



2024 Stormwater Management Program Plan

Prepared in Accordance with
the Western Washington Phase II
2019-2024 NPDES Municipal
Permit

City of Port Orchard
216 Prospect Street
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PERMIT #WAR045536

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I. Introduction



Purpose

The Stormwater Management Program Plan for the City of Port Orchard outlines a comprehensive approach to meet current and future regulations for stormwater and surface water management. Building on the City's Stormwater and Watersheds Comprehensive Plan, the SWMP Plan focuses on fulfilling specific regulatory requirements while also guiding city policies on public safety, stormwater, water quality, climate change, and natural resource management.

The City of Port Orchard's Stormwater Management Program Plan is a living document, as outlined in the City's Phase II Municipal NPDES Permit. The City remains fully committed to complying with the Permit's requirements. However, due to limited resources, the City prioritizes program elements with the most pressing deadlines in order to maintain compliance and implement the Stormwater Management Program Plan.

Background

The federal [Clean Water Act \(CWA\)](#) of 1972 established water quality goals for the surface waters of the United States. In 1987, Congress amended the CWA to address stormwater. One of the mechanisms for achieving the goals of the act is the [National Pollutant Discharge Elimination System \(NPDES\)](#) permit program, which is administered by the Environmental Protection Agency (EPA). The EPA has delegated responsibilities and administration of the NPDES permit program to many states, including the State of Washington via the Department of Ecology (Ecology).

For municipalities, the CWA established a two-phase permit program. [Phase I](#) covered large and medium-sized municipalities and counties, construction sites ≥ 5 acres, and major industrial sources. Later, [Phase II](#) was enacted to cover smaller jurisdictions. Ecology also manages permit programs for [construction](#) sites ≥ 1 acre, and certain other types of [industrial](#) runoff. In 2000, the Environmental Protection Agency finalized the NPDES Phase II rules regulating "small" Municipal Separate Stormwater Sewer Systems (MS4's). The Phase II jurisdictions, such as Port Orchard, are those with populations less than 100,000 located within, or partially within, an urbanized area and that operate a Municipal Separate Storm Sewer System (MS4) which discharges to waters of Washington State.

The 1990 Phase I regulation requires medium and large cities or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for stormwater discharges. The 1999 Phase II regulation requires small MS4s in U.S. Census Bureau defined urbanized areas, as well as MS4s designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges.

In Washington, the Phase I permit was issued in 1995 to the cities of Seattle and Tacoma, as well as King, Pierce, Snohomish and Clark (in 1999) counties. On August 1, 2012, the Department of Ecology issued a new Phase I permit and two new Phase II permits, one each for Western and Eastern Washington.

The current Phase II Municipal Permit became effective on August 1, 2019. Implementation of the program requirements is phased over the 5-year term of the permit. The reporting requirements of the permit cover activities within a calendar year from January 1 to December 31.

The Permit process intends to set jurisdictional standards for municipalities to reduce the impacts from both [point source and non-point source](#) pollution carried by stormwater to waters of the state. The Permit is also intended to promote public education and awareness regarding the proper management and reporting of pollutant-generating activities.

Program Administration

The Permit outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act. Permittees must:

- Develop a SWMP Plan that includes all the required activities in the permit and is designed to reduce the discharge of pollutants to the maximum extent possible.
- Implement those activities within the required timeframes of the permit term; and
- Submit annual reports to the Department of Ecology by March 31st of each year to document progress toward complete program implementation in the previous calendar year. The City will post the Stormwater Management Program (SWMP) Plan on its website annually for public viewing and comments, and submit it to Ecology. Each SWMP Plan will update the previous year's activities and preview the next year's. The City must fully develop and implement the SWMP Plan for the upcoming year by March 31. For 2023, the City will continue tracking costs, training, inspections, enforcement actions, public education, and coordination with other jurisdictions.

Responsibilities and Coordination

The Public Works Department of the City of Port Orchard oversees permit compliance and implementation within the city's jurisdiction and watersheds. Each year, Public Works coordinates with relevant city departments through the Stormwater Permit Coordination Group and Stormwater Planning Program to ensure ongoing and planned activities meet permit requirements. Port Orchard also commits to supporting and seeking support from regional partners and neighboring jurisdictions when opportunities arise.

