



2024 Stormwater Management Program Plan

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

City of Port Orchard
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Port Orchard, WA 98366
PERMIT #WAR045536

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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 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 operates 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 Western Washington Phase II Municipal Stormwater Permit (WWAPHII) 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 into the waters of the state. The waters of the state include rivers, lakes, streams, wetlands, and Puget Sound. Discharge of these waters is only allowed if regulatory municipal programs are implemented to reduce pollution-generating activities that impact stormwater within the following disciplines:

- S5.C.1 – Stormwater Planning
- S5.C.2 – Public Education and Outreach
- S5.C.3 – Public Involvement and Participation
- S5.C.4 – MS4 Mapping and Documentation
- S5.C.5 – Illicit Discharge Detection and Elimination
- S5.C.6 – Controlling Runoff from New Development, Redevelopment, and Construction Sites
- S5.C.7 – Operations and Maintenance
- S5.C.8 – Source Control Program for Existing Development
- S7 – Monitoring
- S8 – Total Maximum Daily Load (TMDL)

Stormwater Planning

Permit Requirement S5.C.1



The city's Stormwater Planning Program develops policies and strategies to manage water quality and protect local waterways. In 2023, the City Council adopted the City of Port Orchard [Stormwater and Watersheds Comprehensive Plan](#) which directs planning, policy, maintenance, capital improvements, watershed SMAP principles, and the asset management system.

The city's Stormwater Planning Program will meet the minimum performance standards required by the 2019-2024 Western Washington Phase II Municipal Permit. This includes:

- ✓ Convening an interdisciplinary team
- ✓ Coordinating with long-range plan updates
- ✓ Implementing low-impact development code-related updates and revisions
- ✓ Completing a Stormwater Management Action Plan

S5.C.1.a – Interdisciplinary Team

The City of Port Orchard has assembled an interdisciplinary team to direct its stormwater planning efforts. The team is composed of the Public Works Director, Development Director, Assistant City Engineer, Finance Director, Operations Manager, Utility Manager, and Stormwater Coordinator, with consultant support as needed. The Utility Advisory Committee and City Council will be regularly updated on the progress of the Stormwater Planning Program.

S5.C.1.b – Long-range plan updates

In 2023, the City’s first Stormwater and Watersheds Comprehensive Plan was adopted by the City Council. The plan outlines specific solutions to ensure long-term protection of the environment and community by improving the city’s stormwater system. Throughout 2024, with help from the interdisciplinary team, the city will continue its implementation of the Stormwater and Watersheds Comprehensive Plan and the Stormwater Management Action Plan, as well as continue developing the SMAP within the next priority watershed.

S5.C.1.c – Low Impact Development (LID) Code

The City requires all development to adhere to LID (low-impact development) principles and requirements. The intent is to make LID the preferred and commonly used approach to site development. The Port Orchard Municipal code, design guidelines, rules, standards, and any other binding documents will be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development, where feasible. Annually, the City will assess and document any newly identified regulatory or administrative barriers to the implementation of LID principles and best management practices (BMPs).

S5.C.1.d – Stormwater Management Action Plan (SMAP)

In 2022, the City completed the Stormwater Management Action Plan (SMAP) with support from Herrera Environmental Consultants. The following year, the City incorporated the SMAP into its 2023 Port Orchard Stormwater and Watersheds Comprehensive Plan, which the City Council then adopted. The City plans to review the SMAP in 2024 to identify ways to enhance the planning process and implementation of the identified projects.

Public Education and Outreach

Permit Requirement S5.C2



The City's education and outreach program educates the public on methods to mitigate stormwater runoff impacts. Through a comprehensive campaign, the program targets diverse audiences, including homeowners, business owners, developers, and families.

Minimum performance measures include:

- ✓ Build general awareness about methods to address and reduce impacts from stormwater runoff.

- ✓ Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- ✓ Create stewardship opportunities that encourage community engagement in addressing the impacts of stormwater runoff.

S5.C.2.a.i – General Awareness

The City of Port Orchard collaborates with partners across the Kitsap area to aid in not only reaching more people with consistent messaging, but also sharing expertise, expenses, staff time, and experiences. The City will continue to collaborate and partner with:

- Puget Sound Starts Here (PSSH)
- West Sound Stormwater Outreach Group (WSSOG)
- Kitsap County Public Health District
- Stormwater Action Monitoring (SAM)
- Kitsap Conservation District

In 2024, the City plans to expand its collaboration and partnership with other local groups and entities to reach a more expansive audience.

