City of Spokane Stormwater Management Program Plan

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1. 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 strategies 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 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 made available to the public annually via the city's stormwater webpage (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 comment period, the SWMP Plan will be finalized and posted on 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

The National Pollutant Discharge Elimination System (NPDES) framework was, in large part, established by the 1972 by the amendments to the 1948 Federal Water Pollution Control Act, which has come to be known as the Clean Water Act. The Clean Water Act (CWA) details federal regulation of stormwater and wastewater discharges to Waters of the United States (WOTUS). 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 east of the Cascade mountains with the Eastern Washington Phase II Municipal Stormwater general permit. The permit is

a NPDES permit and a Washington State waste discharge general permit, and it regulates discharges from small municipal separate storm sewers.

Ecology first issued the permit to municipalities in 2007, and has reissued it with revisions in 2014, 2019, and 2024. The current permit became effective on August 1, 2024 with an expiration date of July 31, 2029. Reissuance of the permit is scheduled for August 1, 2029 with an effective period through 2034. The permit authorizes the city to discharge stormwater to surface waters and groundwaters of the State from the city's Municipal Separated Stormwater Sewer System (MS4) in accordance with federal guidelines. The coverage area regulated by the Phase II permit includes the entire incorporated area within the city's municipal boundary where stormwater is discharged to a surface water or ground water, except for areas that manage stormwater in combined sanitary and stormwater system. 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 separate 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 best management practices (BMPs) that manage stormwater locally and discharge to ground.

1.3 Stormwater Management in Spokane

The city's MS4 system consists of stormwater conveyances, catch basins, structural treatment BMPs, underground injection controls (UICs), and outfalls. Within the permitted MS4 boundary, but outside of the CSO Basins, stormwater is collected by the separated stormwater sewer system and conveyed either to stormwater treatment facilities or to outfalls which discharge directly to the river. The separated stormwater sewer system is roughly located along the Spokane river, and in the northern portion of the city.

Stormwater treatment facilities throughout the city are used to manage stormwater as near as possible to where the runoff is generated. The treatment facilities are typically bioretention facilities such as swales, bioretention cells, infiltration ponds, etc., which are structural stormwater BMPs designed to remove pollutants from runoff before it is discharged to the ground. The facilities have historically been designed and constructed in accordance with the Spokane Regional Stormwater Manual (SRSM). In late 2026 the City is planning to adopt the 2024 Stormwater Management Manual of Eastern Washington (SWMMEW) with an addendum that will include some of the provisions from the SRSM that are protective of the aquifer. Stormwater facility designs from the SRSM and SWMMEW generally consist of inlets, a vegetated retention area, subgrade bioretention soil media, and an outlet/overflow. They are generally 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 swale through an inlet, flows over vegetation to slow 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 by removing pollutants. Figure 1 shows a typical swale design.

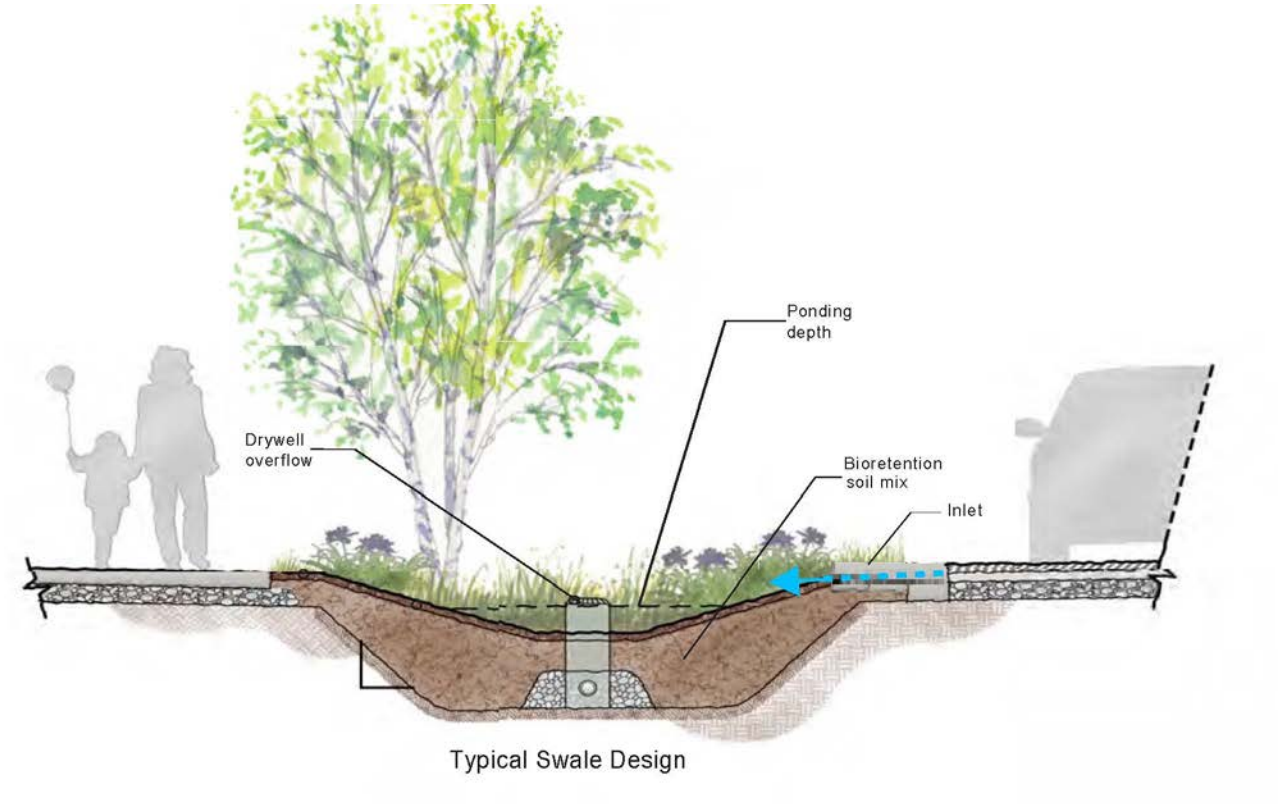

Figure 1. Typical Swale Design.

Special Drainage Districts (SDDs) 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 SDDs have been established due to shallow groundwater, intermittent standing water, and steep slopes in these areas, which make stormwater challenging to manage.

Figure 2 is a map of the City of Spokane showing the general locations of stormwater infrastructure, including MS4 boundaries, CSO basins, and SDDs. On the south side of the city, where rocky geology does not readily allow infiltration, stormwater in CSO basins is largely managed in a combined sewer that conveys both stormwater and sanitary wastewater using 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 combined sewer and stormwater and are regulated by RPWRF's waste discharge permit. CSO basins also contain stormwater treatment BMPs, where practical, to manage stormwater locally which minimizes the amount of stormwater conveyed to the wastewater treatment plant.

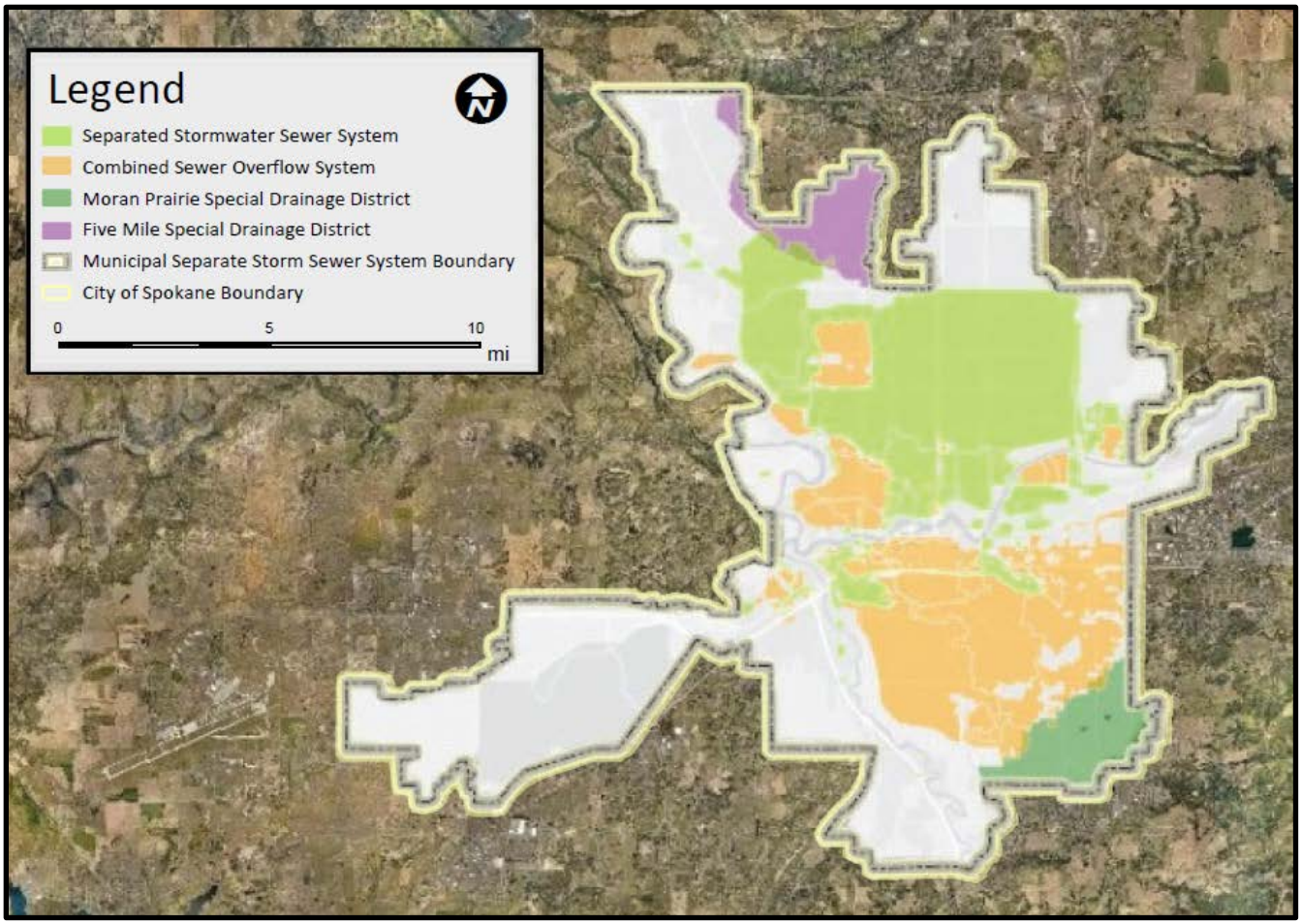

Figure 2. Map of Stormwater Management Areas.

2. 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, this is met through a multifactor approach to promotion of the Pollution Prevention Program on the Water Wise social channels.

2.1.2 Overview of 2025 Public Outreach and Education

During 2025, Public Education & Outreach (PE&O) initiatives were strategically implemented to engage a broad spectrum of audiences, including the general public, key business sectors—such as restaurants, lodging and hospitality, property management, and automotive services—as well as professionals in development, engineering, and contracting. These initiatives serve a critical role in fostering community awareness and engagement on essential environmental issues. Through targeted campaigns and educational resources, PE&O efforts equip individuals and businesses with the knowledge necessary to promote environmental stewardship, protect water quality, and implement sustainable practices. By cultivating a shared sense of responsibility, these outreach initiatives lay the groundwork for active community participation in preserving natural resources and ensuring environmental sustainability for future generations.

2.1.2.1 General Public

Collaboration with Water Wise Spokane, Spokane County and Spokane Valley

Preserving the integrity of the Spokane Aquifer, the Spokane River, and the broader network of regional waterways is a cornerstone of the City's commitment to sustainability. The effective management of seasonal stormwater resulting from weather events and snowmelt, combined with a concerted effort to reduce overall water consumption, plays a critical role in the protection and conservation of Spokane's natural resources.

The Water Wise Spokane initiative has been a supplemental asset in advancing stormwater pollution prevention messaging through a multifaceted educational approach, which included the continued promotion of informative videos, branding materials, and social media content. They were disseminated via platforms such as Facebook and Instagram. Additionally, these outreach efforts have

been expanded to include the cross-promotion of City of Spokane initiatives and community events. The Water Wise initiative is accessible through the Water Wise Spokane Facebook page, which can be found here and the City's dedicated Water Wise webpage which have both proven to be a valuable resource. Instructional videos covering stormwater facility awareness and maintenance have been made available on the City's stormwater webpage and Cable Channel 5.

Collaboration with streamlined messaging to the community with City of Spokane Valley and Spokane County have provided an opportunity to regional reach effectively and efficiently. Plans for this team approach to the Adopt-a-Drain campaign are planned for implementation in 2026.