The City currently cooperates with several groups, including the West Sound Stormwater Outreach Group, the West Sound Stormwater Manager's Group, the Stormwater Work Group, and the West Sound Partners for Ecosystem Recovery. The City also corresponds with local builders' associations

and interested third parties regarding stormwater code revisions. Additionally, the City is developing an ongoing partnership with the South Kitsap School District to address stormwater issues like TMDL monitoring and education/outreach.

SWMP Elements

The Permit regulates how municipalities discharge stormwater to the waters of the state. The waters of the state include rivers, lakes, streams, wetlands, and Puget Sound. Discharge to these waters is only allowed if regulatory municipal programs are implemented to reduce pollution generating activities that impact stormwater within the following disciplines:

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

II. Stormwater Planning

Permit Requirement S5.C1

PLANNING



Permit Requirements

- Implement a Stormwater Planning Program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.
- Convene an interdisciplinary team to inform and assist in the development, progress, and influence of the program.
- Coordinate with long-range plan updates.
- Low-impact development code-related updates and revisions.
- Complete receiving water assessment and watershed inventory by March 31, 2022
- Rank and prioritize receiving waters within city jurisdiction by June 30, 2022
- Complete the first Stormwater Management Action Plan (SMAP) by March 31, 2023.
- Summarize activities in the Annual Report.

In 2023, the City continued implementing its Stormwater Planning Program through an interdisciplinary team consisting of the Public Works Director, Development Director, Assistant City Engineer, and Stormwater Coordinator, with consultant support as needed. This team coordinated the program to align with the City's Master Comprehensive Plan and supporting documents. The team oversaw developing the City Stormwater and Watersheds Comprehensive Plan, completed in 2023, which directs planning, policy, maintenance, capital improvements, watershed SMAP principles, and the asset management system. This plan supports the Master Comprehensive Plan, focusing on regulatory compliance, watershed planning, and capital projects. Relevant municipal code sections were also reviewed in 2023, with updates to include business inspection and source control enforcement. Ahead of the 2023 deadlines, the City completed its receiving water assessment, watershed inventory, SMAP watershed prioritization report, and first SMAP based on the prioritization results. Refer to the City website for SMAP related documents and the City's annual report submittal for S5.C.1.b.i.b.

The interdisciplinary team will continue meeting regularly throughout 2024 to direct planning, implement the City's first Stormwater and Watersheds Comprehensive Plan, implement the City's first SMAP, and continue with SMAP development within the next priority watershed. The City's interdisciplinary team will also continue to review and update LID code as needed.

City of Port Orchard Stormwater Management Program – 2024

Aerial image of Port Orchard Downtown

https://marinas.com/view/harbor/vwtvne_Port_Orchard_Harbor_Port_Orchard_WA_United_States



III. Public Education and Outreach

Permit Requirement S5.C2



Permit Requirements

- Develop a general awareness education and outreach program that is designed to reduce or eliminate behaviors and practices that contribute to or cause adverse stormwater impacts.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impact.
- Create stewardship opportunities that encourage community engagement in addressing impacts from stormwater runoff.
- Evaluate effectiveness of ongoing behavior change campaign by July 1, 2020
- By February 1, 2021 – develop a new campaign.
- By April 1, 2021 – Implement new campaign strategy.
- By March 31, 2024 – Evaluate and report on new campaign.
- Summarize activities in the Annual Report.

In 2023, the City of Port Orchard participated in the Puget Sound Starts Here (PSSH) vehicle maintenance behavior campaign. This year's campaign, titled "Don't Wait to Inflate," focused on the importance of proper tire inflation. The digital campaign reminds drivers that keeping tires inflated to the recommended pressure makes driving safer, improves fuel economy and tire wear, and reduces toxic runoff that pollutes waterways. The ads targeted Puget Sound adults aged 18-64 and were translated into Spanish, Korean, and Vietnamese. Part of the budget was allocated to reach disadvantaged communities identified by income, education, race/ethnicity and English proficiency. PSSH provided an online toolkit to help partners expand the campaign's reach, resulting in increased social media engagement.

