S5.B.4.d.	Trained the staff involved in permitting, plan review, field inspections, and enforcement for construction site runoff control. (S5.B.4.d.) Yes
30	S5.B.4.e.	Provided information to construction site operators and design professionals about training available on how to comply with the requirements in Appendix 1 and the BMPs in the SWMMEW, or an equivalent document. Describe information provided in the Comments field. (S5.B.4.e.) Yes
30a	S5.B.4.e.	Describe information provided in the Comments field. (S5.B.4.e.) The Developer Services Center works with developers, their engineers, and the contractors through the entire process from design to construction to issuance of Certificate of Occupancy. Early in the process the Center engineers hold a pre-development meeting to go over the project and what will be required. A summary of the meeting is provided to the project proponents afterward, and in the summary it identifies opportunities to receive CESCL training.
31	S5.B.5.a.	Implemented ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a. Yes
32	S5.B.5.a.	Revised ordinance or other regulatory mechanism and enforcement procedures to address post-construction stormwater controls runoff to the MS4 from new development and redevelopment as described in S5.B.5.a. (Adopted no later than December 31, 2022) Not Applicable
33	S5.B.5.b.ii.(a)	Allowed non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) techniques to be used. (S5.B.5.b.ii.(a)) Yes
34	S5.B.5.b.ii.(b)(2)	Required projects approved under S5.B.5. to retain runoff generate on-site for, at a minimum, the 10-year, 24-hour rainfall event or a local equivalent, using either on-site or regional stormwater facilities. (S5.B.5.b.ii.(b)(2)) Yes

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35	S5.B.5.d.	Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment sites. (S5.B.5.d.) Yes
35a	S5.B.5.d.i.	Number of new and redeveloped sites inspected during installation of structural BMPs during the reporting period. (S5.B.5.d.i.) 62
35b	S5.B.5.d.i.	Number of new and redeveloped sites inspected upon final installation of BMPs or upon completion of the project during the reporting period. (S5.B.5.d.i.) 62
36	S5.B.5.d.ii.	Inspected structural BMPs at least once every five years after final installation. (S5.B.5.d.ii.) No
37	S5.B.5.d.	Number of enforcement actions taken as a result of these inspections during the reporting period? (S5.B.5.d.) 0
38	S5.B.5.e.	Trained the staff involved in permitting, plan review, inspection, and enforcement for post-construction stormwater control. (S5.B.5.e.) Yes
39	S5.B.5.f.	Provided information to design professionals about training available on how to comply with the requirements in Appendix 1 and apply the BMPs in the SWMMEW, or an equivalent document. (S5.B.5.f.) Yes
39a	S5.B.5.f.	Describe information provided and cite the manual used All design professionals are directed to use the Spokane Regional Stormwater Manual when submitting plans for the City of Spokane to review for permitting, and the following guidelines are provided in pre-construction meetings: City of Spokane Stormwater Compliance Guide https://spokaneriver.net/wpcontent/uploads/2016/04/spokanestormwaterguide.pdf Additionally, during the pre-development meeting and in the pre-development meetingnotes that following statement is provided. "The following link provides information on ESC training and certification programs: https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Certified-erosion-sediment-control"
40	S5.B.6.a.	Reviewed and, if needed, updated Operations and Maintenance Plan. (Required no later than December 31, 2022, S5.B.6.a.) Not Applicable
41	S5.B.6.a.	Implemented the schedule of Operation and Maintenance activities for municipal operations. (S5.B.6.a.) Yes
42	S5.B.6.a.i.(f) and (g)	Have NPDES permit coverage for all applicable Permittee construction projects and industrial facilities. (S5.B.6.a.i.(f) and (g)) Yes

Number	Permit Section	Question
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43	S5.B.6.a.i.(h)	Implemented a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.B.6.a.i.(h)) Yes
44	S5.B.6.a.ii.(a)	Inspected stormwater treatment and flow control facilities (except catch basins) owned or operated by the Permittee at least once every two years. (S5.B.6.a.ii.(a)) Yes
44a	S5.B.6.a.ii.(a)	Number of facilities inspected during the reporting period. 1266
45	S5.B.6.a.ii.(b)	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? (Required at least once every two years, S5.B.6.a.ii.(b)) Yes
45a	S5.B.6.a.ii.(b)	Number of known catch basins. 16625
45b	S5.B.6.a.ii.(b)	Number of catch basins inspected during the reporting period. 15360
45c	S5.B.6.a.ii.(b)	Number of known catch basins cleaned during the reporting period. 1584
46	S5.B.6.a.ii.(b)	If used an alternative to standard schedule for catch basin inspections for all or a portion of the MS4, attach description of the method used. (S5.B.6.a.ii.(b)) Not Applicable
47	S5.B.6.a.ii.(c)	Conducted spot checks of stormwater facilities after major storms. (S5.B.6.a.ii.(c)) Yes
48	S5.B.6.b.	Trained the staff with primary construction, operations, or maintenance job functions that are likely to impact stormwater quality. (S5.B.6.b.) Yes
49	S7.A.	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A.) Yes
50	S7.A.	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A.) COS TMDL Summary 2021_50_03312022003335

Number	Permit Section	Question
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51	S8.A.	<p>Attach a summary of your participation in effectiveness study development and implementation during the reporting year. (S8.A.1. and S8.A.2.a.)</p> <p>COS Effectiveness Study Summar_51_03312022010036</p>
52	S8.A.	<p>Did you submit a list of project participants and their associated roles to Ecology. (Required to submit by June 30, 2021, S8.A.2.b)</p> <p>Yes</p>
56	S8.A.	<p>Was the SWMP updated to include effectiveness study activities? (S8.A.2.f.)</p> <p>Yes</p>
57	G3.	<p>Notified Ecology in accordance with G3. of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare, or the environment. (G3.)</p> <p>Not Applicable</p>
58	G3.A.	<p>Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.</p> <p>Yes</p>
58a	G3.A.	<p>Actions taken to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.</p> <p>No discharges occurred which could constitute a threat to human health, welfare, or the environment. The City did not take actions to correct or minimize the non-existent threat to human health, welfare, and/or environment due to discharges, per G3.A.</p>
59	G20.	<p>Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20.)</p> <p>Not Applicable</p>
60	G20.	<p>Number of non-compliance notifications provided in reporting year. (G20.)</p> <p>Not Applicable</p>
61	S4.F.1.	<p>Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1.)</p> <p>Not Applicable</p>
62	S4.F.3.a.	<p>If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.</p> <p>Not Applicable</p>
63	S4.F.3.d.	<p>Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3. and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d.)</p> <p>Not Applicable</p>

Attachments:

View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
View	Submitted Copy of Record for City of Spokane	Copy of Record CityofSpokane Thursday March 31 2022	.pdf	1234524	1814956	wqwebportal
View	WAR046505_6_03302022204833	COS 2021 PE&O Summary_6_03302022204833	.pdf	1234320	1814956	wqwebportal
View	WAR046505_6_03312022003407	COS 2021 PE&O Summary_6_03312022003407	.pdf	1234331	1814956	wqwebportal
View	WAR046505_6_03312022003426	COS 2021 PE&O Summary_6_03312022003426	.pdf	1234332	1814956	wqwebportal
View	WAR046505_6_03312022003431	COS 2021 PE&O Summary_6_03312022003431	.pdf	1234333	1814956	wqwebportal
View	WAR046505_6_03312022003443	COS 2021 PE&O Summary_6_03312022003443	.pdf	1234334	1814956	wqwebportal
View	WAR046505_6_03312022003451	COS 2021 PE&O Summary_6_03312022003451	.pdf	1234335	1814956	wqwebportal
View	WAR046505_6_03312022003502	COS 2021 PE&O Summary_6_03312022003502	.pdf	1234336	1814956	wqwebportal
View	WAR046505_6_03312022003508	COS 2021 PE&O Summary_6_03312022003508	.pdf	1234337	1814956	wqwebportal
View	WAR046505_24_03312022132326	COS Annual Report IDDE 2021_Fi_24_03312022132326	.pdf	1234515	1814956	wqwebportal
View	WAR046505_51_03312022010036	COS Effectiveness Study Summar_51_03312022010036	.pdf	1234338	1814956	wqwebportal
View	WAR046505_1_03312022131942	COS SWMP 2022_Final_1_03312022131942	.pdf	1234509	1814956	wqwebportal
View	WAR046505_50_03312022003335	COS TMDL Summary 2021_50_03312022003335	.pdf	1234330	1814956	wqwebportal
View	Submitted Cover Letter for City of Spokane	Cover Letter CityofSpokane Thursday March 31 2022	.pdf	1234525	1814956	wqwebportal

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2021
City of Spokane
Illicit Discharge Summary

2021 City of Spokane Annual Report IDDE Summary

Jurisdiction name and permit number	Date incident discovered	Date beginning response	Date end response	How was the incident discovered or reported to you	Discharge to MS4	Street Address or Intersection	Pollutants Identified	Source or Cause	Source tracing approach(es) used	Correction / elimination methods used	Field notes, explanations, and/or other comments
City of Spokane, WAR046505	1/3/2021	1/3/2021	1/13/2021	Other agency referral	Yes, No Notice Required	UNK24 Th. Ave. and Madison St	Fuel and/or vehicle related fluids	Other commercial/industrial activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I was dispatched up to 24 Th. Ave. and Madison St. to meet Sean Thompson from the Dept. of Ecology due to Hydraulic Fluid on the street. Sean Thompson had put booms around the Catch basins to mitigate the fluid from entering the sanitary sewer system. I put absorbent pads in the catch basins that were affected by the fluid. Me and Sean put absorbent on the street in the spots with larger fluid build up, the absorbent will be cleaned up today and the pads in the Catch Basins will be removed on Thursday the 7 Th. to allow the fluid on the street to be separated from the rain water entering the catch basins. On 1/5/2021 crew 5 cleaned up absorbent from street surface. W/O 42166. The Wadles left out by Dept. of Ecology and the Absorbent pads that I left in the Catch Basins were, picked up by Crew 5 under W/O 42225 on January 7 th.
City of Spokane, WAR046505	1/8/21	1/8/21	6/10/2021	Other agency referral	Yes, No Notice Required	840 E Spokane Falls Blvd	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	The Spokane County Assessor's SCOUT Property Information website shows this parcel to equal 66,878 square-foot. Any project that disturbs more than one acre of soil requires a Construction Stormwater General Permit. In addition, the catch basins in the street surrounding the site appear to discharge directly to the Spokane River. For more information or technical assistance in obtaining a Construction Stormwater General Permit, please contact Shannon Adams at (509) 329-3610 or via email at Shannon.Adams@ecy.wa.gov. This project did not obtain a Construction Stormwater General Permit. They have a laydown yard that should have been included in their construction
City of Spokane, WAR046505	1/11/2021	1/11/2021	1/11/2021	Staff referral	Yes, No Notice Required	Carlisle and Ralph	Paint	Unconfirmed, unspecified, or not identified	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Appears that a 1 gallon paint can fell off a truck and splattered on the street. Cleaned up spilled paint with absorb and sweep up.
City of Spokane, WAR046505	1/12/2020	1/12/2021	6/11/2021	Staff referral	Yes, No Notice Required	Lincoln Way and Bolan Ave.	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Drove to Bolan Ave & Lincoln Way and followed the turbid water up the hill. We found that the property at 5010 S Lincoln Way is being developed into 10 parcels. The water is flowing off the site and down the hill. This parcel is owned by and developed by Josh Taylor. I called Josh Taylor and told him of the muddy water running off of property and causing an issue down stream and that he needs to come immediately to get it taken care of. Josh showed up along with his excavator to look at the site. They dug a ditch on site from the area that the water was leaving the site to the west end of the property that connects to a drainage ditch on the south side of Lincoln Way. They then started to clean up the dirt and debris on the side walk in that area. Josh then visited the intersection of Bolan Ave & Lincoln Way and seen all the dirt & debris that

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City of Spokane, WAR046505	2/1/2021	2/1/2021	2/2/2021	ERTS referral	Yes, No Notice Required	3206 N Division	Soap or cleaning chemicals	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove up to 3206 N. Division st and inspected the Catch Basin on the southwest corner of the property, there was a small amount of water in the basin and I did not notice any sheen on the water to indicate any type of automotive fluids of any amount in the standing water. I made contact with the company owner and discussed better management practices, and gave her a couple of pamphlets, and a copy of the Spokane municipal code regarding illicit discharges. The owner Rachael R. Smith was very cordial and stated that she did not know about the regulations regarding illicit discharges in the City of Spokane. I discussed some options for their business to bring it into regulation, due to the grade of the property and it is all asphalt. We discussed using a portable wash area with oil water separation and directing the water to
City of Spokane, WAR046505	2/4/2021	2/4/2021	2/10/2021	Pollution hotline (phone, web, app)	Other agency referral	517 S Division St	Sewage/septage/pe t waste/human waste	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Comments from Dave Heckler: Alley S/O of 6th Ave E/O Division St (517 S Division St) had sewage on ground in the alley. Appears to be coming from cleanout cap at the northwest corner of building. Cleaned sewage from alley and pumped the basin in the alley. Approximate sewage pumped 50 gallons. Supervisor Jim Montague unable to contact land lord at this time. Comments from Jim Montague: Contacted Nick Brock landlord on 2-4-2021. Nick said they were working on the side sewer line yesterday (2-3-2021). Nick said he will call his guys back and see if the line is plugged. 2-9-2021 I talked with Nick on 2-9-2021. Nick said he did have his crew out on 2-4-2021 after I talked to him. 2-5-2021 The line was not blocked by 6th Avenue on 2-5-2021
City of Spokane, WAR046505	2/24/2021	2/24/2021	2/25/2021	Other agency referral	Yes, No Notice Required	2316 W 1 st Ave	Fuel and/or vehicle related fluids	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Dept of Ecology received a call for a strong fuel smell coming from private drywell on property, Dept of Ecology Sean Thompson responded to this call and cleaned up the fuel. There is no response needed from our dept at this time.
City of Spokane, WAR046505	3/5/2020	3/5/2021	3/8/2021	Other agency referral	Yes, No Notice Required	1728 W Cleveland Ave	Unconfirmed, unspecified, or not identified	Unconfirmed, unspecified, or not identified	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	11:00 AM Intersection of Oak St and Cleveland Ave on the NEC CB, someone dumped what appears to be grout or cement residue into the NEC CB of Oak & Cleveland. Tried to contact the person at 1728 W Cleveland but no answer. I left a door hanger for them to call me along with brochure's and my business card. Andrey Germanovich (509)-217-0587 of 1728 W Cleveland Ave gave me a call at 10:25 AM 3-8-2021. I asked him if knew what was dumped into the CB. He said it was just dirty water after cleaning his tools. I asked what it was that he was cleaning off of his tools and I was unable to understand what was said. It looks like residue from sanded grout that is used in grouting tile with 3/16" or bigger grout line. I told him that under no circumstances is anyone allowed to pour anything down the drain. I explained different ways to get rid of the

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City of Spokane, WAR046505	3/29/2021	3/29/2021	3/30/2021	Other agency referral	Yes, No Notice Required	St. Thomas Moore Way and Kyle Ct	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove up to St. Thomas Moore Way and Kyle Ct., and took pictures of dirt and sediment on the street, ada ramps, the curb line, and the grate of a Catch Basin. I made contact with the contractor and met on site with the supervisor for the job,(Paul Vasconcelos). I explained to Paul that all of the mud and sediment has to be cleaned up when they are finished with their project. Due to the large amount of clay in the soil in this area, I suggested returning the day after the job is complete and re sweeping the area after the soil has time to dry. I also requested that the company (Florida Armstrong Boring) use sand bags when working uphill or next to a Catch Basin to mitigate the sediment and water from the core drilling and the boring from entering the Catch Basin. Paul was very cooperative and understood the request and agreed to clean the mud up and sweep the area.
City of Spokane, WAR046505	4/6/2021	4/6/2021	UNK	Pollution hotline (phone, web, app)	Yes, No Notice Required	524 E DAVE CT	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I talked to owner of vehicle about diesel fuel leaking from truck onto the street, I gave them a pamphlet on better management practices, and instructed him that he needed to clean up the fuel and put a drip pan underneath the vehicle until he has it cleaned. The owner of the home is Brian Long, I spoke to the renter of the house.
City of Spokane, WAR046505	4/6/2021	4/6/2021	12/28/2021	Other agency referral	Yes, No Notice Required	1510 S Upper Terrace Rd	Sediment/soil	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Talked with the Jewel Excavating about the DOE call and what the need to do. Talked about track off and water runoff from site and BMP's.Gave him a brochure. Called Parson's Construction and talked Joyce about what is going on. She said she would talk to Dave about it and get it corrected. Work has stopped because the project has not been fully accepted or permitted by the city.
City of Spokane, WAR046505	3/12/2021	3/12/2021	UNK	Other agency referral	Yes, No Notice Required	9TH AND WALNUT	Soap or cleaning chemicals	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Me and Rod Glasser drove up to 9 Th. Ave. and Walnut St. and talked with Julie Garcia the Executive of Jewels Helping Hands, the building 1428 W. 9 Th. Ave. is a current homeless shelter. Julie Garcia assured us that the portable shower has a small leak and was not intentionally discharging onto the street, and that the leak was fixed yesterday. We interated to her that the shower could not discharge onto the street because those catch basing in that particular area discharged directly to Latah Creek. Julie Garcias phone number is 509(263)5502 and her email is jewelhellinghandspokane@gmail.com. There are numerous shower spots set up around spokane and we will be monitoring them for any other discharge calls.

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City of Spokane, WAR046505	4/26/2021	4/26/2021	UNK	Pollution hotline (phone, web, app)	Yes, No Notice Required	2822 E. Wellesley	Soap or cleaning chemicals	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Parking strip on the east side of residence at 2822 E. Wellesley has been used as an area to work on numerous vehicles, leaving large amounts of oil and vehicle fluids on parking strip. I talked to Cynthia Rushing, the owner of the property and I was assured that the area would be cleaned up and further work on vehicles would not be done on the street. Cynthia Rushing's phone number is 509-608-2344. The homeowner seemed to be cooperative, and I will be driving by this address on occasion to make sure that city of Spokane ordinance is being followed as it pertains to the discharge of contaminates onto the street.
City of Spokane, WAR046505	4/26/2021	4/26/2021	UNK	Pollution hotline (phone, web, app)	Yes, No Notice Required	3228 N. Nelson St	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove to 3228 N. Nelson St and there were several vehicles on the north and south side of Liberty Ave. along with oil spots. I talked to the renter of the residence (Daryl Campbell 509-608-6600) and he assured me that he would have a couple of the vehicles removed and would be cleaning the oil off of the street. I will be driving by the residence periodically to insure that the oil is cleaned up off of the street, I left a BMP manual and a copy of Spokane Municipal Code in reference to the issue of vehicle fluids on the street.
City of Spokane, WAR046505	5/5/2021	5/5/2021	5/12/2021	Direct report to your staff	Yes, No Notice Required	2912 N Hemlock	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove by the residence and took pictures of the oil drum sitting in the driveway of 2912 N. Hemlock, the oil drum is empty but has leaked in the past and deposited oil in the alley. I tried to make contact with the residents and was unable to get anyone to come to the door, I will be driving back by the residence again to make contact. 5/12/2021 I made contact with the renter of the property, Craig Wilbur, 509-217-0787 and informed him of the call I received on the oil spill in the alley. Craig informed me that either a person or the wind blew the oil drum over with approximately 5 gallons of used oil in it that leaked onto the alley surface. Craig assured me that he was going to clean up the spill, I left him with a bag of dry sweep and some oil absorbent towels to assist with the clean up effort. Craig also stated to me that he was going to steer the oil drum inside the garage from now.
City of Spokane, WAR046505	5/6/2021	5/6/2021	5/12/2021	Other agency referral	Yes, No Notice Required	1704 E EVERETT	Fuel and/or vehicle related fluids	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove up to 1704 E. Everett Ave. I took pictures of the curb line, and tested the soil with my fingers, there was no petroleum smell or feel to the substance in the street. I knocked on the door of the residence and received no answer. When I returned to the office I called the company and talked with the owner and he informed me that the spill that occurred in the back of one of his work trucks was an organic lawn supplement. I discussed BMP's with Jose and requested that he secure all chemicals and lawn supplies better when moving from job site to job site, and he assured me that he would take more care during use and transportation.