Notably during 2025, the City of Spokane stormwater website (www.spokanestormwater.org) continued to undergo a comprehensive reorganization, update, and expansion. The revamped site now encompasses a broader spectrum of stormwater topics, providing access to educational videos and downloadable documents for the benefit of the community, including access to additional blogs. Links to other local resources and tour information was added for addition ease of access. Community Update weekly City newsletters were distributed on a reoccurring basis. Stormwater information and topics received 1.3 million views in 2025. Meta social media channels received 91,656 views, a reach of 67,193, and 1,599 times of engagement on City Facebook and Instagram accounts.
To see below for highlights from 2025 and for detailed examples of in-person outreach efforts and images, please refer to Attachment A.

Stormwater Awareness Week

City of Spokane participated in Stormwater Awareness Week with social media content promoting the value of stormwater management. Facebook and Instagram audience demographics indicate the content received 9,856 views, reached 5,860 accounts, had 139 engagements and was made up of 60% women and 40% men with the majority being 25-54 years old.

Stormwater Children's Book

As part of the "Exploring Spokane" children's book series produced by City of Spokane's Public Works Division, the third book follow "Milo" as he searches for his frog friend in the City's stormwater system. The kick-off included a children's reading event attended by over 100 children and families.
Social Media: 40,800 views/30,594 reach/154 engagements

Aquifer Protection Area

City of Spokane asked voters if they approve of joining the Aquifer Protection Area again from 2026-2045, an additional annual fee for property owners to dedicated funding for ways to protect the region's sole source aquifer. Over 70 percent of voters said yes, which will provide funding for education, outreach, and programming efforts for the next 20 years. Leading up to the special election, the City provided educational information about the ballot measure. One Facebook and Instagram, the information received 686,000 views and reached 429,000 accounts.

Swale Maintenance Workshops

At this workshop, City staff defined Best Management Practices, explained why they're important, discussed how to properly maintain them, and provided a maintenance demonstration of nearby green stormwater infrastructure. Attendance workshop is encouraged, but not mandatory. The workshop clarified City expectations pertaining to the Private Stormwater Facility Annual Certification Program and provided a valuable opportunity to connect with City staff overseeing this program. Promotion for this program included local construction organizations, large companies, and the general public. The City's weekly newsletter included registration information that received 27,447 views.

Stormwater Knowledge Quiz Campaign

The second annual Stormwater Knowledge Quiz Campaign, organized by City of Spokane stormwater featured the iconic Redband trout logo in collaboration with KXLY. The campaign was successfully promoted and encouraged participation through their website as well as the city's. The first wave of messaging was a two-month period where promotional education videos aired during peak news times and behavior change messaging was promoted surrounding pet waste pick-up and disposal. Collaborating with both KXLY and City Cable 5 exciting announcements were made about the campaign and its winners which fostered a sense of community engagement. This initiative has not only significantly enhanced our community engagement but has also established a robust baseline for subsequent contests. After the two-month commercials aired, a 10-question stormwater knowledge quiz was created to gain a better perspective on the public's understanding of stormwater pollution prevention efforts.

A thorough evaluation of the number of entries, and answers serves as a key quantitative metric for assessing the effectiveness of our promotional initiatives (see Attachment B for further details). Our collaborative marketing efforts, particularly in partnership with KXLY, provided a precise measurement of advertisement reach and impact. Through detailed tracking, we gained valuable insights into the various channels through which participants encountered contest information, offering critical data to refine and enhance future promotional strategies, and thus questions were tailored based on previous years responses.

This campaign presented a unique opportunity to analyze the frequency and visibility of storm drains across different geographic areas. This data-driven approach allows us to identify strategic locations for targeted community outreach and stormwater education initiatives. Ultimately, this comprehensive effort not only successfully encouraged public participation but also established a strong foundation for informed decision-making in our ongoing mission to advance environmental awareness and community engagement in 2026.

Community Outreach/Education Events

The City of Spokane stormwater sector actively participated in over 20 diverse community events, catering to various age groups throughout 2025. These included notable occasions such as Touch-a-Truck events, Earth Day, school assembly's, Combined Sewer Overflow (CSO) tours, Library EnviroKids programs, and Spokane Indians Baseball games, etc. See attachment A. for more detailed information including audience and attendee number. At each event, the program distributed educational materials

and promotional items while providing visual demonstrations, particularly focused on permeable pavement when applicable. This concerted effort in community outreach resulted in reaching over 3,700 individuals. Qualitative data collected from these events indicates a positive reception, especially among children who eagerly anticipate engaging demonstrations, complimentary prizes, and interactive activities like stormwater bingo, walking scavenger hunts, and coloring books that they can take home. A call to action, pledge, or some kind of behavior change was addressed at every outreach opportunity.

The strategic acquisition of targeted promotional items represents a pivotal aspect of the City of Spokane's stormwater outreach efforts. Recognizing the importance of engaging and resonating with the community, specific items such as pet waste bag holders, hand sanitizers, poo emoji stress balls, magnets, and water bottles were carefully selected for their practicality and relevance. Each of these items were thoughtfully branded with the stormwater logo, and where applicable, featured a prevention message, thereby reinforcing the importance of stormwater management and pollution prevention. The significance of such promotional swag lies in its ability to serve as tangible reminders and educational tools. Branded items create a lasting and positive association with the stormwater initiative, fostering brand recognition and community awareness.

Illicit Discharge Hotline

In 2025, the City of Spokane completed a total of 60 reports regarding illicit discharges that underwent a thorough investigation because of 311, the Illicit Discharge Hotline, as well as City of Spokane employee observations.

These calls reflected the community's heightened awareness and commitment to maintaining water quality, with over 450 calls to inquire about an illicit discharge. The investigative screening and efforts were aimed to identify and address any improper or unauthorized discharges into the stormwater system. The year's summary not only highlights the proactive engagement of Spokane residents in reporting such incidents but also underscores the city's dedication to preserving environmental integrity through swift and comprehensive responses to illicit discharge concerns. The collaborative efforts between the community and city authorities contribute significantly to the ongoing commitment to safeguarding Spokane's water resources and promoting a sustainable and resilient urban environment. Notable themes of calls that came in were residential car oil pouring to drain, storm drain overflowing onto roadway, RV illicit dumping of sewage, among many more.

2.1.2.2 Business Sectors

Spokane Regional Health District & EnviroCertified

Collaborating with the Spokane Regional Health District's (SRHD) Pollution Prevention Program, the city extended stormwater messaging to businesses through voluntary site inspections. Between January 1, 2025, and December 31, 2025, Spokane Regional Health District conducted a total of 165 pollution prevention visits within the City of Spokane. These visits included 82 initial site visits, where comprehensive evaluations and data collection were conducted, 35 screening visits, where full data

collection was not possible due to business refusals or closures, and 48 follow-up visits within 90 days to address high-priority environmental concerns.

The program focused on key sectors, including restaurants and grocery stores, where efforts were made to promote food rescue and EnviroCertified certification, as well as automotive facilities, schools, property management, and other small quantity generators (SQGs) identified through complaints. Notable activities included two Environmental Report Tracking (ERTS) complaints (from the Department of Ecology) were conducted and followed up, 43 spill kits were delivered, and 14 businesses were referred for the EnviroCertified program.

Businesses and organizations were engaged through various outreach and education methods. The program maintained an updated website with industry-specific pollution prevention resources and best practices, while face-to-face technical assistance visits provided on-site consultations and educational materials covering topics such as stormwater management and waste disposal. Joint inspections were also conducted with stormwater partners to address complaints and follow up on compliance concerns. A diverse range of businesses and organizations received visits. Details of SRHD's efforts can be found in Attachment C.

2.1.2.3 Developers, Engineers, & Contractors

Development Services Center

The City of Spokane Developer Services Center has played a vital role in guiding construction projects through the stormwater management process. By actively collaborating with developers, engineers, and contractors during pre-development meetings, the center has provided essential insights into stormwater requirements. To support project proponents in navigating the local permitting process, the center has also made available key guidance documents, such as The City of Spokane Stormwater Compliance Guide and Understanding Stormwater Permitting in the City of Spokane.

In a collaborative effort with the Wastewater Management Department, the Developer Services Center has ensured the continued distribution of construction stormwater guidance materials. These materials are thoughtfully organized in an online resources folder accessible on the commercial construction permitting page of the city's website Stormwater Management - City of Spokane, Washington, as well as the stormwater webpage. This strategic approach underscores the commitment to transparency and accessibility in providing developers and stakeholders with the necessary tools to effectively navigate stormwater management requirements. By fostering collaborative partnerships and streamlining access to key information, the Developer Services Center plays a crucial role in promoting compliance and best practices in stormwater management within the construction sector in Spokane. Continuation and strengthening of the partnership with Developer Services is anticipated to continue in 2026 with a specific focus on gaps in education amongst subsectors.

Eastern Washington Stormwater Education & Outreach Group

In 2023, a vital collaborative initiative took form, addressing specific stormwater pollution prevention challenges unique to Eastern Washington. Recognizing the distinct issues faced in this region, often overshadowed by content created for the west side, a dedicated group convened and initiated projects aimed at tailoring educational efforts to the local context. A comprehensive survey identified Developers, Engineers, & Contractors as a target audience requiring specialized assistance to meet MS4 permit requirements. Through concerted efforts involving multiple regional jurisdictions, a suite of educational materials was meticulously crafted. This included continued dissemination of a developer brochure, and a construction flipbook, with careful consideration given to layout, color, language transcreation, content, and imagery. Importantly, these materials were designed to be adaptable, allowing each jurisdiction the flexibility to modify and edit them based on the unique needs of their community. This adaptability ensures that the educational resources remain relevant and effective in diverse contexts, emphasizing a commitment to flexibility and tailored outreach.

Going forth, the 2026 and beyond work plan consists of a continued focus in transcreation, researching grant opportunities, building an Eastern Washington Stormwater Education & Outreach Document Library, and producing additional adaptable outreach documents that can reach underserved communities and smaller jurisdictions. Refer to Attachment D for examples illustrating the adaptability of the created materials. These collaborative educational initiatives underscore the city's dedication to elevating public awareness, promoting compliance, and instilling responsible stormwater management practices within the specific challenges faced by Eastern Washington.

2.2 Public Involvement and Participation

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

The MS4 stormwater permit requires that the city provide ongoing opportunities for public involvement and participation, such as public hearings, advisory panels, and/or committee discussions during rule-making activities. Specifically, permit section S5.B.2.a states the city must create opportunities for the public to provide input during decision-making processes, including during the development and adoption of ordinances and regulatory mechanisms required by the permit. In addition, the city must have a process for consideration of public comments on the SWMP, including required ordinances and regulatory mechanisms.

2.2.2 Public Hearings and Rulemaking

The city provides many opportunities for public involvement and participation in its rule-making processes. Public involvement is a required component of the city ordinance process, and participation by interested community members is encouraged through workshops, open houses, dedicated testimonial times, and formal public comment periods. Information on how to participate in City Council meetings are provided on the city's City Council website, where agendas are posted before each meeting. Additionally, the public may attend City Council briefings, City Council hearings; Planning Commission workshops, Planning Commission hearings, and any of the several Council Committee meetings (e.g. Finance and Administration Committee; Public Infrastructure, Environment, &

Sustainability; and Public Safety & Community Health Committee). The city publishes City Council Official Gazettes , which contain meeting minutes from the City Council hearings, and include calls for bids for stormwater management, infrastructure, and funding projects that the public can respond to. Typical examples of public involvement opportunities include rate structure discussions, stormwater mitigation grants and projects, stormwater infrastructure improvements, joint planning of the stormwater management plans, and ordinance creation or revision, among others.

2.2.3 Stormwater Management Program Plan Public Participation

The city posts the SWMP Plan to the Stormwater Management webpage annually. The public may provide comment on this plan at any time during the year by emailing the Wastewater Department Environmental Manager at jgeorge@spokanecity.org. The city solicits public comments on the draft plan for 30 days after it's posted. After the 30-day period, the city reviews the comments and updates the plan as applicable, before posting the final version of the plan on the Stormwater Management webpage.

2.2.4 Spokane Municipal Code Revisions

In 2023, the City of Spokane Wastewater and Planning Departments began a thorough assessment of the Spokane Municipal Code, specifically Chapter 17D.060 – *Stormwater Facilities* and Chapter 17D.090 – *Erosion and Sediment Control*. This assessment identified sections which would benefit from reorganization to streamline the code and make it more user friendly. A preliminary draft of proposed code revisions is anticipated by 3rd quarter 2026. The final draft of the proposed changes will be released to the public in order to solicit comments before the final draft presented to the Spokane City Council for consent and adoption. Draft stormwater ordinances will be proposed to the City Council by Fall 2026.