Additionally, in September 2023, the City supported PSSH Month by distributing 342 refrigerator magnets, 204 pet waste bag dispensers, and 81 educational pamphlets and brochures, for a total of 627 impressions. For details on the City's pollution prevention efforts, see the 2023 WSSOG Activities Report in this Plan's Appendix A. The City also provides charity carwash kits upon request to prevent wash water from entering storm drains and waterways.

Education and Outreach Accomplishments Through WSSOG

The City of Port Orchard will continue its partnership with the West Sound Stormwater Outreach Group (WSSOG). WSSOG is coordinated by Kitsap County and includes several other cities and organizations in the region. Through an Inter-Local Agreement (ILA), the members pool resources to

jointly develop, implement, and fund stormwater education and outreach. This coordination is encouraged by Ecology and allows for shared expertise, expenses, and staff time. Residents across the region benefit from consistent messaging. The 2023 WSSOG Annual Report (Appendix A) provides details on current and planned activities. By the February 2021 permit deadline, WSSOG developed a natural yard care campaign and began implementation in April 2021.

Stewardship Accomplishments in 2023

The City of Port Orchard promotes environmental stewardship within its jurisdiction by organizing and promoting annual cleanup and educational activities. Through its partnership with the West Sound Stormwater Outreach Group (WSSOG), the City continues to provide public outreach opportunities to educate residents about stormwater and its environmental impacts. Additionally, the City is developing a stream and habitat education program with South Kitsap High School and collaborating with the Kitsap Conservation District through an Interlocal Agreement to encourage rain garden installation in the city.

In 2023, the City actively participated in the West Sound Partners for Ecosystem Recovery, the Salmon Recovery Lead Entity for WRIA 15, and the Watershed Restoration and Enhancement Committee for WRIA 15 to connect and engage citizens and stakeholders in watershed-level discussions and actions related to water quality, salmon enhancement, and stormwater. Furthermore, partnering with Kitsap County, the City completed an overburdened communities assessment in 2021 within city and county jurisdiction. The goal was to better understand spatial, economic, and well-being distribution, identify areas needing improvement, and develop outreach methods to better incorporate these communities into the local decision-making process. Working with WSSOG, the City also participated in the WSSOG natural yard care outreach program.

Planned General Awareness Activities for 2024

The City will continue its engagement with WSSOG and PSSH in 2024, distributing swag to citizens and businesses within City limits. In addition, the City will be adding another target audience to the general awareness campaign, reaching out to contractors, engineers, and developers regarding technical standards, LID principles, and treatment/flow control BMPs.

Planned Education and Outreach Activities for 2024

WSSOG will continue implementing our Natural Yard Care (NYC) social marketing campaign as a behavior enhancement to reduce the use of chemical yard treatments that impact the environment. WSSOG will continue its existing Mutt Mitt, Spills Happen, and Puget Sound Starts Here programs in 2024. These behavior change campaigns aim to reduce waste load allocation from pet waste, fertilizers, and human activities in receiving waters within the City by changing the behaviors of citizens (e.g. using a Mutt Mitt to pick up pet waste, using natural yard care products instead of

chemical fertilizers, etc.). The NYC and Mutt Mitt programs will be evaluated for their effectiveness before the March 31, 2024, annual report. Please refer to Appendix A for further details regarding WSSOG planned activities in 2024. In addition, the City is researching the development of an education and outreach plan for commercial and private facility owners to better educate them on LID principles and practices.

Planned Stewardship Opportunities through Education and Outreach

Port Orchard continues to participate in the WSSOG, West Sound Partners for Ecosystem Recovery and the Salmon Recovery Lead Entity for WRIA 15. The City will continue cleanup and educational outreach to citizens, benthic macroinvertebrate sampling in Blackjack Creek, and will continue to develop a program with South Kitsap High School for stream and watershed monitoring.