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City of Spokane, WAR046505	5/12/2021	5/12/2021	5/12/2021	Pollution hotline (phone, web, app)	Yes, No Notice Required	5311 N Ash	Sewage/septage/pe t waste/human waste	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove to the alley w/o Ash St. directly behind 5311 N Ash St. and confirmed that the grate on the drywell and the bottom of the drywell had human waste and toilet paper in them. I did not find the perpetrator of the offense, but dispatched a truck up to the asset to have the grate cleaned and the drywell pumped. I will be checking this drywell on occasion to make sure that this does not happen in the future.
City of Spokane, WAR046505	4/12/2021	4/12/2021	7/27/2021	Direct report to your staff	Yes, No Notice Required	10608 N Wieber	Soap or cleaning chemicals	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove up to the residence at 10608 N Wieber Dr. several times and knocked on the door to talk with the owner and was unable to make contact, on 5/13/2021 at 10:00 AM I left a door hanger with my information. At 11:00 AM Christina Goodrich called my number and I explained to her that she could not allow soapy water to leave her property and enter the storm system. Christina stated that she did not know that it was in violation of city ordinance and that she would find another way to wash her car as to not cause an issue. I recommended washing her vehicle in the grass, or using sand bags to direct the soapy water to the grass from the driveway. I received an email on July 23 rd. 2021, regarding the washing of vehicles and motorcycles in the driveway and allowing the water to leave property and flow into the storm system.
City of Spokane, WAR046505	5/18/2021	5/18/2021	7/12/2021	Direct report to your staff	Yes, No Notice Required	834 E Decatur	Sediment/soil	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I investigated this and found gravel, grass clippings and other debris in the alley, and plugging the catch basin. I made contact with the home owner and met him in the alley to discuss the issue. The homeowner, Andrew Doughty ph # 509-666-1790 informed me that his portable pool liner ruptured earlier that morning and discharged approximately 2500 gallons of water into the back yard. This was not an intentional act and he did not realize that it deposited all of the debris into the alley. I asked Andrew to clean up the debris from the alley and he assured me that he would sweep up the debris. I will be driving back by the residence to inspect that the issue is corrected. I drove by the property and the debris in the alley was cleaned up and the drywell grate was reopened.
City of Spokane, WAR046505	5/20/2021	5/20/2021	5/20/2021	Staff referral	Yes, No Notice Required	2822 E WELLESLEY	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I took pictures of the oil on the street, the transmission, a gas can, and other debris. I made contact with the homeowner for the second time and issued a notice of violation on the code violation. I left a pamphlet on better management practices, a copy of the code violation, and a copy of Spokane municipal code on vehicle maintenance in the street and the code on illicit discharge violations. I instructed the homeowner Cynthia Rushing that the vehicle maintenance would have to cease, and the vehicle fluids would need to be cleaned up by June 3 rd. 2021.

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City of Spokane, WAR046505	5/25/2021	5/25/2021	8/3/2021	ERTS referral	Yes, No Notice Required	1823 E Wabash	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	arrived at 1823 E Wabash Ave at 3:35 PM. I talked to Shawn Heely the owner of the car. He told me was homeless and then proceeded to give me an address of 6123 N Regal St as where he lived and a phone # of 509-953-1415. Shawn said the car broke down at this location (friends house) and that he was fixing it. Said his friend that lives at 1823 E Wabash has nothing to do with his mess. I talked about what he needs to do to get it cleaned up and about what BMP's he needs to do to prevent the oil from running down the curb to a storm drain. He said he was waiting for his girlfriend to show up so he could go to the store to buy some absorbent for the oil. I told him he needs to get this cleaned up right away. Shawn said he need to get a part at Pull & Save tomorrow to get it fixed. I gave Shawn a brochure on the BMP's and Managing Stormwater. I asked him what he needs to do to get it cleaned up.
City of Spokane, WAR046505	6/1/2021	6/1/2021	6/2/2021	Staff referral	Yes, No Notice Required	W Riverview	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Me and Rod Glasser drove to Euclid and Riverview Ave and took pictures of a blue ford truck, that had leaked gasoline onto the street next to a storm drain, there were used fuel parts in the back of the truck and I noticed that the vehicle had a new fuel tank selector canister installed, the fuel did not enter the storm drain. 6/2/2021 vehicle was moved from its location, no new fuel leaks apparent, some minor damage to asphalt.
City of Spokane, WAR046505	6/7/2021	6/7/2021	6/9/2021	Staff referral	Yes, No Notice Required	Greenwood Blvd.	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	White Toyota Celica parked on Greenwood Blvd. to the west of Wellesley Ave leaking a large amount of engine oil onto street. Neighbor says vehicle operator does not live on the same street and periodically walks to their vehicle and then parks it in the same spot when done. I have left some BMP paperwork with the vehicle and requested owner to contact me to discuss the clean up of the street and mitigation of the vehicle leak. If I do not receive a call from the owner of the vehicle within 3 business days I will be contacting code enforcement to have the vehicle removed. I drove by Greenwood Blvd and Wellesley Ave, on June 8 Th., and June 9 Th., the vehicle was moved and I cleaned up the oil.
City of Spokane, WAR046505	6/5/2021	6/5/2021	12/28/2021	Pollution hotline (phone, web, app)	Yes, No Notice Required	2922 E 35th Ave	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I stopped by the address of 2922 E 35th Ave. The car in question is a Silver Audi A6 Vin #WAUJT64B32N129895. It appears that this is an abandoned vehicle. The car has dents all over, the interior has been trashed, the ignition has been drilled out, the radio is gone and the airbag has been removed. I called crime check and they said the VIN # doesn't come up as stolen. It does have a temporary license dated 4-21-2021 on the rear window. I think this will be a call for Code Enforcement. Maybe they can find out the owner of the car by the VIN #. I did put absorbent and pads down for the leaking oil. If Code Enforcement could give me a call it they can come up with any contact information or when the car is towed, I can get the oil cleaned up. 6-16-2021 Code enforcement call and said car has been removed. Cleaned up oil and disposed for the department.

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City of Spokane, WAR046505	6/8/2021	6/8/2021	UNK	Staff referral	No – cleaned up before reached MS4	909 S. Grand Ave	Sewage/septage/pe t waste/human waste	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Rob Jamison drove by on June 9 th and checked the job site and verified that the right of way was cleaned up, later on the 9 th Ralph Kirby district supervisor drove by and talked with the contractor, the city right of way was cleaned and disinfected and Ralph Kirby was informed that AAA contracting would be returning to clean and disinfect the area on private property on June 10, 2021. I will be driving by 909 S Grand and make sure the job site is thoroughly cleaned.
City of Spokane, WAR046505	6/8/2021	6/8/2021	7/12/2021	Pollution hotline (phone, web, app)	No – none found	Ray and 2nd Ave.	Sewage/septage/pe t waste/human waste	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove to Ray and 2nd Ave. and found no evidence of anything on the street, I drove the entire 6 block section of this neighborhood due to there being 12 recreational vehicles and approximately 20 vehicles parked in this area. I did not find any evidence of any septic tanks being emptied on the street and stopped and talked to a few occupants of the recreational vehicles, no one had seen anyone dumping anything. I will be driving by occasionally and checking on the status of the vehicles and occupants.
City of Spokane, WAR046505	6/1/2021	6/1/2021	6/11/2021	Direct report to your staff	Yes, No Notice Required	Southeast Blvd and Madelia St.	Sediment/soil	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	HECKLER, DAVID 6/1/2021 3:41:33 PM CHECKED PVT SMH ON SOUTHEAST BLVD & MEDELIA. SEWAGE AT PICK HOLES. SOME RESIDUE SEWAGE ON STREET. PVT SMN CONNECTS TO SEWER ON 18TH AVE. CHECKED UPSTREAM & DOWNSTREAM MH'S OF SMN ON 18TH - MEDELIA & MH E/O MEDELIA. HYDROED SMN. CITY MAIN OK. 1705 E 19TH & 1625 E 19TH ARE CONNECTED TO PVT SMN ON MEDELIA. ATTEMPTED TO CONTACT HOMEOWNER OF 1705 E MEDELIA. THEY WERE NOT HOME.
City of Spokane, WAR046505	6/14/2021	6/14/2021	6/15/2021	Direct report to your staff	Yes, No Notice Required	4309 E Joseph	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Business owner at 4309 E Joseph (Leonard Hamilton) had a large oil leak in alley that ran out into Havana St. and to the south, oil stopped just before entering the drywell. I made contact with the owner and he referred me to Brad, his jobsite manager,(1-509-496-0991). I walked back to the alley with Brad and explained what had happened and that the dirt in the alley that was soaked with oil had to be removed and hauled off and that new dirt would have to be brought in and graded out. Randy Nord the WWS operator that reported the incident used 3 bags of absorbal and cleaned the curb line on Havana and removed the oil and Absorbal. Randy informed me that the owner of the business had already started work on the clean up at 4:05 pm when he returned to the office. I will be returning to the above address tomorrow to check on the progress of the cleanup. June 15, 2021 I drove by with

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City of Spokane, WAR046505	6/15/2021	6/15/2021	2/2/2022	Direct report to your staff	No – none found	Sprague Ave E/O D	Sewage/septage/pe t waste/human waste	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Addresses 120 E Sprague Ave and 123 E Sprague Ave and 130 E Sprague Ave. I talked to Joey Gonzalez from Halme Construction who is the site Superintendent phone # 509-951- 0107. I told Joey that there are 3 SSO's (side sewer overflow) and they need to be reported to DOE. I told Joey that they need to be hooked up immediately by temporary means so the sewage does spill to ground. Joey said they would be hooked up in time before going home. Said he would call and send pictures when they get hooked up. Side sewers were hooked up to the sanitary sewer. No pictures were sent to me on the side sewers repairs from Joey as promised.
City of Spokane, WAR046505	7/6/2021	7/6/2021	7/12/2021	Direct report to your staff	Yes, No Notice Required	301 W 3rd Ave	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I was driving down Bernard Ave and a citizen waved me down to look at a vehicle that was leaking oil onto the street. I stopped and looked at the vehicle, it appears to be stolen or abandoned, the vehicle has temporary paperwork, is missing most of the inside electrical components, had been driven on the aluminum wheel, and had impacted something that damaged the engine. The vehicle, a Saab, was parked in a loading zone. I contacted Dave Lok from code enforcement via e-mail and requested the vehicle towed and sent pictures. I put Absorbent along the curb line and will return to assess the oil spill under the vehicle and complete the clean up process, when the vehicle has been removed from the street. The vehicle was towed on July 8 th and Rod Glasser cleaned up the dry sweep and remainder of the engine oil off of the street.
City of Spokane, WAR046505	7/6/2021	7/6/2021	7/12/2021	Pollution hotline (phone, web, app)	Yes, No Notice Required	Fiske & Sinto Ave	Sewage/septage/pe t waste/human waste	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I received an email from 311 on July 6, 2021 after hours. I responded on July 7, 2021 to an email from 311. I drove up to the intersection of Sinto Ave and Fiske St. and took pictures of a motorhome with a small leak from the septic holding tank. There was at least one occupant in the motorhome but I was unable to make contact with the occupant, they appeared to be sleeping and did not answer the knocks at the door or respond to my greeting. I will be returning later today to attempt to make contact again. I returned to the intersection of Fiske & Sinto Ave. and the motor home was moved and the occupants left a large amount of debris on the sidewalk and street. I had one of our pump trucks pump 2-5 gal buckets of feces, and notified code enforcement of the debris. I drove back by the intersection on Monday the 12 Th. of debris and the debris was cleaned up.
City of Spokane, WAR046505	7/8/2021	7/8/2021	7/8/2021	Pollution hotline (phone, web, app)	Yes, No Notice Required	Inland Empire Way and 20 Th Ave	Sewage/septage/pe t waste/human waste	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I located the travel trailer on the west side of Inland Empire Way, just north of 20 Th Ave. I took pictures of the trailer and the dump valve to include the street surface. I did not find any evidence of the trailer leaking onto the street. I attempted to contact the occupants of the travel trailer with no results.

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City of Spokane, WAR046505	7/9/2021	7/9/2021	10/14/2021	Staff referral	Yes, No Notice Required	5104 E Union Ave	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Went to 5104 E Union and found the vehical parked half on the street and half on the sidewalk. Took pictures of the leak, small leak that hadn't reached the basin yet. As I was taking pictures a car pulled up and it was the owner of the car. Domine Morse 509-279-8469 said he had just bought the car a few days earlier and didn't know it had a leak. He said he would move it off the street right away and clean up any fluid leaks. I went back at 2:00 PM and the car was nmoved and the area cleaned up.
City of Spokane, WAR046505	6/25/2021	6/25/2021	7/12/2021	Other agency referral	Yes, No Notice Required	UNK	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	No action needed, Halme Construction was installing a Gabion Basket ERTS NO. 707585
City of Spokane, WAR046505	7/8/2021	7/8/2021	12/28/2021	Staff referral	Yes, No Notice Required	904 E Courtland Ave	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I went to address and found that there was oil and what appeared to be antifreeze. Cleaned up area with dry sweep 12/28/2021 7:12:06 AM MS4 and disposed of it in the dumpster.
City of Spokane, WAR046505	8/6/2021	8/6/2021	12/28/2021	Other agency referral	Yes, No Notice Required	6622 N Perry	Fuel and/or vehicle related fluids	Vehicle-related business	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	1:00 PM Talked to the owner of the boat shop and he said that it is water from testing the emgines. He said he would see what he can do to keep it on property or collect it and dispose of it down the sewer.

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City of Spokane, WAR046505	8/17/2021	8/17/2021	UNK	Direct report to your staff	Yes, No Notice Required	Sheridan Ct. and Columbia Circle.	Paint	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I received a call from one of our crews regarding a white paint like substance entering a catch basin on the corner of Columbia Circle and Sheridan Ct. Upon arriving at 3402 N Columbia Circle I observed a white substance along the curb line and entering the Catch Basin at the Northeast corner of Columbia Circle and Sheridan Ct. The substance was plaster and matched a mound that had been dumped into the driveway on the north side of the residence. I knocked on the door and did not receive and answer, I left a door hanger with the Illicit discharge violation code, and two BMP manuals on the front porch along with my business card and a request for a phone call.
City of Spokane, WAR046505	8/23/2021	8/23/2021	8/25/2021	Staff referral	Yes, No Notice Required	302 W Queen Ave	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	Talked with Foreman from Inland Asphalt about the basins needing to have the ESC installed on the CB's on the project. He told me that there was 3 basins that got missed some how when they did the install of the fabric witches hats at the attar of the project. He said that Spokane Concrete did the cutting of curbs and should have used the vacuum to sock up the slurry. I showed him the picture and he said he would talk to the concrete cutter about this. He was informed earlier about the missing CB ESC from an E-mail that the inspector onsite received and bought the witches hats and was starting to install them. Said he would double check the rest of the CB's to make sure they all had them. I witness him installing the on the missing CB's.
City of Spokane, WAR046505	9/2/2021	9/2/2021	12/28/2021	Staff referral	Yes, No Notice Required	4100 E Queen Ave	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	St and Florida St. Fluids leaking from vehicle. Appears to be oil/transmission fluid and or antifreeze. This is an abandoned vehicle. It is leaking fluids. I put absorbable material down to capture the fluids. Please contact Code Enforcement and have them have the car towed as soon as possible. Please ask them to contact us after it is towed so we can finish cleaning up oil/antifreeze from the street. We have a swale alongside of where the car is so we don't want the fluids to contaminate the soils in the swale and have additional clean up. Have Code Enforcement contact us at: Rod @ 509-991-7853 or Rob @ 509-413-7539. Car was removed 9-7-2021
City of Spokane, WAR046505	9/5/2021	9/5/2021	9/9/2021	Staff referral	Yes, No Notice Required	3115 E 29th Ave	Sewage/septage/pe t waste/human waste	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	To all This email is to inform you there was a private SSO at 3115 E 29th Ave building A. We received a call from the City water Dept.at 12:00pm on 9/5/2021. Water coming out of the side walk at 28th and Fiske. The side sewer for building A was plugged and sewage was flowing from the side walk onto the street and into a City catch basin at 28th and Fiske southeast corner. No sewage entered the city storm main. In the four hours we were there we pumped 500 gallons of sewage and water from cleaning the street and catch basin. Contact person is William Harris at 509-879-5550. William had a side sewer company open the side sewer and then we cleaned the street and basin. We were done with the clean up by 4:30pm on 9/5/2021. 3115 E 29th, Sewage was coming out from side walk from

2021 City of Spokane Annual Report IDDE Summary

City of Spokane, WAR046505	9/9/2021	9/9/2021	UNK	Direct report to your staff	No – none found	5228 N. Ash	Fuel and/or vehicle related fluids	Intentional dumping	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I drove to the Sanitary Manhole on Everett Ave between Ash St and Maple St. I located an unknown small amount of clear tacky substance on the Sanitary MH cover that had no apparent smell. I checked inside the Manhole and it did not appear that the substance actually entered the structure, there was no substance on the stairs, or the platform inside the Manhole. I knocked on the door of the residence that was stated to be the one that poured something into our Manhole and received no answer. I will be following up with another visit to 5228 N Ash street to attempt to make contact with the occupant.
City of Spokane, WAR046505	9/20/2021	9/20/2021	UNK	Staff referral	Yes, No Notice Required	1921 W YORK AVE	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I Drove to 1921 W. York Ave to investigate an abandoned vehicle leaking fluid onto the street. I arrived and the owner of the vehicle was present and working on a way to remove the vehicle, it was involved in an accident. I gave the owner of the vehicle and the shop owner a copy of my business card and requested a phone call when the vehicle was removed so I could return and clean up the transmission fluid and antifreeze off of the street. I will be returning to the scene tomorrow and checking to see if the vehicle has been removed.
City of Spokane, WAR046505	11/30/2021	11/30/2021	UNK	Other agency referral	Yes, No Notice Required	5012 S Lincoln Way	Sediment/soil	Construction activity	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	I visited the sites this morning at 10:00 AM and took pictures. I called Josh Taylor the Developer and is one of the builders and met with him on site. He is going to schedule a crew to get it cleaned up. Josh said he would talk to the other builders about keeping the sites cleaned up. Josh also said he is putting gravel down for the driveways to help with track off and will ask the other builders to do the same. I will check back tomorrow to check progress on the cleanup.
City of Spokane, WAR046505	12/13/2021	12/13/2021	UNK	Staff referral	Yes, No Notice Required	4704 W NORTHWEST BLV	Fuel and/or vehicle related fluids	Other accident/spill	Observation (color/sheen/turbidity /floatables/odor)	Education/technical assistance	OWNER AT 4704 W NORTHWEST BLVD HAS VEHICLE PARKED ON STREET IN FRONT OF HOUSE THAT IS LEAKING FLUIDS ONTO THE RIGHT OF WAY, I TOOK PICTURES AND LEFT A DOOR HANGER ON THE FRONT DOOR WITH A PAMPHLET AND MY BUSINESS CARD WITH A REQUEST TO CALL ME. Rylan Galvi returned my call on 12/14 2021, and we discussed the issues with the car, I drove up to 4704 W Northwest Blvd. and put some dry sweep under the vehicle in question and Rylan assured me he would sweep up the dry sweep and use a container underneath the vehicle to mitigate further leakage until his insurance tows the vehicle. I will be driving by again in the near future to make sure the problem is taken care of. Rylan's phone number is (509)570-6516.

2021
City of Spokane
Effectiveness Study Update



Annual Stormwater Report Reporting Year 2021

Participation in Effectiveness Study Development and Implementation

2014-2019 Permit Cycle

The City of Spokane is currently performing two effectiveness studies as the Lead Entity: 1) Garland Avenue Biochar Amended Storm Garden Pollutant Removal Efficacy –SWMP Effectiveness Study, and 2) Sharp Avenue Permeable Pavement Pollutant Removal Efficacy – SWMP Effectiveness Study.

The Garland Ave effectiveness study was ongoing in 2021. Sampling equipment has been installed at the corner of Garland Ave and Belt St., and sampling and analysis is performed in accordance with the Ecology approved QAPP, as storm events allow, and sampling will be ongoing through 2024. Data will be summarized at the end of the study in the year 2024 and published in accordance with the QAPP.

The Sharp Ave effectiveness study was ongoing in 2021. Sampling equipment has been installed in manholes on Sharp Ave. between Pearl St. and Dakota St., and sampling and analysis is performed in accordance with the Ecology approved QAPP, as storm events allow, and sampling will be ongoing through 2024. However, 2021 was a very dry year and there was also equipment malfunctions. Only two qualifying events were sampled in 2021. The equipment has been troubleshot and returned to service and is currently functioning Data will be summarized at the end of the study in the year 2024 and published in accordance with the QAPP. The Sharp Avenue project was summarized in an article in Stormwater Magazine in January 2021 and is included as attachment A.

2019-2024 Permit Cycle

The City of Spokane, the City of Spokane Valley, and Spokane County have partnered to perform a study that will evaluate the treatment performance of two non-vegetated bioretention soil media (BSM) Best Management Practices in Eastern Washington through the TAPE process. The media tested will include the high performance BSM and the 60 sand: 40 compost (60:40) BSM. A rock mulch will be used to protect the surface from erosion.

Pollutant removal efficacies will be determined from data collected on stormwater pre- and post- swale for each swale co-located in a university parking lot. Dependent on the results, local stormwater management guidelines may be revised and municipal management strategies modified. The study will be implemented by a consultant on behalf of all municipal partners, and the City of Spokane would be the lead entity. The details for this non-vegetated swale study were provided to Ecology in June 2021.

