

City of Poulsbo Stormwater Management Program 2025 Update



Permit #WAR045337

March 2025

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Acronyms

BMP	Best Management Practice
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
O&M	Operations and Maintenance
SFDC	South Fork Dogfish Creek
SMAP	Stormwater Management Action Plan
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

1.0 INTRODUCTION

This document has been prepared to meet the City of Poulsbo's Western Washington Phase II National Pollutant Discharge Elimination System (NPDES) permit condition to annually update and publish the City's Stormwater Management Plan (SWMP). The SWMP includes all activities and programs that the City of Poulsbo has implemented to reduce the discharge of pollutants to the City's Municipal Separate Storm Sewer System (MS4).

Poulsbo has a population of approximately 12,400 (2023 Washington State OFM data) and an area of approximately 4.6 square miles. Fish bearing creeks, including South Fork Dogfish, Lemolo, Johnson and Bjorgen, are fully or partially located within city limits. These creeks have historically supported populations of coho and chum salmon, as well as steelhead trout. Urbanization, habitat loss, and pollutants have decreased their populations. Stormwater pollution is a significant contributor of pollutants in Poulsbo's creeks, Liberty Bay, and the Puget Sound. Stormwater runoff carries pollutants from streets, parking lots, construction sites, industrial sites, and residential neighborhoods into waterways such as Liberty Bay. Stormwater is one of the leading sources of pollution in Puget Sound and the NPDES permit is essential to restore water quality and protect beneficial uses of waterways like fishing and swimming.

The City has a National Pollutant Discharge Elimination System (NPDES) permit, authorized by the Washington Department of Ecology. The NPDES permit regulates stormwater discharges to all waters of the state, including lakes, rivers, ponds, streams, wetlands, and bays. NPDES permits are authorized to cities in urbanized areas, counties with populations over 100,000, large construction sites, and industrial sites that own a storm drain system that flows in waters of the state. The current permit term is August 1st, 2024 to July 31st, 2029.

1.1 STORMWATER MANAGEMENT PLAN ELEMENTS

The 2025 Stormwater Management Plan is organized to correspond to the 12 main elements of the 2024-2029 NPDES permit. Each permit element is identified by title and contains information about current activities as well as planned activities. The current activities subsections may contain programs or activities that were implemented in previous years but are included because they are ongoing or to provide context for a current program. The 12 main elements of the NPDES permit are:

- ◆ **Stormwater Management General Requirements:** Preparation of written documentation of the SWMP, tracking costs of implementing each element of the SMWP, and coordination mechanisms for communication between departments involved with management and execution of the SWMP.
- ◆ **Stormwater Planning:** Policies and strategies for water quality management that protect receiving waters, including long range planning and low impact development codes.
- ◆ **Public Education and Outreach:** General awareness, stewardship, and behavior change programs to address and reduce impacts from stormwater runoff.
- ◆ **Public Involvement and Participation:** This section requires the City to provide opportunities for the public to be involved in the development and implementation of the City Stormwater utility program.
- ◆ **Mapping:** An ongoing program for mapping and documenting stormwater infrastructure and receiving waters in the City's MS4.
- ◆ **Illicit Discharge Detection and Elimination:** A program to prevent, detect, characterize, trace, and eliminate illicit connections and discharges to the City's MS4. The program must include a regulatory mechanism to prohibit non-stormwater discharges, field screening methodology, and an ongoing training program.
- ◆ **Controlling Runoff from New Development, Redevelopment, and Construction Sites:** This section requires the City to implement and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction sites.
- ◆ **Operations and Maintenance:** Requires proper maintenance of publicly and privately owned stormwater infrastructure in the City.
- ◆ **Stormwater Management for Existing Development:** This permit requirement is meant to control or reduce stormwater discharges from areas of existing development through the implementation of strategic stormwater investments such as stormwater retrofit projects, enhanced maintenance, and land management strategies.
- ◆ **Source Control for Existing Development:** A program that enforces the use of best management practices (BMPs) at all sites that are potential pollutant sources.

- ◆ **Monitoring and Assessment:** A collective fund for regional monitoring of SWMP effectiveness and source identification as well as water quality status and trends.
- ◆ **Total Maximum Daily Load Requirements (TMDL):** The City is subject to a TMDL for Liberty Bay watershed's fecal coliform level. The City must implement a plan that provides a framework for meeting TMDL requirements.

For detailed permit requirements, please refer to the *Western Washington Phase II Municipal Stormwater Permit (Permit) 2024-2029*. The permit is available for viewing and downloading on the City of Poulsbo website:

<https://cityofpoulsbo.com/public-works-stormwater-management/>

or from the Department of Ecology website at:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>

1.2 PUBLIC COMMENT AND FEEDBACK ON STORMWATER PROGRAM

Public comments on the annual update of the City Stormwater Management Plan are accepted at any time. Requests for information or comment submission can be made by:

- ◆ Downloading the comment form <https://cityofpoulsbo.com/public-works-stormwater-management/>. Comment form can be submitted:
 - via email at publicworks@cityofpoulsbo.com, OR
 - via mail at 200 NE Moe Street, Poulsbo, WA 98370.
- ◆ Submitting comments in-person. In-person comments can be made on the 2nd floor of Poulsbo City Hall (200 NE Moe Street).