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IV. Public Involvement and Participation

Permit Requirement S5.C.3

Permit Requirements

- Create opportunities for public involvement through advisory councils, public hearings, watershed committees, participation in developing rate structures, stewardship programs, environmental activities, or other similar activities. The public must be provided with opportunities to participate in the decision-making processes involving the development, implementation, and update of the SMAP and the SWMP.
- Make the SWMP, SMAP and Annual Report available to the public, including posting on the City’s website.
- Summarize activities in the Annual Report.
 1. Public hearings are held for any proposed stormwater utility rate structure revisions.
 2. Multiple opportunities for public comment at Planning Commission and City Council meetings are available during the approval process for the City's Comprehensive Land Use Plan (which includes a stormwater component). Public comments can also be submitted through the City's website.
 3. Opportunities for citizen comments are available at Regular City Council meetings during the Public Comment Agenda Item or during scheduled Public Hearings pertaining to those topics.
 4. The Annual Report, SWMP, SMAP and Comprehensive Plans are posted on the City's website and undergo public comment via hearing, public meeting or SEPA process if significant changes or additions are proposed.
 5. The City actively participates in the West Sound Partners for Ecosystem Recovery Lead Entity for WRIA 15 and the Watershed Restoration and Enhancement Committee for WRIA 15, connecting and engaging citizens and stakeholders in watershed level discussions and actions relating to water quality, salmon enhancement and stormwater.
 6. Partnering with Kitsap County in 2020, an overburdened communities assessment was conducted to better understand spatial, economic and wellbeing distribution, areas where improvement is needed, and methods of outreach to better incorporate these communities into driving the local decision-making process. Results of this study have been used to better target outreach and involvement from these areas that have unique challenges for engagement.
 7. Activities are summarized in the Annual Report.

Planned Activities

The City will continue its current public involvement and participation strategies by soliciting public comments on stormwater issues on the City website, and continuing to expand ways to reach overburdened communities by participating in WSPER and WSSOG, and collaborate with local builders associations to help them stay informed of stormwater issues and regulatory requirements.



V. MS4 Mapping & Documentation

Permit Requirement S5.C.4

Permit Requirements

Continue maintaining an ongoing program for mapping and documenting the MS4 through:

- Continuation of existing mapping efforts
- New mapping efforts to include:
- Outfall size and material (started January 2020)
- Complete mapping of private connections to MS4

The City continues to investigate and update its features inventory database annually while screening and performing maintenance activities. The City has already mapped all receiving waters, City-owned stormwater treatment and flow control BMPs, geographic areas without discharge to surface waters, and known outfalls and discharge points 24 inches or larger in diameter. In 2018, the City began mapping smaller features under 24 inches in diameter in anticipation of new permit requirements that will require mapping all known outfalls, and documenting their size, materials, and maintenance condition in the GIS database.

Planned Activities

The City plans to continue implementing S5.C.4 requirements and to meet the deadlines specified in this section of the permit. The City has already implemented an electronic mapping format (GIS) for features inventory and will continue characterizing all known outfalls upon inspection/investigation. We have met the 2023 deadline for mapping all known private connections from the MS4 that receive stormwater runoff from the public MS4.

VI. Illicit Discharge Detection and Elimination (IDDE)

Permit Requirement S5.C.5

Permit Requirements

- Develop an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections, illicit discharges and improper disposal including spills into the municipal stormwater system.
- Develop a municipal storm sewer map that includes attributes for known stormwater outfalls, notes receiving waters other than ground water, stormwater treatment and flow control Best Management Practices (BMPs)/facilities owned or operated by the Permittees.
- Adopt and implement an updated ordinance to prohibit non-stormwater discharges, spills, illicit connections, and illegal dumping into stormwater systems.
- Procedures for conducting investigations of the stormwater system including field screening and methods for identifying potential sources.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste and publicize a hotline phone number for the public to report spills, dumping, and illicit discharges.
- Adopt and implement procedures for program evaluation and assessment which includes spill tracking, inspection tracking, and feedback from public education efforts.
- Provide training for municipal field staff, which during normal job duties may come into contact with or observe illicit discharges and/or connections, on the identification and reporting of illicit discharges and/or connections in the stormwater system.
- Summarize activities in the Annual Report.

