2025
City of Bremerton
Stormwater Management Program (SWMP)
Western Washington NPDES Phase II
Municipal Stormwater Permit
WAR04-5507

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Contents

Stormwater Management Program Summary

Introduction

The City of Bremerton is a medium-sized city located on the Kitsap peninsula in Western Washington. Bremerton is surrounded by water, forest lands, and scenic views of the Olympic Mountains to the west, the Cascade Range to the east, and majestic Mt. Rainier located to the southeast. An average of 54" of rain falls on Bremerton each year. This rainfall provides water to local lakes, wetlands, streams, and recharges our aquifers that provide drinking water. Shallow aquifers are recharged by rainfall and provide year-round base flow in our steams.

Rainfall is one of the more important assets for the region, but our daily activities can leave pollutants on the ground that can be caught in this rainfall and carried by runoff to local surface waters. Impervious surfaces such as paved streets, parking lots, building rooftops, and gravel areas are not able to infiltrate rainwater into the ground. Rainfall that encounters these impervious surfaces becomes stormwater. Historically, because of this inability to infiltrate stormwater, Municipal Separate Storm Sewer Systems (MS4s) were constructed throughout the built environment to collect and convey stormwater to receiving waters to prevent flooding and keep roads open for use. This stormwater runoff also picks up trash, chemicals, oils, dirt, and sediment that can harm our streams, lakes, and Puget Sound. Research has found that stormwater is one of the largest contributors of human generated pollution to Western Washington streams and Puget Sound. This pollution is extremely detrimental to the Puget Sound regional ecosystem and its fish and wildlife.

To protect against stormwater pollution, Best Management Practices (BMPs) are implemented. BMPs can take various forms, such as education and outreach to citizens and businesses to reduce pollutant generating activities, installation of runoff treatment facilities and retrofitting existing facilities to provide better treatment of runoff. Correct use of BMPs can prevent erosion, reduce pollutant mobilization and protect receiving waters from harm.

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. The City of Bremerton is issued a Municipal Phase II Permit.

In 2000, the US EPA finalized the NPDES Phase II rules regulating "small" Municipal Separate Stormwater Sewer Systems (MS4's). The Phase II jurisdictions, such as Bremerton, 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 their 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, Ecology issued a new Phase I permit and two new Phase II permits, one each for Western and Eastern Washington. The City's current Phase II Municipal Permit became effective on August 1, 2024. 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 NPDES Permit (Permit) process sets jurisdictional standards for municipalities to reduce the impacts from both point source and nonpoint source pollution. Permit requirements affect businesses, residents, development, and City activities. Bremerton's Public Works and Utilities (PWU) Department oversees regulatory compliance, provides Operations and Maintenance (O&M) services to the City's infrastructure, and conduct annual reporting as specified in the Permit. The City updates the elements of the Stormwater Management Program Plan (SWMP Plan) annually to meet the requirements of the Permit, and to inform the public of the planned activities for the upcoming year.

City of Bremerton Stormwater Management Program (SWMP)

The elements of the Stormwater Management Program are:

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 Stormwater Management for Existing Development
S5.C.8 Source Control Program for Existing Development
S5.C.9 Operations and Maintenance

The City's Stormwater Program also strives to:

- Implement an Asset Management system to manage the Stormwater Program effectively and proactively. This includes financial management as well as operations and maintenance of the stormwater system.
- Effectively control and convey stormwater runoff within the city limits,
- Provide acceptable levels of service which include:
  - Flood prevention,
  - System condition evaluation and monitoring,
  - Upgrade and replacement of older and failing assets,
- Protect environmental resources:
  - Protect and improve local water quality,
  - Reduce stormwater runoff quantity,
  - Restore streams and eliminate fish barriers,
  - Prepare for and mitigate climate change impacts.
- Promote pollution prevention through business inspections and education,
- Assess and prioritize watershed water quality goals,
- Identify and prioritize water quality improvement retrofit sites,
- Install, monitor, and maintain water quality retrofit treatment systems,
- Compliance with Total Maximum Daily Load (TMDL) clean-up program requirements,
- Maintain a balanced budget for the program.

Legal Authority

Bremerton established the Stormwater Utility in 1994 pursuant to Ordinance 4454 as codified in the Bremerton Municipal Code (BMC) 15.04 - Stormwater. Funding for the Stormwater Utility is provided by user fees as codified in Bremerton Municipal Code (BMC) Title 3.01 Rate and

Fees. Bremerton's SWMP is updated annually as required by the Stormwater Permit and as codified in BMC 15.04.050 - Stormwater Management Program (SWMP). Within this code, the City has adopted Ecology's Stormwater Management Manual for Western Washington (SWMMWW) to establish the minimum requirements for stormwater pollution prevention at new, existing, or redevelopment projects.