2.0 STORMWATER PROGRAM MANAGEMENT AND ADMINISTRATION

Permit Requirement S5.C

STORMWATER PROGRAM MANAGEMENT PERMIT REQUIREMENTS

The City must develop and implement a stormwater management program (SWMP). The requirements for program management and administration include:

- ◆ Annual written update of the Stormwater Management Plan.
- ◆ Tracking the estimated cost for each component of the SWMP. Program cost estimates must be included in the annual report no later than March 31st, 2027.
- ◆ A coordination mechanism for communication among departments in the City to eliminate barriers to compliance with the permit. A written description of internal coordination mechanisms must be included in the annual report no later than March 31st, 2026.

CURRENT ACTIVITIES

The City meets the requirements of this section through the establishment of the NPDES coordinator position. The NPDES coordinator is responsible for ensuring that the City meets the permit requirements, internal meetings, asset management software, and coordination with other permittees.

PLANNED ACTIVITIES

The City will continue all the activities listed above. The current coordination mechanism will be reviewed and revised as necessary. Before the deadline to submit program costs to the department of ecology, the City will review our tracking methods to ensure that labor hours, equipment, and other costs are properly captured and recorded.

3.0 STORMWATER PLANNING

Permit Requirement S5.C.1

STORMWATER PLANNING PERMIT REQUIREMENTS

Implement a Stormwater Planning program to inform and assist in the development of water quality management policies and strategies to protect receiving waters.

The minimum performance measures are:

- ◆ Continue using the inter-disciplinary team created in the previous permit term to assist in the development of the stormwater management program.
- ◆ Coordinate with long-range plan updates to address and mitigate anticipated water quality impacts due to growth and transportation. No later than March 31st, 2027, the City must demonstrate how stormwater management needs and protection of receiving water health is (or is not) informing long-range planning.
- ◆ Continue to require Low Impact Development (LID) principles and best management practices. Annually assess and document any newly identified administrative or regulatory barriers to LID implementation and the measures developed to address the barriers.
- ◆ By March 31st, 2027, the City must create a Stormwater Management Action Plan (SMAP) that identifies one high-priority basin area for facility retrofits, land management strategies, long-range planning, implementation schedules, and budget sources. This plan can be an expansion of the SMAP the city created to meet the requirements of the 2019-2024 permit.
- ◆ By December 31, 2028, the City must adopt and implement tree canopy goals and policies that support stormwater management.

CURRENT ACTIVITIES

The City's stormwater team includes the NPDES coordinator, public works director, utility engineer, public works superintendent, and water quality technician. The team works with other departments including planning, as well as consultants when needed to meet permit requirements.

The planning department works with our stormwater team to provide input in long-range planning. The stormwater team provided input to the 2024 Comprehensive Plan

Update. The Comprehensive Plan provides a framework for the growth of the City that considers land use, housing, transportation, the environment, and economic development. The Comprehensive Plan includes goals for the City's stormwater utility and plans for new capital facilities. Stormwater admin staff also contributed to the Environmental Impact Statement (EIS), created in concurrence with the Comp Plan. The EIS examined various growth alternatives to accommodate the expected population and jobs increase in the City over the next 20 years. Stormwater admin staff worked with a consultant to determine potential stormwater impacts between the different alternatives, as well as mitigation.

As required by the NPDES permit, a Stormwater Management Action Plan (SMAP) was created in 2022. The SMAP analyzed water quality, hydrology, habitat, shellfish and fish consumption, land use, and stormwater infrastructure of the receiving water basins in the City. The SMAP identified the South Fork Dogfish Creek (SFDC) basin as the highest priority basin. The SFDC basin has a high percentage of commercial, industrial, and high-density residential development, as well as the highest amount of total impervious area and highest average daily trip (ADT) road miles of all the sub-basins examined. The basin has historically supported runs of chum and coho salmon, but urban development has degraded habitat conditions and water quality. Designating the SFDC basin as the City's highest priority basin will guide stormwater utility management and financial planning.

PLANNED ACTIVITIES

The SMAP for South Fork Dogfish Creek includes the following measures to improve water quality in the basin:

- ◆ Public Education and Outreach on pet waste and natural yard care
- ◆ Potential facility maintenance enhancements for existing publicly and privately owned stormwater facilities
- ◆ Stormwater facility retrofits
- ◆ Source Control inspections to targets sources of fecal coliform

These land management and development strategies, along with financial planning, will be used to guide future capital projects and permit compliance. In 2024, the City applied for construction funding for stormwater treatment and retrofit in the South Fork Dogfish Creek basin.