The City has an existing comprehensive map of its stormwater infrastructure. To maintain compliance with the permit, infrastructure mapping must be updated to include newer developments and any newly identified features or structures within the City. Activities in support of this requirement began in 2009 and are ongoing.

1. A spill hotline continues to be active and advertised via Kitsap One (360-337-5777).
2. A spill documentation and tracking system has been initiated and continues to be utilized.
3. Employee training for identification and reporting of illicit discharges and connections has been instituted. This training is updated annually for City staff. The City uses the Herrera 2020 IC/IDDE Guidance manual for training of City staff who conduct screening, with a general

IDDE Training for all Public Works staff as an annual refresher (IDDE, A Grate Concern, Program Training by ExCal).

4. Updated the IDDE ordinance that was enacted in 2009 in accordance with S5.C.3.b before February 2, 2016. Review code annually and update as needed.
5. Conducted field screenings to identify illicit connections and unauthorized interties to City MS4. We successfully screened more than 12% of our MS4 as required for illicit connections and corrected deficiencies as they were identified.
6. Transitioned from current method of IDDE reporting to the new WQwebIDDE portal in 2019.
7. The City is keeping a running tally for total percentage of MS4 screened for illicit connection/illicit discharges between 2019 and 2024.
8. Activities are summarized in the Annual Report.

Planned Activities

The program is planning to include the following components to continue meeting permit requirements:

- Continue refining existing public education materials and disseminate to public, including additional hotline outreach/advertisements relating to stormwater and pollution.
- Continue working to improve existing compliance strategies for IDDE implementation.
- Continue to meet requirements of S5.C.5.d.i.(a) by screening no less than an additional 12% of our MS4 for illicit connections each year.
- Continue existing employee training and education relating to spill response, IDDE, Illicit Connection (IC) screening and stormwater management.
- The City is keeping a running tally for total percentage of MS4 screened for illicit connection/illicit discharges between 2019 and 2024
- Monitor enforcement policies, regulatory mechanisms and procedures for effectiveness, revise as needed.
- Summarize activities in the Annual Report.

VII. Controlling Runoff from New Development, Redevelopment and Construction Sites

Permit Requirement S5.C.6

Permit Requirements

- Adopt an ordinance that addresses runoff from new developments, redevelopment, and construction sites which includes the following:
 - Effective January 1, 2017, for all new permit applications and all construction projects that have not started construction by January 1, 2022, minimum stormwater design standards that are equivalent to the Department of Ecology’s 2012 Stormwater Management Manual for Western Washington (as amended in 2014) shall be applied to all site development applications.
 - A site planning process and Best Management Practice (BMP) selection and design criteria that protect water quality, reduce pollutant discharges to the maximum extent practicable, and apply all known, available, and reasonable methods of prevention, control, and treatment before discharge.
 - The legal authority, through the approval process for new development, inspects private stormwater facilities that discharge to the City's stormwater system.
 - Provisions to require non-structural preventative actions and source reduction practices such as Low Impact Development (LID) techniques, measures to minimize the creation of impervious surfaces, and measures to minimize the disturbance of native soils and vegetation as the preferred and commonly used approach.
- Implement a program to review plans, inspect construction sites, and take enforcement action against those failing to meet the required standards.
- Adopt an ordinance that addresses maintenance responsibility, maintenance standards, inspection requirements and procedures, and enforcement provisions to ensure the long-term operation and maintenance of permanent stormwater control facilities constructed after the effective date of the ordinance.
- Develop a centralized record-keeping system of inspection, enforcement, and maintenance activities associated with new development, redevelopment, and construction sites.
- The program shall make copies of the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" available to representatives of proposed new development and redevelopment.
- Continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by the Department of Ecology.
- Provide training for staff on new and revised regulations, standards, processes, and procedures.
- Summarize activities in the Annual Report.