ATTACHMENT A

STORMWATER



City of Spokane

BMPS

Infiltration Avenue

Permeable pavements show promise in Spokane

Author — Mark Papich, Trey George

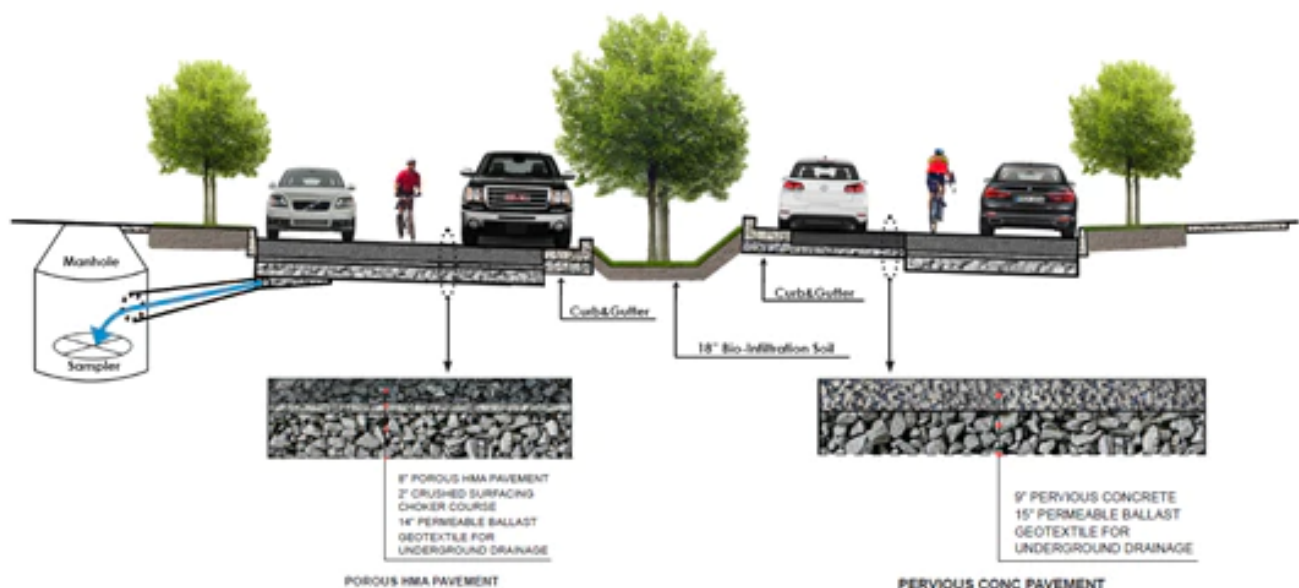
Jan 14th, 2021

In the City of Spokane, WA, along the northern border of the Gonzaga University campus and just a few blocks from the Spokane River, lies Sharp Avenue, a minor arterial street located within the City's separated stormwater system. The street sits above part of the Spokane Valley-Rathdrum Prairie (SVRP) Aquifer, the sole source drinking water aquifer for around a million people in Washington and Idaho. Stormwater runoff within the City ultimately recharges the SVRP aquifer via various infiltration pathways or discharges directly to the Spokane River, which is listed as

impaired for metals and PCBs and has a Total Maximum Daily Load (TMDL) limit for dissolved oxygen. In 2014, the City implemented a multipronged approach to improving water quality in the Spokane River, including the implementation of creative solutions for the management of runoff to include infiltration. Because there is a drinking water aquifer underlying much of the City, adequate water quality treatment is crucial prior to any infiltration approaches used to manage stormwater.

In the last few years, the City of Spokane has focused on an integrated approach to its infrastructure projects, working to address multiple concerns in a single project. Sharp Avenues' pavement had been in very poor shape, and it contrasted against the manicured lawns and many young pedestrians of the university, and it was perfect for an overhaul focused on stormwater management that would provide valuable information on the effectiveness of permeable pavement treatment of stormwater. Using an integrated approach, the project also enhanced pedestrian safety through the addition of bump-outs at intersections, added a center swale to manage stormwater if the permeable pavements were insufficient, and the area was beautified with the addition of landscaping.

Spokane kicked off the project to evaluate permeable pavements in a semi-arid environment that has hot summers with long antecedent periods between storm events, and cold winters that often have multiple freeze-thaw cycles. The project area is approximately four acres of impervious pavements that constitute a section of Sharp Avenue, which has an average daily traffic count of up to 7,500 vehicles. The permeable pavements were constructed within the vehicular traveled way on Sharp Avenue, and consist of several different cross-sections with varying layouts.

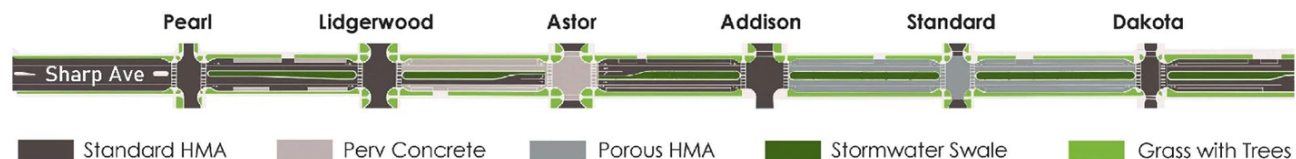


Two different layouts tested at Sharp Avenue. Left: porous hot mix asphalt. Right: porous concrete pavement in the parking lane.

Stormwater quality monitoring is the primary monitoring focus on the permeable pavements, however, the durability of the various pavement sections is also of particular interest to the City and will be used to determine viability and estimate costs of managing the pavements citywide.

Project Construction

The construction goal was to install different layouts with the pavements to capture performance information of each material. The City's design engineers developed design and cost documents for several layouts of differing pavements for cross-sections that varied by material, layout widths, and slope direction by location. The final design was of adjacent areas that were either full street width, vehicle lane only, and/or bike and parking lanes, each with differing slope directions and comprised of either porous hot mix asphalt (HMA), pervious concrete, or standard impervious asphalt.

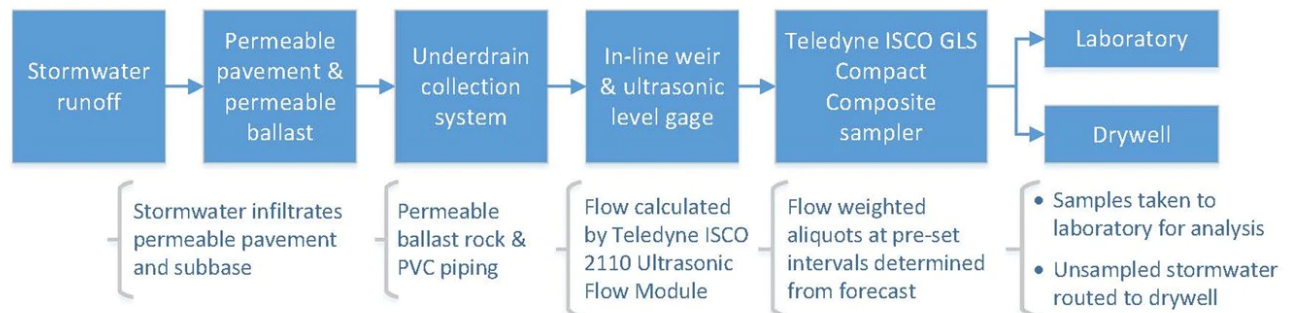


Underdrains constructed from PVC liners and slotted pipes were installed under the subbase of pervious concrete and porous asphalt areas in order to capture infiltrated stormwater and convey it to sample stations. The underdrain system isolates native soils from the permeable pavements and subbase and allows monitoring of stormwater that has only interacted with the materials of construction for the pavements. Permeable pavements and underdrains were constructed during the 2018 construction season as follows:

- Pervious concrete in full lane width (25 feet wide) on the north side of Sharp Ave from Lidgerwood Street to Astor Street.
- Pervious concrete in parking and bike lane (14 feet wide) with 11 feet of run-on on the south side of Sharp Ave from Lidgerwood Street to Astor Street. Underdrain installed under the pervious concrete parking and bike lane.
- Pervious concrete in full intersection of Sharp Ave at Astor Street.
- Porous hot mix asphalt in full lane width (25 feet wide) on both sides of the median of Sharp Ave from Addison Street to Dakota Street. Underdrain installed under the south lane from Astor to Addison.
- Porous hot mix asphalt in full intersection at Sharp Ave and Standard Street.

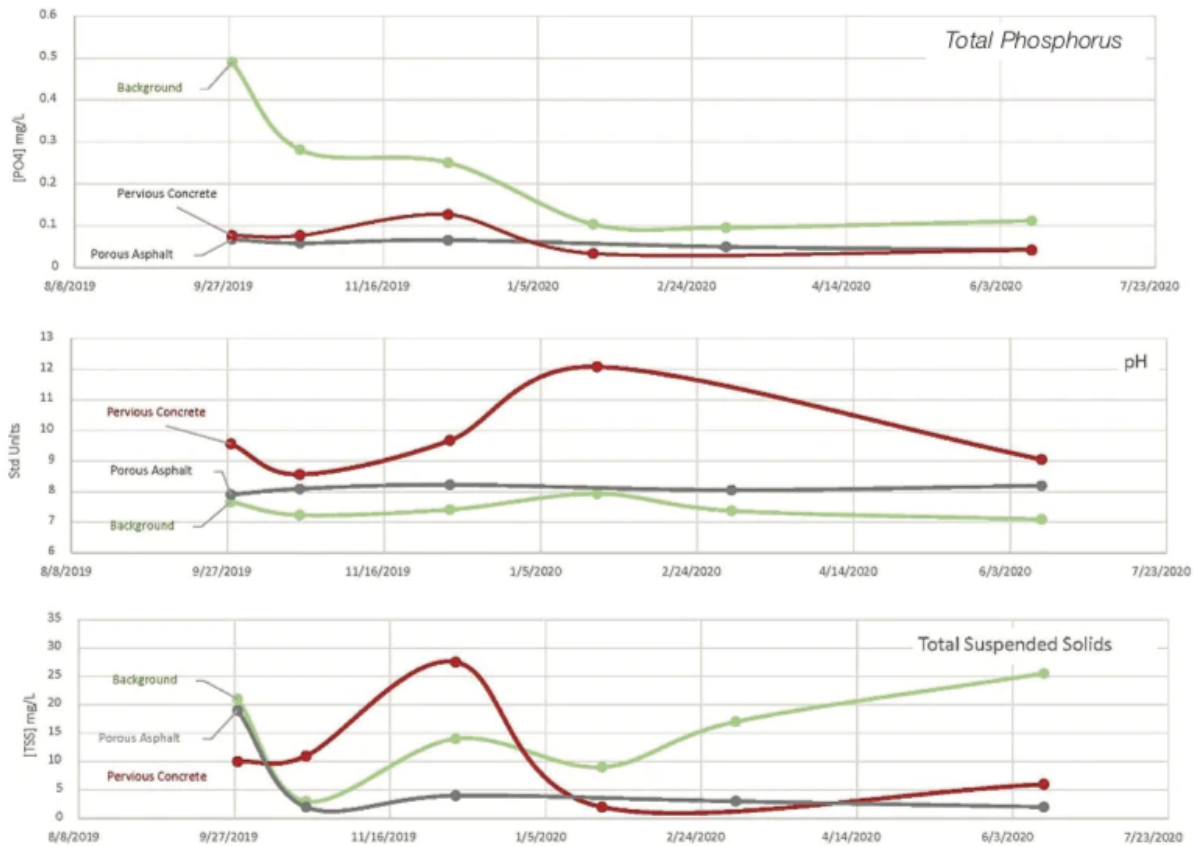
Stormwater Monitoring

Stormwater monitoring is being performed to determine the pollutant removal efficiency of the pavements for typical roadway contaminants prior to infiltration into native soils that overlie the SVRP Aquifer. Equipment for three sample stations (one background and two for pavement underdrain effluents) were installed in manholes and connected via piping to each of the sample sources. The background station captures untreated runoff from the west end of the project area, and the pavement underdrain effluent stations capture infiltrated runoff through pervious concrete and porous asphalt pavement sections.



City of Spokane

The stormwater monitoring goal is to collect samples for up to 12 qualifying storm events each year, where the criteria for a qualifying storm event is a rainfall volume of at least 0.2 inches, and an antecedent dry period of 0.05 inches of rain or less in the previous 24 hours. Weather forecasts are monitored, and storms are chased to collect samples, but given the semi-arid environment in Spokane, and the long antecedent dry periods during portions of the year, monitoring 12 qualifying events has been a challenge. On several occasions, personnel and equipment were deployed and samples collected, but the storm failed to meet the qualifying event criteria so the data could not be used. On one occasion, a storm event was not predicted and equipment and personnel were not deployed, although the weather culminated in a qualifying event. Recently, public health concerns over COVID-19 have kept sampling personnel from assembling for storm events. Despite the challenges presented, 7 events were sampled in the first year of monitoring, and samples from each storm event were analyzed for pH and typical roadway contaminants, including total suspended solids (TSS), oil range organics (ORO), diesel range organics (DRO), total phosphorus (P), as well as the total and dissolved metals arsenic, calcium, cadmium, chromium, copper, magnesium, lead, and zinc.



During the first year of monitoring, testing suggests the systems were stabilizing before settling down.

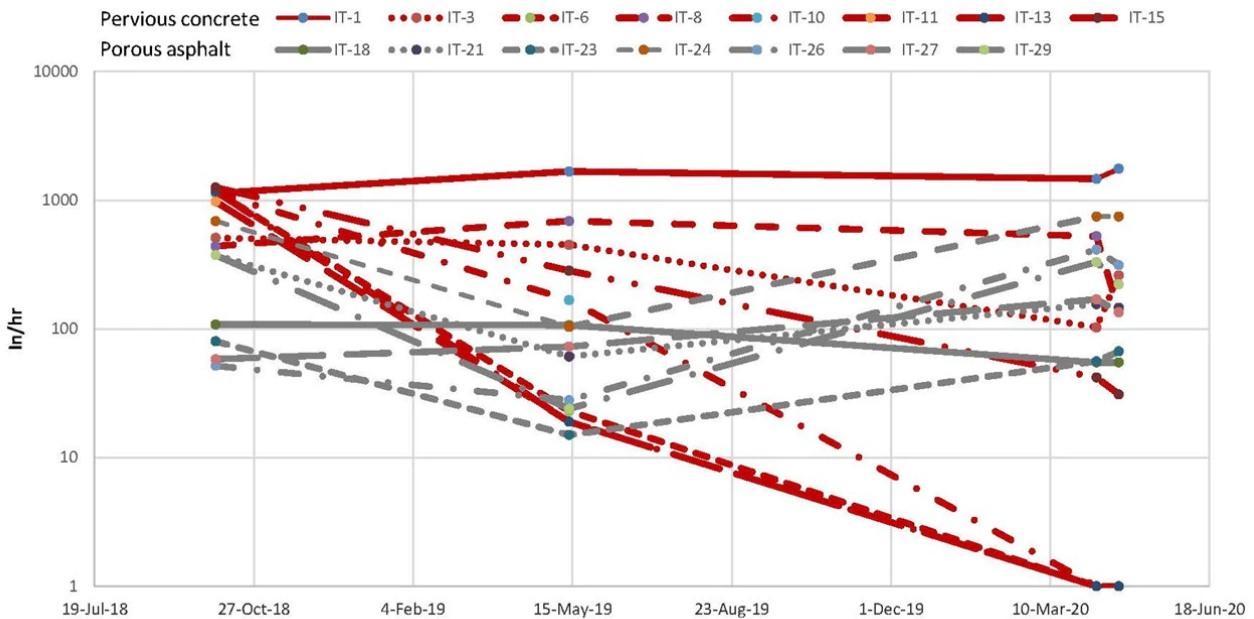
City of Spokane

Stormwater quality trends for pH, P, and TSS trends suggest that the systems were still stabilizing a little over a year after being constructed, but appear to have settled down more recently. The pH trend shows that pH was elevated in the pervious concrete effluent relative to effluent from the porous asphalt, which is attributable to the chemical nature of curing concrete. An early spike in TSS was observed in the pervious concrete effluent and is likely an artifact of construction being flushed from the system. Metals data and pollutant removal efficiency trends not presented in the above figure show similar trend behaviors. The pavement systems will continue to be monitored for water quality for an additional four years to provide a more robust data set over time, and stormwater quality trends and pollutant removal efficiencies will be more thoroughly addressed.

Infiltration Tests

Infiltration rate tests were performed over time at 15 locations on both pervious concrete and porous asphalt. The infiltration rates for the porous asphalt ranged from 52 to 691 inches per hour initially, and the rates for pervious concrete initially ranged from 19 to 1762, each showing significant heterogeneity. Year one data indicates that the porous asphalt infiltration rate is consistently similar over time, whereas the pervious concrete appears to show signs of diminishing infiltration rates with some locations near-zero infiltration. It is unclear if the lower infiltration rates are an artifact of plugging or

deterioration of the pervious concrete. The City currently performs street sweeping with a Tymco 500x regenerative air system vacuum sweeper twice a year to clean the surface of the pavements, but a more rigorous cleaning method that uses a maintenance vehicle specific to permeable pavements may be required to address the diminishing rates of infiltration.



Infiltration rates for the porous asphalt and pervious concrete over the first year.

City of Spokane

Durability

The Pavement Condition Index (PCI) is a score from 0-100, where 100 would be a road surface in perfect condition with no wear. The City's Streets Department has applied a PCI score to Sharp Avenue annually to track the durability. As of Fall 2020, the porous asphalt sections have a PCI score of 82 while the remainder of the sections, including the pervious concrete, have a PCI score of 98 or better. The wear that has affected the PCI score occurred within the first year, and there was no change in the scores between the last two surveys. Since the wear was not significant and the scores remained the same from the last survey, the City is not overly concerned with the PCI score. PCI surveys will continue indefinitely on Sharp Avenue as it is integrated into the citywide PCI scoring program.

Learnings to Share

There were several lessons learned during the construction phase of this project. First and foremost, selecting an appropriate location is critical. It was determined early that the native soils in this area of the City were favorable for infiltration and treatment, which is clearly critical for the final disposal of stormwater. In addition, having a single property owner/stakeholder (i.e. Gonzaga University) with multiple entrance/exit points and few

dry utility connections simplified construction immensely. Specifically, the ability to keep vehicles and equipment off of the permeable pavements during construction and to minimize the in and out traffic as much as possible were paramount to a successful install on schedule.

Since completion of construction, City teams have worked to evaluate the effectiveness of the permeable pavements on Sharp Avenue and use its lessons to plan future green infrastructure projects. The end goal is to minimize stormwater discharges to the river and provide long-term value to the community. The positive status of the project to date is due to City staff communicating effectively across departments, and being committed to delivering a high-quality product. For example, the designers identified construction materials and methods that would ensure the project was constructible, that the pavement layout capitalized on the best use of permeable materials, and identified the best locations for sampling stations. The Street's Department has adopted a non-standard maintenance approach for leaf removal to avoid clogging the pavements and use a rubber-bit snowplow to prevent damaging them. The sewer maintenance crew and inspectors have stepped out of their comfort zone to learn new skill sets to collect data and perform inspections. The wastewater management sampling team designed and installed the sample collection train, and have added Sharp Avenue to their routine list of sites to prepare for when eagerly chasing storms. It takes a village.

The City of Spokane will continue to monitor the permeable pavements for an additional four years and will report the observations to the Washington State Department of Ecology in an Effectiveness Study report. Data is also available to the public on Ecology's Environmental Information Management System website at www.apps.ecology.wa.gov/eim/search/default.aspx.

Mark Papich, PE, is a senior engineer in the City of Spokane's Integrated Capital Management Department and is responsible for capital project scoping, funding, and programming the City's utility projects. Papich has designed and programmed water, sewer, and stormwater capital projects, following projects from inception to completion of construction. **James "Trey" Geroge III** is an environmental analyst for the City of Spokane where he is responsible for ensuring that the City meets the conditions of its' Phase II Municipal Stormwater Permit by engaging with interdepartmental city personnel, coordinating with other regional permittees, and interacting with local agencies and regulators.

Source URL: <https://www.stormh2o.com/bmps/article/21203016/infiltration-avenueprint>

2022
City of Spokane Stormwater
Management Program Plan

City of Spokane Stormwater Management Program Plan

March 2022

Prepared by:

City of Spokane
Wastewater Management
909 East Sprague Avenue
Spokane, Washington 99202



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1.0 INTRODUCTION

1.1 Purpose

Stormwater in the City of Spokane is regulated by the Eastern Washington Phase II Municipal Stormwater Permit (the permit) issued by the Washington State Department of Ecology (Ecology). The permit requires the development and implementation of a Stormwater Management Program (SWMP) that addresses permit Sections S5, S7, and S8. This Stormwater Management Program Plan (the plan) has been prepared to provide information to the public on the activities and means that the City of Spokane (the city) expects to implement in order to protect local water quality and satisfy the conditions of the permit.

The permit requires that a municipal Stormwater Management Program consist of six elements that, when implemented, will ensure that local water quality is protected. Section S5 of the permit, *Stormwater Management Program for Cities, Towns, and Counties*, details the six elements as:

- (1) Public Education and Outreach,
- (2) Public Involvement and Participation,
- (3) Illicit Discharge Detection and Elimination,
- (4) Construction Site Stormwater Runoff Control,
- (5) Post-Construction Stormwater Management for New and Redevelopment, and
- (6) Municipal Operations and Maintenance.