4.0 PUBLIC EDUCATION AND OUTREACH

Permit Requirement S5.C.2

PUBLIC EDUCATION AND OUTREACH PERMIT REQUIREMENTS

Develop a stormwater education and outreach program that builds general awareness about methods to address and reduce impacts from stormwater runoff, effect behavior changes to reduce practices that contribute to adverse stormwater impacts and create stewardship opportunities that encourage community engagement. Permittees may choose to meet these requirements individually or as a member of a regional group, however the program design shall be based on local water quality information and target audiences to identify high priority target audiences, subject areas, and/or BMPs.

The minimum performance measures are:

- ◆ Annual selection of at least one target audience and one subject area for a general awareness campaign.
- ◆ Annual selection of at least one target audience and one subject area for a campaign to affect behavior change.
- ◆ Behavior change campaigns must use social marketing practices and methods to tailor the campaign to the Permittee's community. The campaigns shall be evaluated to determine their effectiveness and develop recommendations for improvement. Evaluations of the campaigns must be utilized to improve the campaign, or if desired, develop a new target audience and/or behavior change campaign.
- ◆ No later than July 1st, 2025, the City shall use the behavior change evaluation created in the previous permit term to develop a campaign that is tailored to the community.
- ◆ No later than September 1st, 2025, the City shall begin to implement the behavior change campaign.
- ◆ The City must provide and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and educational activities.

CURRENT ACTIVITIES

General Awareness and Behavior Change

The cities of Poulsbo, Bainbridge Island, Port Orchard, Bremerton, Gig Harbor, and Port Angeles partnered with Kitsap County to create the West Sound Stormwater Outreach Group (WSSOG). WSSOG provides a mechanism to pool resources for the development, implementation, and funding of stormwater education and outreach. This partnership creates consistent messaging across city and county boundaries, while also increasing municipal resource efficiency. WSSOG fulfills multiple permit requirements through our public education and outreach campaigns such as:

Natural Yard Care Campaign: This behavior change program aims to reduce synthetic fertilizer use by hosting natural yard care webinars with Master Gardeners and providing a coupon for a natural fertilizer. The campaign pilot was conducted in Poulsbo in 2021 and expanded to all WSSOG partners in 2022. The priority audience of this campaign are families with kids/and or pets who live in single family homes and perform their own yard maintenance. The 2024 campaign generated 10,948 link clicks on Facebook, 102 webinar registrations, 51 webinar attendees, and 105 coupon redemptions.

“Mutt Mitt” Program: In this behavior change program, stations dispense pick-up bags for dog waste. The city owns and maintains stations in its parks, but stations can also be sponsored by volunteers such as neighborhood groups, homeowner's associations, apartment complexes, and marinas. Three new mutt mitt stations were sponsored in 2024. Currently there are 51 volunteer stations, 15 city-owned stations, and 5 private stations in Poulsbo.

Puget Sound Starts Here: Kitsap County represents the City of Poulsbo and other WSSOG members at the Puget Sound Stormwater Outreach for Regional Municipalities (STORM). STORM is a partnership of over 80 Puget Sound area cities with the goal of addressing polluted stormwater runoff. STORM created the broad-reaching Puget Sound Starts Here (PSSH) media campaign. The PSSH campaign raises general awareness of stormwater pollution as well as targets behavior changes for the people who live and work in the Puget Sound. Targeted behavior changes include the Don't Wait to Inflate Campaign, natural yard care, car washing, and pet waste. By pooling resources with other Puget Sound cities, the PSSH campaigns ensure that regional stormwater outreach is effective, consistent, and cost-efficient.

The 2024 PSSH campaign included ads on social media, print, as well as digital media and movie theaters. The “Don't Wait to Inflate” campaign focused on creating awareness to encourage people to learn more about proper tire pressure. The campaign asked viewers to check their tire pressure monthly and add air when needed to drive safer, save money, and save coho salmon. The 2024 PSSH campaign was viewed 3,444 times on devices in the City from various social media sites and generated 84 clicks to the Puget Sound Starts Here website.

Pollution Prevention Assistance: The City cooperates with the Pollution Prevention Assistance (PPA) program of the Kitsap Public Health District. The PPA program provides non-regulatory, technical assistance to businesses to incorporate BMPs that prevent pollution and responsibly manage waste.

Stewardship

The City of Poulsbo Tree Board and the Fish Park Steering Committee provide multiple opportunities for community involvement and stewardship with a focus on tree planting and landscape mitigation in both upland and riparian locations. In 2024, 29 work party events were held in Fish Park, with 291 volunteers giving 1,205 hours.

Poulsbo's Fish Park Steering committee and the Parks and Recreation Department participated in two events in 2024 to provide outreach to citizens in the City. The City had its inaugural Earth Day event, which attracted approximately 300 people. The City stormwater utility had a booth at the event and played the “Poop Toss” game. Poulsbo's Fish Park also participates in Kitsap County's Salmon Tours, an annual event that gives citizens the opportunity to view migrating salmon and cutthroat trout. Trained salmon docents and volunteers have interactive activities that educate participants in environmental protection and water quality issues. Approximately 450 people attended the 2024 Salmon Tours in Fish Park.

PLANNED ACTIVITIES

The City will continue to be involved in the PSSH Campaign, STORM, WSSOG, and stewardship activities throughout the city. Further stewardship activities will be considered as opportunities and funding allows.