The City is participating in and promoting these events in 2024:

- Sinclair Inlet Clean-up: Spring and Fall
- Arbor Day: Friday, April 26, 2024
- Earth Day: Monday, April 22, 2024
- Port Orchard Farmers Market: Spring and Summer

The City also uses existing resources to promote consistent messaging at:

- City of Port Orchard's Website
- Pet Waste Stations
- Suds Free Car Wash Kit
- Public flyers and information posted at City Hall and available handouts
- Posted flyers at the Port Orchard Library

In addition, the Utilities Compliance Program designed and implemented in 2021-2022, is integral in continuous education of local businesses and private Stormwater facility owners. The City designed flyers internally to inform business owners of the importance of protecting the City's storm system. These flyers will be distributed throughout 2024 to businesses during the Utilities Compliance Specialist annual site visits. In 2024, the City will develop additional flyers educating the public about the risk of PCB-containing materials in certain buildings.

S5.C.2.a.ii – Behavior Change

The City partners with WSSOG, which will continue in 2024 to implement the Natural Yard Care (NYC) social marketing campaign to encourage behavior change targeting residents who do their own yard care and use weed and feed products. This campaign aims to reduce the use of chemical yard treatments that can be a source causing excess nutrients and pesticides in water. The City is looking forward to the evaluation of this campaign in 2024. With this evaluation, the City will be able to understand how the

targeted behavior changes were adopted in the community and whether the campaign has been effective and successful. This will help the City decide the direction of the campaign for the future.

S5.C.2..a.iii – Stewardship

The City of Port Orchard actively promotes environmental stewardship by organizing and hosting an array of annual cleanup and educational activities within its jurisdiction. Through its partnership with the West Sound Stormwater Outreach Group (WSSOG), the City continues to provide public outreach opportunities that educate residents about stormwater management and its environmental impacts. Additionally, the City collaborates with Kitsap County to facilitate benthic macroinvertebrate sampling with local volunteers, coordinates Sinclair Inlet cleanup events, and hosts educational pop-up events at the Port Orchard Farmers Market. These community-engaged initiatives are widely advertised on the City's website, Facebook page, and City Hall information hub.



Public Involvement and Participation

Permit Requirement S5.C.3

The City actively solicits and values public input in the Stormwater Management Program and Plan. The community benefits from the program elements, and the City gains valuable insights from the community's input to help address their goals and priorities, all while ensuring compliance with permit requirements.

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.

S5.C.3 – Creating Opportunities and availability of the SWMP, SMAP, and Annual Report

The City creates opportunities for public engagement, including overburdened communities in the following ways:

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. Citizens are invited to City Council meetings, Utility Advisory meetings, and Public Hearings pertaining to NPDES Phase II 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. Online, the public can review the annual report, SWMP, SMAP, and Comprehensive plans at <https://portorchardwa.gov/stormwater-management/> Each year the city will make the updated versions of these documents available by March 31st.

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 WSSOG and collaborating with local builders associations to help them stay informed of stormwater issues and regulatory requirements.



MS4 Mapping & Documentation

Permit Requirement S5.C.4

The City utilizes the Geographic Information System (GIS) to map the city's Stormwater system. This information is also being integrated into a newly acquired asset management system – Cartegraph. These tools allow the City to not only track existing infrastructure but also to plan for the future. The MS4 Map currently provides data on :

- Known MS4 outfalls and known MS4 discharge points.
- Receiving waters other than groundwater.
- Stormwater treatment and flow control BMPs owned and operated by the City of Port Orchard.
- Geographic areas served by the City that do not discharge stormwater to surface waters
- Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger.
- Connections between the MS4 owned or operated by the City and other municipalities.
- All connections to the MS4 authorized by the City after February 16, 2007.
- Size and Material for all known MS4 outfalls.
- All known connections from the MS4 to privately owned stormwater system.