Section S7 of the permit, *Compliance with TMDL Requirements*, requires implementation of the Total Maximum Daily Load (TMDL) monitoring detailed in Appendix 2 of the permit, and Section S8 of the permit, *Monitoring and Assessment*, details the requirements to implement stormwater management effectiveness studies.

The draft SWMP Plan is posted made available to the public annually via the city's stormwater website (Spokanestormwater.org) on or before April 1st of each year. The draft plan is posted for 30 days, at which time the public may submit comments on the draft plan. After the 30 day draft period, the SWMP Plan will be finalized and posted to the website on or before May 1st of each year. Comments on the final SWMP Plan will be accepted anytime throughout the year and considered for inclusion during the next plan revision.

1.2 Regulatory Background

Created in 1972 by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) is a federal requirement that regulates stormwater and wastewater discharges to "Waters of the United States". The Environmental Protection Agency (EPA) authorizes States to implement the NPDES program and perform many of its' permitting, administrative, and enforcement aspects. The regulatory authority

in Washington State is the Washington State Department of Ecology (Ecology), who regulates stormwater west of the Cascade mountains with the Eastern Washington Phase II Municipal Stormwater permit. The permit is a quasi-combination NPDES and State Waste Discharge General Permit for discharges from small municipal separate storm sewers in Eastern Washington.

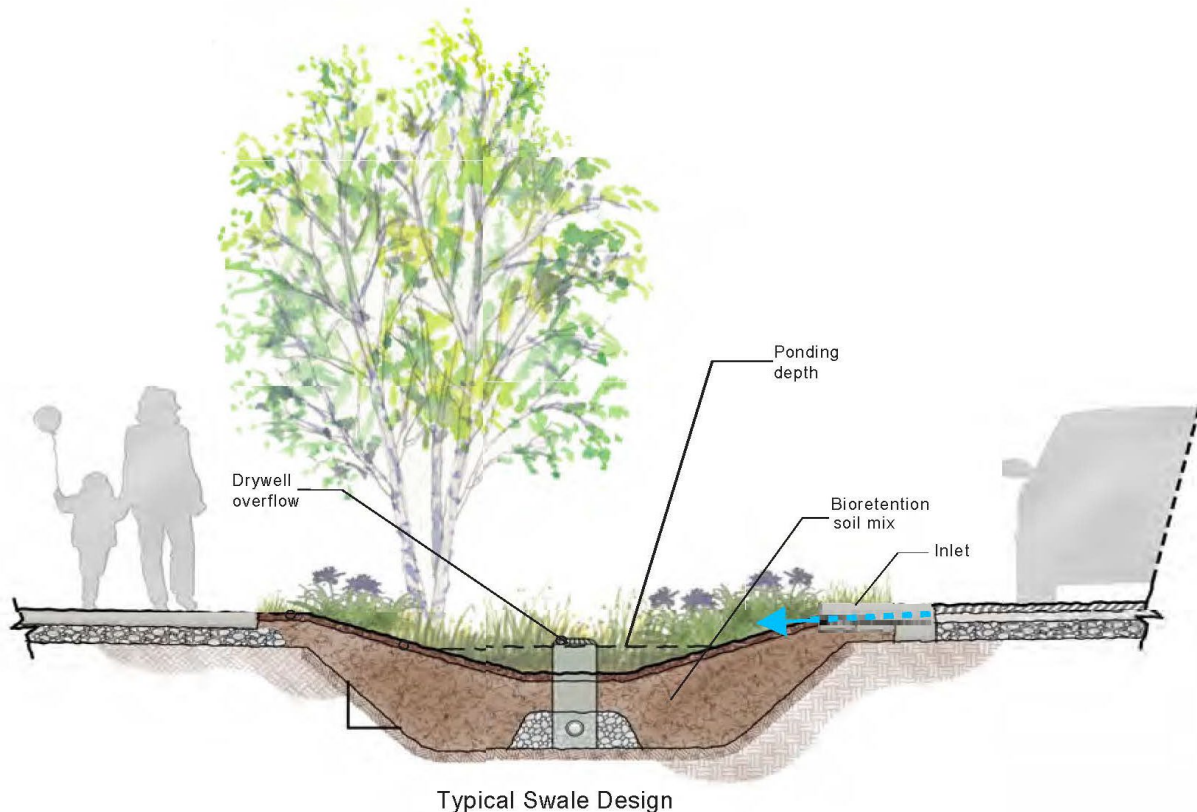
Ecology first issued the permit to municipalities in 2007, and has reissued it three times since 2007 with revisions in 2014 and 2019. The current permit became effective on August 1, 2019 and is set to expire July 31, 2024. The city is authorized to discharge stormwater to surface waters and to groundwaters of the State from the city's Municipal Separated Stormwater Sewer System (MS4) in accordance with the permit. The entire incorporated area within the city's geographic boundary is considered the MS4 and stormwater is managed in accordance with the stormwater permit. There are several combined sewer overflow (CSO) basins within the regulated MS4 that collect and convey stormwater to the Riverside Park Water Reclamation Facility (RPWRF) for treatment. Surface waters that flow on hard surfaces and are collected and conveyed within infrastructure in the CSO basins are regulated under a NPDES waste discharge permit, and managed accordingly. Stormwater within CSO basins is, in large part managed in a combined sewer system, with exception of occasional structural treatment BMPs that manage stormwater locally and discharge to ground.

1.3 Stormwater Management in Spokane

The city's MS4 system consists of catch basins, piping, structural BMPs, outfalls, and underground injection controls (UICs). Within the permitted MS4 boundary, but outside of the CSO Basins, stormwater is collected by the separated stormwater sewer system and conveyed to stormwater treatment facilities, and/or directly to outfalls that discharge to the river. The separated stormwater sewer system and stormwater treatment facilities manage stormwater separate from sanitary wastewater, and is generally located in the North/Northwest portion of the city.

Stormwater treatment facilities can be found throughout the city's MS4, and are used to manage stormwater as near as possible to where the runoff is generated. The treatment facilities are generally swales, bioretention cells, infiltration ponds, etc., which are structural stormwater BMPs designed to remove pollutants from runoff. The facilities are typically designed and constructed in accordance with the Spokane Regional Stormwater Manual (SRSW), and consist of inlets, a vegetated retention area, subgrade bioretention soil media, and an outlet/overflow. They are designed to retain water to approximately six inches depth, and have drywells to serve as overflows. Treatment facilities range in size from a small roadside swale that receives drainage from a parking lot, to of a large dry pond that treats stormwater for an entire neighborhood, but the treatment processes are the same. Stormwater enters the treatment facility through an inlet, flows over vegetation slowing it down, and infiltrates into the ground through bioretention soil media. The vegetation, bioretention soil media, and microbes in the soil are providing treatment to the stormwater and removing any pollutants. Figure 1 shows a typical swale design.

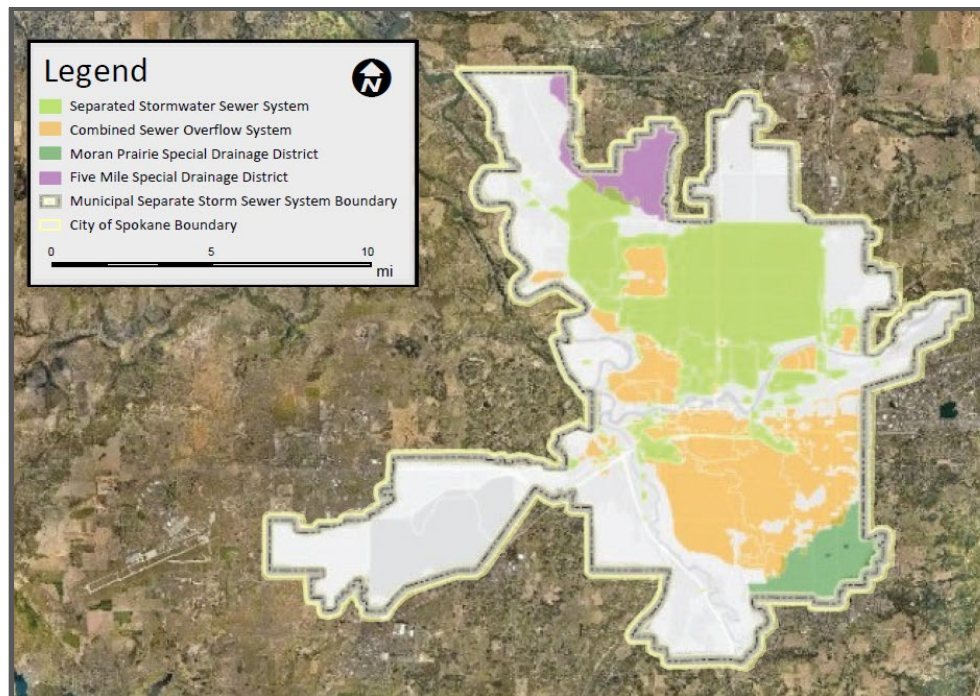
Figure 1. Typical Swale Design.



Special Drainage Districts (SDD's) have been established where typical stormwater treatment BMPs may not be effective because treatment via standard infiltration approaches is not practical. The Moran Prairie and Five Mile SDD's have been exist because of the challenges that managing stormwater in those areas presents due to shallow groundwater, intermittent standing water, or steep slopes.

Figure 2 is a map of the City of Spokane that shows the generalized locations of the stormwater infrastructure systems. On the south side of the city, where geology does not readily allow infiltration, stormwater in CSO basins is largely managed in a combined sewer that conveys stormwater and sanitary wastewater in the same infrastructure. The CSO systems consist of catch basins, piping, and storage tanks that are used to collect and convey the stormwater to RPWRF. The CSO facilities are used to minimize or eliminate discharges of the combined sewer and stormwater, and are regulated by the waste discharge permit that the RPWRF operates under. CSO basins also contain stormwater treatment BMPs, where practical, to manage stormwater that has not been combined with sanitary sewer locally and to minimize the amounts of stormwater that are conveyed to the wastewater treatment plant.

Figure 2. Map of stormwater management areas.



STORMWATER MANAGEMENT PROGRAM COMPONENTS

2.1 Public Education & Outreach

2.1.1 Public Education and Outreach Permit Requirements (S5.B.1)

Section S5.B.1.a of the permit requires the city to implement a public education and outreach program designed to reach the general public, businesses, and engineers/developers to achieve improvements in the target audiences' understanding of stormwater and how they can contribute to water quality protection. Outreach to the general public should focus on water quality impacts and tangible actions that the general public can take to protect water quality. The focus of the outreach to businesses should focus on education on preventing illicit discharges appropriate materials management. engineers/developers should receive outreach focused on technical standards, the use of BMPs and developing erosion control plans.

Section S5.B.1.b of the permit requires the city to measure the understanding and adoption of targeted behaviors for at least one target audience in at least one subject area, and use the results to direct ongoing education and outreach resources most effectively.

2.1.2 Public Education and Outreach Program Introduction

The central mission of the city's PE&O program is to inform target audiences about the value in improving water quality by reducing stormwater pollution through understanding stormwater dynamics, source control, and the value of green stormwater infrastructure (i.e. bioretention treatment facilities). The city's stormwater education and outreach was hindered in 2021 due to restrictions that were implemented during the pandemic. With the lifting of restrictions on public gatherings, it is expected that there will be an increase in opportunities for the city to perform outreach at public events and in classrooms in 2022.

The city's Wastewater Management Department recently created, and filled, a Public Education and Outreach Coordinator position. The new role will focus solely on stormwater and wastewater outreach, which will include social media messaging, attending public events, overhauling the city's stormwater website, and re-establishing a presence in the classrooms, among other public engagement. In addition to the new position, the department has established a contract with a local multi-media vendor to establish a more pronounced stormwater presence on social media channels to inform, engage, and network with the community for stormwater stewardship. The current focus of the outreach program is to continue performing outreach using the vehicles currently in place, as well as to establish additional methods to reach the public. The methods the city employs for education and outreach are discussed in *Section 2.1.2.2 - Education and Outreach Methods*.

2.1.2.1 Elements of the PE&O Program

Public Education & Outreach PE&O efforts focus on reaching the general public, business sectors, property developers, and children in the classroom, which are the target audiences.

General Public

The objectives of outreach to the general public, specifically rate paying households and residents on social media, is to increase the stormwater knowledge base of the community. The ultimate goal is increasing the practice of source control, ownership and appreciation for stormwater treatment facilities, and in overall investment in stormwater stewardship. Census data from 2019 indicate that there are approximately 522,798 residents and 223,079 housing units in the City of Spokane, where. 202,811 of the housing units are households with 2.41 persons per household on average. So, approximately 488,775 residents live in households, where approximately 87% of households in Spokane have internet access. This means that the city could potentially reach 93% of the population by targeting the general population that reside in households, who receive a utility bill and have the ability to engage online.

Education and outreach resources have been increased by the Wastewater Department to affect change and realize behavior change for the general public. Specifically, outreach methods will include social media messaging, solicitation of public engagement with the city's stormwater website, presentations to neighborhood councils, and attendance/presentations at public events. A final behavior evaluation will be performed via survey after some time to measure the change from baseline.

Business Sectors

The city has established a partnership with the Spokane Regional Health District (SRHD) to perform outreach with the business community. SRHD receives funding from Ecology as part of the Pollution Prevention Program with the goal of educating businesses to increase pollution prevention behaviors. The city does not compete with SRHD for the limited Ecology funding to perform outreach to the community SRHD currently reaches. In addition, the city writes letters of recommendation to Ecology in support of SRHD receiving funding.

With input from the city SRHD selects target audiences, and focuses on the restaurant, lodging/hospitality, automotive, and property management business sectors. If necessary, the SRHD inspector will follow up with the city if there are areas of concern pertaining to illicit discharges identified during inspections. Likewise, during illicit discharge investigations, city stormwater inspectors will recommend visits from SRHD to businesses who would benefit. In 2021, SRHD conducted 8 screening visits, 35 initial visits, and 10 follow-up visits, for a total of 33 visits total. The city will continue to partner with SRHD to affect behavior change in local businesses with respect to stormwater.

Developers, Engineers, and Contractors

The City of Spokane Developer Services Center works with developers from the design phase through permitting and issuance of Certificates of Occupancy. Throughout that process the Center provides verbal guidance and support materials for appropriate stormwater management that is necessary to receive city permits to construct. Pre-development meetings with project proponents are standard practice, where during the meetings, city engineers meet with developers, their engineers, and contractors to discuss the scope of the project, to establish stormwater requirements, and identify improvement opportunities. Pre-development meeting notes are provided to the project proponents, and detail the guidance provided during the discussions, and include a notification of stormwater training opportunities the project proponents. In 2021 the Center reviewed and provided guidance on 143 stormwater plans for development projects.

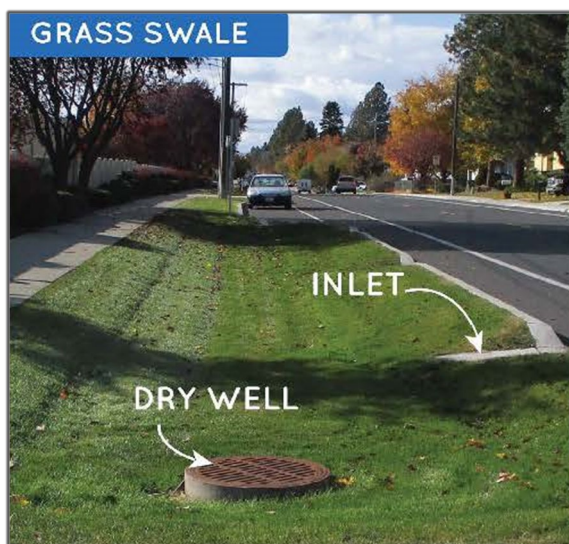
Guidance materials provided to project proponents include, but are not limited to, the City of Spokane Stormwater Compliance Guide, and the Understanding Stormwater Permitting in the City of Spokane guide, each of which contain numerous links to additional educational stormwater materials. The city will continue to provide outreach to the development community through the Developer Services Center to affect behavior change with respect to stormwater.

Classrooms

The city's classroom stormwater education and outreach was combined with the water stewardship and conservation outreach program. The water education and outreach program has historically had a very strong focus on children in the classroom, but due to the corona virus pandemic, the program had limited opportunities to engage the younger generations in the classroom. In 2021, no stormwater outreach was performed to children in the classroom. However, the city's Wastewater Department has increased personnel to re-establish a stormwater education presence in the classrooms, and is currently determining the methods and frequencies of outreach that will provide the most benefit.

2.1.2.2 Education and Outreach Methods

Neighborhood Council Meetings: The Wastewater Management Department attended neighborhood council meetings virtually and in person throughout the city in 2021 to provide information on pollution prevention and stormwater facility maintenance. Eleven neighborhood council meetings were attended in 2021. Two brochures titled [Managing Stormwater - A Residential Guide](#) and [Stormwater Pollution Guide](#) were provided as outreach materials, or referenced as available online. at the neighborhood council meetings. The department will continue to attend neighborhood council meetings in 2022 and give a brief presentation on stormwater management and swale maintenance, hand out brochures that provide the messaging in greater detail, answer any questions the community might have, and reiterate our availability to address any concerns they may have.



TRIMMING, THINNING & MOWING

Keeps vegetation healthy & provides space for stormwater

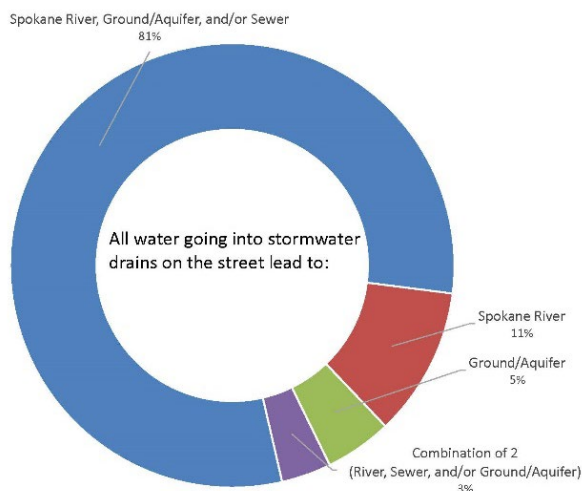
REMOVING SEDIMENT & DEBRIS

Promotes infiltration while keeping vegetation healthy

CLEARING BLOCKED INLETS

allows stormwater to enter swale

Stormwater Survey: The portion of the general public that reside in households that receive a utility bill and have the ability to engage online were targeted for the measurement of the understanding of stormwater management. In 2019, the city sent out a mailer with utility bills that offered a rebate on a



water bill to complete an online stormwater survey. The survey established a baseline measurement of the stormwater knowledge base, and the results indicated that there is room to improve the knowledge base on illicit discharges and the function, and maintenance responsibilities, of stormwater treatment facilities. The survey had nearly 1400 respondents, and the information received from the survey was used to tailor outreach for the years 2020 and 2021. Messaging will continue to focus on illicit discharges and stormwater treatment facilities and after some time a follow up survey will be sent out via mailer to measure the change in the knowledge base.

Stormwater Education in the Classroom: The Franklin County Conservation District created the Drain Rangers educational program using Ecology funding. The program developed materials specific to stormwater education focused for kindergarten through 5th grade students. The materials were created in templates that are available for school districts to leverage into their programs, including curriculums, lesson plans, and exercise. The city is evaluating how to incorporate the Drain Rangers materials into local Spokane School District classroom, which will require engaging specific schools and school teachers to assess interest. In 2022 the Drain Rangers program will be tailored to the Spokane Region, and the materials will be presented to Spokane School District schools to develop interest in adopting the materials into local curriculums.



Cable 5: City of Spokane Cable Channel 5 rotates stormwater pollution prevention tips on the reader board. A different seasonally relevant tip was used each week. An EPA video entitled “After the Storm” is shown throughout the year, highlighting the importance of stormwater management and individual citizen responsibility to help prevent stormwater pollution. Cable 5 also broadcasts stormwater outreach videos as filler between scheduled programming. These broadcasts will continue to occur in 2022.

Idaho Washington Aquifer Collaborative: Is a non-profit organization that is made up of Idaho and Washington water purveyors, and the city is a member of the organization. IWAC developed an educational video for the public that is an overview of the Spokane Valley Rathdrum Prairie aquifer, its importance to our region, the impact stormwater has on river and aquifer water quality, sources of pollution, and things that residents can do to protect and preserve our water. for the public to understand the importance of stormwater pollution and water. The video is currently aired on Cable 5 in continuous rotation on its air and will continue to be aired in 2022.

Website: The internet domain Spokanestormwater.org was created to direct people to the city’s stormwater website in the Public Works and Utilities webpages section, where stormwater information has been elevated one level to its own page on the new website. Web users seeking stormwater information are now able to find it more quickly. Upon the reissuance of the 2014-2019 stormwater permit, the city published an article titled ‘Managing stormwater protecting the Spokane River’, which is still available online. The article described the Permit and the city’s efforts to improve water quality in the river. The website is updated as necessary as additional articles are written and activities occur.