Program Evaluation and Coordination

The SWMP is evaluated annually to improve the program and to fulfill Permit requirements. Cost for development and implementation of the SWMP is tracked as required by the Permit. This process is being improved with implementation of the City's Asset Management Program. Bremerton has partnered with other agencies and cities to coordinate stormwater related policies, public education, programs, and projects through interlocal agreements and coordination groups.

Implementation of this SWMP is expected to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable (MEP) and will protect the beneficial uses of our local receiving waters enjoyed by residents, visitors, and fish and wildlife. The Program meets state requirements for use of All Known, Available, and Reasonable Treatments (AKART) to protect water quality.

2025 SWMP Plan

Program activities for 2025 are summarized in this Stormwater Management Program (SWMP) Plan. Required activities are addressed in the same order listed in the Permit. Each section of the plan has a short description of minimum performance measures, a summary of the existing program, and planned program components to fulfill Permit requirements. The Stormwater Program complies with the Growth Management Act, the City's Comprehensive Plan, Shoreline Master Plan, and supports the City's Stormwater Comprehensive Plan which provides long range operational and capital improvement guidance for the Utility.

S5.A - Stormwater Management Program General Requirements

Each Permittee shall develop and implement a Stormwater Management Program (SWMP). A SWMP is a set of actions and activities comprising the components listed in S5 and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 – Compliance with Total Maximum Daily Load Requirements and S8 – Monitoring and Assessment. This Section applies to all cities, towns, and counties covered under this Permit (termed as "Permittee," including cities, towns, and counties that are Co-Permittees).

S5.C.1 - Stormwater Planning

Each Permittee shall implement a Stormwater Planning Program to inform and assist in development of policies and strategies as water quality management tools to protect receiving waters.

S5.C.1.a - Inter-Disciplinary Team

Each Permittee shall continue to convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.

Bremerton's team consists of staff and management from the City's Public Works divisions including Engineering, Stormwater Operations, Maintenance, Facilities, Community Development, and the Parks Department. Bremerton also works closely with the City of Port Orchard, Kitsap County, and Kitsap Public Health to coordinate stormwater pollution prevention activities and treatment retrofits to improve water quality. The team holds *ad hoc* meetings with individual groups and staff, related to their areas of responsibility within the city's organization. Topics reviewed included Permit required stormwater actions, pollution prevention, land use designation and zoning, buildable lands inventory, urban density, road

cover, development pressure, improving existing areas with minimal water quality and flow control treatment, and review and discussion of water quality data.

In 2025, group meetings will be held to review and share consolidated data, gather input on proposed actions, and to continue coordination efforts with Kitsap County and Port Orchard to support regional opportunities where MS4's intermingle.

S5.C.1.b - Coordination with Long-Range Plan Updates

Each Permittee shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report, due March 31, 2027. The Annual Report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, considering stormwater management needs or limitations.

Stormwater pollution reduction efforts have been ongoing for more than three decades with CSO reduction, and private property separation (separating private stormwater systems from the sanitary sewer). Installation of stormwater treatment retrofits has been an ongoing focus of the past 10 years.

Bremerton's most recent Stormwater Comprehensive Plan was completed in 2022. The Comprehensive Plan summarizes how the City's stormwater program has focused on improving water quality in the highest need areas. A report will be developed in 2025 to evaluate how successful the approach has been.

S5.C.1.c - Low Impact Development (LID) Code-Related Requirements

Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.

The intent shall be to make LID the preferred and commonly used approach to site development. The local development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

Bremerton Municipal code 15.04.100 requires the use of LID BMPs to manage stormwater runoff for new and redevelopment. The City's Comprehensive Plan, sub-area plans, and related land development code, BMC 20 – Land Use, requires and encourages use of LID as the

preferred method to manage stormwater. Reduction of impervious areas is encouraged where possible, balanced with public safety concerns such as access road width for emergency and maintenance vehicles.

A city-wide infiltration assessment was conducted by Herrera Environmental Consultants, Inc. in 2017 to identify where infiltration is most likely to be a successful method for stormwater onsite management. This assessment will assist our development engineering staff when evaluating new applicant plans.