The City continues to maintain and update its features inventory database annually, while also screening and performing routine maintenance activities. The City has already transitioned to an electronic mapping format (GIS) for its features inventory and will continue characterizing all known outfalls during inspections and investigations. In 2024, the City will integrate this data into the Cartegraph system, which will allow staff to prioritize workflow, manage and track stormwater infrastructure and inspection schedules, as well as monitor maintenance and improvements the stormwater system. The City plans to hire 2 new Stormwater Operations employees in 2024. This will free up existing staff to utilize CCTV cameras to map unknown connections and other Stormwater features. As new information becomes available through routine business operations, the City will promptly update both the GIS and Cartegraph systems. This comprehensive mapping data is available upon request to the Department of Ecology, federally recognized Indian Tribes, municipalities, and other permittees.

Illicit Discharge Detection and Elimination (IDDE)

Permit Requirement S5.C.5

The City is committed to the prevention of water pollution to protect water quality for humans, animals, and the environment. To support this goal, the City's Illicit Discharge Detection and Elimination program aims to prevent, detect, trace, and eliminate spills, illicit discharges, and illicit connections into the MS4, stopping pollutants from reaching receiving waters.

The NPDES Phase II Municipal permit lays out these requirements:

- ✓ 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.
- ✓ Implement an ordinance to effectively prohibit non-stormwater discharges.
- ✓ Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections to the MS4.
- ✓ Provide training for municipal field staff, who 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.

S5.C.5.a – Reporting Procedures for IDDE

The City's illicit discharge detection and elimination program is guided by the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.) The City is utilizing the Department of Ecology's WQWebIDDE reporting tool to track IDDE responses and investigations, and any corrective or enforcement actions.

S5.C.5.b – Informing the Public

To prevent illicit discharges and improper waste disposal, the City proactively informs the public, businesses, and employees about these hazards. The City distributes educational brochures and articles, both physically and digitally, to raise IDDE awareness. Additionally, the City maintains an active spill hotline (360-337-5777) advertised through Kitsap 1. Through comprehensive codes, policies, training programs, and community outreach, the city works to engage the entire community in IDDE prevention efforts.

S5.C.5.c – Ordinance Implementation

The City codified the IDDE ordinance in 2009 and reviews the ordinance annually to update it according to new requirements. Ordinances for the City's illicit discharge prevention, detection and elimination are always available online at:
<https://www.codepublishing.com/WA/PortOrchard/#!/html/PortOrchard15/PortOrchard1530.html>

S5.C.5.d – Implement IDDE Program

Due to staff changes and limitations, the City was unable to meet the field screening requirements and submitted a non-compliance letter to the Department of Ecology (G20). However, the City has since hired

additional staff to track, monitor, and complete the necessary field screening tasks. In 2024, the City's Operations and Maintenance team will conduct the MS4 field screening, including outfall inspections during the dry weather season and routine annual catch basin inspections and cleaning. Additionally, the City plans to create a checklist to guide the Utilities Compliance Specialist in conducting business source control inspections as part of the MS4 field screening process. This comprehensive approach will help the City regain compliance and ensure thorough monitoring of the municipal separate storm sewer system. The O&M team and the Utilities Compliance Specialist will utilize the methodologies recommended in the Herrera Environmental Consultants guide: [Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual](#).

S5.C.5.d.iii – Training on IDDE

The city has implemented annual training for all public works staff on identifying and reporting illicit discharges and connections as well as spill response. This training utilizes the [Herrera 2020 IC/IDDE Guidance manual](#) and includes a general IDDE refresher course for all public works employees. The training program is reviewed and updated annually to ensure city staff remain informed and prepared to address illicit discharges.

Controlling Runoff from New Development, Redevelopment, and Construction Sites

Permit Requirement S5.C.6

The City is responsible for managing stormwater runoff entering its MS4s from new development, redevelopment, and construction sites. To reduce pollutants in stormwater runoff from entering the MS4, the City has established an inspection program for development in the public and private sectors, including transportation projects. The inspection program meets these minimum performance measures outlined in the WWPBII Municipal Permit:

- ✓ Implement enforcement mechanisms and ordinances that address runoff from new development, redevelopment, and construction site projects.
- ✓ Program for site plan review, inspection and enforcement.
- ✓ Make available Notice of Intent(s) to proposed new development and redevelopment. Enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- ✓ Train staff whose primary duties are implementing this program.

S5.C.6.a,b – Enforcement

To ensure proper management of stormwater, the City adopted the criteria specified in the Washington State Department of Ecology Stormwater Management Manual for Western Washington, 2019 (SMMWW, 2019) for all development and redevelopment, public and private. This is outlined in the [Port Orchard Municipal Code 20.150](#), established in 2017. The Port Orchard Municipal Code meets the current

permit requirements and follows the minimum requirements, thresholds, and definitions in [Appendix 1](#).

