## **City of Tacoma 2024 Annual Report**

## Q.11a Written description of internal coordination mechanisms (S5.C.3.a)

The following is an excerpt from Tacoma's March 2025 SWMP:

## Implement Executive Directive to Facilitate Permit Compliance (\$5.C.3.a.)

The City Manager and Tacoma Public Utilities Director issued a joint memorandum in the first quarter of 2025 to all City Department Directors informing them of the Permit and the need for all affected staff's cooperation and input. The internal coordination memorandum is included as Appendix B.

As previously stated the ES Department and specifically the Environmental Programs Group acts as the City's Stormwater Permit Coordinator and Administrator. Environmental Programs Group staff compiled a list of department contacts and developed specific Stormwater Permit Coordination and Compliance Plans identifying each SWMP element involving their work group's participation, recordkeeping, and staff training.

Coordination includes forming and meeting regularly with the Interdepartmental Team (IDT) from representatives across many City Departments to assist with Permit implementation generally and specially, Stormwater Planning. Specific tasks for intra-governmental coordination include the following:

- Identifying which permit requirements apply to each specific department and work group;
- Integrating compliance activities into each department's programs and operations;
- Providing training and technical assistance if required;
- Recordkeeping, or technical assistance for recordkeeping, as required in the Permit;
- Facilitating submittal of information for the Permit required Annual Report; and
- Conducting check-ins with staff responsible for various portions of the Permit to ensure compliance continues.

These coordination efforts ensure ongoing Permit compliance and submittal of the NPDES Annual Report by March 31st each year.

In addition to the formal coordination memorandum, coordination for NPDES compliance occurs at all levels of the organization on an ongoing basis. City staff at all levels coordinate for implementation and compliance with the NPDES Permit. When the updated Permit was issued in August 2024, Environmental Programs Group (EPG) staff coordinated with all staff affected by the new Permit. Upper management and staff level meetings were held to discuss coordination and implementation needs and to gather updated staff contact information as needed.

EPG staff facilitates the administration of the City's SW NPDES Permit and coordinate with staff throughout the City via the Departmental Stormwater Permit Coordination and Compliance Plans. EPG staff check in with staff responsible for compliance activities to ensure compliance activities are ongoing and that training and technical needs are addressed. Reviews of compliance programs and new policies occur to ensure permit compliance is maintained. Program improvements occur as needed.



## City of Tacoma

**TO:** General Government Department Directors

TPU Deputy Directors and Superintendents

FROM: Elizabeth A. Pauli, City Manager

Jackie Flowers, Tacoma Public Utilities Director

SUBJECT: City of Tacoma Compliance with Ecology Phase I Municipal Stormwater Permit

**DATE:** March 28, 2025

On August 1, 2024, the new Washington State Department of Ecology Phase I Municipal Stormwater Permit (Permit) under the National Pollutant Discharge Elimination System (NPDES) became effective (see <a href="PhaselPermit">PhaselPermit</a>. This Permit covers stormwater discharges from large and medium municipal separate storm sewer systems (MS4s), including the City of Tacoma's stormwater system, into Waters of the State such as creeks, rivers and Puget Sound.

Environmental Services - Environmental Programs Group (EPG) administers and interprets the Permit. The Permit provisions apply to the City of Tacoma's MS4, which includes the system of conveyances owned or operated by the City of Tacoma, including General Government departments and the Department of Public Utilities (TPU.) The MS4 is located on City-owned properties or within easements and rights-of-way within the City of Tacoma and may include conveyances owned or operated by the City of Tacoma on City-owned properties or within easements within Phase I Municipal Stormwater Permit jurisdictions, currently Pierce County and King County or Western Washington Phase II Municipal Stormwater Permit jurisdictions. This area of coverage may evolve over time.

Permit requirements and general responsibilities are outlined in the Stormwater Management Program Plan (SWMP) available at <a href="https://www.cityoftacoma.org/stormwater">www.cityoftacoma.org/stormwater</a>. EPG can assist other departments with training and technical assistance as needed or requested.

This memorandum directs the coordination efforts expected from all General Government and TPU staff to meet the requirements for cross-departmental coordination under Section S5.C.3 of the Permit.

Pursuant to Permit Section S5.C.3, a written Stormwater Permit Coordination Plan (Plan) has been developed for each City department and TPU which has key staff roles and responsibilities for facilitating compliance with the Permit and reducing stormwater impacts on receiving waters from Tacoma's MS4. Links to these Plans are available on the Environmental Services Science and Engineering NPDES SharePoint site <a href="https://cityoftacoma.sharepoint.com/sites/ES-ScienceEng/SitePages/NPDES.aspx">https://cityoftacoma.sharepoint.com/sites/ES-ScienceEng/SitePages/NPDES.aspx</a>. The Plans document the applicable Permit requirements and how EPG staff may interact with each City Department, which may vary depending on the operating group job function. Environmental Programs Group needs your support and involvement in meeting our Permit requirements.

For any questions or concerns, contact:

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Sharepoint Site: Environmental Services, Science	Sharepoint Site: TPU Environmental Compliance
and Engineering, NPDES	

All of our efforts together play an important role in protecting local wetlands, streams, rivers, lakes, and Puget Sound. Thank you in advance for your assistance with this important program.