In 2025, BMC 15.04 will be reviewed and updated if any barriers to LID are identified or improvements to LID processes emerge. Appropriate members of the coordination group will be tasked with identifying areas where processes, alternatives selection, and implementation can be improved to support developers and capital projects in the city.

S5.C.1.c.iii – Adopt and Implement Tree Canopy Goals

No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing, or future tree canopy can support stormwater management and water quality improvements in receiving waters.

In 2025, the City of Bremerton will pursue a contract with an environmental consultant to establish a program monitoring tree canopy cover. As part of this contract, a benchmark canopy coverage will be established, methods to evaluate changes in canopy coverage, and goals for canopy coverage will be established. The finalized program will be implemented no later than December 31, 2028.

S5.C.1.d - Stormwater Management Action Planning (SMAP)

Stormwater Management Action Planning (SMAP). Permittees shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication no. 24-10-027) for one new priority catchment or additional actions for an existing SMAP.

In 2019 the City began the assessments and planning process for Stormwater Management Action Planning, *per Ecology guidance (Ecology, 2019; Publication 19-10-010).* In 2022 the City completed the receiving water conditions assessment and the basin and receiving water prioritization process. SMAPs were prepared and submitted in 2023 for the top two priority basins: Oyster and Ostrich Bay and Kitsap Lake.

Stormwater Management Action Planning began in 2024 for the third ranked basin group, West Narrows Basin, and will be completed in 2025. There will be a description of the stormwater

facility retrofits needed for the area, including BMP types and preferred locations. Appropriate targeted stormwater management actions will also be developed for the priority basins.

S5.C.2 - Public Education and Outreach

The SWMP shall include an education and outreach program designed to:

- *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; and*
- *Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.*

Permittees may choose to meet these requirements individually or as a member of a regional group. Regional collaboration on general awareness or behavior change programs, or both, includes Permittees developing a consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to effect behavior change. If a Permittee chooses to adopt one or more elements of a regional program, the Permittee should participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.

S5.C.2.a - Education and outreach program

Each Permittee shall implement an education and outreach program. The program design shall be based on local or regional (or a combination of both) water quality information and priority audience characteristics to identify high priority audiences, subject areas, and/or BMPs. Based on the priority audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the priority audience.

Bremerton partners with Kitsap County, through an inter-local agreement, and with other regional municipalities to form the West Sound Stormwater Outreach Group (WSSOG). The WSSOG collaborative effort develops, implements, and funds stormwater education, outreach messages, materials, activities, and program assessment tools for the public, businesses, and other target audiences. Bremerton will continue to partner with WSSOG in 2025 and participate in Puget Sound Starts Here (PSSH).

S5.C.2.a.i – General awareness

To build general awareness, Permittees shall annually select, at a minimum, one priority audience and one subject area from either (a) or (b):

(a) *Priority audiences: General public (including overburdened communities, school age children, college/university, or trade students) or businesses (including home-based, or mobile businesses). Subject areas:*
   - *General impacts of stormwater on surface waters, including impacts from impervious surfaces.*
   - *Low impact development (LID) principles and LID BMPs.*

(b) *Priority audiences: Engineers, contractors, developers, property owners/ managers, or land use planners. Subject areas:*
   - *Technical standards for stormwater site and erosion control plans.*
   - *LID principles and LID BMPs.*
   - *Stormwater treatment and flow control BMPs/facilities.*
   - *Source control BMPs for building materials to reduce pollution to stormwater, including but not limited to stormwater pollution from PCB-containing materials.*

(c) *Permittees shall provide subject area information to the priority audience on an ongoing or strategic schedule.*

Bremerton's selected priority audience for awareness efforts is the general public and this focus will continue in 2025. The City sets up and staffs information tables at water-related public events such as Kids Fishing Day and Kitsap Salmon Tours. A variety of posters and handouts raise awareness of stormwater and receiving water quality and encourage behavior changes in the attendees.

Bremerton School District (BSD) provides environmental education to K-12 students. In return, the City reduces the School District's stormwater fees. The approved curriculum covers science, biology, and environmental topics covering water and climate, salmon, soil erosion, plants, insects, stormwater, pollution, and human impacts on the environment. This program provides local students with a well-rounded knowledge base that supports our environmental restoration and preservation efforts for future generations. The value of the discounted stormwater fees for BSD will be $251,644.54 in 2025.

S5.C.2.a.ii – Behavior change

To affect behavior change, Permittees shall select, at a minimum, one priority audience and one BMP.