The City is responsible for managing stormwater runoff entering its MS4s from new development, redevelopment, and construction sites. To ensure proper management of stormwater, the City requires developers to meet the criteria specified in the Washington State Department of Ecology Stormwater Management Manual for Western Washington, 2019 (SMMWW, 2019) for all development and redevelopment.

In 2017, to achieve compliance with the NPDES permit requirement S5.C.4, the following actions were taken:

- Ordinances were revised and implemented to control runoff from new development, redevelopment, and construction sites.
- Permitting processes were refined to include new plan review, inspection, and enforcement criteria.
- Existing maintenance standards were refined to ensure long-term operation and maintenance of facilities, reflecting new policies and procedures specified in the 2019 SMMWW.
- Adherence continued to the minimum requirements, technical thresholds, and definitions in Appendix 1 of the permit.
- After January 1, 2017, low impact development (LID) principles and best management practices (BMPs) became preferred, with assessment for LID feasibility made mandatory for all new development or redevelopment.

The City has an existing permitting process for plan review, inspection, and enforcement. In 2016, the City reviewed and revised ordinances, municipal code, and guidance documents to align permitting with the S5.C.4 requirements. Revisions were completed and adopted by the December 31, 2016 deadline, then implemented and enforced by January 1, 2017. The City maintains records of inspection, enforcement, and maintenance activities, evaluating and revising record-keeping procedures as needed to uphold permit compliance. The City's Department of Community Development Permit Center makes the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" available to representatives of proposed developments and informs applicants of the permit requirement via pre-application letters and the stormwater chapter of the Development Guidelines. The City Municipal Code was revised before the June 30, 2022 deadline to adopt the new Stormwater Management Manual for Western Washington (SWMMWW) 2019 edition. The City continues providing access to the Department of Ecology's Construction Stormwater General Permit and Industrial Stormwater General Permit and associated NOI documentation for applicable developments. All inspection staff are Certified Erosion and Sediment Control Lead trained, with construction inspection training, low-impact development techniques knowledge, and stormwater design standards expertise. Additional internal and external training occurs as needed, including drone operator certification for inspection drones. Staff use the sediment damage potential evaluation in the permit's Appendix 7 for all permitted development activities, requiring a 10-year storm design if the site scores over 100, or a 2-year storm design if under 100. The City guides applicants regarding access to the Construction Stormwater General Permit where applicable.

Planned Activities

To comply with 2024 requirements, the city will update guidance documents and staff training as needed to include new procedures for controlling runoff from development, redevelopment, and construction sites. The city will continue implementing Appendix 7 requirements for new development and redevelopment, maintaining 2 and 10-year sediment damage design standards based on each site's potential. Drone site inspections before, during, and after construction will continue for applicable sites. The 2024 annual report will summarize these efforts to control runoff and meet regulatory requirements.



VIII. Operations and Maintenance

Permit Requirement S5.C.7



Permit Requirements

- Establish maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the SMMWW, 2019 by June 30, 2022.
- Perform annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, taking appropriate maintenance actions following adopted maintenance standards.
- Perform spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events and inspect all facilities if widespread damage/maintenance is found.
- Inspect all catch basins and inlets owned and operated by the Permittee, clean as needed, at least once no later than August 1, 2017, and every two years thereafter.
- Establish and implement practices to reduce stormwater impacts associated with runoff from municipally owned or maintained streets and parking lots and from street maintenance activities.
- Establish and implement practices to reduce pollutants in runoff from all lands owned and maintained by the City.
- Develop a program to inspect all non-municipal stormwater facilities to ensure they are functioning and maintained as designed.
- Develop and implement an ongoing training program for City staff whose job functions may impact stormwater quality.
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage and material storage facilities owned or operated by the City.
- Maintain records of inspections and maintenance or repair activities.

To comply with operations and maintenance permit requirements, the City's Operations and Maintenance Department implements several measures to minimize pollutants in stormwater runoff from municipal activities. These measures align with Endangered Species Act guidelines, NPDES permit regulations, and best management practices. The department inspects and maintains all city-owned stormwater facilities annually. For private facilities built after 2007, owners receive annual reminders to arrange third-party inspections; a voluntary inspection program is offered for older private systems. To further reduce pollutants, the department sweeps all city streets annually and more often in TMDL's, inspects catch basins every other year (annually in TMDL areas), and cleans both as needed. The department's maintenance meets or exceeds SWMMWW standards.