2.3 Illicit Discharge Detection & Elimination

2.3.1 Permit Requirements for Illicit Discharge Detection and Elimination (§S5.B.3)

Illicit discharges are defined as any discharge to the city's MS4 that is not composed entirely of stormwater, allowable non-stormwater discharges, or conditionally allowable non-stormwater discharges. The permit requires the city to implement and enforce an Illicit Discharge Detection and Elimination (IDDE) 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 an accurate map of the MS4 to include:

- Known outfalls and known discharge points with size and material attributes,
- Receiving waters other than ground,
- Areas served by the MS4 that discharge to ground,
- Permanent stormwater facilities owned or operated by the city,
- All connections to the MS4 authorized or approved by the city 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 city and other municipalities or public entities.

Section S5.B.3.b of the permit identifies the allowable and conditionally allowable non-stormwater discharges. Any discharge or connection into the city's MS4 which is not allowed or conditionally allowed by the below bullet sections will be considered an illicit discharge
Allowable non-stormwater discharges include:

- Diverted stream flows,
- Rising groundwater,
- Uncontaminated groundwater infiltration (defined at 40 CFR 35.2005(b)(20)),
- Uncontaminated pumped groundwater,
- Foundation drains,
- Air conditioning condensation,
- Irrigation water from agricultural sources that is commingled with urban stormwater,
- Springs,
- Uncontaminated water from crawl space pumps,
- Foundation drains,
- Flows from riparian habitats and wetlands,
- Non-stormwater discharges authorized by another NPDES permit or State Waste Discharge permit, and
- Non-stormwater discharges from emergency firefighting activities in accordance with S2 – *Authorized Discharges*.

Conditionally allowable non-stormwater discharges include:

- Discharges from potable water sources (e.g. water line flushing, fire hydrant system flushing, pipeline hydrostatic test water, etc.) that have been dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH adjusted (if needed), and flow-controlled to prevent suspension of sediment in the MS4;
- Limited discharges from lawn watering and other irrigation runoff that have been minimized through public education activities and/or water conservation efforts;
- Discharges from swimming pools, spas, and hot tubs that have been dechlorinated/debrominated to a total residual concentration of 0.1 ppm or less, free from sodium chloride, pH adjusted, reoxygenated, flow-controlled, and temperature controlled to ambient temperatures.
  Note: Swimming pool cleaning wastewater and filter backwash are not allowed by this section;

- Street and sidewalk wash water and water used to control dust where the amount has been minimized by water conservation efforts or through public education activities;
- Routine external building wash water from buildings constructed or renovated before 1950 and after 1980 that has been minimized and does not contain detergents; and,
- External building wash water from commercial, industrial, and multi-story residential structures constructed or renovated between 1950 and 1980 that do not contain PCB-containing building materials as demonstrated by testing.

In addition, Section S5.B.3.b requires the city to prohibit illicit discharges into the MS4 by ordinance, and to implement a compliance strategy that includes ordinance enforcement and informal compliance actions (e.g. public education and technical assistance).

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 city's MS4. The illicit discharge detection program components include:

- Procedures for conducting investigations of the Permittee's MS4,
- Procedures for locating priority areas likely to have illicit discharges,
- Field assessments of outfalls, discharge points, and facilities serving priority areas to verify outfall and discharge point locations,
- A publicly listed hotline for reporting spills and illicit discharges,
- Training of all municipal staff who may observe illicit discharges at work on identification, reporting, and response to illicit discharges, and
- Education of public employees, business, and citizens of hazards associated with illicit discharges and improper waste disposal.

Section S5.B.3.d of the permit requires the city to implement an ongoing program designed to address spills, illicit discharges, and illicit connections into the city's MS4, which includes:

- Procedures to investigate complaints, reports, or monitoring information that may indicate an illicit discharge,
- Procedures to characterize and evaluate containment of reported illicit discharges,
- Procedures to respond immediately to illicit discharges that may constitute a threat to human health, welfare, or the environment,
- Procedures to determine the source, volume, and responsible party of an illicit discharge, and
- Procedures to notify appropriate authorities and property owners, provide technical assistance, perform follow-up inspections, and escalate enforcement actions in order to eliminate an illicit discharge.

Section S5.B.3.e of the permit requires the city to train all staff responsible for reporting, identifying, investigating, terminating, and cleaning up of illicit discharges.

Section S5.B.3.f of the permit requires the city to maintain records of activities conducted to detect and eliminate illicit discharges to the city's MS4.

2.3.2 Map of the MS4

In order to comply with Section S5.B.3.a and enable efficient and timely response to illicit discharge notifications, the Wastewater Management Department maintains up-to-date Global Information System (GIS) map layers of the city's stormwater collection and conveyance system. The publicly accessible GIS map MapSpokane includes a stormwater utility layer that shows the location of the city's stormwater collection and conveyance system.

2.3.3 Illicit Discharge Ordinances

In accordance with permit Section S5.B.3.b, Spokane Municipal Code (SMC) Section 17D.060.190 defines prohibits illicit discharges, defines the allowable and conditionally allowable discharges to the MS4, and includes applicable enforcement tracks. The illicit discharge ordinances are included in the scope to evaluate and improve the stormwater sections of the Spokane Municipal Code in 2025 as described below in Section 2.2.4 - Spokane Municipal Code Revisions.

2.3.4 Illicit Discharge Detection and Elimination Program

Per Sections S5.B.3.c and S5.B.3.d of the permit, the Wastewater Management Department manages an ongoing Illicit Discharge Detection and Elimination (IDDE) program to identify and address illicit discharges and connections. The IDDE program utilizes the storm sewer field crews to identify potential illicit discharges by incorporating field inspections into the operation and maintenance routines performed on stormwater infrastructure. Additionally, the Wastewater Management Department receives illicit discharge notifications from the public via the Illicit Discharge Hotline (509-625-7999), MySpokane 311, Environmental Reports Tracking System (ERTS) reports forwarded by Ecology, and referrals from the Spokane Regional Health District Pollution Prevention Program. Stormwater Inspectors from the Wastewater Management Department investigate illicit discharges reported by the storm sewer field crews and the public, mitigate and clean up the illicit discharges when necessary, and educate those responsible when appropriate. The inspectors log their observations and response activities into a database for tracking over time. See Section 2.3.6 of this document for further discussion of field inspections, characterization, and tracing of illicit discharges.

2.3.5 Illicit Discharge Priority Areas

Industrial zoning areas adjacent to the river are assumed to have higher potential for significant illicit discharges, where the Union Basin has the highest potential for illicit discharges associated with industrial activities. In order to identify priority illicit discharge areas, illicit discharge reports from 2023 were mapped to see if there were geographic illicit discharge trends. Figure 3 illustrates the locations of 2023 illicit discharges, and it demonstrates that illicit discharge notifications occur throughout the city somewhat equally, with mild grouping near the downtown area.

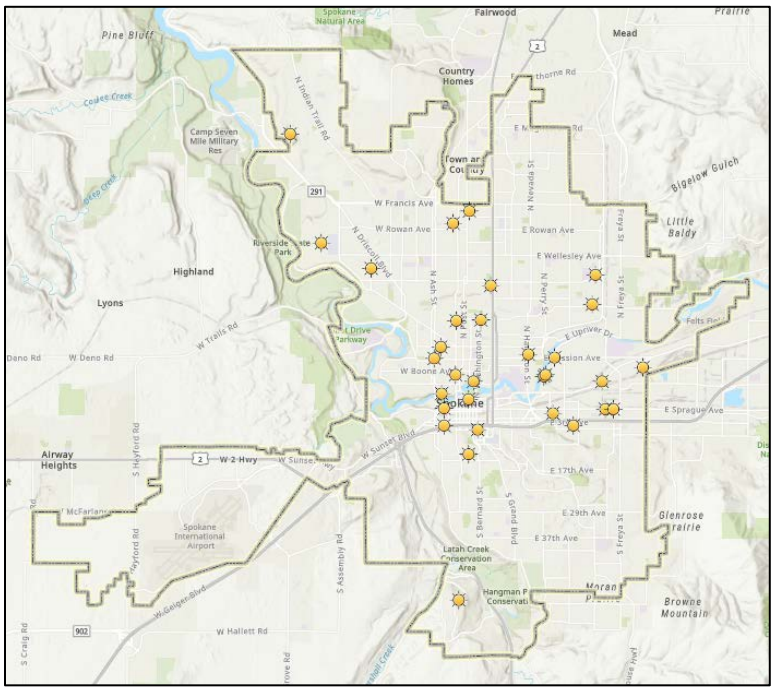

Figure 3. Location of 2023 Illicit Discharge Responses

2.3.6 Elimination of Illicit Discharges

Several approaches to minimize or eliminate illicit discharges to the MS4 are continually ongoing to include installing drain/curb markers, participating on the Spokane River Toxics Advisory Committee (SRTAC), and partnering with the Spokane River Forum, and openly communicating with the Spokane Riverkeeper.

2.3.7 Field Inspections, Characterization and Tracing of Illicit Discharge

Illicit discharge investigations are generally initiated from notifications received by the Illicit Discharge Hotline (509-625-7999), the MySpokane 311 hotline, or from ERTS reports provided by Ecology. The Illicit Discharge Hotline is publicized on storm drain markers throughout the city, in brochures handed out to the public, and at Spokanestormwater.org. Notifications are conveyed to city Stormwater Inspectors, who investigate, mitigate, and report on these discharges. In addition to the stormwater hotline, Wastewater Management Department storm sewer staff continually check for illicit discharges as a part of normal day-to-day operations and maintenance of stormwater assets, and often inform the public about illicit discharges as they observe behaviors and practices conducive to illicit discharges in the field. Figure 4 is a decision tree used by the department to determine if a spilled material is an illicit discharge. Records of inspections and enforcement actions by the Stormwater Inspectors are maintained in a dedicated database that is used to retain inspection reports and notices of violations. The illicit discharge program is ongoing and will continue in 2025.

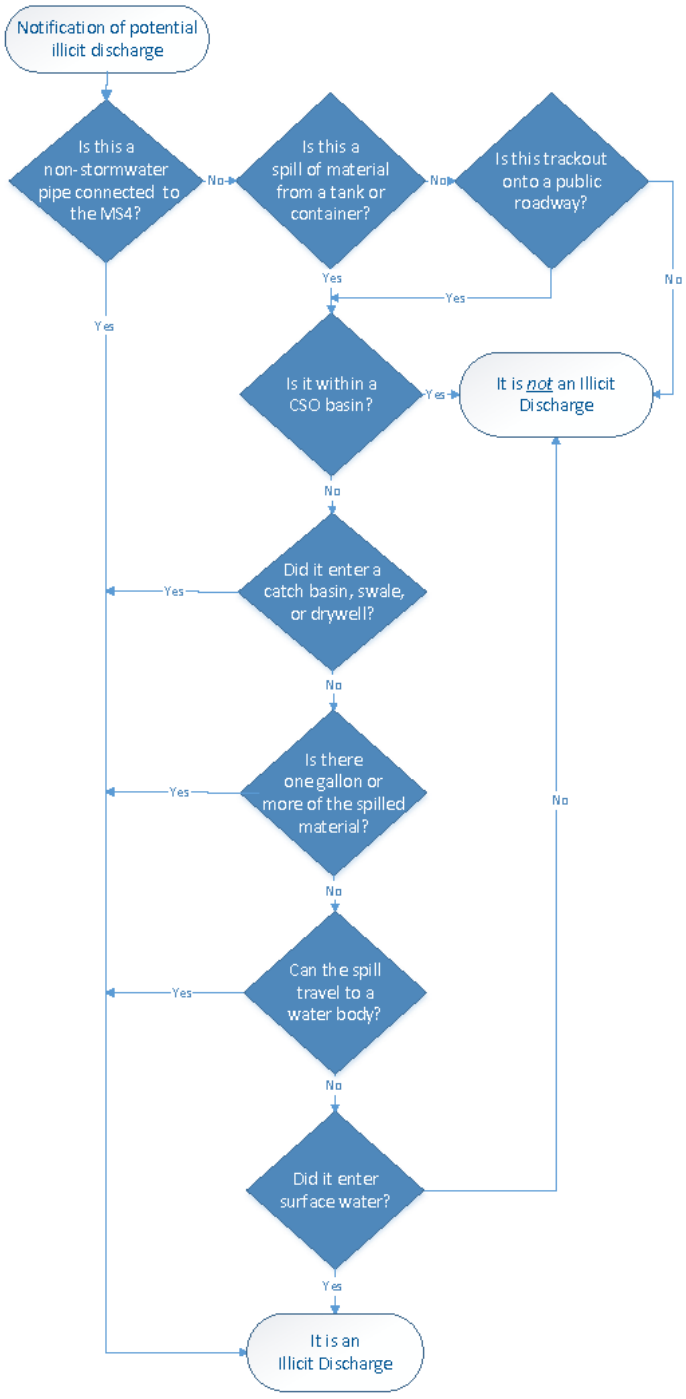

Figure 4. Illicit Discharge Decision Tree

2.4 Construction Site Stormwater Runoff Control

2.4.1 Permit Requirements for Construction Site Stormwater Runoff (§S5.B.4)

Construction site stormwater runoff is required to be managed during construction activities, and the city's stormwater permit requires the implementation of several ordinances and procedures regarding construction stormwater management. Specifically, Section S5.B.4 of the permit requires the city to implement and enforce a program to reduce construction related pollutants in stormwater runoff to the MS4.