Bremerton's ongoing behavior change BMP is pet waste management and disposal. Mutt Mitt bag dispensers are located throughout Bremerton to directly facilitate behavior change, as well as raising awareness of the impact from pet waste left on the sidewalks and in our parks. Fifty City owned and maintained dispensers are installed in parks, public rights-of-way, and on City-owned properties. Residents and private organizations in Bremerton can request to sponsor additional pet waste stations through Kitsap County's website, which are funded by an ILA with Kitsap County. Bremerton stations provided 238,000 pet waste bags to residents and visitors in

2024. This program also assists in meeting Bremerton's TMDL requirements in the Permit and will be continued in 2025.

S5.C.2.a.ii(b) Social marketing campaign development

Based on the recommendation from 2024 evaluation and report, no later than July 1, 2025, each Permittee shall follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan.

The West Sound Stormwater Outreach Group, or WSSOG, is a multijurisdictional partnership between Kitsap County and the Cities of Bremerton, Bainbridge Island, Gig Harbor, Poulsbo, Port Angeles, and Port Orchard. The group works together to develop, implement, and evaluate a regional behavior change campaign. The recent Natural Yard Care behavior change campaign began in 2018 and was fully evaluated in 2023. In 2025 the City, as part of WSSOG, will design and implement a new social marketing program based on recommended dumpster maintenance BMPs.

S5.C.2.a.iii – Stewardship

Each Permittee shall provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement. Permittees may provide, partner with, or promote stewardship opportunities created or organized by existing organizations (including non-Permittees).

Bremerton coordinates a portion of the Sinclair Inlet Cleanup, a volunteer cleanup effort supported by local agencies, business, and residents that was established in 1995. This cleanup effort is conducted twice a year. Stormwater educational materials and program information are provided and displayed at this event. The cleanup volunteers collect trash from the shorelines and local streets, and install storm drain markers when teams are available. Storm drain markers are also provided to Bremerton's schools and local neighborhoods upon request.

The City will continue to promote and participate in the Sinclair Inlet Cleanup efforts in 2025.

S5.C.3 Public Involvement and Participation

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 City of Bremerton recognizes the inherent value of public involvement and engagement with the Stormwater Program and encourages the public to stay informed on current and future Stormwater projects. Bremerton solicits feedback through the City's website, Utility bill messages, e-News emails to customers, and has provided a survey specific to stormwater on its website. To address communities burdened by limited internet access or technology constraints, additional efforts to distribute printed materials and newspaper notifications in these communities has been conducted. In 2024, the City of Bremerton tracked 458 site visits to the Stormwater website, 484 contacts in the Public Works & Utilities Constant Contact List, 2768 followers on X, 4946 followers on the City of Bremerton Facebook page, and 666 followers on the City of Bremerton- Public Works & Utilities Facebook page.

Public access TV and social media will be used again in 2025 to encourage participation in program development. Modified efforts such as printed distribution and newspaper notifications for overburdened communities will continue to be developed. New efforts to distribute multilingual notifications will also be researched for implementation. Other partnership opportunities between the Stormwater Program and the public will be pursued in 2025, including LID guidance, assistance, and site assessments to identify opportunities for business and residents.

S5.C.3.a - Public participation in stormwater planning

Permittees shall 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. Permittees shall document specific outreach measures for overburdened communities.

Public comment and participation are encouraged and accepted through Bremerton's website, customer email list, direct contact, customer response calls, the Permit Center, and the Utility's customer service division. There is an online stormwater survey, and the public can email comments or suggestions about Bremerton's stormwater program to the Stormwater Program Manager. The City SMAP webpage includes a GIS Storymap (https://arcg.is/1qryrP) that is accessible to the public and includes a link to submit feedback.

Public access TV, through the Bremerton Kitsap Access Television (BKAT) station, and social media, specifically Facebook and Twitter, will be used again in 2025 to encourage participation in program development. Modified efforts such as printed distribution and newspaper notifications for overburdened communities will continue to be developed. New efforts to distribute multilingual notifications will also be researched for implementation.

S5.C.3.a.i – Public involvement opportunities for overburdened communities

Annually document specific public involvement and participation opportunities provided to overburdened communities and specifically highly impacted communities.

Currently, Bremerton uses widely available platforms, such as Facebook and Twitter, to spread awareness of city activities. Free printed materials are also left out at city facilities as resources that citizens can avail themselves of. Additionally, publicly available television station BKAT (Comcast channel 12 and Astound/Wave channel 3) is occasionally used to spread stormwater pertinent information.