In the year 2020 the city updated the Green Infrastructure webpage within the stormwater webpages, to discuss structural BMPs, Low Impact Development (LID) and Green Stormwater Infrastructure (GSI). The webpage provides links to the Eastern Washington LID manual and Spokane Regional Stormwater Manual (SRSM) for reference. Also, a webpage was added that provides information to the public on the Cochran/Downriver Stormwater Management Facilities project which is currently being designed and scheduled to construct in 2022.



The city created three videos specific to stormwater in 2020 that were tailored to provide information on [Spokane Stormwater](#), [Hazels Creek](#) and [Green Area Maintenance](#). Links to the videos can be found

at Spokanestormwater.org. The city has contracted a local multi-media vendor to create additional outreach videos that will be broadcast on social media channels and placed on the City's website.

The website will be given an overhaul in 2022 to make it more interactive and to link to pertinent social media channels performing stormwater messaging. The information available on the website will be increased to include the private stormwater inspection program, educational information on stormwater treatment facilities, and best practices to perform source control, among others.

Presentations: Various professional and educational groups are interested in learning about the city's stormwater management system and its efforts to prevent and reduce stormwater pollution. Presentations are open to the public to attend, and are anticipated to continue to be provided, as relevant, in the current and upcoming years. Sharp Avenue Permeable Pavement will be presented at PNWCA in 2022.

Publications: Integrated Capital Management and Wastewater Management Department personnel co-authored an article in the January 2021 edition of Stormwater Magazine titled [Infiltration Avenue](#). The article showcases The Sharp Avenue permeable pavement study by discussing the integrated approach to design, collaborative efforts with the Gonzaga University, and goes into the data and information collected as part of the study. The Infiltration Avenue article can be found on the [Stormwater Magazine webpage](#). The article is still relevant and currently available.



Gonzaga Senior Project Support: The Wastewater Management Department is currently supporting a Gonzaga Engineering Senior Student project by providing guidance, access to stormwater infrastructure, and funding for analysis of sample collected for a swale assessment. The GU students are assessing a number of swales in public service in Spokane to determine life cycle functionality. A final presentation of the results will be provide to city Leaders at the end of the school year in 2022, and made available to the public online.

Hazel's Creek Regional Stormwater Facility and LID Demonstration Site: In Fall of 2012, construction was completed and the facility began receiving stormwater from properties within a specified up-gradient boundary. The site also contains publicly used walking trails. This system was utilized as an LID educational opportunity, hosting various LID demonstrations throughout the trail system. Visitors can download a brochure from the Public Works & Utilities website and take a self-guided tour. An informational video showcasing Hazels Creek was created in 2020 to reinvigorate curiosity and interest

from the public and is provided on the [Hazels Creek](#) link at [Spokanestormwater.org](#). In 2021 the city supported science education at Ferris High School by supplying tools and plantings for the students to establish additional vegetation at the site. The students planted approximately 600 starts of native species of shrubs and bushes, and will measure the success of the starts in 2022. This outreach activity will be evaluated at other high schools for potential to implement.

Stormwater Permitting Educational Materials: The city partnered with the Spokane River Forum and Spokane Riverkeeper to develop the guides [Understanding Stormwater Permitting in the City of Spokane](#) and [City of Spokane Stormwater Compliance Guide](#). These guides address stormwater-related building permit requirements; erosion and sediment control, and also references Ecology's stormwater permit requirements. The guides are provided to development contractors during pre-construction meetings, and are also available on the [Spokane River Forum stormwater website](#). These materials have been available for a number of years, and will continue to be available in 2022.

Stormwater Messaging: The city's Wastewater Management Department has initiated a contract with Rogue Heart Media to continue to perform stormwater messaging on the Water Wise social media channels with a more stormwater focused subset of outreach. The outreach will provide source control and treatment facility educational information to the public, and will showcase established partnerships with the city and other agencies. The city is partnering with the Spokane River Toxics Task Force and Spokane River Forum with respect to stormwater outreach to ensure that messages will align and be consistent for the public to be able to clearly gain a better understanding of stormwater best practices. Social channel messaging will continue through 2022 and into 2023.



City of Spokane Wastewater Department
SPOKANE STORMWATER

Fix Car Leaks Don' Drip and Drive Promotion: The city has partnered with the local community college, and other organizations, for a free auto leaks workshop to help the public learn about their car and make sound choices for our region. Utility billing inserts have been used as a method of advertisement to over 70,000 customers. The free inspection and monetary savings coupon are still valid at participating shops. More detailed information and a list of participating vendors is available at [Fixcarleaks.org](#).





The city is coordinating with other local municipalities to host a Don't Drip and Drive workshop in 2022 with support from Ecology. The workshop is available as part of the Fixcarleaks.com campaign, and will be provided to the community to support source control practices with respect to car fluids. The program will be evaluated to confirm that the rebates are valid and local automotive shop participants continue to be supportive.

Promotional Campaign: The city partnered with the Spokane Indians Baseball Club to champion a campaign designed to connect citizens to the Spokane River, educate about stormwater and work begin done to clean up the River, and support local organizations devoted to River protection. Advertisements included prints, radio, television, billboards, social media, and promotion during live baseball games, and the effort has been dubbed the [Redband Rally Campaign](#), the promotion gets its name from the native Redband Trout. Due to the pandemic the campaign was temporarily suspended during 2020, but has resumed in 2021, and will continue through 2022.



2.2 Public Involvement and Participation

2.2.1 Public Involvement and Participation Permit Requirements (S5.B.2)

The permit requires the city to provide ongoing opportunities for public involvement and participation such as at public hearings or on advisory panels or committees during rule-making, or other similar activities. Section S5.B.2.a requires the city to implement a program or policy to create opportunities for the public, to provide input during the decision making processes, including development and adoption of all required ordinances and regulatory mechanisms. Also, to provide ongoing opportunities for public involvement through various councils, committees, programs, and activities. In addition, develop and implement a process for consideration of public comments on the SWMP, including required ordinances and regulatory mechanisms.

2.2.2 Public Involvement and Participation Opportunities

Stormwater Management Program Plan

The city posts this plan on its website at Spokanestormwater.org annually. The public may provide comment on this plan at any time during the year by emailing the Wastewater Department Environmental Analyst at jgeorge@spokane.org. The city solicits online comments on the draft plan from the public for a 30-day period when this plan is posted. After the 30-day period, the city will review the comments and update the plan as applicable, and post the final version of the plan at Spokanestormwater.org.

Public Participation Opportunities

Many of the stormwater activities that the city undertakes in order to meet the goal of the permit (i.e. protect water quality) goes through City Council, which as discussed below, inherently provides the public opportunities to participate, and the public participates.

The city provides many opportunities for public involvement and participation in its decision making processes via open City Council; Public Infrastructure, Environment, and Sustainability Committee; and Planning Commission meetings on a weekly basis. Public involvement is a required component of the ordinance process, and involvement of any interested member of the public is encouraged through workshops, open houses and a formal public comment period. Information on how to participate at City Council meetings and meeting agendas are provided on the city's City Council website prior to the occurrence of the meeting. The city publication *The Gazette* publishes the meeting minutes from the City Council, as well as all call for bids, which include stormwater management, infrastructure, and funding issues and projects. Examples of opportunities for public involvement include rate structure discussions, stormwater mitigation grants and projects; stormwater infrastructure improvements; joint planning of the stormwater management plans; and, ordinances creation or revisions, among others, at the Committee level, and at City Council Meetings.

In 2021, notifications were made to affected property owners and to the general public for an ordinance on private post-construction stormwater facilities as follows:

- September 2021 - Planning Commission workshop and hearing
 - 2 public notices published in Spokesman Review
- September 2021 – Public Infrastructure, Environment, and Sustainability Committee
- September 2021 – City of Spokane blog post
- September/October 2021 - Notification letter sent out to all affected properties
- October 2021 - City Council advance briefing, first reading, and final hearing
 - 2 public notices published in Spokesman Review

The City Council process will continue to be followed in 2022 for stormwater related business being conducted to protect water quality. Additionally, the Spokane Municipal Code is currently being reviewed to determine if there are opportunities to modify the code that would add value to the stormwater program, and ultimately the general public. Ordinances may be proposed to City Council in 2022 specific to stormwater management and the city processes necessary to ensure the protection of water quality.

2.3 Illicit Discharge Detection & Elimination (IDDE)

2.3.1 IDDE Permit Requirements (S5.B.3)

The permit requires the city to implement and enforce a program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. Section S5.B.3.a of the permit requires the city to maintain and periodically update a map of the MS4 to include:

- known outfalls and known discharge points,
- receiving waters other than ground,
- areas served by the MS4 that discharge to ground,
- permanent stormwater facilities owned or operated by the Permittee,
- all connections to the MS4 authorized or approved by the Permittee after August 1, 2019,
- all known connections from the MS4 to a privately owned stormwater system, and
- connections between the MS4 owned and operated by the Permittee and other municipalities or public entities.

Section S5.B.3.b of the permit requires the city to effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the MS4 to include:

- Implement an ordinance or other regulatory mechanism that prohibits illicit discharges and authorizes enforcement actions, including on private property.
- Implement a compliance strategy that includes informal compliance actions such as public education and technical assistance, as well as the enforcement provisions of the ordinance or other regulatory mechanism.

Section S5.B.3.c of the permit requires the city to implement an ongoing program designed to detect and identify illicit discharges and illicit connections into the Permittee's MS4 to include:

- Procedures for conducting investigations of the Permittee's MS4, including field screening to identify potential sources.
- Procedures for locating priority areas likely to have illicit discharges.

2.3.2 Mapping the System (S5.B.3.a)

The first major component of the City's illicit discharge program is mapping the municipal stormwater drainage system. Maintaining an accurate and up-to-date map of the stormwater drainage system enables the City to track and locate the source(s) of suspected illicit discharges. The Permit outlines minimum information that should be included in the City's municipal storm sewer system map:

- Location of all known municipal storm sewer outfalls, receiving waters, and structural BMPs owned, operated, or maintained by the City;
- Location of all known outfalls and known discharge points,
- Receiving waters,
- Areas served by the MS4 that discharge to ground,
- Permanent stormwater facilities owned or operated by the Permittee,
- All connections to the MS4 authorized or approved by the Permittee
- All known connections from the MS4 to a privately owned stormwater system, and
- Connections between the MS4 owned and operated by the Permittee and other municipalities or public entities.

The Wastewater Management Department completed a map of the stormwater MS4 utilizing the Global Information System (GIS) by Esri computer software program. GIS layers are updated periodically to reflect changes to the system and any additional information.

2.3.3 IDDE Ordinance (S5.B.3.b)

The City adopted Ordinance ORD C34564 Section 17. Section 17D.060.190 addresses illicit discharges in accordance with requirements in the Permit. The ordinance defines allowable discharges to the MS4, unlawful discharges, and enforcement actions. The ordinance is available on the Spokane Municipal Code website.

2.3.4 IDDE Program (S5.B.3.c)

The Wastewater Management department currently incorporates illicit discharge field inspections with routine maintenance activities. Stormwater crews inspect all inlets to the MS4, including green stormwater infrastructure and stormwater treatment facilities. The stormwater assets are inspected for illicit discharges on a recurring frequency while performing inspections to determine maintenance needs on the assets. The city responds to illicit discharge reports to 311 and 625-7999, Environmental Report Tracking System (ERTS) complaints submitted to Ecology that Ecology notifies the city of, and opportunities that the Spokane Regional Health District identifies while encouraging pollution prevention.

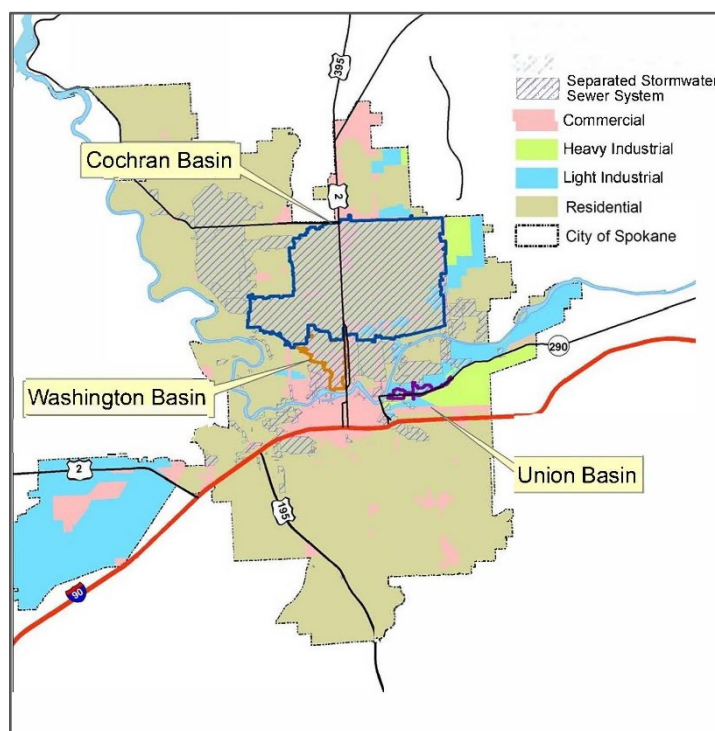
2.3.4.1 Priority Areas

IDDE priority investigation areas have been defined according to the receiving water body, past illicit discharge complaints, land use and known sources of contamination. The Spokane River flows through

the City, and is the main priority water body. Review of past illicit discharge complaints do not indicate that any one sub-basin within the MS4 had substantially more complaints than another. Figure 2 illustrates a map of zoning and MS4 sub-basins. Industrial zoning areas are assumed to have the greatest potential for storage of large quantities of materials which may potentially produce illicit discharges. Only one stormwater basin within the City, the Union Basin, is located in a heavy industrial area. The Union Basin is located between I-90 and the Spokane River, east of the Hamilton Street Bridge as shown in Figure 2, and is located in heavy industrial and light industrial zoned areas.

PCBs from unknown ubiquitous sources are a contaminant of concern in the Spokane River and may contribute to illicit discharges. The city has performed extensive investigative efforts to obtain environmental PCB information. The [Wastewater PCBs - City of Spokane, Washington \(spokanecity.org\)](http://spokanecity.org/WastewaterPCBs) website details the city's approach to PCBs. Stormwater and catch basin sediments throughout in the Union Basin were sampled for PCBs in 2009, and remedial maintenance was performed on each catch basin after sampling. This effort was part of a larger study that also sampled catch basins in other MS4 sub-basins throughout the City, and detailed sampling and analysis report information is available on the City's website.

Figure 3. Map of zoning and MS4 sub-basins.



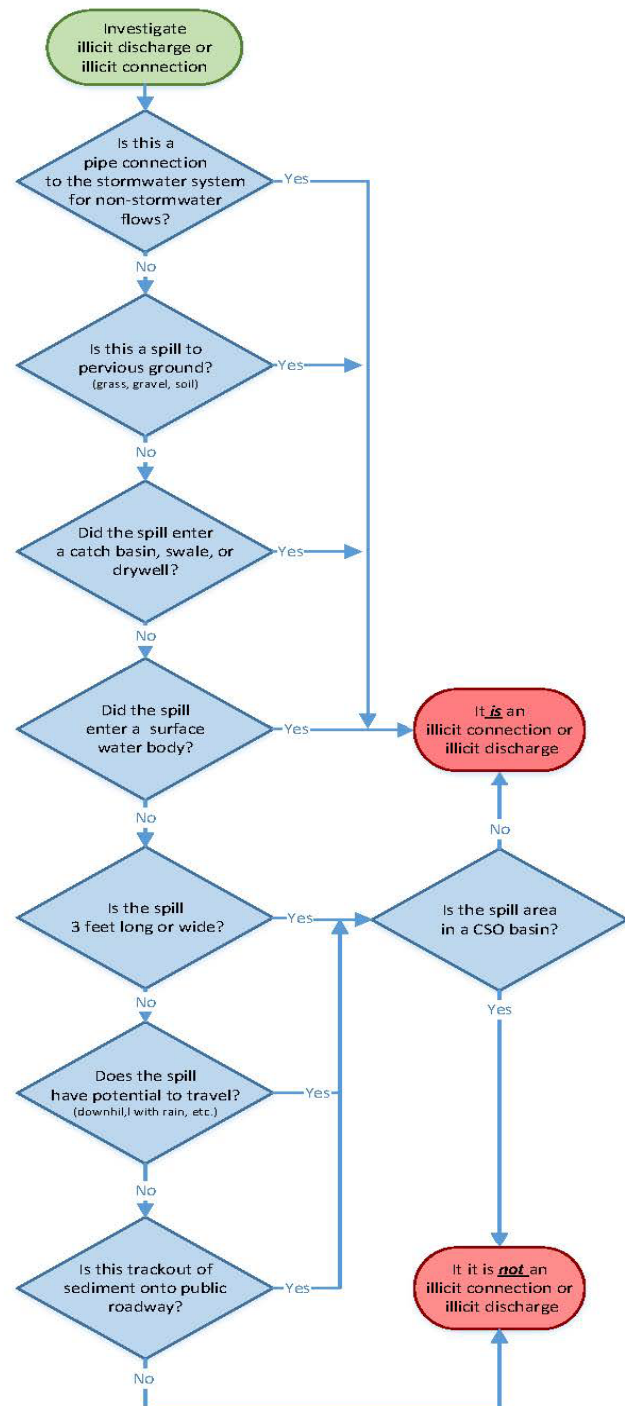
The City's illicit discharge potential investigation efforts include the Cochran and Washington stormwater basins. The Cochran stormwater basin is the largest basin in the City, encompassing nearly 5,300 acres of primarily residential area with relatively smaller areas of commercial and light industrial land use. The Cochran basin is considered to have 'typical' stormwater pollutant concentrations for the City, and a project currently underway to pull stormwater flows for the Type IIA design storm offline and send to treatment in three separate green stormwater infrastructure locations. The Cochran Basin project will continue through 2022, and is anticipated to be completed in 2023.

The Washington stormwater basin, whose outfall is on the north end of the Washington Street Bridge, is a much smaller stormwater basin (about 450 acres), where land use is predominantly commercial. Stormwater has been taken offline as project opportunities have risen, and a project that will install emerging stormwater treatment technologies will be implemented in 2022 that will take additional Washington Basin stormwater offline.

2.3.4.2 Field Inspections, Characterizing and Tracing Illicit Discharge

Most illicit discharge investigations are initiated when the city receives a call on the Illicit Discharge Hotline (625-7999), the MySpokane 311 hotline, or the Wastewater Management primary phone number (625-7900). The Illicit Discharge Hotline is publicized on storm drain markers throughout the City, on the wastewater management website, in brochures, and in booklets handed out at public events. A call to the hotline is routed to one of the Wastewater Management Stormwater Inspectors, who inspects and reports the Wastewater Management maintains a protocol for investigating stormwater complaints and keeping records. In addition to the stormwater hotline, Wastewater Management staff continually checks for illicit discharges as a part of normal day-to-day operations of stormwater asset maintenance. Staff and maintenance crews frequently en route to job sites throughout the City report any noticed illicit discharges to the Stormwater Inspectors. In many cases, the staff and maintenance crews inform the public about proper disposal and appropriate BMPs at the time of seeing the

Figure 4. IDDE Decision Tree



illicit discharge. Figure 3 is a decision tree procedural aid for determining if a released material is a reportable illicit discharge. The illicit discharge program is ongoing and will continue in 2022.

2.3.4.3 Eliminating Illicit Discharges

Curb Markers

Curb markers were installed on all catch basin inlets throughout the basin groups and the locations recorded during the sediment sampling process. Markers were not placed on sumps located in the middle of the street. After markers were installed, a larger effort was undertaken throughout the city. Areas with high pedestrian traffic, downtown, and around schools were targeted first. Installation of curb markers are now incorporated into regular maintenance activities throughout the City and will continue.

Spokane River Regional Toxics Task Force

The city is currently a contributing member of the Spokane River Toxics Task Force (SRTTF), which has a large focus on PCBs in our region. The city will continue to be a contributing member of the SRTTF. Additionally, the city is partnering with the SRTTF to develop stormwater messaging to the general public. The city is providing support to the task force and Ecology by providing access and coordinating sampling in the Union Basin and Mission Reach areas.



EnviroStars Waste Directory

The Spokane River Forum administers the EnviroStars program in Spokane, a small business certification program to provide assistance and incentives for reducing hazardous materials and waste. Businesses and households can use this resource to understand their waste and learn how to properly dispose of it. The city is a member of the forum, and is currently partnering with the forum to develop stormwater messaging for 2022 that aligns with the city's outreach for illicit discharge elimination.



2.4 Construction Site Stormwater Runoff Control

2.4.1 Construction Site Stormwater Runoff Control Permit Requirements

Section S5.B.4 of the permit requires the city to implement and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities.

Section S5.B.4.a requires the city to implement an ordinance by December 31, 2022 that applies to construction sites disturbing one acre or more, and to construction projects of less than one acre that are part of a larger common plan of development or sale.