Section S5.B.4.a requires the city to implement an ordinance that applies to construction sites disturbing one acre of land or more, and to construction projects of less than one acre that are part of a larger common plan of development or sale which is greater than one acre, in total.

The ordinance must 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 that discharge to the MS4, and
- Sanctions to ensure compliance with escalating enforcement procedures and actions.

The ordinance must 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 of the permit 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 elements of the 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.g 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 Guidance Manuals for Development and Re-development

The permit requires that the city to mandate the 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 *Spokane Regional Stormwater Manual (SRSM)* has historically been considered equivalent to the SWMMEW, and it is currently the stormwater manual mandated for use within the city for development and redevelopment projects. However, the SWMMEW was revised in 2024 and the content and scope have grown beyond that of the SRSM. The City of Spokane is adopting the 2024 SWMMEW with an addendum in 2026 that that will be the city's stormwater guidance manual for development and redevelopment projects. The addendum will incorporate some of the elements of the SRSM that are preferred for use within the city. Development of the addendum and adoption of the SWMMEW for mandated use is expected to be complete by 3rd quarter 2026. Until adoption of the 2024 SWMMEW with addendum, the standards and guidelines contained in the SRSM and SWMMEW are applicable for use in the Spokane upon approval from the appropriate city department.

2.4.3 Erosion and Sediment Control Plan

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

Per the SRSM, the four objectives of the ESC Plan are to:

- 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, and
- Protect water quality.

Section 17D.090.070 of the Spokane Municipal Code, requires the generation of an ESC for projects that disturb 5000 square feet, and projects on special sites. 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 a 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. Section 17D.090.070 was updated in 2021 to include the requirement of a Construction SWPPP, where applicable per the Construction Stormwater General Permit issued by Ecology.

In accordance with city review procedures and permitting processes, Erosion and Sediment Control (ESC) plans are reviewed by the Development Services Center to ensure the proposed projects will control erosion and keep pollutants from leaving the project site during construction. An ESC Plan is prescribed as one of the minimum required elements for the commercial development application. Application submittal requirements are provided on the city's Development Services Center Commercial Building Review website.

2.4.4 Construction Site Inspection and Enforcement

Construction oversight on City of Spokane development projects is provided by the Field Engineering Department. The Field Engineering inspectors verify proper installation and maintenance of required erosion and sediment controls for city construction projects prior to clearing and grading for construction if a high potential for sediment transport is determined. Inspectors and field engineers from the City of Spokane Developer Services Center, Field Engineering, and Wastewater Management Department inspect privately constructed infrastructure during construction. Inspection records are retained in the city's permit tracking tool.

2.4.5 Construction Stormwater Training and Informational Materials

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 and online at the Business and Development Resources web page.. In addition to highlighting erosion and sediment control requirements, brochures direct the target audience to the SRSM for erosion and sediment control requirements.

2.5 Post-Construction Stormwater Management

2.5.1 Permit Requirements for Post-Construction Site Stormwater Runoff (§S5.B.5)

Post-construction stormwater runoff from development and redevelopment project sites must be managed to prevent water quality impacts. Permit Section S5.B.5 requires the implementation of an enforceable program to manage post-construction stormwater runoff to the MS4 for public and private projects that disturb one acre or more or, are less than one acre but are part of a larger common plan of development or sale.

Permit Sections S5.B.5.a and S5.B.5.b.i-ii require the city to implement an ordinance that mandates development and redevelopment projects that disturb one acre or more or, are less than one acre but are part of a larger common plan of development or sale, to incorporate the BMP selection, design, installation, operation, and maintenance standards provided contained in Stormwater Management

Manual for Eastern Washington, or a functionally equivalent manual approved by Ecology, and Appendix 1 of the permit.

Section S5.B.5.b.iii of the permit requires the ordinance to either include provisions for construction-phase and post-construction access for city staff to inspect stormwater BMPs on private properties that discharge to the MS4, or require annual certifications of private stormwater BMPs by a qualified third party that BMP maintenance has been performed and the BMPS are operating as designed.

Permit Sections S5.B.5.b.iv-v of the permit requires the ordinance to include escalating enforcement procedures and the implementation of an enforcement strategy for the permit conditions in Section S5.B.5.

Section S5.B.5.d of the permit requires the city to implement procedures for qualified staff to review stormwater site plans for applicable new development and redevelopment projects, and Construction Stormwater Pollution Prevention Plans when required, to ensure that the plans include stormwater pollution prevention measures from Appendix 1 of the permit and the design standards provided from the SWMMEW, or a functionally equivalent manual approved by Ecology.

Section S5.B.5.e of the permit requires the city to implement procedures for qualified personnel to perform site inspections of post-construction stormwater control measures to ensure that the structural BMP standards in the SWMMEW or an equivalent manual are met. Post-construction structural BMPs must be inspected at least once during installation, once upon final installation or completion of the project, and at least once every five years after final installation. If the BMP inspections identify any deficiencies, then maintenance or repair is required to be performed as soon as practicable and verified complete by city personnel.

Section S5.B.5.f of the permit requires the city to train all city staff involved in permitting, planning, review, inspection, and enforcement to carry out the provisions of the post-construction stormwater program.

Section S5.B.5.g of the permit requires the city to inform design professionals of available trainings and guidance on how to comply with the requirements of Appendix 1 of the permit, and how to apply the BMPs described by the SWMMEW or an equivalent manual.

Section S5.B.5.h of the permit requires the city to retain project records for 5 years for all projects applicable to the requirements of the post-construction stormwater program, with the exception of operation and maintenance plans, which must be kept for the life of the BMP. In addition, the city must maintain copies of the information provided to design professionals, and retain staff training records that includes dates, course descriptions, and staff names/positions.

2.5.2 Post-Construction Stormwater Ordinances

Post-construction stormwater management is addressed in Chapter 17D.060 of the Spokane Municipal Code, which details the duties of property owners, prohibition of illicit discharges, site inspection

requirements, and enforcement measures, among others. Chapter 17D.060 of the code references the SRSM and SWMMEW guidance manuals and the City of Spokane design standards and specifications as relevant standards that are protective of stormwater, such as the, among others.

2.5.3 Encouragement of Low Impact Development

The city encourages the use of Low Impact Development (LID) principles that strive to mimic pre-disturbance hydrological processes by emphasizing site conservation, use of on-site natural features, site planning, and distributed stormwater management practices on development and redevelopment projects. Chapter 17D.060.300 of the Spokane Municipal Code references the Eastern Washington LID Guidance Manual for use as supplemental guidance for the design, construction, and maintenance of LID stormwater BMPs suited to Eastern Washington. The regional LID manual focuses on the practices of stormwater pollution prevention, flow control, and treatment by promoting the use of natural features and managing stormwater as close to where it falls as possible. The LID guidance manual is available from the Spokane Stormwater Green Infrastructure website.

2.5.4 Procedures for Development Site Plan Review

The Development Services Center requires developers to submit an operation and maintenance plan for a project's stormwater treatment facilities, and a draft copy of the Conditions, Covenants and Restrictions (CC&Rs) for homeowners' associations that will be in charge of operating and maintaining stormwater treatment facilities, per the city's plan review process. .

Drainage submittals are reviewed the Developers Services Center for compliance with the Spokane Municipal Code by when creation of impervious areas is proposed and for projects in critical areas of management and buffer zones. Development Services Center reviews drainage submittals to ensure they meet the for civil engineering requirements provided by the city's Engineering Design Standards and stormwater guidance manuals.

Engineering Services Department develops and/or reviews project designs and stormwater plans for city projects in the public right-of-way to ensure consistency with the city's Engineering 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 Business and Development 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 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.

2.5.5 Construction Site Inspection and Enforcement

Field Technicians from the Engineering Services Department provide construction oversight and site inspections for public projects. Construction Inspectors from the Development Services Center perform construction oversight and site inspections for private projects. Stormwater Inspectors from the

Wastewater Management Department inspect stormwater controls and infrastructure once during construction and a final inspection when construction is complete for public and private projects.

Deficiencies identified during site inspections of either private or public projects are added to a punch list to be completed by either the developer or the contractor, respectively. Final approval, acceptance of the project, or issuance of a Certificate of Occupancy, dependent on the type of project, does not occur until all deficiencies have been corrected.

2.5.6 Post-Construction Site Inspection and Enforcement

Post-construction stormwater BMPs generally include collection, conveyance, treatment, and discharge infrastructure. Stormwater BMPs that are used to manage stormwater from public properties and roadways are public stormwater assets inspected and maintained by the city. Public stormwater assets are inspected at a minimum of every 2 years, but typically more frequently, by Wastewater Management Department staff. Maintenance is performed on the stormwater assets as needed, based on the inspection results of the structures. Inspection and maintenance activities are documented and tracked with asset management programs by Wastewater Management Department Supervisors.

Stormwater BMPs on private property used to manage stormwater runoff from private property are required to be inspected and maintained by the property owner. Private stormwater BMPs that meet the applicability criteria defined in Section 17D.060.140.E of the Spokane Municipal Code are required to be registered in the City of Spokane Private Stormwater Facility Annual Certification Program. The program requires applicable private stormwater facilities to be certified annually by a third-party qualified stormwater professional that they are being maintained and functioning as designed. Any deficiencies noted during the inspection are required to be corrected prior to submission of the certification. Certification forms must be submitted to the Wastewater Management Department via Spokane Accela Citizens Access portal, or in hard copy by mail, for confirmation of completion and record retention.

2.5.7 Training for Staff and Stormwater Professionals

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 detailed in the stormwater guidance manual. The Center retains copies of the training information provided to construction site operators.

Staff and professional training was provided for employees and design professionals to aid in reaching water quality goals, ensure permit compliance, and reduce pollution to stormwater runoff. Six training modules were developed, including NPDES Overview, Operations and Maintenance, Facility Inspections, Site Plan Review, Illicit Discharge, and LID. Training records are kept in Wastewater Management Department files that include training materials, the dates of trainings, and attendees.

2.6 Municipal Operations and Maintenance

2.6.1 Permit Requirements Pollution Prevention by Municipal Operations (§S5.B.6)

Pollution prevention includes good housekeeping and controlling the source of potential pollutants to that they are isolated from coming into contact with stormwater. 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. The O&M Plan must include BMPs that will reduce the discharge of pollutants and protect water quality, and include O&M standards at least as protective as those listed in the SWMMEW or another functionally equivalent stormwater manual approved by Ecology.

Section S5.B.6.a.i of the permit requires the O&M Plan to include appropriate pollution prevention procedures for the following types of facilities and/or activities:

Stormwater Collection and Conveyance System

Inspection and cleaning of the following stormwater collection and conveyance system components:

- Catch basins
- Stormwater sewer pipes
- Open channels
- Culverts
- Structural stormwater treatment, and
- Structural stormwater treatment flow control facilities.

Waste generated from the O&M collection and conveyance components shall be disposed of in accordance with Appendix 6 of the permit.

Roads, highways, and parking lots

Maintenance of roads, highways, and parking lots owned or operated by the city, and which constitute pollutant generating impervious surfaces of ≥ 5,000 square feet, to include:

- Street cleaning
- Deicing
- Snow removal
- Management of snow storage areas
- Management of material storage areas (e.g. salt, sand, etc.), and
- Implementation of BMPs to reduce road and parking lot debris/pollutants.

Vehicle fleets and Equipment

Maintenance of city equipment and fleet vehicles must occur in covered self-contained areas, or designated areas operated to keep stormwater separate from materials and wastewaters, to include:

- Storage,
- Washing,
- Maintenance,
- Repair, and
- Fueling.

Municipal buildings

Pollution prevention, good housekeeping, and PCB mitigation practices are required for municipal buildings owned or operated by the city to include:

- Cleaning,
- Washing,
- Painting,
- Maintenance,
- Renovations, and
- Demolitions.

Parks and open space

Pollution prevention, good housekeeping, and best management practices are required for activities in parks and open spaces to include:

- Applying fertilizer,
- Applying pesticides, and herbicides,
- Managing pet waste,
- Controlling sediment migration and erosion,
- Maintaining landscapes and disposing of vegetation
- Handling trash and dumpsters, and
- Cleaning and maintain building exteriors.