WSSOG hired a consultant to conduct an evaluation of the Natural Yard Care Campaign, as required by the NPDES permit. The evaluation contained the following recommendations:

- ◆ Focusing future efforts on moving beyond awareness to skill building.
- ◆ Identifying a behavior that is non-divisible and end state, meaning that the behavior will produce the desired outcome without requiring additional action.
- ◆ Continuing and expanding the use of social marketing tools.
- ◆ Clarifying the intent of the fertilizer discount. The fertilizer discount may be seen as having limited value since people contemplating moving over to organic fertilizer have to buy the product repeatedly and the discount provided is a one-time offer.

After the evaluation of the natural yard care campaign, the WSSOG decided to focus their efforts on the development of a new behavior campaign. In 2025, the WSSOG will be developing a behavior change campaign to encourage commercial businesses to keep their dumpsters closed and contained to prevent the contamination of stormwater runoff. The campaign will provide outreach to overburdened communities by translating materials into multiple languages.

5.0 PUBLIC INVOLVEMENT AND PARTICIPATION

Permit Requirement 5.0.c.3

PUBLIC INVOLVEMENT AND PARTICIPATION PERMIT REQUIREMENTS

Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate structures or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

The minimum performance measures are:

- ◆ Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and update of the Permittee's SMAP and SWMP.
- ◆ Each Permittee shall post on their website their SWMP Plan and the annual report no later than May 31 each year. All other submittals shall be available to the public upon request.
- ◆ No later December 31st, 2026, the City will document and report methods used to identify overburdened and highly impacted communities.

CURRENT ACTIVITIES

Comments on the SWMP are accepted all year and can be viewed from the City's stormwater webpage. The SMAP is also posted, and comments are accepted. Public hearings are held for any legislative actions such as proposed stormwater utility rate structure revisions and comprehensive plan updates. Citizens can comment at City Council Meetings and Planning Commission. When applicable, stakeholders are included in the development of plans or documents.

There are not any designated highly impacted census tracts within the Poulsbo MS4, as defined by the Department of Health Environmental Health Disparities map. The City does provide opportunities for overburdened communities to participate in legislative actions such as proposed stormwater utility structure revisions and comprehensive plan updates. Overburdened community tracts within Poulsbo MS4 includes English as a second language communities (Spanish speaking), individuals over 65, and individuals

without internet or vehicle access. Opportunities are provided to these communities by posting physical notices of legislative actions and public meetings to the post office and public library. If individuals are not able to physically or virtually attend public meetings, they can also write in their comments to have it recorded. In 2024, the City also started providing Spanish language translation services. City employees can call into a Spanish translation service for in-person citizen inquiries. Translation services for citizens that desire to provide public comments during City Council meetings have also become available with advance notice.

PLANNED ACTIVITIES

All current activities are planned to continue. Additional opportunities that may arise will be supported when appropriate and when funding, staffing, and partner resources are available.

In 2025 and 2026, the City will use existing resources, including Kitsap County's *Outreach and Engagement Report and Implementation Plan*, to evaluate and refine City outreach to overburdened communities.

6.0 MS4 MAPPING AND DOCUMENTATION

Permit Requirement s5.c.4

MS4 MAPPING PERMIT REQUIREMENTS

An ongoing program for mapping and documenting the MS4.

The minimum performance measures are:

- ◆ Permittees must map known MS4 outfalls, discharge points, receiving waters, stormwater facilities owned or operated by the permittee, tributary conveyances larger than 24 inches in diameter to all known outfalls and discharge points, associated drainage areas and land use, connections between the permittee's MS4 and other municipalities, and all connections to the MS4 made after February 16th, 2007, that has been authorized by the permittee.
- ◆ No later than December 31st, 2026, all tree canopy on City-owned or operated properties must be mapped.
- ◆ No later than March 31st, 2028, the City must implement a methodology to map and assess the area of the City's MS4 that has stormwater treatment and flow control BMPs owned and/or operated by the City. The assessment must include a map and a table with a breakdown of the acres of the City's MS4 that is managed or unmanaged by stormwater treatment.

CURRENT ACTIVITIES

Existing maps are updated as necessary to map new infrastructure or to revise incorrect information. Mapping data is collected and stored using asset management software.

PLANNED ACTIVITIES

All current activities are planned to continue. Updates to existing maps will be performed to include new infrastructure and revise incorrect information as it is discovered. In 2024, the Parks and Recreation Department received a Department of Natural Resources (DNR) grant for urban tree canopy assessment and planning. Information and results from this grant will inform the City's tree canopy mapping and planning.

7.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

Permit Requirement S5.c.5

ILLICIT DISCHARGE DETECTION AND ELIMINATION PERMIT REQUIREMENTS

Develop and implement an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and discharges into the MS4.