S5.C.3.a.ii – Identification of overburdened communities

No later than December 31, 2026, document methods used to identify overburdened communities.

Bremerton recognizes and affirms the need to incorporate overburdened communities into the planning process, both as people providing input and people receiving environmental and infrastructure benefits. In 2025, a concerted effort will be made to specifically identify and target best marketing practices using environmental justice resources, state recommendations, and newly developed policies.

S5.C.3.b Post the Stormwater Management Plan (SWMP) on the City's website

Each year upon completion, the SWMP is posted on Bremerton's website at: https://www.bremertonwa.gov/489/Stormwater-Management-NPDES-Phase-II along with the annual Stormwater Report. The Stormwater Comprehensive Plan Update was presented to the public for review and comment and was finalized in 2023.

S5.C.4 MS4 Mapping and Documentation

The SWMP shall include an ongoing program for mapping and documenting of the MS4.

S5.C.4.a - Ongoing Mapping

Bremerton's stormwater system GIS map covers the entire geographic area served, including receiving waters and areas of adjacent jurisdictions and watersheds. Stormwater system features mapped include:

- conveyance system location, size, and material
- outfall location, size, and material
- treatment facility location and type
- connections between the City's MS4 and neighboring jurisdictions

System data are shared between the city and neighboring agencies per the Memoranda of Understanding (MOUs) between Kitsap County and the City of Port Orchard. These MOUs are renewed as needed. New stormwater assets, including collection, treatment, and flow control BMPs, are added as construction is completed. Updated data are available on handheld tablets for field staff to use when needed.

Improvements to the maps, layers, and functionality of the system will continue in 2025.

S5.C.4.b - New Mapping

Each Permittee shall:

S5.C.4.b.i - Outfalls

No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.

Bremerton keeps extensive maps electronically in the ARCGIS software, including all known MS4 outfalls. In 2025, all information will be verified to ensure required data is present.

S5.C.4.b.ii - Tree Canopy

No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.

Bremerton shall map tree canopy and develop requirements and regulations to support and forward stormwater management activities. A consultant will be kept on retainer in order to develop mapping procedures, identify desired outcomes, and anything else to meet this requirement.

S5.C.4.b.iii – Acreage of tributary basins to 24 inch and larger outfalls

No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Submit with the March 31, 2028 Annual Report a map(s) (.pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.

Bremerton maintains extensive digital maps on the ARCGIS software. This software contains maps of all known outfalls along with supporting information, pictures, and more. By March 31, 2028, Bremerton will submit a detailed map and inventory of all outfalls meeting these criteria.

S5.C.4.b.iv – Map of overburdened communities

No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

Bremerton will identify overburdened communities using various resources to satisfy other sections of this permit. When doing so, the area shall be mapped, infrastructure serving these communities will be identified, and stormwater management policies will be evaluated to support these communities.

S5.C.4.c - Electronic Format Mapping

The stormwater system is mapped with ArcGIS Pro (GIS) on an internal network server. Remote access is provided for field staff who can edit layer details and add new data as needed. New development, and new system details are continually added to the layers of the map by GIS technicians and field staff. This is an ongoing project, and an important part of the Stormwater Utility functions.

S5.C.4.e - Providing Mapping to Other Permittees

Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. This Permit does not

preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

Bremerton shares stormwater system data on an annual basis with neighboring agencies per the MOUs with Kitsap County and the City of Port Orchard. This was set up to provide support for ongoing stormwater system map sharing that includes system details, features, and general information where systems merge. The MOU includes support for reporting spills, TESC incidents, IDDE tracing, and source control issues. This effort will continue in 2025.

S5.C.5 - Illicit Discharge Detection and Elimination (IDDE)

The SWMP shall include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

The City has an ongoing program to detect and remove illicit connections and discharges which began in 1995 has continued to evolve as techniques and regulations change to comply with Permit requirements.

Bremerton developed its own software application, Bremerton1, that can be downloaded from the Apple® or Google® stores, for use on cell phones or desktop computers. The application can be used by the public to submit reports of spills, accidents, and various issues the city addresses. All reported issues are recorded in Cartegraph so potential illicit discharges can be recorded and tracked.

In 2025, the program will continue to monitor water quality at outfalls, using the field screening sampling plan, and will respond to notifications, complaints, and reports when they are submitted.