Construction projects

Public construction projects must comply with the requirements applied to private projects, to include:

- Obtaining a Construction Stormwater General Permit, if applicable, and
- Implementing construction and post-construction controls in accordance with the Core Elements in Appendix 1 of the permit.

Industrial Activities

Industrial facilities owned or operated by the city must:

- Obtain an Industrial Stormwater General Permit, if applicable, or another NPDES permit that authorizes stormwater discharges associated with the activity.

Material storage areas, heavy equipment storage areas, and maintenance areas

Municipal SWPPPs are required for material storage areas, heavy equipment storage areas, and maintenance areas owned or operated by the city, except those which have obtained coverage under another NPDES permit, and must include:

- Site map showing the facility's stormwater drainage, discharge points, and potential pollution-generating areas,
- Inventory of the site materials and equipment that may be exposed to precipitation or runoff,
- List of site activities that may expose materials to precipitation or runoff,
- Spill prevention and response plan,
- Description and implementation schedule of site BMPs (operational and structural),
- Annual facility inspections, to include visual observations of discharges, to evaluate BMP effectiveness, identify maintenance needs, and determine if BMPs need to be modified, and
- Documentation of inspection report or checklist.

Flood management projects

The city is required to assess water quality impacts, and consider controls that minimize impacts to site hydrology, in the design of all new flood management projects.

Other facilities that would reasonably be expected to discharge contaminated runoff

City facilities that may discharge contaminated runoff must implement BMPs to protect water quality.

Section S5.B6.a.ii of the permit requires the O&M Plan to include a schedule of inspections and requirements for recordkeeping in accordance with permit Section S9 – *Reporting and Record Keeping* that includes:

- Inspection of 95% of the city's stormwater treatment and flow control facilities (except catch basins) at least once every two years,
- Inspection all the city's catch basins and inlets at least every two years, to include cleaning per maintenance standards, if applicable; and,
- Spot inspections of city stormwater facilities following major storm events to check for damage, where maintenance and repairs are performed as soon as practicable.

Section S5.B.6.a.iii of the permit requires the O&M Plan to identify the departments or roles responsible for performing the activities identified in the Plan.

Section S5.B.6.c of the permit requires water quality protection training for construction, operations, and maintenance job functions that may impact stormwater quality on applicable O&M requirements, site SWPPPs, inspection procedures, street sweeper operation, and jobsite pollution prevention. Training records must be retained and include dates, course descriptions, and names and job roles of the attendees.

2.6.2 Municipal Operations and Maintenance Program

An operation and maintenance (O&M) program has been developed and implemented that includes a citywide Operation and Maintenance Plan for typical municipal activities, site specific SWPPPs for applicable municipal properties, and a recurring training component, where the ultimate goal is reducing or preventing pollutant runoff from municipal operations in order to protect water quality.

2.6.3 Municipal Stormwater Operations and Maintenance Plan

The Wastewater Management Department developed the City of Spokane Municipal Stormwater O&M Plan to replace several obsolete department-specific O&M Plans. The Municipal Stormwater O&M Plan is a comprehensive document that contains a schedule of municipal O&M activities, and BMP guidance documents specific to typical job functions and tasks, that have the potential to impact water quality. The schedule of municipal O&M activities in the Plan are organized into sections per type of municipal asset as follows:

- Stormwater Collection and Conveyance System,
- Roads, Highways and Parking Lots,
- Vehicle Fleets,
- Municipal Buildings,
- Parks and Open Space,
- Construction Projects,
- Industrial Activities, and
- SWPPPs.

Appendix A of the Plan contains several BMP guidance documents that were adopted from the SWMMEW and grouped into these categories:

- General Housekeeping,
- General Maintenance and Construction,
- Active Construction Site,
- Landscaping and Vegetation Management,
- Fertilizers and Pesticides,
- Materials Management and Spill Control,
- Vehicles and Equipment,
- Street and Roadway,
- Stormwater Collection and Conveyance System, and
- General Administrative.

2.6.4 Schedule of Municipal O&M Activities

2.6.4.1 Stormwater Collection and Conveyance System

The Sewer Maintenance Division of the Wastewater Management Department manages the city's storm sewer infrastructure (i.e. catch basins, storm sewer pipes, open channels, culverts, stormwater treatment facilities, flow control facilities, and drywells), regularly inspects and maintains the

components of the system. The Municipal Stormwater O&M Plan documents the inspection and maintenance frequencies of the storm sewer system components. BMP-specific procedures for inspecting and maintaining the storm sewer system are provided in the O&M Plan.

Waste generated from cleaning and maintaining the stormwater collection and conveyance system are taken to the city's decant facility, where the liquids are separated from solids and conveyed to an evaporation pond, and the solids are dried and transported to a permitted solid waste landfill. A site-specific Municipal SWPPP was written for the decant facility and is kept on-site.

2.6.4.2 Roads, Highways and Parking Lots

City Departments that own parking lots are responsible for maintaining their parking lots and parking areas, which includes good housekeeping, clearing the pavements, removing snow, and protecting stormwater.

The Streets Department is responsible for maintaining the city's streets, roads, and highways to ensure they are safe for travel, which includes performing maintenance activities, clearing obstructions, managing snow removal, adding sand and/or deicer, and performing street sweeping to recover accumulated pollutants before they are transported downstream by runoff. Street debris waste is transported to the city's decant facility and unloaded to dry. Dry street debris is landfilled in a permitted solid waste landfill. BMP-specific documents on good housekeeping practices, management of bulk materials, application of pesticides, and maintenance of roadways, among others, are provided in the Municipal Stormwater O&M Plan.

2.6.4.3 Vehicle Fleets

City departments that own vehicles are responsible for operating, fueling, storing, and washing their vehicles, as well as maintaining the vehicle parking areas to protect stormwater. City vehicles and equipment are washed at a dedicated car wash, and the washwaters are discharged to the sanitary sewer. Maintenance and repair of city owned vehicles and equipment is typically performed by Fleet Services at the Central Services Center, where stormwater is managed per a site-specific Municipal SWPPP. Vehicle and equipment maintenance may be performed by the owning department inside a building or in areas operated to minimize the impacts to stormwater. Stormwater BMPs applicable to storing, washing, fueling, and maintaining city vehicles are provided in Municipal Stormwater O&M Plan.

2.6.4.4 Municipal Buildings

Maintenance of municipal buildings (e.g. cleaning, washing, painting, and landscape maintenance) is the responsibility of the owning department, who is expected to implement stormwater BMPs when performing cleaning and maintenance activities in order to reduce the potential for pollutants to enter the storm sewer. Stormwater BMP documents for building maintenance are provided in the Municipal Stormwater O&M Plan.

2.6.4.5 Parks and Open Space

The maintenance of parks and open space areas includes fertilization, mowing, pesticide application, and supplemental irrigation, and has significant potential to impact stormwater and ultimately the

Spokane River. Potential pollutants from these activities include nutrients (ammonia and phosphorous), chemicals (pesticides), organic debris, and sediment, among others, which must be mitigated with appropriate stormwater BMPs. Stormwater treatment facilities and green stormwater infrastructure are often incorporated into parks and open spaces to provide multi-use facilities for the public. Green areas used to manage stormwater have additional maintenance requirements beyond those for parks and open spaces alone.

The Parks and Recreation Department is responsible for maintaining the vegetation in city owned parks, open spaces, and stormwater treatment facilities. Stormwater BMPs applicable to the maintenance activities performed at parks and open spaces, as well as BMPs for stormwater bioinfiltration facilities, are provided in the citywide Municipal Stormwater O&M Plan as guidance resources for the departments responsible for their maintenance.

2.6.4.6 Construction Projects

Public and private construction projects are required to comply with Appendix 1 of the permit, which details the requirements of seven core elements for the protection of stormwater. In addition, larger construction projects are also required to obtain a project specific Construction General Stormwater Permit from the Department of Ecology.

Construction projects have significant potential to impact stormwater via dirt particles from exposed soils, and via the building materials and chemicals/ coatings/ fluids used for the construction project. Stormwater pollution prevention BMPs are required to be implemented for construction projects performed by the city. BMPs for both large and small construction sites are provided in the citywide Municipal Stormwater O&M Plan

2.6.4.7 Industrial Activities

Industrial activities have a significant potential to impact stormwater with pollutants that are specific to industrial sectors. The City of Spokane municipal operations activities which would typically qualify for an industrial stormwater permit are the Northside Landfill and the Waste to Energy Facility.

The Northside Landfill is closed to the public and no longer accepts municipal solid waste for disposal. The Waste to Energy Facility is active, and conducts all waste transfer and processing of materials indoors under a building roof. In lieu of an industrial stormwater permit, the Northside Landfill and the Waste to Energy Facility sites manage stormwater onsite in accordance with a site-specific SWPPP, as required for municipal operations by the permit.

The Northside Landfill and Waste to Energy Facility are responsible to update the site-specific SWPPPs for each respective facility to reflect current activities and operations, and to continue to perform the required tasks identified in the SWPPP for each site. In addition to carrying out the SWPPP, the Northside Landfill and Waste to Energy Facility both implement some applicable stormwater BMPs that are not provided in the site specific SWPPP, specifically BMPs for good housekeeping and non-routine maintenance activities, which are provided in the citywide Municipal Stormwater O&M Plan.

The Riverside State Park Water Reclamation Facility (RPWRF) is a publicly owned wastewater treatment plant operating under a National Pollutant Discharge Elimination System (NPDES) permit specific to the

facility. RPWRF is responsible to operate in accordance with the conditions of its' NPDES permit, and the requirements of the municipal stormwater permit do not regulate any activities at RPWRF.

2.6.4.8 Staff Training

The city provides stormwater training for employees with primary construction, operation, or maintenance job functions likely to impact stormwater quality. Training is typically performed by each department for the applicable personnel, and it 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 water quality concerns (such as potential/observed illicit discharges). The city's stormwater training program is part of the long-term strategy for the implementation of the citywide Municipal Stormwater O&M Plan. Every employee will receive annual training on the O&M Plan by department stormwater focal points, who will have been trained as trainers on the O&M Plan and stormwater protection.

2.6.4.9 Site-Specific Municipal SWPPPs

Site-specific Municipal SWPPPs have been developed for municipal properties that have material storage areas, heavy equipment storage areas, and outdoor maintenance areas. The SWPPPs contain site maps, inventories of equipment and materials on-site, descriptions of the operations activities, spill mitigation procedures, inspection criteria to identify site conditions, and water quality protection practices specific to each site. Table 2.6 provides information of City of Spokane site-specific SWPPPs.

Table 1. Site-Specific SWPPPs

SWPPP Property	Property Address	Department	SWPPP Date
Sewer Maintenance Operations	909 E Sprague Avenue	Wastewater Management	Dec 2022
Vactor Waste Facility	2401 E Ferry Road	Wastewater Management	Aug 2019
Water Department Operations	914 E Foothills Drive	Water	Dec 2022
Northside Landfill	7202 N Nine Mile Road	Solid Waste Disposal	Mar 2021
Waste to Energy Facility	8125 W Pilot Drive	Solid Waste Disposal	Dec 2022
Parks Operations Complex	2304 E Mallon Street	Parks and Recreation	Dec 2022
Riverfront Park	610 W Spokane Falls Blvd	Parks and Recreation	Dec 2022
Manito Park	2406 S Tekoa Street	Parks and Recreation	Dec 2022
Central Services Center	915 N Nelson Street	Streets, Fleets Services, Solid Waste Collections	Oct 2019

3. COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD

3.1 Total Maximum Daily Load (TMDL)

3.1.1 TMDL Permit Requirements (§S7)

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 2 of the permit. Appendix 2 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, 2024, and expires on July 31, 2029;
- 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; and
- Evaluate and report on changes in flow and pollutants discharged from the Cochran Basin stormwater outfall for the applicable TMDL parameters following the implementation of the Cochran Basin stormwater facility retrofit projects no later than March 31,2028.

3.1.2 Dissolved Oxygen TMDL Stormwater Monitoring

Stormwater monitoring is performed at the Cochran Basin outfall to comply with TMDL stormwater monitoring requirements of Appendix 2 of the permit. Stormwater from the Cochran Basin is representative of stormwater discharges from the city's MS4, and the Cochran Basin outfall near TJ Meenach Drive is monitored as the proxy location to determine the citywide DO TMDL waste loads to the Spokane River. Stormwater discharges from the Cochran Bain outfall have been monitored per the stormwater TMDL since 2016 through 2025, to include continuous flow monitoring, and stormwater sampling and analysis.