The minimum performance requirements are:

- ◆ Develop procedures for reporting, correcting, and/or removing illicit connections, spills, and other illicit discharges when they are suspected or identified. Pollutants entering the MS4 from an interconnected, adjoining MS4 must also be addressed. Illicit connections and discharges must be identified through field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information.
- ◆ Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper waste disposal.
- ◆ Permittees must implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater discharges into the Permittee's MS4. The ordinance or regulatory mechanism must include escalating enforcement procedures and actions.
- ◆ No later than July 1st, 2027, update the IDDE ordinance to prohibit routine external building washdown for buildings built or renovated between 1950-1980, to prevent the release of polychlorinated biphenyls (PCBs) into stormwater runoff.
- ◆ Create an ongoing program designed to detect and identify non-stormwater discharges and illicit connections. The program must include procedures for conducting illicit discharge investigations, a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns, an ongoing training program for all staff who might come into contact or observe an illicit discharge as part of their normal job responsibilities, and a publicly listed and publicized spill hotline.
- ◆ Implement an ongoing program designed to address illicit discharges into the MS4 which includes procedures whose actions meet timelines described in the

Permit. The program must include procedures for tracing and elimination of the source of an illicit discharge.

- ◆ Track and maintain records of the activities conducted to meet the specific reporting requirements to Ecology for this permit section.
- ◆ No later than January 1st, 2027, the City will coordinate with Poulsbo Fire Department to prevent the release of per- and polyfluoroalkyl substances (PFAS)-containing firefighting foam. This partnership will include an arrangement to have the City notified with PFAS-containing firefighting foam is released within the City's MS4 and procedures to minimize the discharge of PFAS-containing firefighting foam to the stormwater system.

CURRENT ACTIVITIES

Reports of spills and illicit discharges are investigated, and appropriate actions are taken depending on the nature of the event. Poulsbo Municipal Code (PMC) 13.18 gives the City legal authority to require illicit discharges to be corrected and penalize the responsible party, if warranted. Illicit discharges and enforcement actions are documented and tracked. The telephone hotline Kitsap1 (360-337-5777) is advertised throughout Kitsap County for reporting illicit discharges and spills. The City has also partnered with Kitsap County's SeeClickFix program. Reports of spills and illicit discharges within the City's MS4 that are reported to SeeClickFix or Kitsap1 are immediately forwarded to the City. Illicit discharges can be reported online at www.kitsap.gov/dis/Pages/callkitsap1.aspx.

City employees are trained to identify and report illicit discharges. New and refresher training is provided when appropriate. Program guidance is provided by the *Illicit Connection and Illicit Discharge Field Screening and Tracing Guidance Manual*, prepared by Herrera Environmental Consultants. Additional field screening is implemented as required by the permit and is ongoing in association with the operations and maintenance (O&M) program for municipal facilities.

Public employees, businesses, and the public are informed of hazards associated with illegal discharges and improper disposal of waste in accordance with permit requirements. Magnets with information about Kitsap1 and spill reporting are available on the 2nd floor of City Hall and businesses are informed of the hazards of illicit discharges during stormwater source control inspections.

The City has had an Inter Local Agreement (ILA) with Kitsap Public Health District since 2009 to perform water quality sampling. Sampling results are used to detect and investigate illicit discharges. Screenings were originally only performed at outfalls during dry weather. In 2015 the City created a Total Maximum Daily Load (TMDL) Implementation Plan for fecal coliform in Liberty Bay. The TMDL implementation plan included two additional annual wet-weather screenings, as well as stream sampling.

To fulfill the permit requirement to detect and eliminate illicit connections and discharges from commercial properties and private stormwater facilities, the Private Facility Maintenance (PFM) program was created. The PFM program requires owners of private stormwater facilities to inspect and maintain their facilities. Records of inspections and maintenance must be turned into the City annually. Under the NPDES permit, private stormwater facilities permitted after February 16th, 2010, must comply with this requirement. Poulsbo's PFM program exceeds the permit requirement by requiring inspection and maintenance for all properties with private stormwater facilities.

PLANNED ACTIVITIES

All current activities will be continued and refined as necessary. A program to prevent the release of PFAS-containing firefighting foam is scheduled to be developed in 2026.

8.0 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

Permit Requirement 55.c.6

CONTROLLING RUNOFF PERMIT REQUIREMENTS

Implement and enforce a program to reduce pollutants in stormwater runoff to the municipal stormwater system from new development, redevelopment, and construction site activities. The program shall apply to private and public development, as well as transportation projects.

The minimum performance measures are:

- ◆ Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects. This includes legal authority to inspect and enforce maintenance standards for private stormwater facilities that are discharged to the Permittee's MS4. Records of inspections and enforcement must be kept.
- ◆ The permitting process must include site plan review, enforcement capabilities, and inspections before, during, and after construction.
- ◆ Permittees must verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities.
- ◆ Electronic Construction Stormwater General Permit Notice of Intent (NOI) form, Industrial Stormwater General Permit NOI, and the online registration requirements for Underground Injection Control wells must be available to representatives of proposed new development and redevelopment. Permittees must continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permit issued by Ecology.
- ◆ All staff whose primary job duties are implementing this section's program must be trained to conduct these activities. Follow-up training must be provided as needed.
- ◆ No later than June 30th, 2027, the City shall adopt the 2024 Stormwater Management Manual for Western Washington (2024 SWMMWW). The 2024 SWMMWW will apply to all applications submitted on or after July 1st, 2027.