S5.C.6.c – Program for Site plan review, Inspection, and Enforcement

The City has an established permitting

process for plan review, inspection, and enforcement to ensure effective stormwater management. This includes reviewing and approving all stormwater plans, inspecting sites with high potential for sediment runoff per the WWPBII Municipal Permit, monitoring the construction process to evaluate erosion and sediment controls, and verifying maintenance activities on new residential stormwater BMPs every 6 months until project completion. Upon final approval, the City inspects permitted sites to confirm proper installation and maintenance of stormwater facilities. When enforcement is necessary based on inspections, the City follows the progressive enforcement policy outlined in Port Orchard Municipal Code 20.150.270. The City also maintains thorough records of all inspection, enforcement, and maintenance activities, regularly evaluating and revising record-keeping procedures to uphold permit compliance.

S5.C.6.d – Notices of Intent

The City's Permit Center makes the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" available to developers. It also informs applicants of the permit requirement through pre-application letters and the stormwater section of the Development Guidelines. Additionally, the City provides access to the Department of Ecology's Construction Stormwater General Permit, Industrial Stormwater General Permit, and associated NOI documentation for applicable developments.

S5.C.6.e – Training

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.



Operations and Maintenance

Permit Requirement S5.C.7



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 City implements and documents the Operations and Maintenance program to regulate maintenance activities to reduce stormwater impacts. The minimum performance measures include:

- ✓ Maintenance Standards
- ✓ Maintenance of stormwater facilities regulated by the City
- ✓ Maintenance of stormwater facilities owned and operated by the City
- ✓ Practices, policies, and procedures to reduce stormwater impacts
- ✓ Ongoing training program for employees

S5.C.7.a – Maintenance Standards

The City has adopted the [Stormwater Management Manual for Western Washington \(SWMMWW\)](#) standards, which it uses to regulate maintenance activities. Specifically, the City uses these maintenance standards to determine when maintenance is required. If an inspection identifies that a maintenance standard has been exceeded, the City will perform the necessary maintenance and document the actions taken within the following timeframes:

- Typical maintenance of facilities, except catch basins, will be completed within 1 year.
- Maintenance of catch basins will be completed within 6 months.
- Maintenance requiring capital construction of less than \$25,000 will be completed within 2 years.

S5.C.7.b – Maintenance of stormwater facilities regulated by the City

The Public Works Director is implementing new inspection procedures in 2024 for the City's annual review of privately owned stormwater facilities built after 2007. The City's Utilities Compliance Specialist now inspects these facilities annually, working closely with the facility owners. The Specialist educates owners on the maintenance standards and best practices detailed in the facilities' maintenance manuals. If the private facilities fail to meet the maintenance standards, the

Specialist first provides education but will escalate to progressive enforcement if necessary. The Utilities Compliance Specialist documents all inspections and enforcement actions.

S5.C.7.c – Maintenance of stormwater facilities owned by the City

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. To further reduce pollutants, the department sweeps all City streets annually and more often in TMDLs, inspects catch basins every other year (annually in TMDL areas), and cleans both as needed.

Every year, staff inspect at least half of all known public catch basins and inspect and clean all the TMDL catch basins. In a major storm event, the staff also conducts spot checks for potential damage to the City's stormwater system. Upon identifying deficiencies or maintenance issues during inspections, staff promptly address those needs by establishing maintenance timelines in the 2019 SWMMWW.

In 2024, the City will implement Cartegraph, its new asset management system, to improve stormwater management. This system will streamline the City's processes for documenting all maintenance and repairs, leading to more efficient recordkeeping and work order management.



S5.C.7.d Practices, policies, and procedures to reduce stormwater impacts

The City will continuously review and update the adopted maintenance standards (as outlined in the City of Port Orchard's Operations and Maintenance Manual, which follows the Stormwater Management Manual for Western Washington) as well as current inspection, maintenance, and record-keeping practices. The goal is to improve the efficiency, accuracy, and timeliness of the stormwater program.

In 2024, the City will implement an asset management database to facilitate the scheduling and tracking of maintenance processes, and to accurately document the condition of the City's stormwater infrastructure.