The stormwater TMDL monitoring samples were analyzed for temperature, total suspended solids, carbonaceous biological oxygen demand, total phosphorous, ammonia nitrogen, and polychlorinated biphenyls. The analytical data was used to calculate both the annual and seasonal (March 1st - October 31st) waste loads of stormwater pollutants to the Spokane River. The annual and seasonal stormwater TMDL calculated waste loads from 2016 – 2025are presented in the Table 2 and Table 3, respectively. The stormwater TMDL waste load allocations (WLAs) are included in the tables for reference.

Table 2. Median Seasonal Stormwater Waste Loads

Year	CBOD (lbs/day)	Total P (lbs/day)	NH3-N (lbs/day)
2016	**79.5**	1.8	0.22
2017	**73.1**	4.8	0.00
2018	12.5	0.6	0.08
2019	42.2	2.1	**1.58**
2020	33.8	1.0	0.1
2021	7.0	0.4	0.11
2022	**60.1**	2.6	**1.50**
2023	29.5	1.1	0.98
2024	42.1	0.7	0.15
2025	48.5	1.6	0.32
WLAs	59.1	6.1	0.98

Bold values indicate calculated waste loads greater than the Waste Load Allocation (WLA)

Table 3. Median Annual Stormwater Waste Loads

Year	CBOD (lbs/day)	Total P (lbs/day)	NH3-N (lbs/day)
2016	**73.9**	1.6	0.21
2017	**125.0**	3.5	0.00
2018	25.4	1.0	0.48
2019	**84.5**	2.4	**1.41**
2020	30.7	2.1	0.96
2021	21.0	1.1	0.32
2022	**91.5**	3.9	**2.65**
2023	**69.6**	2.5	**2.32**
2024	**142.3**	2.6	0.54
2025	**100.5**	3.3	0.66
WLAs	59.1	6.1	0.98

Bold values indicate calculated waste loads was greater than the Waste Load Allocation (WLA)

The median annual stormwater waste load for CBOD was exceeded in 2016, 2017, and, and in response, the city submitted the Stormwater TMDL Waste Load Reduction Action Plan was submitted to Ecology on August 6, 2020. The response plan 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 three facilities, and will bypass flows in excess of the 6-month design storm to the existing outfall which discharges to the Spokane River. Construction of the Cochran Basin Stormwater facilities was completed in late 2023, and was brought incrementally throughout 2024 and 2025.

Monitoring continued in 2025 in accordance with the protocols established by 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. Monitoring will continue in accordance with the QAPP through the end of the current permit cycle in July 2029. Monitoring results were tabulated and uploaded into Ecology's Environmental Information Management (EIM) database for all data collected in 2020, 2021, 2022, 2023, 2024, and 2025. Summary reports for the stormwater TMDL monitoring have been developed and are on file with the city's stormwater program. Monitoring will continue to occur in 2026.

4. MONITORING AND ASSESSMENT

4.1 Stormwater Management Program Effectiveness Studies

4.1.1 Effectiveness Study Permit Requirements (§S8)

Section S8 of the permit requires the city perform and/or participate in effectiveness studies, and monitor tree canopy. Section S8.A.1 of the permit requires the city to adopt and implement tree canopy goals and policies to support stormwater management by December 31, 2028. Per this section of the permit, the city must:

- Consider how existing or future tree canopy can support stormwater management and water quality improvement in receiving waters;
- Establish a long-term (5 years or longer) goal of canopy, existing or future projection, to be used for stormwater management and which is appropriate for the jurisdiction;
- Consider maintaining or increasing canopy in overburdened communities;
- Consider maintaining existing mature canopy; and
- Document considerations, reasoning, and rationale for goals and policies.

Section S8.B.1 requires the city to continue to implement the effectiveness studies that are ongoing from 2014-2019 and 2019-2024 permit cycles in accordance with the applicable Quality Assurance Project Plans (QAPPs).

- Section S8.B.1 of the permit requires the city to continue to participate in implementation of the eight Ecology-approved studies that were selected pursuant to Section S8 in the Eastern Washington Phase II Municipal Stormwater Permits (2014-2019 and 2019-2024) in accordance with the QAPPs.
- Section S8.B.2 of the permit requires the city to notify Ecology, in writing, which of the options presented in permit Section S8.B.3 the city chooses to carry out during the 2024-2029 permit term, and to submit such notification on or before December 1, 2024.
- Section S8.B.3 of the permit lists three options from which the city may choose in order to fulfill the requirements of permit section S8. These options are as follows:
    - Section S8.B.3.a of the permit describes the Regional Stormwater Management Plan (SWMP) Effectiveness Study, which would require the city to coordinate with other local permittees to plan and initiate an additional SWMP effectiveness study according to the requirements listed in permit section S8.C.
    - Section S8.B.3.b of the permit describes the Stormwater Action Monitoring (SAM) Collective, which would require the city to submit annual payments into the SAM collective fund to implement SWMP Effectiveness and Source Identification Studies. Such payments would be due on or before August 15 of each year, beginning in 2025, and would be submitted according to permit section S8.D. Up to three times per permit term (2024-2029), the SAM coordinator may submit information requests to the city's permit

coordinator via Ecology's regional permit manager, for the purposes of effectiveness and source identification studies under contract with Ecology as active SAM projects. The city would have 90 days to provide any and all requested information.

- Section S8.B.3.c of the permit describes Stormwater Discharge Monitoring, which would require the city to conduct stormwater discharge monitoring according to the requirements listed in permit section S8.E.

- Section S8.C of the permit describes requirements applying to permittees who choose to coordinate with other permittees in their urban area to plan and begin an additional SWMP effectiveness study per permit section S8.B.3.a. This section would require the city to:
  - Participate in the effectiveness study by serving as the lead entity, contributing staff time or other in-kind services for the purposes of conducting the study, and/or provide funding;
  - Submit a brief description of the study to Ecology, with a list of project participants and their associated roles, on or before June 30, 2025;
  - Submit a detailed study design proposal to Ecology by June 30, 2026, according to the format and instructions in the *Eastern Washington Stormwater Effectiveness Studies, Detailed Study Design Proposal and QAPP* templates (July 1, 2019, v.1) appropriate for the study type (operational, structural, or education and outreach);
  - Submit a completed QAPP to Ecology by December 31, 2026, according to the format and instructions in the appropriate QAPP template;
  - Initiate the study by June 30, 2027, or within three months of receiving Ecology's approval of the QAPP, whichever is later;
  - Include effectiveness study activities, such as assigned duties, participation in meetings/ proposal development/ project reviews, and study implementation in the permittee's updated SWMP Plan;
  - Document assigned duties, participation in meetings/ proposal development/ project reviews, and study implementation, and include a summary in the permittee's Annual Report;
  - Enter all applicable data collected into Ecology's EIM database once the final report is complete;
  - Include project data inappropriate for EIM in the Annual Report;
  - Publish a final report, with study results an recommended future actions based on the findings, within 60 days of completing the study;
  - Produce a fact sheet summarizing findings and recommendations within 90 days of completing the study and share it with other permittees; and
  - Submit the final report and fact sheet to Ecology within 90 days of completing the study.

- Section S8.D of the permit describes requirements applying to permittees who chose to make annual payments into the SAM collective fund per permit section S8.B.3.b, and states that

permittees electing to move forward with this option will be invoiced three months prior to the payment due date. Permittees are to follow the instructions on the invoice. Each permittee's payment amount will be recorded in Appendix 8 of the permit.

- Section S8.E of the permit describes requirements applying to permittees who choose to conduct stormwater discharge monitoring per permit section S8.B.3.c. This section would require the city to:
    - Conduct monitoring according to permit Appendix 9 and an Ecology-approved QAPP;
    - Monitor three independent discharge locations;
    - Submit a draft stormwater discharge monitoring QAPP to Ecology by June 30, 2025, according to the requirements in Appendix 9;
    - Submit a final QAPP to Ecology by August 15, 2025, or within 60 days of receiving Ecology's comments on the draft QAPP (whichever is later);
    - Begin flow monitoring by October 1, 2025, or within 30 days of receiving Ecology's approval of the final QAPP;
    - Fully implement a stormwater discharge monitoring program, per an Ecology-approved QAPP, by October 1, 2026;
    - Annually enter all water and solids concentration data into EIM per Appendix 9; and
    - Submit a final report to Ecology with the results of stormwater discharge monitoring and recommended future actions within 90 days of completion of the monitoring.

4.1.2 City of Spokane Effectiveness Studies

Two effectiveness studies have been recently completed by the City of Spokane: 1) Sharp Avenue Permeable Pavement Pollutant Removal Efficacy Study, and 2) Garland Avenue Biochar Amended Storm Garden Pollutant Removal Efficacy Study. Monitoring for these studies was completed in 2025 and final reports will be submitted Ecology in 2026.

4.1.2.1 Sharp Avenue Sharp Avenue Permeable Pavement

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-Spokan-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 road bed. 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 which is surrounded by residential and college-campus land use areas. The goal of this study is to collect stormwater infiltrated by the permeable pavements into the 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 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 associate sub-base materials was constructed on Sharp Avenue between 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 control sample, which can be used to determine comparative pollutant-removal efficacies of the permeable pavements, catch basins and conveyance piping were installed to the west of the permeable pavement areas to collect un-infiltrated stormwater runoff.

A Quality Assurance Program Plan detailing the study was submitted to Ecology and approved in 2019. Monitoring at all three distinct locations began in 2019 and was ongoing for five 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. Infiltration tests at various locations were performed before and after some street sweeping events to monitor changes in the permeability of the pavements after sweeping and over time. The Sharp Ave effectiveness study was completed in 2025, and a final report will be submitted to Ecology in 2026.

4.1.2.2 Garland Avenue Biochar Amended Storm Garden

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 stormwater at the storm garden. To achieve this, the city will sample the influent (pre-infiltration) and effluent (post-infiltration) stormwater concentrations. A Quality Assurance Program Plan detailing the study was submitted to Ecology and approved in 2019. Monitoring began in 2019 and was ongoing for five consecutive years to include observations of water quality over time. The Garland Avenue effectiveness study was completed in 2025, and a final report will be submitted to Ecology in 2026

4.1.3 Additional Effectiveness Study (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) BMPs in Eastern Washington through the TAPE (Technology Assessment Protocol – Ecology) process. The media tested will include the high performance (HP) BSM and the 60% sand to 40% compost (60:40)

BSM. A rock mulch will be used to protect the surface from erosion. The City of Spokane was awarded a water quality grant from Ecology to perform the TAPE project in 2023, which commenced in 2024 at a swale test site on Gonzaga University.

An Effectiveness Study will be performed in concert with the TAPE Project and will leverage the TAPE data into the study for comparisons outside the scope of the TAPE Project. The study will be implemented by a consultant on behalf of all municipal partners, and the City of Spokane will be the lead entity. The details for this non-vegetated swale study were provided to Ecology in June 2021 and a detailed design study proposal was submitted to Ecology in September 2022. The effectiveness study QAPP was developed and submitted to Ecology in 2023, and the study was kicked off with the TAPE Project in 2024. The Effectiveness Study was ongoing in 2025, and continues in 2026 in alignment with the TAP project.

4.1.4 Stormwater Action Monitoring (SAM)

The City of Spokane joined Stormwater Action Monitoring (SAM) program collective in 2025. The SAM program brings together municipal stormwater permittees to cooperatively fund and select proposed projects that aim to improve stormwater management, reduce pollution, improve water quality, and reduce flooding. The SAM program requires an annual participation fee that is based on municipal populations, and it provides a structure for municipalities to cooperatively fund and steer projects with transparency and accountability. The SAM program requires an annual participation fee that is based on municipal populations. Municipalities that participate in the SAM program are able to leverage SAM projects into their stormwater programs to satisfy permit requirements in lieu of performing an effectiveness study themselves.

The Stormwater Work Group (SWG) is a formal stakeholder group consisting of Federal, Tribal, State, Port, and Municipal representatives that provides leadership and oversight on SAM projects. The City of Spokane is a voting member of the SWG as an Eastern Washington municipal representative. The SAM program selecting study proposals to fund in 3rd quarter 2026, and upon approval form the SWG, selected SAM projects will be performed in 2026-2027.

5. REPORTING REQUIREMENTS

5.1 Annual Stormwater Report

5.1.1 Permit Requirements for Reporting (§S9)

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

Section S9.C 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.D of the permit requires the city to include the following in each Annual Report:

- Stormwater Management Program Plan (SWMP Plan), per permit section S5.A.4;
- 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 the permit during the reporting period;
- Notice that the city is relying on another entity to satisfy any obligations under the permit, if applicable;
- 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 the city's permit coverage area during the reporting period.

5.1.2 City of Spokane Annual Stormwater Report

The city completes and submits the Annual Report by March 31st on an annual basis. The annual report is submitted using Ecology's WQWebPortal in SecureAccess Washington. Copies of the annual report can be found at Spokanestormwater.org under the stormwater management tab.