CURRENT ACTIVITIES

The City's permitting process includes plan review, inspection, and enforcement capabilities in accordance with the permit. In May 2022 the *2019 Stormwater Management Manual for Western Washington (2019 SWMMWW)* was adopted to regulate standards for new development and redevelopment. The *2019 SWMMWW* is used to protect water quality and reduce the discharge of pollutants to the MS4 during development and construction. Developers must use the *2019 SWMMWW* to apply all known, available, and reasonable methods of prevention, control, and treatment (AKART) during site planning, BMP selection and design, and low impact development (LID) competing needs criteria.

Site plans are reviewed for the elements above to ensure that appropriate BMPs are selected and designed to the maximum extent practicable. Employees implementing permit requirements have training on erosion control, construction inspections, low impact development techniques, and stormwater design standards and practices. Staff that perform construction site inspections are also Construction Site Erosion and Sediment Control Lead (CESCL) certified. The City maintains records of inspections, enforcement, and maintenance activities.

Maintenance responsibility, standards, inspection requirements, and procedures for long term operation and maintenance of permanent stormwater control facilities is codified in City ordinance. The Private Facility Maintenance program (PFM) supports this effort by requiring commercial properties to inspect their stormwater facilities, perform maintenance as required, and submit documentation to the City.

In 2024, City staff reviewed 8 site plans and did not grant any variances to the requirements in the *2019 SWMMWW*. 11 construction sites were inspected by City staff and 1 24- hour correction notice was issued due to violations of the City's Stormwater Municipal Code.

PLANNED ACTIVITIES

All current activities will be continued as required by the permit, with refinements and adjustments made as necessary.

9.0 STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT

Permit Requirement S5.C.7

STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT PERMIT REQUIREMENTS

Implement a program to control or reduce stormwater discharges to waters of the State from areas of existing development through long-term, strategic stormwater investments such as stormwater retrofits, land management/development strategies, and enhanced stormwater management actions.

The minimum performance measures are:

- ◆ Identification of strategic stormwater investments (qualifying investments are provided in Appendix 12 of the NPDES Permit). These investments may be from the City Stormwater Management Action Plan (SMAP) or opportunistic stormwater investments outside of the SMAP focus basin. This list must be provided with each annual report.
- ◆ No later than March 31st, 2028, the City must fully fund, start construction, or completely implement project(s) that meet the level of effort assigned to the City by the Department of Ecology, called the Assigned Equivalent Acres. Assigned equivalent acres is a measure of the treatment area through implementation of qualifying actions and is scaled by population size.

CURRENT ACTIVITIES

The City SMAP determined that the highest priority basin in the City is the South Fork Dogfish Creek (SFDC) basin. In the SMAP, several water quality retrofit projects have been identified that meet the requirements for this permit section. The City has applied for grant funding for the design and construction of projects in the SFDC SMAP.

The City received grant funding from the Washington Department of Ecology for a retrofit project in Nelson Park. The project will retrofit the existing swales into two bioretention swales, as well as install a pre-treatment unit and Filterra Bioscape cell. This opportunistic stormwater investment will be used to meet the assigned equivalent acres for the 2024-2029 permit.

PLANNED ACTIVITIES

Construction of the Nelson Park stormwater retrofit is slated to start in spring- summer 2025. This project will satisfy the assigned equivalent acres for the current permit term.

10.0 SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

Permit Requirement 55.c.8

SOURCE CONTROL PROGRAM PERMIT REQUIREMENTS

Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program must require the application of BMPs to pollutant generating sources associated with existing land uses and activities. Applicable sites include publicly and privately owned institutional, commercial, and industrial sites.

The minimum performance measures are:

- ◆ No later than August 1st, 2027, update and make effective an ordinance or other enforceable document to meet the requirements of the permit section, if current enforcement mechanisms are not adequate.
- ◆ All pollutant generating sources shall be required to implement all applicable source control BMPs. Structural source control BMPs or treatment BMPs/facilities may be required if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards.
- ◆ Update the source control inventory that identifies publicly and privately owned institutional, commercial, and industrial sites that have the potential to generate pollutants to the MS4 at least once every 5 years.
- ◆ Conduct an inspection program requiring application of BMPs at identified pollutant generating sites. The inspection program shall include:
 - Annual inspections equal to 20% of the sites listed in the source control inventory. Follow-up compliance inspections at the same site, as well as inspections conducted after credible complaints, may be counted towards the 20%.
 - Enforcement of sites that fail to adequately implement BMPs after a follow-up inspection.
 - Retention of records to demonstrate an effort to bring sites into compliance, including documentation of each site visit, inspection reports, warning letters, notices of violations, and any other enforcement records.

- Training for staff responsible for implementing the source control program to conduct these activities.