The ordinance shall include:

- Provisions to review site plans,
- Provisions to inspect sites with high potential for sediment transport prior to clearing or grading,
- Provision for access by qualified personnel to inspect construction-phase stormwater BMPs on private properties that discharge to the MS4, and
- Sanctions to ensure compliance with escalating enforcement procedures and actions.

The ordinance shall require:

- Erosion and Sediment Controls, among others, at new development and redevelopment projects,
- Construction operators to:
 - Adhere to the Core Elements, which include preparation of Construction Stormwater Pollution Prevention Plans,
 - Implement appropriate erosion and sediment control BMPs, and
 - Control waste materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site.

Section S5.B.4.b requires the city to implement procedures for site plan review which incorporates consideration of potential water quality impacts.

Section S5.B.4.c requires the city to implement procedures for site inspection and enforcement of construction stormwater pollution control measures prior to clearing and grading for high potential sites, and during construction to verify proper installation and maintenance of required erosion and sediment controls.

Section S5.B.4.d requires the city to ensure that all staff who are implementing construction stormwater program are trained accordingly.

Section S5.B.4.e requires the city to provide information to construction site operators about available training opportunities.

Section S5.B.4.f requires the city to keep records of all projects disturbing one acre or more, and all projects of any size that are part of a common plan of development or sale that is one acre or more.

2.4.2 Construction Site Stormwater Runoff Control Introduction

The *Spokane Regional Stormwater Manual (SRSM)* was developed in joint cooperation by the Cities of Spokane and Spokane Valley and Spokane County. The manual establishes standards for stormwater design and management to protect water quality, natural drainage systems and down-gradient properties as urban development (and redevelopment) occurs. The permit requires that the city use the BMPs from the Washington State Department of Ecology's *Stormwater Management Manual for Eastern Washington (SWMMEW)*, or another technically equivalent manual approved by Ecology. The SRSM was updated to reflect the 2019 revisions of the SWMMEW and provided to Ecology for approval in 2021. The SRSM will continue to be used in 2022.

2.4.3 Construction Site Stormwater Runoff Control Activities

The SRSM outlines Erosion and Sediment Control (ESC) requirements, which are equivalent to Core Element #2, Construction Stormwater Pollution Prevention, in Appendix 1 of the Permit. An ESC plan is a requirement of the construction permit process and is equivalent to the Permit's Construction Stormwater Pollution Prevention Plan (Construction SWPPP). Controlling erosion and preventing sediment and other pollutants from leaving the project site during the construction phase is achievable through implementation and selection of BMPs that are appropriate both to the site and to the season during which construction occurs.

The SRSM highlights four objectives of the ESC Plan:

- Protect existing or proposed stormwater management infrastructure;
- Minimize the impacts of erosion, sedimentation and increased runoff caused by land-disturbing activities on private property, public roads and rights-of-way, and water bodies;
- Protect the health, safety and welfare of the general public;
- Protect water quality.

An ESC Plan is required for land disturbing activities 5,000 square feet or greater and projects identified as special sites of any size. Special sites are defined in SMC 17D.090.080 and may include sites with greater than 10 percent slope, highly erosive soils, slope lengths greater than 300 feet, or disturbance of natural vegetative buffer within 50 feet of a wetland or water body. If an ESC Plan is not required, the proponent would still be responsible to control erosion and sediment during construction.

2.4.3.1 Construction Site Stormwater Runoff Control Ordinance (S5.B.4.a.)

The ESC Ordinance, available on the Spokane Municipal Code 17D.909 website, was adopted and is relevant documents such as the SRSM and SWMMEW; require drainage plans and submittals, maintenance and performance standards in compliance with the Permit.

2.4.3.2 Procedures for Site Plan Review (S5.B.4.b.)

Erosion and sediment control (ESC) plans are reviewed by the Development Services Center to ensure the proposed controls prevent erosion and keep pollutants from leaving the project site during construction. Commercial application submittal requirements are available on the City's website. An ESC Plan is required as one of the minimum site plan elements.

2.4.3.3 Site Inspection and Enforcement (S5.B.4.c.)

Inspectors and field engineers from the Development Services Center inspect privately constructed infrastructure. The City of Spokane also has two stormwater inspectors located at the Wastewater Management Department who inspect development sites during construction and when illicit discharge calls are received by the general public. Engineering Services provides construction oversight for public capital improvement projects on City-owned land. The Engineering Services inspectors verify proper installation and maintenance of required erosion and sediment controls for NPDES Construction Stormwater General permitted development sites and capital improvement projects prior to clearing and grading for construction if a high potential for sediment transport is determined, and during construction.

Records of inspections and enforcement actions by Wastewater Management staff are maintained concurrently with the Illicit Discharge program. Many of the erosion and sediment control violations, such as track-off of sediments from the construction site to the street, are considered illicit discharges. These are logged in a database (Complaint Tracker) and on employee time sheets. WWM also maintains records of inspection reports and notices of violations.

Records of inspections and enforcement actions completed by Engineering Services and the Development Services Center are maintained in daily inspection logs as well as digitally in the Accela computer software program.

2.4.3.4 Training and Informational Materials (S5.B.4.d.)

Informational materials regarding erosion and sediment control are available to construction site operators, design professionals, and other members of the public in the Development Services Center lobby at City Hall. In addition to highlighting erosion and sediment control requirements, brochures direct the target audience to the SRSM. The SRSM details erosion and sediment control requirements equivalent to Appendix 1 of the Permit and BMPs in Department of Ecology's SWMM EW.

2.5 Post-Construction Stormwater Management

Section S5.B.5 of the permit requires the city to implement a program to address post-construction stormwater runoff for development and redevelopment projects to ensure that controls are in place to prevent or minimize water quality impacts.

Section S5.B.5.a requires the city to implement an ordinance by December 31, 2022 that requires post-construction stormwater controls for development and redevelopment projects that disturb one acre or more or, are less than one acre and are part of a larger common plan of development or sale. The ordinance must include mechanisms to ensure compliance, and require projects to adhere to the Core Elements. The ordinance must also include requirements to ensure adequate ongoing long-term operation and maintenance of the constructed BMPs.

Section S5.B.5.b requires that the ordinance or other regulatory mechanism include provisions for both construction-phase and post-construction access for the city to inspect stormwater facilities and BMPs on private properties that discharge to the MS4.

Section S5.B.5.b.ii of the permit details that the ordinance should require development and redevelopment projects to adhere to the Core Elements and encourage Low Impact Development of green stormwater infrastructure.

Section S5.B.5.b.ii(c) of the permit requires the ordinance to include requirements to ensure adequate long-term operation and maintenance of the BMPs occurs.

Section S5.B.5.b.iii of the permit requires that the ordinance include provisions for both construction-phase and post-construction access for the city to inspect stormwater BMPs on private properties that discharge to the MS4. In lieu of requiring post-construction access to private properties for city inspectors in perpetuity, Section S5.B.5.b.iii allows for the city to require annual certifications of stormwater facilities by a qualified third party to meet the conditions of S5.B.5.b.ii(c) of the permit.

Section S5.B.5.b.iv of the permit requires that the ordinance include enforcement procedures with the ability to escalate.

Section S5.B.5.b.v of the permit requires the ordinance to include enforce provisions, and for the city to implement an enforcement strategy for the conditions of Section S5.B.5 of the permit.

2.5.1 Post-Construction Stormwater Management Permit Requirements (S5.B.5)

- Implement an ordinance that requires post-construction stormwater controls at new development and redevelopment projects.
- Implement procedures for site plan review.
- Implement procedures for site inspection and enforcement of post-construction stormwater control measures.
- Provide training for staff involved in post-construction stormwater management.
- Provide information to design professionals about available training and compliance with BMPs described in the Spokane Regional Stormwater Manual.
- Establish record-keeping methods.

2.5.2 Post Construction Stormwater Management Permit Introduction

This section identifies post-construction stormwater requirements, including adoption of the Stormwater Facilities Ordinance, site plan review, site inspection and enforcement of control measures, training, and record keeping. The SRSRM, introduced in section 2.4, is used to implement the post-construction stormwater runoff program. The Manual meets or exceeds applicable criteria from the Washington State Department of Ecology's SWMMEW.

2.5.3 Post-Construction Stormwater Management Activities

The SRSM outlines the post-construction stormwater program. Chapter 2, Basic Requirements, defines the eight basic requirements for stormwater management for new development and redevelopment projects. Within the City, the threshold for requiring compliance with the Basic Requirements is the “addition or replacement of any impervious surfaces.”

Basic Requirements include:

- No. 1 – Drainage Submittal;
- No. 2 – Geotechnical Site Characterization;
- No. 3 – Water Quality Treatment;
- No. 4 – Flow Control;
- No. 5 – Natural and Constructed Conveyance Systems;
- No. 6 – Erosion and Sediment Control;
- No. 7 – Source Control; and
- No. 8 – Operation and Maintenance.

The Stormwater Site Plan referenced in the municipal stormwater permit (S5.B.5.b) is analogous to the Drainage Submittal in the SRSM (2.2.1 Basic Requirement No. 1). A Concept Drainage Report, a requirement of a Drainage Submittal, is generally required for large projects or those located in environmentally sensitive areas to preliminarily assess drainage requirements and potential impacts. A Drainage Report, another requirement of a Drainage Submittal, is required for most projects and is used to identify drainage impacts from the project as well as determine necessary stormwater runoff treatment and controls. The Drainage Report also assesses operation and maintenance requirements, inspection requirements, and erosion and sediment control.

2.5.3.1 Post-Construction Stormwater Facilities Ordinance (S5.B.5.a.)

The Stormwater Facilities Ordinance, [SMC Chapter 17D.060](#), was adopted and effective in March of 2010. The ordinance references relevant design documents such as the SRSM and the City of Spokane design standards and specifications, enforcement authority, runoff and infiltration controls, and natural location of drainage requirements.

2.5.3.2 Procedures for Site Plan Review (S5.B.5.c.)

Drainage submittals are reviewed by the Planning department for code requirements such as critical areas of management, buffers, impervious area creation, building and landscape design and building setbacks. Then, Development Services Center reviews Drainage Submittals for civil plan requirements as described in City Engineering Design Standards and the SRSM.

Engineering Services reviews plans for City Capital Improvement Projects and stormwater plans for the public right-of-way to ensure consistency with Design Standards.

The Development Services Center reviews and approves drainage submittals for private commercial and residential developments. A Stormwater Intake Checklist was added to the City’s Engineering Services website to ease the review process. The drainage submittal requires a Drainage Report, Drainage Plan, Grading Plan, Swale Details, and Erosion and Sediment Control Plans and Details. The City requires

developers to submit a maintenance plan for all facilities during the plan review. A draft copy of the Conditions, Covenants and Restrictions (CC&Rs) for the homeowners' association in charge of operating and maintaining the drainage facilities is required.

The developer must address any comments resulting from City staff review and submit revised plans to the City. After confirming that staff comments have been adequately addressed, the Development Services Center will send the developer a letter accepting the design and permitting construction.

2.5.3.3 Site Inspection and Enforcement (S5.B.5.d.)

There are three inspectors and a field engineer from the Development Services Center who inspect privately constructed infrastructure. Two stormwater inspectors from the Wastewater Management Department inspect privately constructed stormwater controls. Engineering Services provides construction oversight for public capital improvement projects on City-owned land.

Private development sites are inspected during installation and upon completion of construction. If there are deficiencies, a punch list is created by the Engineering Services inspectors to be completed by the developer. Final acceptance does not occur until all deficiencies have been remedied.

2.5.3.4 Training for Staff and Professionals (S5.B.5.d., S5.B.5.e.)

The Development Services Center is responsible for providing information to construction site operators and design professionals about training available regarding how to (1) install and maintain effective erosion and sediment controls, (2) comply with the requirements of Appendix 1 of the Permit and (3) apply the BMPs described in the SRS. Copies of information provided to construction site operators are kept. If information is distributed to a large number of design professionals at once, the dates of the mailings and lists of recipients should also be kept.

Staff and professional training is provided for employees and design professionals to aid in reaching water quality goals, ensure permit compliance, and reduce pollution to stormwater runoff. Five training modules were developed, including NPDES Overview, Operations and Maintenance, Facility Inspections, Site Plan Review, and Illicit Discharge. Training was provided for LID and records should be kept including training materials, the date of training, and attendees.

2.5.3.5 Eastern Washington LID Guidance Manual

The Eastern Washington Low Impact Development (LID) Guidance Manual was adopted as a supplemental guidance for the design, construction, and maintenance of LID stormwater best management practices. The manual was a regional effort led by Spokane County in conjunction with many Eastern Washington municipalities, including the City of Spokane, the Washington Stormwater Center, Department of Ecology, and regional LID experts. It builds on the practices of stormwater pollution prevention, flow control, and treatment, promoting the use of natural features and managing stormwater as close to where it falls as possible. The guidance manual is available on the City's website. The City of Spokane adopted this manual in the Spokane Municipal Code ([SMC 17D.060.300](#)). LID remains optional in Eastern Washington, but is encouraged in the City in part by the adoption of this manual. It provides an understanding of LID practices applicable in Eastern Washington and design guidance that both developers and City review engineers can follow.

2.6 Pollution Prevention & Good Housekeeping for Municipal Operations

Section S5.B6 of the permit requires the city to implement an operation and maintenance program with the goal of preventing or reducing pollutant runoff from municipal operations.

Section S5.B.6.a of the permit requires the city to develop an Operation and Maintenance (O&M) Plan that details a schedule of the city's Operation and Maintenance activities by December 31, 2022. The O&M Plan must include BMPs that will reduce the discharge of pollutants and protect water quality.

Section S5.B6.a.i of the permit details that the O&M Plan must include appropriate pollution prevention procedures for the following types of facilities and/or activities that must be implemented by the city:

- Inspections and cleaning of stormwater collection and conveyance system assets to include[♦]:
 - Catch basins
 - Stormwater sewer pipes
 - Open channels
 - Culverts
 - Structural stormwater treatment
 - Structural stormwater treatment flow control facilities
- Notes: ♦ Waste materials generated must be properly managed, and adequate records kept of all cleaning inspection, and disposal activities.
- Maintenance of roads, highways, and parking lots owned or operated by the city that are pollutant generating impervious surface $\geq 5,000$ square feet to include:
 - Street cleaning
 - Deicing
 - Snow removal
 - Managing runoff from snow storage areas
 - Managing material storage areas (e.g. salt, sand, or other chemical storage)
 - All-season BMPs to reduce road and parking lot debris and other pollutants
 - Management of fleet vehicles fleets to include[♦]:
 - Storage
 - Washing
 - Maintenance
 - Repair
 - Fueling

Notes: ♦ All vehicle and equipment washing and maintenance must be performed in a self-contained covered building, or in designated wash and/or maintenance area that separates wash water from stormwater.

- Maintenance and pollution prevention activities for municipal buildings owned and/or operated by the city to include:
 - Cleaning
 - Washing
 - Painting
 - Other maintenance activities
- Maintenance and pollution prevention activities for parks and open spaces to include:
 - Application of fertilizer
 - Application of pesticides, and herbicides
 - Pet waste BMPs
 - Sediment and erosion control BMPs
 - BMPs for landscape maintenance and vegetation disposal
 - Trash and dumpster management
 - Building exterior cleaning and maintenance BMPs
- Implementing construction projects owned or operated by the city to include:
 - Adhering to the Construction Stormwater General Permit
 - Adhering to the construction and post-construction controls detailed in the Core Elements
- Implementing industrial activities owned or operated by the city to include:
 - Adhering to the conditions of the Industrial Stormwater General Permit
- Implementing and updating Stormwater Pollution Prevention Plans (SWPPPs) for material storage areas, heavy equipment storage areas, and maintenance owned or operated by the city to include♥:
 - Site map showing the facility's stormwater drainage, discharge points, and potential pollutant areas
 - Inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to precipitation or runoff
 - Spill prevention and mitigation plan for illicit discharges
 - Description and schedule of facility BMPs (operational and structural)♦
 - Annual inspections of the facility to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed.

- Record keeping of inspection results (report or checklist)

Notes: ♥ Unless required to have coverage under the Industrial Stormwater General Permit.

♦ BMPs shall be consistent with the Stormwater Management Manual for Eastern Washington, or other Ecology-approved technical manual.

- Implementation of flood management projects to include:
 - Controls that minimize impacts to site hydrology
- Implementation of BMPs at other facilities to include:
 - Protection of water quality

Section S5.B6.a.ii of the permit requires the O&M Plan to include schedule of inspections and requirements for recordkeeping pursuant to permit Section S9 – Reporting and Record Keeping. The schedule of inspections must include:

- Requirement to inspect a minimum of 95% of all known stormwater treatment and flow control facilities (except catch basins) owned, operated, or maintained by the city shall be inspected at least once every two years. Problem facilities identified during inspections should be inspected more frequently.
- Requirement to inspect all catch basins and inlets owned or operated by the city every two years. Catch basins should be cleaned as needed in accordance with permit section S5.B.6.a.
- Requirement to conduct spot of stormwater treatment and flow control facilities after major storm events for damage. Maintenance and repairs should be performed as soon as practicable.

Section S5.B6.a.iii of the permit requires the city to identify the responsible departments or roles for performing each activity in the O&M Plan.

Section S5.B6.a.iii of the permit requires that all city employees with primary construction, operations, or maintenance job functions that are likely to impact stormwater quality to have training that addresses trained: protection of water quality, operation and maintenance requirements, relevant SWPPPs, inspection procedures, and pollution prevention methods to use during job activities.

2.6.1 Municipal Operations and Maintenance (S5.B.6)

- Implement Operations and Maintenance (O&M) Plans for municipally-owned facilities. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for the following facilities and/or activities:
 - Stormwater collection and conveyance system

- Roads, highways and parking lots
- Vehicle fleets
- Municipal buildings
- Parks and open space
- Construction projects
- Industrial activities
- Material storage areas, heavy equipment storage areas and maintenance areas
- Flood management projects
- Other facilities that would reasonably be expected to discharge contaminated runoff
- Provide training for employees who have primary construction, operations or maintenance job functions that are likely to impact stormwater quality

2.6.2 Municipal Operations and Maintenance Introduction

An operation and maintenance (O&M) program has been developed and implemented that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

2.6.3 Municipal Operations and Maintenance Activities

In coordination with each pertinent City department, Wastewater Management developed a Stormwater Pollution Prevention Operations and Maintenance (O&M) Plan. The O&M Plan was updated to include City activities in one comprehensive document. The Wenatchee O&M Plan template, provided by Ecology, was used.

The O&M Plan highlights pollution control, good housekeeping, BMPs and source control measures that are implemented at public facilities. Basic principles of the O&M Plan are shown below. Recordkeeping and inspection requirements as well as responsible departments are listed within the O&M Plan. It's available on the City's website.

2.6.3.1 Stormwater Collection and Conveyance System

Stormwater treatment and flow control facilities owned by the City were inspected by Wastewater Management at least once during the first Permit cycle. After major storm events, at a minimum for the 10-year recurrence interval, spot checks of these facilities are conducted. The second permit cycle requires that each facility be inspected at least once every two years. Maintenance concerns are reported after each inspection and addressed as necessary.

The MS4, including streets, catch basins, curbs, gutters, ditches, and storm drains, are also inspected by Wastewater Management. Wastewater Management utilizes a database to assist with documenting inspections. The City is divided into four quadrants. Maintenance crews inspect the sewer and

stormwater systems in each quadrant until inspection of the system is complete before restarting the process. Catch basins are inspected for proper function, structural stability, and debris buildup. A work order is processed for any required maintenance work. Catch basins on steep hills and in problem flooding areas are inspected twice a year (spring and fall).

Numerous bio-infiltration swales are located throughout the City. Adjacent property owners and Planned Unit Developments (PUDs) are responsible for maintenance of most swales. WWM is responsible for maintenance of a portion of the swales. The swales maintained by WWM are either planted in dry land grass and maintained as needed or planted in turf grass and maintained on a regular schedule. Turf grass is mowed regularly to maintain a height of two to three inches. For curb cut inlets, maintenance crews remove grass, sediment and debris to prevent buildup and clogging of the inlet. Curb cut inlets are inspected as maintenance crews work through their designated quadrants of the City, or if there is flooding problems.

Culverts are inspected on a three-year cycle by the City's Street Department. Wastewater Management staff clean out culvers as needed upon request.

2.6.3.2 Decant Facility

The City received a grant from the Department of Ecology to construct a Vactor waste decant facility at the Playfair site, located at 2400 E. Ferry, in Spokane, Washington. Waste generated from cleaning catch basins and other stormwater management and treatment facilities are transferred to the decant facility. At the facility, the liquids are decanted from solids. Liquids are conveyed to an evaporation pond, and solids are transported to a lined landfill. Procedures for using the decant facility are incorporated into the O&M Plan and a site Stormwater Pollution Prevention Plan (SWPPP).

2.6.3.3 Roads, Highways and Parking Lots

The City of Spokane Street Maintenance Division is responsible for cleaning, repairing and performing preventative maintenance on the 2017 lane miles of paved streets and 61 lane miles of gravel streets. Various divisions within the Streets Department are responsible for maintaining the following: street sweeping, leaf pick up, weed control, street markers, asphalt repair, paving and bridge maintenance, de-icing operations and snow removal. Streets equipment is located at the Central Services Center at 901 N. Nelson, and site has a site specific SWPPP.