Additionally, the City will evaluate its owned lands for potential stormwater pollution sources and establish mitigation practices. These City-owned lands typically include, but are not limited to: streets, parking lots, roads, highways, buildings, parks, open spaces, road right-of-ways, maintenance yards, and stormwater treatment/flow control BMPs/facilities.

The following activities have been addressed:

- Pipe cleaning
- Cleaning of culverts that convey stormwater in ditch systems
- Ditch maintenance
- Street cleaning
- Road repair and resurfacing, including pavement grinding
- Snow and ice control
- Utility installation
- Pavement striping maintenance
- Maintaining roadside areas, including vegetation management
- Dust control
- Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts
- Sediment and erosion control
- Landscape maintenance and vegetation disposal
- Trash and pet waste management
- Building exterior cleaning and maintenance

S5.C.7.e Staff Training

The city is developing a comprehensive operations and maintenance training program for employees whose job functions involve construction, operations, or maintenance that may impact stormwater quality. The training provides hands-on, practical guidance on critical topics, including:

- Protecting water quality
- Performing job duties to prevent or minimize impacts to water quality
- Operations and maintenance standards
- Inspection procedures
- Stormwater Pollution Prevention Plans (SWPPP)

- Selecting appropriate BMPs (Best Management Practices)
- Procedures for reporting water quality concerns

The city maintains thorough documentation of each training session, ensuring the program stays up-to-date.

Source Control for Existing Development

Permit Requirements S5.C.8

In 2022, the City adopted ordinances to establish 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. This program is designed to prevent and reduce pollutants in runoff from areas that discharge to the MS4. Minimum performance measures include:

- ✓ Make effective an ordinance or other enforceable document requiring the application of source control BMPs associated with existing land uses and activities.
- ✓ Inventory sites within City jurisdiction that have the potential to generate pollutants to the MS4.
- ✓ Implement an inspection program for all identified sites within City jurisdiction.
- ✓ Implement a progressive enforcement policy
- ✓ Implement a training program for all staff conducting these activities.

S5.C.8.b.i Ordinance

To address pollutant-generating sources from existing land uses and activities, as outlined in the NPDES municipal permit's Appendix 8, the City enacted an ordinance enforcing the use of source control best management practices (BMPs). The City annually reviews this source control ordinance, making any necessary changes or improvements to ensure an effective program and enforcement mechanism..

S5.C.8.b.ii Inventory

The City conducted a comprehensive inventory of all businesses within its jurisdiction. This included identifying businesses and sites that engage in pollutant-generating activities, as well as other pollutant sources identified through complaint responses, such as home-based and multi-family properties. In total, the City pinpointed 147 publicly and privately owned sites with the potential to generate pollutants that could enter the municipal separate storm sewer system (MS4). Looking ahead, the City plans to update this inventory in 2024 by removing closed businesses and adding new ones that have opened since the initial assessment.

S5.C.8.b.iii Inspection Program

The City created a new position to implement an inspection program, a Utilities Compliance Specialist(UCS). This position was responsible for educating each site identified with educational materials about pollution

prevention, good housekeeping, the activities that may generate pollutants, and the source control requirements. While this was accomplished by January 1, 2023, the City is committed to an ongoing educational program. The UCS will complete annual required inspections equal to 20% or more of the identified sites, and sites are prioritized based on the highest potential for pollution generation.

S5.C.8.b.iv Progressive Enforcement

Port Orchard's Municipal Code 15.30.140 outlines a progressive enforcement policy for stormwater compliance. This policy requires sites to implement required best management practices (BMPs) within a reasonable timeframe. If a site fails to comply, the City will take escalating enforcement actions, such as sending reminders via letters or phone calls, conducting inspections, and potentially pursuing enforcement through municipal codes or the judicial system.

To demonstrate the efforts made to bring sites into compliance, the City maintains detailed records of site visits, inspection reports, warning letters, and violations. The enforcement policy is reviewed annually to evaluate its effectiveness, with changes made as needed.

S5.C.8.b.v Training

The City provides ongoing staff training to those who are responsible for implementing the source control program, covering key topics such as legal authority, best management practices (BMPs) and their proper application, inspection procedures, lessons learned, typical cases, and enforcement procedures. This training is thoroughly documented, tracked, and updated as needed to reflect changes in policies and procedures.

Total Maximum Daily Load (TMDL)

Permit Requirement S7

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 TMDLs 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.

Monitoring

Permit Requirement S8

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.

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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