CURRENT ACTIVITIES

Poulsbo Municipal Code (PMC) chapter 13.18 requires all properties within the City to implement source control BMPs and prevent non-stormwater discharges. PMC 13.18 has required the implementation of source control BMPs for several years, however, the code was refined in November 2022 to provide consistency with stormwater permit language and other Kitsap County municipalities' source control codes.

A site inventory for the source control program was completed in June 2022. The source control inventory was compiled using commercial stormwater utility accounts, business licenses, Washington Department of Revenue business look-up tool, and windshield surveys. Sites include, but are not limited to food service, industrial activities, vehicle maintenance and washing, and manufacturing.

In October 2022, two City employees attended training for municipal source control, sponsored by the Washington Stormwater Center's Business Inspection Group (BIG). The in-person training addressed creating a source control program, implementing a progressive enforcement policy, site inspections, and best management practices. A source control program manual that utilizes resources from the BIG was developed for staff administering the program.

In 2024, The City inspected 27 sites and conducted 5 follow-up inspections, for a total of 32 inspections. No enforcement action was taken at any of the sites; however, one site received a notification letter regarding an illicit discharge.

PLANNED ACTIVITIES

The City will continue to inspect 20% of all sites on the source control inventory annually. Other program elements such as progressive enforcement policies and training will continue and be adjusted as necessary. The source control inventory is updated on an annual basis.

11.0 OPERATIONS AND MAINTENANCE

permit requirement 55.c.9

OPERATIONS AND MAINTENANCE PERMIT REQUIREMENTS

Implement a program to regulate and conduct O&M activities to prevent or reduce stormwater impacts.

The minimum performance measures are:

- ◆ No later than June 30th, 2027, implement maintenance standards that are as protective of facility function as those specified in the 2024 SWMMWW.
- ◆ For stormwater facilities owned or operated by the Permittee:
 - Implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities and take appropriate maintenance actions.
 - Spot check potentially damaged stormwater treatment and flow control BMPs/ facilities after major storm events and take appropriate maintenance actions.
 - Inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean as needed for compliance with maintenance standards.
- ◆ For stormwater facilities regulated by the Permittee:
 - Verify adequate long-term maintenance of stormwater facilities by implementing an ordinance or other enforceable mechanism that clearly identifies the party responsible for maintenance, requires annual inspection of facilities, and establishes enforcement procedures.
- ◆ No later than December 31st, 2027, document the practices, policies, and procedures implemented to reduce stormwater runoff from lands owned or maintained by the permittee.
- ◆ Conduct a training program for employees whose primary job functions may impact stormwater quality. Training shall address the importance of protecting water quality, operation and maintenance standards, relevant Stormwater Pollution Prevention Plans (SWPPP), selecting appropriate BMPs, ways to perform job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns.

- ◆ Create a SWPPP for all heavy equipment maintenance and storage yards, and material storage facilities owned or operated by the Permittee.
- ◆ No later than July 1st, 2027, develop and implement a municipal street sweeping for water quality program. Priority areas include high traffic streets and streets that serve commercial or industrial land use areas. High priority areas must be swept at least once between July and September each year, and at least two additional times.
- ◆ No later than March 31st, 2028, submit to the annual report the following information about the street sweeping program: priority areas identified on a map, sweeping dates, sweeping frequency, type of sweeper, total curb miles of priority areas, total curb miles swept, and an estimate for the amount of street waste solid removed during each sweeping event.

CURRENT ACTIVITIES

In 2024, the City:

- ◆ Inspected 1,437 catch basins
- ◆ Maintained 442 catch basins
- ◆ Inspected 159 Stormwater facilities/ BMPs
- ◆ Maintained 21 Stormwater facilities/BMPs

Long-term operation and maintenance of permanent stormwater control facilities is codified in City ordinance. Maintenance responsibility, standards, inspection requirements, and procedures are addressed. Annual inspections and maintenance are required under the Private Facility Maintenance (PFM) program. In 2022, the private and public facility maintenance manual was updated to comply with maintenance standards in the 2019 SWMMWW.

The City takes steps to minimize pollutants in runoff from City activities and on land owned or operated by the city. The following activities, as required by the permit, were evaluated for their contribution to run-off pollution: street cleaning, snow and ice control, utility installation, pavement striping maintenance, dust control, application of pesticides, sediment and erosion control, landscape maintenance, trash management, and stormwater conveyance maintenance. For each of these activities, fact sheets

were created detailing the activity and required source control BMPs to be implemented when performing those activities (from the 2019 SWMMWW). The fact sheets are used by supervisors to help train new employees and provide refresher training for current employees.

In addition to fact sheets for city activities, a Stormwater Pollution Prevention Plan (SWPPP) is in place for all facilities owned by the City that conduct heavy equipment maintenance and storage, as well as bulk material storage. Requirements in the SWPPP include monthly site inspections, annual inspections of stormwater facilities, and stormwater facility inspections after storm events. Records of inspections, maintenance, and repair activities are maintained.

PLANNED ACTIVITIES

The above activities will be continued and refined as needed. The SWPPP for City owned properties is reviewed annually for any major revisions.