2.6.3.4 Vehicle Fleets, Heavy Equipment Storage Areas and Maintenance Areas

The City of Spokane Fleet Services conducts routine vehicle maintenance on City vehicles including heavy equipment. Fleet Services also conducts major vehicle engine maintenance and/or repairs on vehicles. Vehicle maintenance BMPs are followed to prevent stormwater pollution from cleaning solvents, leaking vehicle parts and vehicle fluids.

The City of Spokane Fleet Services stores numerous heavy and small equipment as well as vehicles on impervious areas such as concrete or asphalt. Oils, greases, metals, vehicle fluids and suspend solids can contribute to stormwater pollution. These facilities are considered high-use sites and have oil/water separators installed.

Fleet Services' Central Service Center facility has a covered designated area wash bay for trucks, equipment, and vehicle washing. The wash bay is connected to the sanitary sewer and is equipped with an oil/water separator for pretreatment of wash water. Sewer Maintenance cleans and removes accumulated sediment as needed. BMPs are followed for proper washing and storage of equipment. SWPPPs have been prepared for facilities with material storage areas, heavy equipment storage areas, and maintenance areas. However, there are no known municipal facilities which discharge runoff to the separated storm sewer system. At this time, we are unaware of any municipal facilities that require industrial stormwater permits.

2.6.3.5 Municipal Buildings

Facility operations have the potential to pollute stormwater without proper BMP utilization. Measures are taken to control window washing, carpet and floor cleaning, exterior building and rooftop cleaning and maintenance, painting, trash and dumpster management, remodeling and retrofitting, parking lot maintenance, and landscape maintenance.

2.6.3.6 Parks and Open Space

Pesticides, herbicides, and fertilizers contain pollutants such as nutrients and toxins. City of Spokane Parks Operations only utilizes store-bought products (i.e. Trimec, Tripleshot, Foundation, Speedzone, Roundup®, fertilizers). Small amounts of such products are applied to stormwater facilities in the field for routine maintenance. By law, when applying any Restricted Use Pesticide (RUP), the applicator must be certified. BMPs are utilized to minimize the impact of pesticides, herbicides, and fertilizers.

Landscaping waste can consist of, but is not limited to, leafy and woody debris from clipping, cutting, mowing and other maintenance activities. These materials can accumulate in the storm system and/or discharge into receiving waters. To ensure that these waste materials do not enter the storm drainage system, proper disposal is necessary.

2.6.3.7 Construction Projects

Municipal construction projects are subject to the same requirements as those projects proposed by private developers. During construction, erosion and sediment controls are used to prevent sediment-laden stormwater from flowing away from the site and into the stormwater collection and conveyance system. Construction NPDES permits are obtained from the Department of Ecology for projects disturbing more than one acre.

2.6.3.8 Staff Training (S5.B.6.b.)

The City provides training for employees with primary construction, operation, or maintenance job functions likely to impact stormwater quality. Target employees were identified to participate in the training sessions. Training addresses the importance of protecting water quality, the requirements of the Permit, operation and maintenance requirements, inspection procedures, ways to perform job activities to prevent or minimize impacts to water quality, and procedures for reporting such water quality concerns as potential illicit discharges. Follow-up training should be provided as needed to address changes in procedures, methods or staffing.

Training is generally provided in conjunction with other permit training requirements and/or on the job training activities. Records should be kept including training materials, the date of training, and attendees.

3.0 TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

Section S7 of the permit requires the city to apply the conditions of the Total Maximum Daily Limit (TMDL) applied to the Spokane River and Lake Spokane (Long Lake), which are detailed in Appendix of the permit. Appendix 2 of the permit states that the city must:

- Continue to monitor Cochran Basin for phosphorus, ammonia, CBOD, and flow rates in accordance with the Cochran Basin DO TMDL Stormwater Sampling Quality Assurance Project Plan (April 2016).
- Continue to implement the monitoring program throughout the duration of the Eastern Washington Phase II Permit issued on August 1, 2019, and expires on July 31, 2024.
- Enter the results of monitoring for each calendar year into Ecology's EIM database by January 31st of the following year.
- Evaluate and report the results of the monitoring program on an annual basis with respect the city's share of the stormwater Waste Load Allocations in the TMDL.

3.1 TMDL Permit Requirements (S7)

Section S7 applies for jurisdictions with applicable Total Maximum Daily Load (TMDL) approved for stormwater discharges from MS4s as listed in Appendix 2 of the permit. Appendix 2 of the permit states the City of Spokane, within the area under its jurisdiction, shall:

- Continue to implement the Appendix 2 TMDL monitoring program that was developed during the August 1, 2014, to July 31, 2019, Eastern Washington Phase II Municipal Stormwater Permit cycle for the Cochrane Basin. Stormwater shall be monitored for phosphorus, ammonia, CBOD, and flow rates. Monitoring shall be conducted shall be conducted according to the Cochran Basin DO TMDL Stormwater Sampling Quality Assurance Project Plan (April 2016).
- The City of Spokane shall continue to implement the monitoring program throughout the duration of the Eastern Washington Phase II Permit issued on August 1, 2019, and expires on July 31, 2024.
- The results of the monitoring for each calendar year shall be entered into Ecology's EIM database by January 31st of the following year.
- The City of Spokane shall evaluate and report the results of the monitoring program on an annual basis with respect the City of Spokane's share of the stormwater Waste Load Allocations in the TMDL

3.2 TMDL Activities

Stormwater from the Cochran Basin in the northwest portion of the City of Spokane was monitored from 2016 – 2019. Continuous flow rates were recorded, and analyses was performed on stormwater samples for temperature, pH, total suspended solids (TSS), carbonaceous biological oxygen demand (CBOD),

phosphorus, ammonia, and polychlorinated biphenyls (PCBs). The City submitted the Cochran Basin Dissolved Oxygen (DO) TMDL Stormwater Monitoring Report to Ecology in June 2020, which presented the monitoring results for the basin for the years 2016 – 2019 in accordance with Appendix 2 of the permit.

The monitoring data indicated that the City exceeded the assumptive modeled Waste Load Allocations in 2016 and 2017 for CBOD, and 2019 for ammonia. Given the WLA exceedances, the Stormwater TMDL Waste Load Reduction Action Plan was submitted to Ecology on August 6, 2020, which detailed the construction of stormwater infrastructure that will ultimately eliminate discharges from Cochran Basin into the river for storms up to the size of the 6-month design storm. In support of treatment for Cochran Basin stormwater runoff, the City evaluated treatment facility design options at properties near or within the basin. The evaluation determined that the preferred design option would be to construct three separate treatment facilities near the current Cochran Basin stormwater outfall. The three bioretention facility locations will be at TJ Meenach Drive and Northwest Boulevard, the Disc Golf Course at Downriver, and the Boat Launch facility near the TJ Meenach Bridge. Flows to each facility will be managed from a single common flow control vault in Cochran Street between Cleveland and Grace Avenues. The flow control vault will distribute prescribed flows to each of the facilities, and will bypass flows in excess of the 6-month design storm to the existing outfall which discharges to the Spokane River.

Monitoring continued to be conducted in 2020 in accordance with the protocols established in the Cochran Basin DO TMDL Stormwater Sampling Quality Assurance Project Plan (QAPP). Six qualifying storm events were monitored and sampled for phosphorus, ammonia, CBOD, and flow rates, among other parameters, in 2020. Monitoring for phosphorus, ammonia, CBOD, and flow rates, among others, will continue to be conducted in accordance with the QAPP through the end of the permit cycle in July 2024. Monitoring results were tabulated and uploaded into Ecology's Environmental Information Management (EIM) database for the year 2020 data.

Upon receipt of comments back from Ecology on the Cochran Basin Dissolved Oxygen TMDL Stormwater Monitoring Report, the City will evaluate and create a report of the results of the annual monitoring performed in 2020.

4.0 MONITORING AND ASSESSMENT

Section S8 of the permit requires the city perform and/or participate in effectiveness studies. Section S8.A.1 requires the city to continue to implement the effectiveness studies that are ongoing from 2014-2019 permit cycle in accordance with the applicable Quality Assurance Project Plan (QAPP).

Section S8.A.2 of the permit requires the city to plan and begin an additional effectiveness study, and encourages collaboration with other municipalities.

Section S8.A.2.a requires the city to:

- Participate in an effectiveness study by serving as the Lead Entity, contributing staff time or other in-kind services, and/or providing funding,

- Submit to Ecology a brief description of the study, with a list of project participants and each participant's associated role(s) in the study, on or before June 30, 2021,
- Submit a detailed study design proposal to Ecology on or before September 30, 2022 following the instructions in *Eastern Washington Stormwater Effectiveness Studies, Detailed Study Design Proposal & QAPP* template (July, 1, 2019, v.1),
- Submit a completed QAPP on or before July 31, 2023,
- Begin to conduct the study on or before December 1, 2023, or within three months of receiving Ecology's approval of the QAPP (whichever is later), and
- Include effectiveness study activities (e.g. assigned duties; participation in meetings, proposal development, project reviews; and study implementation) in the Permittee's updated SWMP.

Section S8.B.2.1 of the permit requires the city to follow the reporting requirements and timelines in the approved QAPP for the study, including:

- Entering all applicable data collected for the study into Ecology's Environmental Information Management (EIM) database.
- Publishing a final report within 60 days with the results of the study and recommended future actions based on the findings.
- Producing a fact sheet summarizing the findings and recommendations with 90 days of completing the study and sharing it with other Permittees. The target audience for the fact sheet is stormwater managers and local government elected officials.

Section S8.B.2.2 of the permit requires the city to track assigned duties and record participation in effectiveness study meetings, proposal development, project reviews, and study implementation, and include a summary in the Permittee's Annual Report.

4.1 Monitoring and Assessment Permit Requirements (S8)

- Continue to participate in implementation of the Ecology-approved studies pursuant to *Eastern Washington Phase II Municipal Stormwater Permit (2014-2019)*.
- Coordinate with other Permittees in your Urban Area to plan and begin an additional Stormwater Management Program effectiveness study. Submit to Ecology a detailed study design proposal.
- Submit a completed QAPP to Ecology.
- Enter all applicable data collected as part of conducting the study into Ecology's Environmental Information Management (EIM) database.
- Within 60 days of completing the study, publish a final report with the results of the study and recommended future actions based on the findings.

4.2 Eastern Washington Effectiveness Studies

Each City and County in Eastern Washington was required to participate in preparation of studies to test the effectiveness of stormwater management program components. A total of twelve to fifteen study ideas were submitted to Ecology. Eight to twelve of these studies should be implemented.

The City of Spokane Valley received a grant from Ecology and was coordinating the first phase of this effort. In 2014, permittees developed a long list of potential study ideas and began to refine the list. Potential studies may involve:

- Public education and outreach strategies that provide the most benefit
- Catch basin cleaning and street sweeping effectiveness
- Most beneficial frequency of maintenance practices
- IDDE techniques that provide the most benefit
- Planting options for vegetated swales
- Pollutant loading from various land uses specific to eastern Washington
- Checklists for reporting requirements
- Effective design of BMPs

Two effectiveness studies have been initiated by the City of Spokane: 1) Sharp Avenue Sharp Avenue Permeable Pavement Pollutant Removal Efficacy Study, and 2) Garland Avenue Biochar Amended Storm Garden Pollutant Removal Efficacy Study.

4.2.1 Sharp Avenue Sharp Avenue Permeable Pavement Pollutant Removal Efficacy Study

Permeable pavement in the forms of pervious concrete and porous hot mix asphalt was constructed on Sharp Avenue in order to satisfy the effectiveness studies requirements of Section 8 of the permit. The project was funded in part by Ecology grant WQC-2016-Spokane-000016, and construction was completed in 2018. The intent of permeable pavement is to allow for precipitation and stormwater runoff to infiltrate into the subsurface. Therefore, the location of this study is its own catchment area or drainage basin. This drainage basin includes a portion of a minor arterial with Average Daily Traffic (ADT) count of 7,500 that is surrounded by residential and campus land use. The approach of this study is to collect stormwater infiltrated into the permeable pavements and associated sub-base via underdrains and piping conveyance systems to separate monitoring locations.

Two different types of permeable pavements have been constructed on Sharp Avenue: porous hot mix asphalt (HMA) and pervious concrete. Pervious concrete with associated sub-base materials was constructed on Sharp Avenue between the side streets of Lidgerwood Street and Astor Street, where a liner and underdrain were installed on the south side of Sharp Avenue to collect infiltrated stormwater for sampling. Porous HMA with associated sub-base materials was constructed on Sharp Avenue between the side streets of Addison Street and Dakota Street, where a liner and underdrain were installed on the south side of Sharp Avenue between Addison Street and Standard Street to collect infiltrated stormwater for sampling. In order to collect a background stormwater sample to determine the efficacy of pollutant removal by the permeable pavements, catch basins and conveyance piping were installed to the west of the permeable pavement areas in order to collect un-infiltrated stormwater runoff.

A Quality Assurance Program Plan detailing the monitoring to be conducted was submitted to Ecology and approved in 2019. Monitoring began in 2019 and will be ongoing for 5 consecutive years to include observations of the pavements through the changes in season and in response to maintenance activities such as street sweeping and snow removal. Stormwater sampling at 3 distinct locations began in 2019 and the data continues to be evaluated. Infiltration tests at various locations is being performed before and after certain street sweeping events to monitor changes in the permeability of the pavements after sweeping and over time.

The Sharp Ave effectiveness study was underway in 2020. Sampling equipment had been installed in manholes on Sharp Ave. between Pearl St. and Dakota St., and sampling and analysis was performed in accordance with the Ecology approved QAPP, as storm events allow, and sampling will be ongoing through 2022. Data will be summarized at the end of the study in the year 2022 and published in accordance with the QAPP.

4.2.2 Garland Avenue Biochar Amended Storm Garden Pollutant Removal Efficacy Study

Storm gardens were installed on Garland Avenue in order to satisfy the effectiveness studies requirements of Section 8 of the permit. The City of Spokane and University of Idaho funded a laboratory research study to develop a soil/biochar design mix for application in the storm gardens. The study used bench-scale laboratory testing of two different types of biochar available in the Spokane Region: 1) wood, and 2) Kentucky bluegrass stubble. The laboratory study conducted at Gonzaga University included bench scale laboratory testing to identify a soil mixture for field application. Results from the study determined that the wood biochar with loamy sand (and no other additives) removed the most pollutants. As a result, it was selected for use in the storm garden field application phase.

The goal of this study is to measure the percent reduction of monitored pollutant concentrations between the influent and effluent at the storm garden. To achieve this, the City will sample the influent (pre-infiltration) and effluent (post-infiltration) stormwater concentrations. Influent sample concentrations will be measured prior to infiltration, and effluent sample concentrations will be measured after infiltration through the storm garden comprised of the amended soil. A Quality Assurance Program Plan detailing the monitoring to be conducted was submitted to Ecology and approved in 2019. Monitoring began in 2019 and will be ongoing for 5 consecutive years to include observations of water quality over time.

The Garland Ave effectiveness study was underway in 2020. Sampling equipment had been installed at the corner of Garland Ave and Belt St., and sampling and analysis was performed in accordance with the Ecology approved QAPP, as storm events allow, and sampling will be ongoing through 2022.

4.2.3 Additional Effectiveness Study (2019–2024 Permit Cycle)

The City of Spokane is currently assessing the potential to cooperatively perform an effectiveness study with the City of Spokane Valley and Spokane County to determine the pollutant removal efficacies of two soils for comparison: 1) a bioretention soil mix created using soil mix standards provided in the

Stormwater Management Manual for Eastern Washington, and 2) a bioretention soil mix created using soil mix standards provided in the Spokane Regional Stormwater Management manual. If it is agreed on between the jurisdictions, adjacent swales will be installed in the field with each having a different soil mixture. Pollutant removal efficacies will be determined from data collected on stormwater pre- and post- swale for each swale co-located in a university parking lot. Dependent on the results, local stormwater management guidelines may be revised and municipal management strategies modified. The study would be implemented by a consultant on behalf of all municipal partners, and the City of Spokane would be the lead entity. If deemed feasible, plans to move forward will be finalized, and the details for this soil pollutant removal field study comparison will be provided to Ecology by June 2021

Section S9 of the permit requires the city to submit an annual report electronically using Ecology's WQWebPortal program no later than March 31st each year.

Section S9.A requires the city to keep all records related to the permit for at least five years.

Section S9.B requires the city to make all records related to the permit and this SWMP available to the public at reasonable times during business hours, and provide a copy of the most recent Annual Report to any individual or entity, upon request.

Section S9.C of the permit requires the city to include in the following:

- Stormwater Management Program Plan (SWMP Plan),
- Annual Report form describing the status of implementation of the requirements of the permit for the reporting period,
- Attachments to the Annual Report form including summaries, descriptions, reports, and other information, as required or as applicable, to meet the conditions of this Permit during the reporting period.
- Certification and signature of the report by principal executive officer or ranking elected official, and
- Notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in permit coverage during the reporting period.

5.0 ACRONYMS

BMP:	Best Management Practice
CFR:	Code of Federal Regulation
CSO:	Combined Sewer Overflow
CWA:	Clean Water Act
ESC:	Erosion and Sedimentation Control
GIS:	Geographic Information System
LID:	Low Impact Development
MS4:	Municipal Separate Storm Sewer System
NPDES:	National Pollutant Discharge Elimination System
O&M:	Operation and Maintenance
RCW:	Revised Code of Washington
SRSW:	Spokane Regional Stormwater Manual
SMC:	Spokane Municipal Code
SMP:	Stormwater Management Plan
SWMP:	Stormwater Management Program
SWPPP:	Stormwater Pollution Prevention Plan
TMDL:	Total Maximum Daily Load
UIC:	Underground Injection Control
WAC:	Washington Administrative Code

6.0 **DEFINITIONS**

Best Management Practice: The utilization of methods, techniques and/or products that have been demonstrated to be the most effective and reliable in minimizing environmental impacts.

CWA: The federal 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 in Pub. L. 95-217, Pub. L. 95-576, pub. L. 96-483, and Pub. L 97-117, 33 U.S.C 1251 *et seq.*

Development: Any proposed land use, zoning, or rezoning, comprehensive plan amendment, annexation, subdivision, short subdivision, planned unit development, planned area development, conditional use permit, special use permit, shoreline development permit, or any other property development action permitted or regulated by the Spokane Municipal Code (SMC).

Discharge (v): Disposal, injections, dumping, spilling, pumping, emitting, emptying, leaching or placing of any material so that material enters and exits from the MS4 or from any other publicly owned or operated drainage system that convey storm water. The term includes other verb forms where applicable.

Discharge (n): Runoff, excluding offsite flows, leaving the proposed development through overland flow, built conveyance systems or infiltration facilities.

Discharger: When used in the context of stormwater management and the SMC of 17D.060 and 17D.090, means any person who discharges to the City’s MS4 or any other publicly owned or operated drainage system that conveys, manages or disposes of stormwater flows.

Drainage: (1) The process of removing surplus ground or surface water by artificial means, (2) the manner in which the waters of an area are removed, or (3) the area from which waters are drained; a drainage basin.

Erosion and Sedimentation Control: Any temporary or permanent measures taken to reduce erosion, control siltation and sedimentation, and ensure that sediment-laden water does not leave a site.

Groundwater: Water in a saturated zone or stratum beneath the surface of the land or below a surface water body.

Heavy Equipment Maintenance or Storage Yard: An uncovered area where heavy equipment (e.g. mowers, excavators, dump trucks, backhoes, or bulldozers) is washed or maintained, or where at least five pieces of heavy equipment are stored regularly or on a long term basis.

Illicit Connection(s): Any man-made conveyance connected to the municipal separate storm sewer system (MS4 system) in violation of the National Pollutant Discharge Elimination System (NPDES) permit requirements.

Illicit Discharge: The introduction or discharge of anything into the municipal separate storm sewer system (MS4 system) in violation of the National Pollutant Discharge Elimination System (NPDES) permit requirements.

Impervious Surface: A hard surface area that either prevents or retards the entry of water into the soil mantle. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios,

driveways, parking lots, storage areas, concrete, or surfaces that impede the natural infiltration of stormwater.

Industrial Activity: Manufacturing, processing or raw materials storage areas at an industrial plant. These activities may be required to have Department of Ecology's NPDES permit coverage in accordance with 40 CFR 122.26.

Low Impact Development: A stormwater management and land development strategy applied at the parcel and/or subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic conditions.

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

Municipal Separate Storm Sewer System (MS4): A conveyance or system of conveyances, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains, (1) 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 the United States, (2) designed or used for collecting or conveying stormwater, (3) which is not a combined sewer, and (4) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

National Pollutant Discharge Elimination System (NPDES): 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 (Ecology).

NPDES Eastern Washington Phase II Municipal Stormwater Permit (WAR04-6505): A permit issued to the City of Spokane from the Washington State Department of Ecology, granting authority to discharge stormwater into state surface waters. Permit also addresses water quality issues.