Planned Activities

The city is continuously reviewing and updating our adopted maintenance standards and current inspection, maintenance, and record-keeping practices to improve efficiency, accuracy, timeliness, and enhancement of the stormwater program. We are in the early stages of developing an asset management database to facilitate the scheduling and tracking of maintenance processes and accurately document the condition of the City’s stormwater infrastructure. City-owned lands will be evaluated for potential stormwater pollution sources to establish mitigation practices. The city will improve the operations and maintenance program by evaluating and enhancing ongoing training, the Stormwater Pollution Prevention Plan, and record-keeping practices for training, maintenance, inspections, and repairs. If non-city personnel (County or adjacent Cities) conduct relevant work, an interlocal agreement will be generated as per Section S1.D.3.c of the draft permit outlining the agreement's terms.

IX. Source Control for Existing Development

Permit Requirements S5.C.8

Permit Requirements

- Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.
- Make effective an ordinance or other enforceable document requiring the application of source control BMPs associated with existing land uses and activities. Due August 1, 2022.
- Inventory sites within City jurisdiction that have the potential to generate pollutants to the MS4. Due date August 1, 2022.
- Implement an inspection and enforcement program for all identified sites within City jurisdiction. Due January 1, 2023.
- Implement a training program for all staff conducting these activities.

In 2022, the City adopted ordinances to enforce its source control program, which inspects businesses and private properties to ensure compliance with permit requirements for implementing and maintaining best management practices that prevent pollution. Before the December 2022 deadline, the City inventoried all businesses within its jurisdiction, developed educational materials about good housekeeping and pollution prevention, and implemented an inspection program with progressive enforcement policies. In 2023, the source control program completed 23% of its business inventory and inspected 100% of all credible complaints, and, of those, two businesses were given warning letters and 1 had further enforcement action.

Planned Activities

The City plans to contact all businesses by the end of 2024 to provide resources, informational flyers, and support that educate on activities that can generate pollutants and relevant regulatory requirements. The City will continue inspecting at least 20% of businesses as mandated, following up with escalating enforcement when necessary. Training on these regulations and procedures will be continuous for City staff.

X. Total Maximum Daily Load (TMDL)

Permit Requirement S7

Permit Requirements

The City is required to comply with the Sinclair and Dyes Inlets Fecal Coliform Bacteria TMDL and Water Quality Improvement Plan requirements as approved by Ecology and the EPA.

“For applicable TMDLs listed in Appendix 2, affected Permittees shall comply with the specific requirements identified in Appendix 2. Each Permittee shall keep records of all actions required by this Permit that are relevant to applicable TMDLs within their jurisdiction. The status of the TMDL implementation shall be included as part of the annual report submitted to Ecology. Each annual report shall include a summary of relevant SWMP and Appendix 2 activities conducted in the TMDL area to address the applicable TMDL parameter(s).”

In addition to this requirement, Appendix 2 states that the City of Port Orchard must also: “Designate any previously unscreened areas discharging via the MS4 to the TMDL area as the highest priority for illicit discharge detection and elimination routine field screening. Screen for bacteria sources when conducting illicit discharge detection and elimination field screening activities in these areas. Implement the schedules and activities identified in S5.C.5 of the Western Washington Phase II Permit for response to any illicit discharges found.”

The City must also “install and maintain pet waste education and collection stations at municipal parks and other Permittee-owned and operated lands adjacent to stream and marine shorelines. Focus on locations where people commonly walk their dogs.”

- The City is required to keep records of all actions relevant to TMDL
- Summarize activities in the Annual Report.