The City has a street sweeping program. All public roadways are swept several times annually. In 2025, the City will identify high priority areas for street sweeping and evaluate the expected water quality benefit of the current street sweeping program to identify any necessary adjustments in order to meet street sweeping for water quality permit requirements.

12.0 TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

permit requirement s7

PERMIT REQUIREMENTS

The Total Maximum Daily Load (TMDL) is a water quality improvement metric to clean up polluted waters to meet state water quality standards. The federal Clean Water Act requires a TMDL plan for each waterbody on Washington State's polluted waters list, known as the 303(d) list. NPDES Permittees may be subject to applicable TMDLs for stormwater discharges from their MS4. For applicable TMDLs listed in Appendix 2 of the permit, affected Permittees shall comply with the specific requirements. The TMDL for Liberty Bay is not listed in Appendix 2 and no special requirements are necessary besides compliance with the NPDES permit.

CURRENT ACTIVITIES

In 2013, Ecology prepared the *Liberty Bay Watershed Fecal Coliform Bacteria TMDL and Water Quality Implementation Plan*. The TMDL was created because bacterial contamination was affecting beneficial uses like shellfish harvesting and primary contact recreation in Liberty Bay. The City's TMDL is currently not included in the NPDES permit but the City has taken proactive steps to implement TMDL standards.

In 2016, the City received a grant from the Department of Ecology to develop an implementation plan to provide a framework to meeting TMDL requirements. The plan is available on the City's website (<https://cityofpoulsbo.com/wp-content/uploads/2017/04/libertybayTMDLplan.pdf>). The plan includes an assessment of the watershed that identified needs and opportunities for improving water quality in Liberty Bay. The TMDL plan sets to improve water quality in Liberty Bay through effectiveness monitoring, capital improvements, and operations and maintenance.

The TMDL focuses on IDDE efforts in the MS4 upstream of Liberty Bay sampling sites with Load/Waste Load Allocations. To support the TMDL, the City has undertaken the following actions:

- ◆ Doubled the frequency of catch basin inspections due to the requirements under the 2019-2024 NPDES permit.
- ◆ Conducted stormwater public outreach and education centered around Liberty Bay watershed pollution sources, as described in Section 2 of this document.

- ◆ Encouraged local stewardship and engagement with the public on pollution prevention practices through an ongoing Inter-Local Agreement (ILA) with the Kitsap Conservation District.
- ◆ Active seeking of supplemental grant funding to implement more capital improvement projects that support pollution prevention and habitat restoration/enhancement.

In response to the State requirement for managing the growth and development of the City, the Planning Department identified areas which require ecological protection. Maps have been developed to show areas in the City where there are critical aquifers, geological hazards, fish and wildlife habitat, wetlands, and shoreline. The adopted codes and maps support the TMDL requirement to identify areas with high potential to contribute bacteria and sediment to nearby surface waters.

The effectiveness of the City's pollution prevention practices is investigated through water quality sampling each year; once during the dry season and twice during specific wet weather conditions. A Microbial Source Tracking (MST) project in 2018-2019 coincided with the annual water quality sampling rounds and was used to provide additional direction for IDDE efforts.

In collaboration with Clean Water Kitsap and the Suquamish Tribe, the Liberty Bay growing area was re-established and 760 acres of shellfish beds were reopened in 2017 for the first time in several decades.

PLANNED ACTIVITIES

The City will continue to support and develop a multi-faceted approach to meeting TMDL requirements. The Source Control Program (permit requirement S5.C.8) will prioritize businesses that have the potential to discharge fecal coliform bacteria, including restaurants or facilities that dispose of food waste in outdoor trash containers. The City will continue to explore opportunities in the Liberty Bay watershed to encourage citizen stewardship of the environment.

In 2023, the City received a grant from the Department of Ecology for construction of the West Poulsbo Storm Retrofit Project. This project will improve water quality in Liberty Bay through the construction of bioretention cells and a proprietary media Bioscape cell in Nelson Park. The 74-acre upstream basin is currently untreated and contains high

ADT roadways, commercial, residential, and industrial land uses. The basin's redevelopment potential is low, indicating that the project can provide a significant benefit to water quality in Liberty Bay and support TMDL goals. Construction is scheduled to occur this summer.

13. MONITORING AND ASSESSMENT

permit requirement s8

PERMIT REQUIREMENTS

To meet this permit requirement, permittees must implement stormwater monitoring assessment either individually or by paying into a collective fund to support regional monitoring in association with other permittees. Monitoring shall address (1) Status and Trends and (2) SWMP Effectiveness and Source Identification.

CURRENT ACTIVITIES

The City of Poulsbo pays annual fees into the collective fund for regional monitoring to be performed on its behalf. The collective, called the Stormwater Action Monitoring (SAM) group, conducts effectiveness studies, records water quality status and trends, and investigates regional solutions for source control. The Stormwater Working Group (SWG) solicits and selects SAM studies and manages the pooled resources contributed by members.

PLANNED ACTIVITIES

The City will continue its involvement in this regional collective.