6. 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
SRSM:	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

7. 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 ad 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 WAR40-6505.

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.

8. REFERENCES

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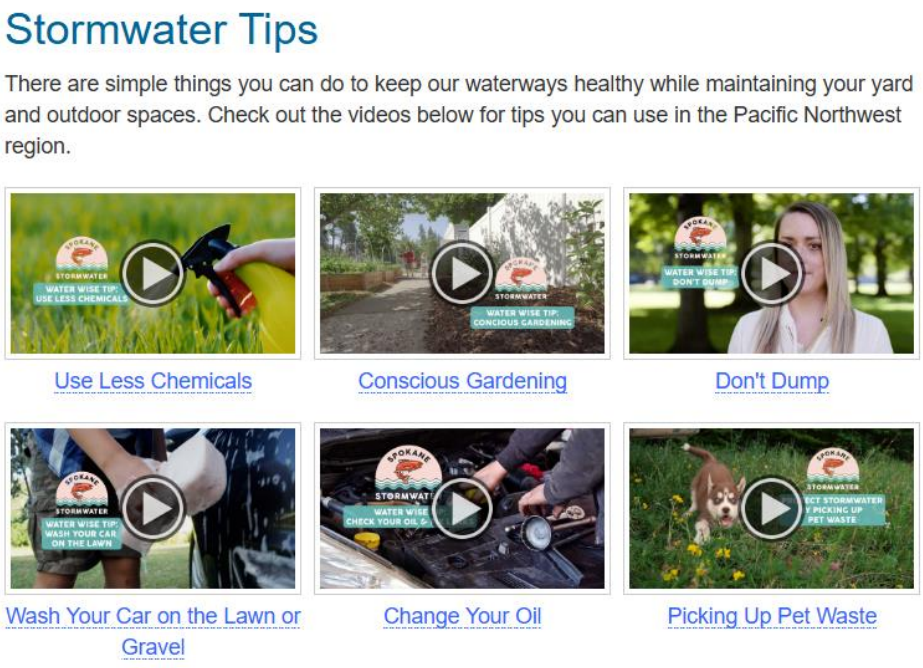
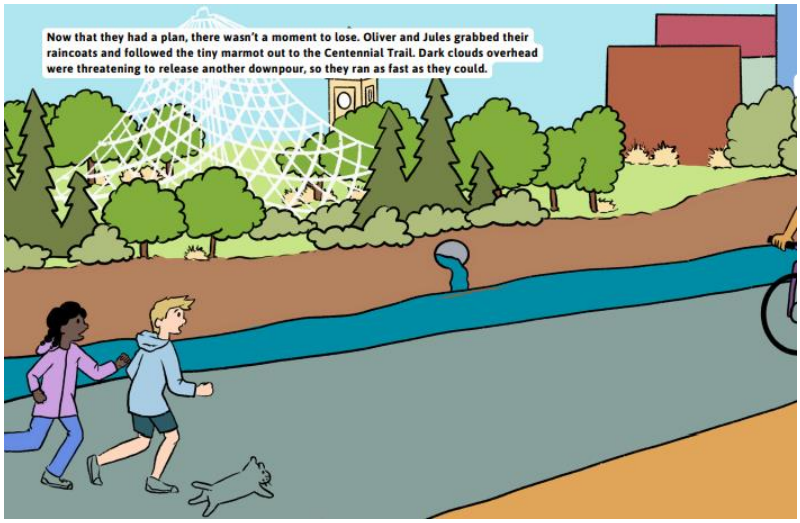
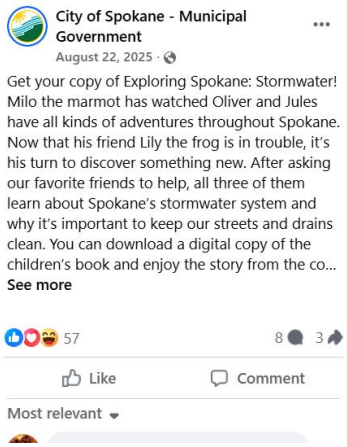
9. APPENDICES

Appendix A
Education and Outreach



Featured tips on City of Spokane website.





Author and Illustrator community public reading and community education activity lesson. Example pages of the book.

In-Person Education & Outreach				
Month, 2025	**Event**	**Location/ School**	**Audience**	**Attendees**
March	Adopt-a-Drain Presentation	In-Person & Virtual	Adults Across State	90
March	CSO26 Tour	CSO26	College Students	30
April	Earth Day	Central Library	All Ages	300
April	Arbor Day	Finch Arboretum	All Ages	200

In-Person Education & Outreach				
Month, 2025	**Event**	**Location/ School**	**Audience**	**Attendees**
May	Municon Stormwater Conference Presentation	Vancouver, WA	Adults	40
June	Manhole Art Contest Ed/Winner Announcement Assembly	Sacajawea Middle School	Students/Staff	1,000
June	Touch-a-Truck	Indian Trail Library	All Ages	150
June	Spokane Indians Game	Avista Stadium	All Ages	700
August	Children's Book Reading	Loof Carrousel	Children/Family	40
August	CSO Tour	CSO26	EWSG	15
August	River Clean-up	Redband Park	Adults	25
August	Touch-a-Truck	Hillyard Library	All Ages	200
August	Sewer Contest Dedication	Sacajawea	Adults	75
September	Touch-a-Truck	SCC	All Ages	600
September	Avista Swale Education x2	Scott Morris Center	Adults	30
October	Fall Leaf Festival	Finch Arboretum	All Ages	200
October	Swale Door-to-Door Education	Lincoln Street.	Homeowners	50
October	CSO Tour w/ Lumen School	CSO26	Students/Chaperones	40
Approximate Number of Attendees:				**3,785**

2025 In-Person Community Outreach and Education Events

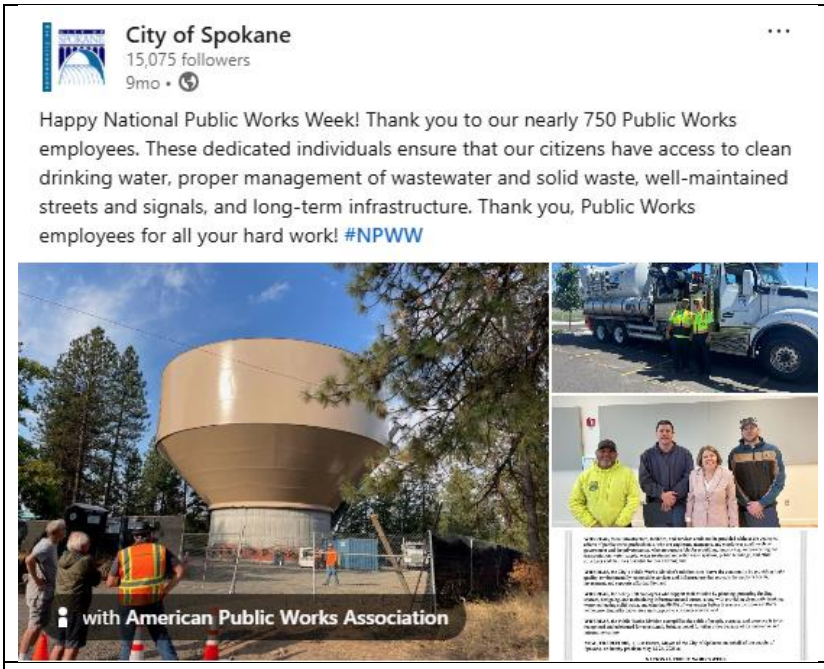
Stormwater Social Media Report

LinkedIn

LinkedIn Definitions	
Impressions	Views when the post is at least 50% on screen, or when it is clicked, whichever comes first.
Members Reached	The number of unique individual users who have seen your post, article, or video at least once
Engagements	The number of reactions, comments, shares, and saves on your post.

Average Facebook Post	
Impressions	1,770
Members Reached	1,144
Engagements	120

Post	Impressions	Members Reached	Engagements
City of Spokane 15,074 followers 8mo • Congratulations to Sacajawea Middle School Student Izzy Parker! Izzy won the Spokane Arts and City of Spokane's Wastewater Management Department's student art contest. Her design will be cast in iron and placed on the streets of Spokane! **Spokane Public Schools** 8,324 followers 8mo • ART ON THE STREET: At an all-school assembly this morning, Sacajawea Middle School 6th grader Izzy Parker was recognized as the winner of the City of Spokane Wastewater Department and Spokane Arts' 2025 Student-Designed Wastewater Access Cover Art Contest! This contest occurs every five years in Spokane as the city replaces approximately 100 wastewater access covers, also known as manhole covers. For decades and at no extra cost, the City of Spokane has added the winning student-designed artwork to these manholes to add creativity to our city streets. The design prompt was to be reflective of the ecology, water, nature, creatures or landscape of the Inland Northwest. Izzy's whimsical design featuring a kayaker on the Spokane River, lots of trees, and Spokane's unofficial mascot, the marmot, stood out the panel of judges as the top entry out of hundreds of submissions. Her family also attended the surprise reveal where Izzy received a $100 prize and goody bag from Spokane Stormwater. Congrats, Izzy!   	1,014	596	185

	436	281	38
	2,845	1,818	132

City of Spokane 15,074 followers 10mo • We are recognizing a team for Employee of the Quarter! Congratulations to Sewer Department employees Kris Reid, Peter Venable, Joaquin Leal-Rodriguez, and Eric Sanchez, along with Engineering Construction Inspector Jake West! This team responded to the Cochran Basin Stormwater System breach, which occurred before the system was fully operational due to excessive rainfall. To lessen the impacts of erosion and chances of sediment reaching the Spokane River, the team attempted to close the valve that was not operating. Despite initial efforts to close it, water continued to flow rapidly. The crew adapted by lowering sandbags and a piece of plywood to block the valve and dramatically slowed the water flow. This decreased the water entering the already full swales and protected the Spokane River. Way to go! #EmployeeRecognition 			
City of Spokane 15,074 followers 10mo • Capturing pollutants before they reach the wastewater system is critical to protecting people, infrastructure, and the environment. Each year, City of Spokane recognizes businesses and organizations that prioritize operations to protect the Spokane River by excelling in the management of their wastewater. The following have achieved 100 percent compliance with requirements in the industrial wastewater discharge permits for 2024: -Darigold, Inc. -Jubilant HollisterStier CMO -Selkirk Pharma, Inc. -Fairchild Air Force Base -Goodrich Corporation https://lnkd.in/gKRt_sH6  **Business Operations Benefit the Spokane River** my.spokanecity.org	2,134	1,513	68

X/Twitter

X/Twitter Definitions	
Impressions	The number of times your post was played or displayed.

Average Instagram Post	
Impressions	363

Post	Impressions
	299

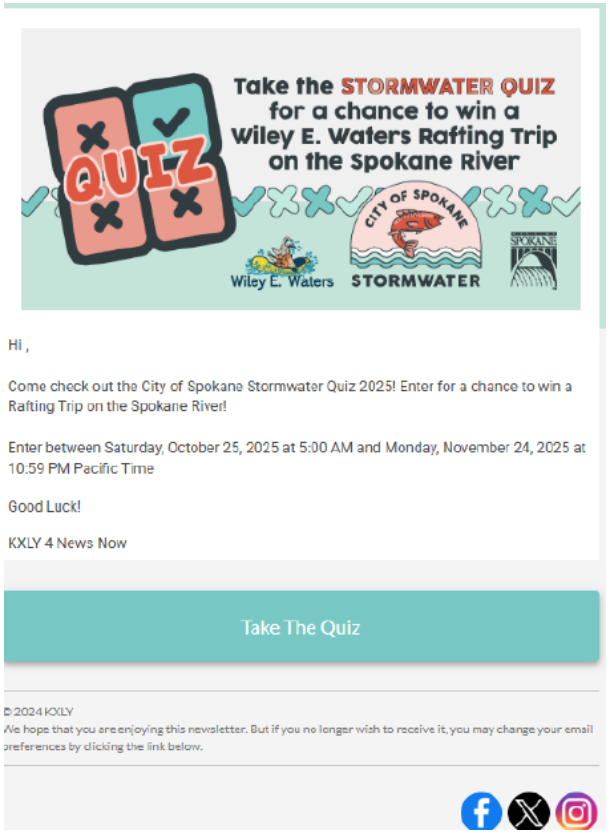
City of Spokane @SpokaneCity Students living in the City of Spokane are invited to submit a design for a wastewater access cover, also known as a manhole cover. The selected design will be cast and used in locations throughout the City. Contest ends 5/30. my.spokanecity.org/news/stories/2...  Spokane Arts	281