Outfall: A point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

Permittee: Any Primary Permittee, Co-Permittee, or Secondary Permittee unless specifically stated otherwise for a particular section of permit WAR04-6505.

Pollutant: (1) Any substance prohibited or limited by federal, state or local regulations, released or discharged in conjunction with development. (2) Any substance, released or discharged, that causes or contributes to violation of water quality standards.

Runoff: Water that travels across the land surface, or laterally through the ground near the land surface, and discharges to water bodies either directly or through a collection and conveyance system, includes stormwater and water that travels across the land surface from other sources.

Spokane Regional Stormwater Manual: A technical document establishing standards for stormwater design and management to protect water quality, natural drainage systems, and down-gradient properties as urban development occurs.

Stormwater: Any runoff flow occurring during or after any form of natural precipitation, and resulting from such precipitation, including snowmelt. Stormwater further includes any locally accumulating ground or surface waters, even if not directly associated with natural precipitation events, where such waters contribute or have potential to contribute to runoff onto the public right-of-way, public storm or sanitary sewers, or flooding or erosion on public or private property.

Stormwater Management Program (SWMP): A set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the MEP, and to protect water quality; it comprises the components listed in S5 or S6 of permit WAR04-6505 and any additional actions necessary to meet the requirements of applicable TMDLs.

Total Maximum Daily Load (TMDL): A water cleanup plan. A TMDL is both 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 non-point sources. The calculation includes a margin of safety to ensure that the water body can be used for its state-designated purposes. The calculation also accounts for seasonable variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each water body—such as 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.

7.0 REFERENCES

- Brown, E., D. Caraco, and R. Pitt. 2004. *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*. Center for Watershed Protection, Ellicott City, MD. [<http://cfpub.epa.gov/npdes/stormwater/menuofbmps/illicit.cfm>]
- Casco Bay Estuary Partnership (CBEP). *Guidelines and Standard Operating Procedures: For Stormwater Phase II Communities in Maine*. [<http://www.cascobay.usm.maine.edu/publications.html>].
- City of Spokane, City of Spokane Valley, and Spokane County. (2008). *Spokane Regional Stormwater Manual*.
http://www.spokanewastewater.org/Docs/Stormwater/Spokane_Regional_Stormwater_Manual.pdf.
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- Washington State Department of Ecology. (2007). *Eastern Washington Phase II Municipal Stormwater Permit*.
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- Washington State Department of Ecology. (2008). *Municipal stormwater general permit: Guidance for cities and counties*.
- Washington State Department of Ecology. (2004). *Stormwater Management Manual for Eastern Washington*. <http://www.ecy.wa.gov/programs/wq/stormwater/tech.html>.

2021
City of Spokane
Stormwater TMDL Implementation



Annual Stormwater Report Reporting Year 2021

Summary of Applicable TMDL Requirements in Appendix 2 of the Permit

Stormwater from the Cochran Basin in the northwest portion of the City of Spokane was monitored from 2016 – 2019. Continuous flow rates were recorded, and analyses was performed on stormwater samples for temperature, pH, total suspended solids (TSS), carbonaceous biological oxygen demand (CBOD), phosphorus, ammonia, and polychlorinated biphenyls (PCBs). The City submitted the Cochran Basin Dissolved Oxygen (DO) TMDL Stormwater Monitoring Report to Ecology in June 2020, which presented the monitoring results for the basin for the years 2016 – 2019 in accordance with Appendix 2 of the permit.

The monitoring data indicated that the City exceeded the assumptive modeled Waste Load Allocations in 2016 and 2017 for CBOD, and in 2019 for ammonia. Given the WLA exceedances, the Stormwater TMDL Waste Load Reduction Action Plan was submitted to Ecology on August 6, 2020, which detailed the construction of stormwater infrastructure that will ultimately eliminate discharges from Cochran Basin into the river for storms up to the size of the 6-month design storm. In support of treatment for Cochran Basin stormwater runoff, the City evaluated treatment facility design options at properties near or within the basin. The evaluation determined that the preferred design option would be to construct three separate treatment facilities near the current Cochran Basin stormwater outfall. The three bioretention facility locations will be at TJ Meenach Drive and Northwest Boulevard, the Disc Golf Course at Downriver, and the Boat Launch facility near the TJ Meenach Bridge. Flows to each facility will be managed from a single common flow control vault in Cochran Street between Cleveland and Grace Avenues. The flow control vault will distribute prescribed flows to each of the facilities, and will bypass flows in excess of the 6-month design storm to the existing outfall which discharges to the Spokane River.

Monitoring continued to be conducted in 2020 and 2021 in accordance with the protocols established in the Cochran Basin DO TMDL Stormwater Sampling Quality Assurance Project Plan (QAPP). Six qualifying storm events were monitored and sampled for phosphorus, ammonia, CBOD, and flow rates, among other parameters, in 2020. Five qualifying storm events were monitored and sampled for phosphorus, ammonia, CBOD, and flow rates, among other parameters, in 2021. Monitoring for phosphorus, ammonia, CBOD, and flow rates, among others, will continue to be conducted in accordance with the QAPP through the end of the permit cycle in July 2024. Monitoring results were tabulated and uploaded into Ecology's Environmental Information Management (EIM) database for the year 2021 data.

The data collected from the 2020 and 2021 monitoring has been evaluated, and the monitored constituents appear to be below the waste load allocations. Comments have not been received on the methodologies used to write the Cochran Basin Dissolved Oxygen TMDL Stormwater Monitoring Report that was submitted in June 2020, and the approaches used to calculate the waste loads has not been validated by Ecology. Upon receipt of comments back from Ecology on the report submitted in June 2020 confirming the approaches to calculating the waste loads are valid, the city will generate reports of the results of the annual monitoring performed in 2020 and 2021.

2021
City of Spokane
Public Education and Outreach
Summary



City of Spokane Wastewater Department
SPOKANE STORMWATER
2021 Recap

CAMPAIGN SUMMARY

A key category of the full 2021 City of Spokane Water Stewardship campaign included incorporating seasonally-specific messaging with a focus on informing the local community about regional Stormwater safety, pollution prevention, and shared, responsible management. Primarily throughout the late winter, spring, and early autumn months a blend of video, photo, and digital resources were shared with the public utilizing the Water Wise Spokane social media channels, streaming digital audio, and the City of Spokane website.

Outlining key content, production acquisition planning, and distribution strategizing began in the early part of the year, with publication and dissemination rolling out during the months of highest regional rainfall. Leveraging the suite of freshly redesigned Spokane Stormwater logo and branding assets, the primary messages included defining stormwater, causes of pollution and potential risks to the Spokane River and natural ecosystem, the responsibility of residents to keep stormwater clean, as well as illuminating the efforts the City of Spokane Wastewater Department actively takes to manage stormwater. Notably, the content highlighted and defined neighborhood and community swales, shared a downtown CSO tank tour, featured local natural stormwater filtration spaces such as the Gonzaga University Sharp Avenue porous pavement project, demonstration of water system backflow prevention, detailed various sources of human-generated stormwater pollutants, in addition to the preventative maintenance that can be taken before rain water ever hits a storm drain, showcased the Green Area Maintenance Crew, as well as the wide scope of essential work being conducted by the Wastewater Department to protect and conserve our region's water.

With another year of focused Spokane Stormwater messaging and public outreach complete, reaching thousands of measurably engaged Spokane residents, the year ahead will only offer further opportunities to maximize the momentum built thus far and further grow and improve Spokane Stormwater education and public action. With eight Spokane Stormwater-related pieces of video content and 32 graphic image assets published in 2021, a few key digital marketing performance metrics from January - December include:

Social Media (Facebook & Instagram)

- Reach (unique impressions served): 95,985
- Engagement (clicks, reactions, shares): 12,041
- Video Views: 50,476

Digital Radio (Spotify & Pandora)

- Reach (unique impressions served): 44,885

Website Traffic

- www.SpokaneStormwater.org Visitors: 6,347
- Average Time on Site: 02:21



DIGITAL METRICS OVERVIEW

HIGHEST PERFORMING SOCIAL MEDIA POSTS [VIDEOS]



Water Wise Spokane

April 13 · 🌐

We have a shared responsibility to help manage stormwater and keep the Aquifer and Spokane River clean. Reducing the use of pollutants that can be swept into the water system, as well as respecting the green areas located throughout the City (which filter and clean runoff and excess rain) are great places to start. 🌧️

Learn more about all the admirable work being done to help maintain safe & clean water in Spokane: www.spokanestormwater.org

#spokanestormwater #waterwisespokane #spokaneriver #aquifer #cleanwater #safewater #protectwater #conservewater #spokane #rain #pnw



Road to River | Spokane Stormwater
01:07

SPOKANESTORMWATER.ORG

Road to River | Spokane Stormwater

[Learn More](#)



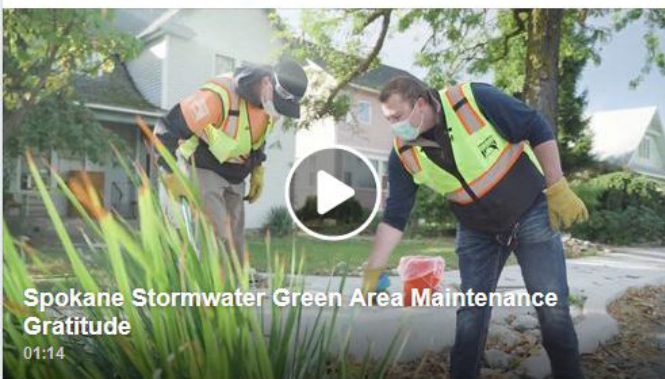
Water Wise Spokane

April 29 · 🌐

There are countless green spaces around Spokane that are essential to properly manage stormwater and help beautify this great city... and they are maintained by an even more essential crew of City of Spokane - Municipal Government Water Department staff members who work throughout the seasons in tandem with Mother Nature to make sure our river, aquifer, and wider waterway systems stay clean and safe.

Learn more about Spokane Stormwater: www.spokanestormwater.org

#spokanestormwater #waterwisespokane #spokaneriver #aquifer #spokane #waterwise #protectwater #cleanwater #valuewater



Spokane Stormwater Green Area Maintenance Gratitude
01:14

WATERWISESPOKANE.ORG

Spokane Stormwater Green Area Maintenance Gratitude

[Learn More](#)



Water Wise Spokane

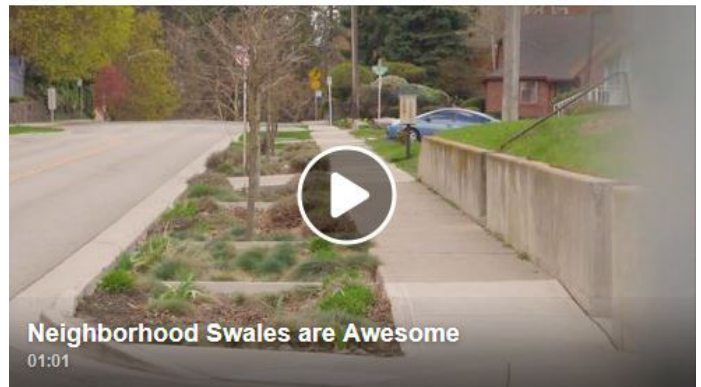
May 20 · 🌐

RAIN has finally fallen in Spokane 🌧️ and neighborhood swales are in their element!

If you are lucky enough to have a swale in front of your home, it is your responsibility to help maintain these natural areas and keep them clear so that water can be properly filtered before it reenters our watershed.

Learn more: www.spokanestormwater.org

#spokanestormwater #waterwisespokane #swale #stormwater #spokane



Neighborhood Swales are Awesome
01:01

SPOKANESTORMWATER.ORG

Neighborhood Swales are Awesome

[Learn More](#)



Water Wise Spokane

September 17 · 🌐

Now that back-to-school season is in full swing, it's exciting to see and learn from students right here in Spokane who are studying and actively working to responsibly clean and manage our regional stormwater with innovative conservation projects. Hear from Logan, a Gonzaga University undergrad, who is part of the porous pavement stormwater filtration project, and other sustainability efforts being engineered both on and off campus. www.SpokaneStormwater.org

#SpokaneStormwater #Stormwater #Sustainability #Gonzaga #SustainableCampus #PorousPavement #SpokaneRiver



Sustainable Stormwater Management with Gonzaga Student, Logan!
01:40

DIGITAL METRICS OVERVIEW

HIGHEST PERFORMING SOCIAL MEDIA POSTS [IMAGES]

Water Wise Spokane
 February 16 · 🌐

Spokane is applauding local companies that managed their wastewater impeccably over the past year. 🌟💧 And since "wastewater" is ANY water that has been contaminated by human use, there are many ways our water systems can be impacted at the household level too! 🏠

Some residential wastewater tips that are easy to implement include: disposing of solid waste in the garbage, refraining from dumping oils and grease down the drain, as well as not flushing harmful chemicals, wipes, and other materials. Help keep Spokane water clean! 💧

#waterwisespokane #waterwise #cleanwater #valuewater #spokaneriver #spokane #wastewater



City of Spokane - Municipal Government
 February 10

The City of Spokane is recognizing five organizations that have excelled in the management of wastewater generated as part of their processes. Baker Commodities...

Water Wise Spokane
 October 8 · 🌐

Our regional water supply is a precious and fragile resource. 💧 Protecting the Spokane River, Aquifer, and wider network of area waterways is essential - and you can help! Learn more at www.SpokaneStormwater.org 🌧️

#SpokaneStormwater #WaterWiseSpokane #SpokaneRiver



Water Wise Spokane
 January 12 · 🌐

Stormwater runoff following rain storms and snowmelt is a concern because it can transport pollutants to the aquifer and other Spokane area waterways. Discover more about the dedicated work happening behind-the-scenes to manage stormwater and keep our water safe and clean. The Wastewater Management Department works in tandem with Mother Nature to protect our beautiful Spokane River from pollutants, in addition to being responsible stewards of our region's sole-source aquifer.

www.spokanestormwater.org

#spokanestormwater #spokane #waterwisespokane



Water Wise Spokane
 September 16 · 🌐

Meet Logan, a Gonzaga University undergrad student studying Civil Engineering and specializing in water resources and environmental engineering. Working alongside the Office of Sustainability, he and his cohorts are involved in a program that takes an intriguing approach to sustainable stormwater management. Learn more about the super cool project - new video coming tomorrow!

#SpokaneStormwater #SustainableStudents #SustainableCampus #Gonzaga #Stormwater #Spokane #SpokaneRiver





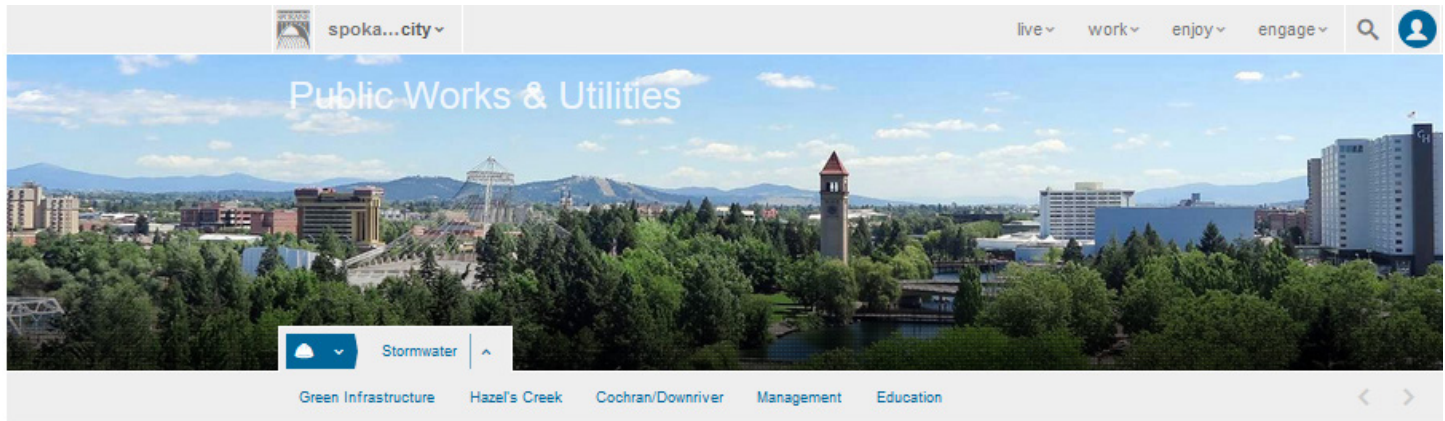
DIGITAL METRICS OVERVIEW

DIGITAL RADIO AD PLACEMENT PREVIEWS

The image displays a digital radio ad placement preview. It features a desktop music player interface with a playlist of 26 songs, including 'Rainbows & Waterfalls' by Pretty Lights, 'Pamplemousse' by Flavien Berger, and 'River' by Leon Bridges. A sidebar on the left lists various radio shows like 'Release Radar' and 'Discover Weekly'. At the bottom left of the desktop interface is a 'SPOKANE STORMWATER' logo with the URL 'SpokaneStormwater.org'. Overlaid on the bottom right is a smartphone screen showing a 'Top 40 Radio Songs' playlist with the same 'SPOKANE STORMWATER' logo and URL. Below the logo is a large play button and a progress bar indicating 0:02 of a 0:27 duration.

DIGITALMETRICSOVERVIEW

SPOKANE STORMWATER WEBSITE



Stormwater

Stormwater is defined as the runoff from hard surfaces following storms and snowmelt. Stormwater is a concern because it can transport pollutants to the aquifer or surface waters.

The City of Spokane's stormwater drainage system is a large, complex network of conveyances that are designed to take rainfall and direct it away from roads, buildings, and other public and private property. It consists of several different components, including:

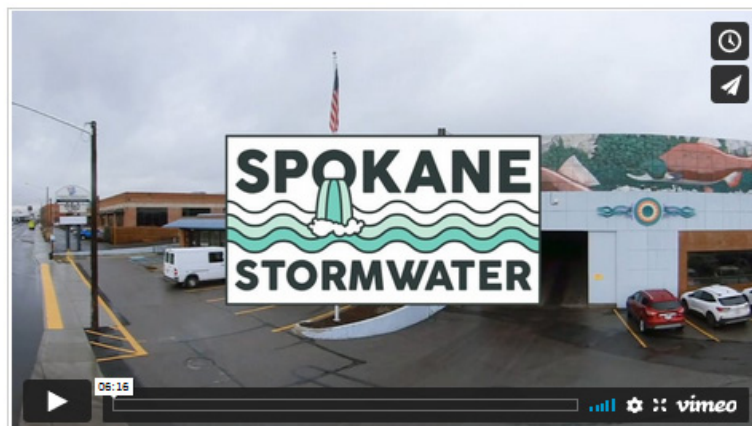
- More than 300 miles of separate storm sewers that discharge stormwater to infiltration facilities, the Spokane River and Latah Creek at over 100 locations, including many bridges. About 1 billion gallons of untreated stormwater enters the River annually.
- More than 400 miles of combined stormwater and wastewater sewers that carry stormwater to the City's wastewater treatment plant when it rains. During moderate to heavy rainfall and snowmelt events, a combination of stormwater and untreated sewage can overflow to the Spokane River to prevent overloading the plant.
- Thousands of swale bioinfiltration treatment facilities that discharge stormwater into the ground after treating the water by trapping sediments, oil, grease, and other pollutants.

Discover more about the dedicated work happening behind-the-scenes to manage stormwater and keep our water safe and clean. The Wastewater Management Department works in tandem with Mother Nature to protect our beautiful Spokane River from pollutants, in addition to being responsible stewards of our region's sole-source aquifer.



Resources

- [Managing Stormwater - A Residential Guide](#) (PDF 6.3 MB)
- [Stormwater Pollution Guide](#) (PDF 11.3 MB)
- [Stormwater Management Plan](#) (PDF 2.0 MB)



As a City, we are putting increasing effort on managing stormwater to improve the health of the Spokane River. The City has developed an Integrated [Clean Water Plan](#) that prioritizes projects based on their relative

**Spokane Regional Health District
Pollution Prevention Visits located within
the City of Spokane Valley**

January 1, 2021- December 31, 2021

Site Visit Information	
Number of Initial Site Visits During the Reporting Period:	35
Number of Screening Site Visits During the Reporting Period:	8
Number of Follow-up Site Visits During the Reporting Period:	10
Total Number of Site Visits During the Reporting Period:	53
Sector Focus Areas	
<p>We focused on the following sectors</p> <ul style="list-style-type: none">• High Schools with Foam Mats- gathering information for Ecology product replacement study• Gyms with Foam Mats- gathering information for Ecology product replacement study• Restaurants/Grocery Stores• Hotel/Motel• Property Management• Automotive	
Site Visit Definitions	
<ul style="list-style-type: none">• Initial Site Visit- occurs at the actual site and results in a completed 'checklist' (or enough data gathered to complete data entry into the Pollution prevention Database• Screening Visit- an attempted visit to the site, but the business declined or put off the visit and unable to gather complete data, or the business does not exist anymore.• Follow-up Visit- Should occur within 90 days of the initial visit. The follow-up visit must be conducted to resolve high priority environmental issues.	