The City has mapped the areas of concern under the previous permit and uses that mapping to target TMDL’s in annual clean-up activities of city parks, walkways, and properties. City staff routinely work to identify additional areas to be cleaned or maintained within City limits. In addition, City staff respond to illicit discharge, illicit connection, and spill reports as they occur in nearshore areas and on City properties. The city, in collaboration with the Port of Bremerton, has maintained and stocked Mutt Mitt dispensers in all City parks and pedestrian areas.

Planned Activities

- Continue catch basin cleaning to include all shoreline areas annually.
- Continue the routine screening program to identify areas of greater concern.
- Continue working with the Port of Bremerton and City Parks Department staff to ensure Mutt Mitt dispensers are located along the shoreline and maintained. Expand the Mutt-Mitt program in TMDL areas and near waterbodies, focusing specifically on walkways and areas where people walk their pets.
- Continue to map City regions of the TMDL as new areas of concern arise.
- Determine areas of greatest concern for TMDL implementation and then explore options for outreach efforts that will raise awareness of fecal coliform concerns and provide citizens and homeowners along the shoreline with simple solutions.
- City of Port Orchard will work with the Kitsap Health District to determine the number of on-site septic systems that are located within the city limits and determine how many have been identified as older, potentially failing, or failing systems.
- Internal staff training for staff on Illicit Discharge Detection and Elimination, Spill Response and Water Quality Best Management Practices, utilizing the 2020 Herrera IC/ID Guidance Manual.
- Participating in the West Sound Stormwater Outreach Group (WSSOG) and STORM.
- Participate in local Pollution Prevention campaigns.
- Designating any previously unscreened areas discharging via the MS4 to the TMDL area as the highest priority for IC/IDDE screening, focusing specifically on screening for bacteria sources. The City is procuring an on-call service to provide bacterial screenings to these areas that will be implemented in 2024, to alleviate the burden from operations staff.

XI. Monitoring

Permit Requirement S8

Permit Requirements

- Permittees are required to report on any stormwater monitoring or Stormwater related studies conducted during this permit term.
- Permittees are required to participate in or create a program of equal level to stormwater monitoring and targeted Stormwater Management Plan (SWMP) effectiveness monitoring, known as the Stormwater Action Monitoring (SAM) Program.
- Permittees are required to participate in the SAM Source Identification Repository.

The City of Port Orchard has conducted monitoring to detect illicit discharges and screen for illicit connections. This monitoring has occurred throughout the city and will continue as necessary to provide further characterization. To fulfill permit requirements under Section S8, the City has chosen to pay fees to the Washington State Department of Ecology to support the Stormwater Action Monitoring program. Additionally, Kitsap County performs annual monitoring at four freshwater and seven marine stations located within the City of Port Orchard's watersheds through the county's Pollution Identification and Correction Program.

Planned Activities

1. Seek opportunities to participate with Kitsap County and other local jurisdictions in an integrated and coordinated monitoring and assessment program.
2. To be proactive regarding TMDL allocation, the City is in the process of developing a Pollution Control Program, guided by a Pollution Control Program Plan (QAPP equivalent) to monitor the status of streams and watersheds within City limits. This program will monitor stream health and provide water quality status updates, as well as key-out sources of impairment within the watershed. Currently, implementation of this program has been delayed due to limited resources. The program is intended to be finalized and in place by the end of 2023 pending staff availability and funding. Monitoring results will be reported within the annual report.
3. In 2011, Kitsap County Health District completed an Illicit Discharge Detection and Elimination (IDDE) Inventory that included the City of Port Orchard. The City will continue working with the Health District to determine the status of deficient systems identified in the IDDE inventory and explore options for correcting any that have not been completed.

XII. Conclusion

The City of Port Orchard has prepared its 2024 Stormwater Management Program Plan to demonstrate compliance with the Municipal NPDES Phase II Permit requirements. As the Permit mandates, the City will update the Plan annually to reflect progress in implementing the stormwater program components necessary for Phase II Permit compliance. The current Annual Report, Stormwater Management Program, and Municipal NPDES Phase II Permit are available on the City's website. Printed copies can also be requested from the Public Works office.

The City welcomes public participation in developing the Stormwater Management Program Plan. Please contact the Public Works Department with any questions, comments, or suggestions.

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