City of Spokane @SpokaneCity CELEBRATING NATIONAL PUBLIC WORKS WEEK! The City is proud of the employees in our Public Works Division who ensure we have clean drinking water, managed wastewater & solid waste, maintained streets & signals, long-term infrastructure, & utility bill processing. THANK YOU! #NPWW  	369

City of Spokane @SpokaneCity Visit a garbage truck, water vac truck, ambulance, and more at the Touch-a-Truck event at Hillyard Library on Friday, June 27, 9:30 - 11:30 a.m. This family event is for kids of all ages, 8 and under with an adult. Details on @spokanelibrary's website. events.spokanelibrary.org/event/13363032  	324
City of Spokane @SpokaneCity Protect stormwater by keeping soap suds on the lawn when washing your car. It's an easy way to prevent harmful chemicals from entering our waterways while giving your lawn a natural boost. Let's wash responsibly! Go to WaterWiseSpokane.org for more tips youtu.be/HAbGMnj8RZw?si...	688

City of Spokane @SpokaneCity It's time for the 2025 Water Wise Spokane challenge! Enter by Tuesday, July 15, so you can learn more about simple ways to use less water and get a credit on your water bill this summer! Learn more at WaterWiseSpokane.org. 	315

Attachment B. KXLY Television Campaign, Golden Stencil Community Contest and Quiz



	Impressions	Clicks	CTR	Reach
Marquee Ad – 10.29.2025	16,379	24	0.15%	N/A
Branded Facebook Post -10.29.2025	12,488	286	2.29%	8,489
Onsite Display – KXLY.com	20,005	5	0.02%	N/A
TOTAL	**48,872**	**315**	**0.65%**	**8,489**

Attachment C. Spokane Regional Health District Pollution Prevention Report

Spokane Regional Health District

Pollution Prevention Visits located within the City of Spokane

January 1, 2025- December 31, 2025

Site Visit Information	
Number of **Initial** Site Visits During the Reporting Period:	82
Number of **Screening** Site Visits During the Reporting Period:	35
Number of **Follow-up** Site Visits During the Reporting Period:	48
Total Number of Site Visits During the Reporting Period:	165

Site Visit Definitions

- *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 no longer exists.
- *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.

Sector Focus Areas

We focused on the following sectors:

- Restaurants/Grocery Stores- focus was talking to the restaurants and grocery stores about food rescue and getting them interested and certified in EnviroCertified Food Rescue
- Automotive Facilities
- Schools
- Property management
- Any other sectors that we have received complaints for Small Quantity Generators (SQG's).

Site Visit Highlights

2- Environmental Report Tracking (ERTS) complaints (from the Department of Ecology) were conducted and followed up.

43- Spill kits were delivered.

14- Businesses were referred for the EnviroCertified program.

Means of Communication to the businesses

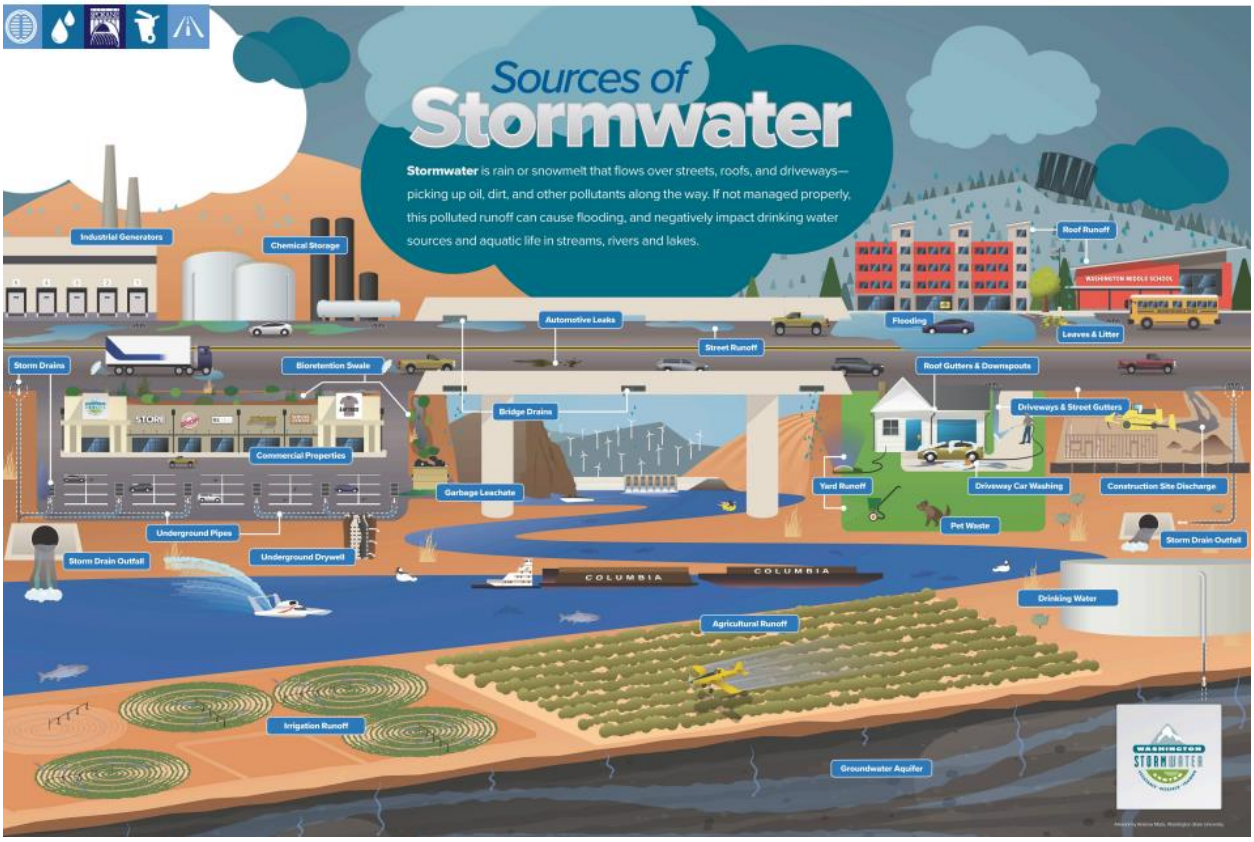
- Website- srhd.org- on our pollution prevention page, we have resources, industry-specific handouts, and information on how we can help. (Services | SRHD)
- We do face-to-face pollution prevention technical assistance visits to small quantity generators. During these visits, handouts are provided to the business that are sector-specific.
- Handouts provided during the visit include, but are not limited to:
    - Pollution prevention program, Ecology handouts, Stormwater good housekeeping practices, paint care, EnviroCertified brochure, light recycle, understanding the Spokane River, and any other sector-specific handouts, or handouts provided by the Stormwater jurisdiction, to include.
- Joint inspections with Stormwater partners are conducted when necessary, and follow up on any complaints that are referred to us.

Forest Park Court Apts	Kalico Kitchen
Village House LLC	Sunset House Apartments
Selkirk Lodge Apartments	Northridge Court
Fox Glen Apartments	Safeway Distribution Center
Edgewater Village	Riverfalls Tower Apartments
Cedar Green Apts	Altura Apartments
Somerset Meadows Apt	North Star Lodge Apartments
Five Mile Auto Center	Crystal House Apartments
Crepe Cafe Sisters	Sunset House Apartments
Hello Sugar	Northridge Court

Ruins	Copper River Apartments
Conoco	Riverfalls Tower Apartments
76	Forest Park
H&S	Brentwood Gardens
Reliable Charlie's /Automotive Specialiteis and Sales	Sundance Village HOA
Dusty's and Steve's Automotive	Lusitano Apartments
Saint Georges Middle/High School	Divine's Towing and Hauling
Saint Georges Elementary	Wilbert Precast
Saint George's Maintenance Facility	Sundance Village HOA
Quality Inn Oakwood	Selkirk Lodge Apartments
Madison Inn By Riversage	Lusitano Apartments
Oxford Suites	The Jake Apartments
Madision Inn By Riversage	Panera Bread
Altura Apartments	76
Copper River Apartments	AmeriMart
North Star Lodge Apartments	Wandermere Glen
Quality Inn Oakwood	Brentwood Gardens
Crystal House Apartments	Farwell North
Sunset House Apartments	Carl'sJr
Northridge Court	Jack in the Box
Safeway Distribution Center	Carl's Jr
Riverfalls Tower Apartments	Knightsbridge Apartments
Altura Apartments	Quadrangle I Apartments
North Star Lodge Apartments	Quadrangle II Apartments
Crystal House Apartments	Lyons Court
Sunset House Apartments	Rock Creek Apartments
Northridge Court	Mayfair Apartments
Copper River Apartments	Kalico Kitchen

Riverfalls Tower Apartments	Saint Georges Middle/High School
Forest Park	Saint George's Maintenance Facility
Brentwood Gardens	Carl's Jr
Sundance Village HOA	Jack in the Box
Lusitano Apartments	Carl's Jr
Divine's Towing and Hauling	Magnesium Village
Wilbert Precast	Hampton Inn
Sundance Village HOA	Downtown Motel
Selkirk Lodge Apartments	Atilano's Mexican Food
Lusitano Apartments	Indian Trail Service Center (Store)
The Jake Apartments	Indian Trail Service Center (Quick Lube)
Panera Bread	Yoke's Fresh Market
76	West Wynn Motel
AmeriMart	Motel 6
Wandermere Glen	Global Neighborhood Thrift
Brentwood Gardens	Mainstay Suites Spokane Airport
Farwell North	Baymont by Wyndham Spokane
Studio K	Mainstay Suites Spokane Airport

Attachment D.


Sources of
Stormwater
Stormwater is rain or snowmelt that flows over streets, roofs, and driveways—picking up oil, dirt, and other pollutants along the way. If not managed properly, this polluted runoff can cause flooding, and negatively impact drinking water sources and aquatic life in streams, rivers and lakes.
Industrial Generators
Chemical Storage
Roof Runoff
Automotive Leaks
Flooding
Leaves & Litter
Street Runoff
Storm Drains
Bioretention Swale
Roof Gutters & Downspouts
Bridge Drains
Driveways & Street Gutters
Commercial Properties
Yard Runoff
Driveway Car Washing
Construction Site Discharge
Garbage Leachate
Pet Waste
Underground Pipes
Storm Drain Outfall
Underground Drywell
Storm Drain Outfall
COLUMBIA
COLUMBIA
Drinking Water
Agricultural Runoff
Irrigation Runoff
Groundwater Aquifer
WASHINGTON STORMWATER

Proteja su taller de automóviles y las vías fluviales locales

El trabajo automotriz puede ser sucio. Manténgalo limpio con las siguientes prácticas:

Cubrir
- Cubra las áreas de almacenamiento al aire libre, incluidas piezas, contenedores y equipos
- Realizar todo el trabajo en interiores o bajo espacios cubiertos

Capturar
- Use bandejas de goteo para recolectar líquidos
- Realizar la recolección de fluidos en interiores

Limpiar
- Limpiar derrames inmediatamente
- Nunca use agua de la manguera para limpiar derrames
- Tenga almacenado y listo un kit de derrame y sepa cómo usarlo
- Barrer o aspirar para recoger los escombros de las operaciones diarias
- Limpie las fugas del vehículo con trapos u otros materiales absorbentes

Contener
- Recoja el agua de lavado y deséchela en alcantarillado sanitario o sistema de tratamiento (confirme los requisitos de eliminación con su ciudad / condado local)
- Áreas de lavado de vehículos y equipos en subcontención
- NO lave ni vierta agua de lavado en un desagüe pluvial
- Almacenar materiales y residuos peligrosos en contenedores con contención secundaria (en caso de derrame o daño en el contenedor)
- Cierre las tapas del contenedor de basura y del cubo de basura cuando no esté en uso

¿Qué son las aguas pluviales?

Agua de lluvia o nieve que puede recoger la contaminación y llevarla a las vías fluviales locales desde estacionamientos y carreteras a través de desagües pluviales o zanjas.

SOLO LLUVIA VA AL DESAGÜE PLUVIAL

Capacitación de empleados

- Ubicación de los desagües pluviales
- A dónde van las aguas pluviales una vez que salen de su espacio de trabajo
- Identificación de fuentes contaminantes

- Prevención y respuestas básicas ante un derrame
- Dónde encontrar kits de derrames en su espacio de trabajo
- Procedimientos de respuesta ante una emergencia

Education and Outreach Program

2. **Were elements of a regional program implemented to complete any part of your education and outreach program? (S5.B.1)**

    a. **If yes, list the elements and the regional program.**

- Spokane Regional Health District (SRHD) pollution prevention visits
- Eastern Washington and Southern Washington Education and Outreach Committee (EW&SW E&O) as well as Statewide E&O workgroups continued to collaborate and create educational content to distribute