Environmental Reports Tracking Systems (ERTS) from Ecology are also recorded in Cartegraph and dispatched to trained staff from Public Works, or Fire Department as needed. Procedures are in place to provide staff guidance on how to proceed with each type of incident.

Response to reported spills is a coordinated effort with Public Works staff as lead responders for most events. Bremerton's Fire Department responds to larger incidents with Puget Sound Naval Shipyard Hazmat Unit and Washington State Department of Transportation as backup resources. Bremerton distributes and maintains spill kits in all city vehicles, service trucks have larger kits, and city owned facilities have significant cleanup supplies. A portable vacuum system was purchased and installed on a trailer for quick dispatch to incidents where vacuuming materials is needed. Public Works and Utilities staff are trained to operate this equipment.

S5.C.5.c - Prohibit non-stormwater and illicit discharges to the MS4

Each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law. The ordinance or other regulatory mechanism in effect as of the effective date of this Permit shall be revised, if necessary, to meet the requirements of this Section no later than July 1, 2027.

Bremerton has an ordinance to effectively prohibit non-stormwater, illicit discharges into the MS4 to the maximum extent allowable under state and federal law. Bremerton Municipal Code

(BMC) 15.04.190 PROHIBITED ACTS includes a list of "Prohibited Discharges, BMC 15.04 190(b)", including non-stormwater, illegal discharges, and actions such as dumping, damaging, or removing facilities of the MS4. Violations under this section are punishable as a misdemeanor and escalating enforcement is authorized pursuant BMC Title 1.12 General Provisions, Code Enforcement.

In 2025, BMC 15.04 will be evaluated and updated as needed to refine stormwater program requirements for compliance and enforcement actions.

S5.C.5.c.iv - Escalating enforcement procedures and actions

The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.

The City utilizes BMC section 15.04.210 Violation Enforcement – Penalty, to provide an escalating enforcement strategy up to and including civil financial penalties, BMC Title 1.04 Code Enforcement, and/or confinement in Jail per BMC Title 1.12 General Provisions, Code Enforcement.

S5.C.5.d - Implement an IDDE Program

Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.

Bremerton's IDDE program follows the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants and Aspect Consulting, LLC, 2020). The program actively looks for non-stormwater discharges, spills, illicit connections, and illegal dumping into the MS4. Bremerton staff are trained to recognize illicit discharge to the stormwater system and procedures are in place to report, investigate, document, and resolve incidents when found or reported. The Program has identified priority urban areas likely to have illicit discharges and has defined field assessment activities. Bremerton has had an ongoing field screening outfall reconnaissance inventory program since 1997. All known outfalls discharging to marine and fresh waters have been inventoried, inspected, and screened.

To facilitate reporting of spills and illicit dumping, the City advertises its Customer Response Line (360-473-5920), responds to calls from 911 for emergencies, the "Bremerton1" application, the regional hotline KITSAP1 (360-337-5777), and Kitsap County's *SeeClickFix* which is monitored by Kitsap County. Bremerton's response staff are dispatched by a central operator based on information provided by the caller, emailed report, or the Bremerton1 application. If the call is non-specific, the Customer Response staff will go to the site and determine who needs to be dispatched for incident control, or containment, and follow-up, in accordance with

PWU policies. The responder's investigation report and resolution are recorded in a database with the call information to help identify areas of concern in the MS4. This system provides quick response for incidents involving the MS4 by dispatching the appropriate staff for the situation. All reports are logged and tracked in the database from the initial report through resolution.

For incidents that are beyond City capabilities, Bremerton alerts hazmat responders through 911 and other responsive agencies such as the Department of Ecology, Kitsap Department of Emergency Management, PSNS Emergency Response crew, and Kitsap Public Health District.

The "Spills Happen, Help Us Find Them" graphic with reporting phone number is on City Street sweepers, large signs at public facilities, and used in public outreach materials.

In 2025, outfalls will be screened for illicit connections and evidence of illicit discharges. Bremerton's IDDE and source control program will continue its ongoing efforts to find and remedy IDDE/Illicit Connections within City jurisdiction.

S5.C.5.d.i.(a) - Annual field screening of the MS4

All Permittees shall complete field screening for an average of 12% of the MS4 each year.

The City's field screening outfall screening program assessed 35% of the City's stormwater outfalls in 2024. In 2025, sampling and system inspections will occur City-wide as part of the regular annual sampling, as well as on an ad hoc basis.

S5.C.5.e. - Implement a program designed to address illicit discharges.

Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.

Bremerton's program includes procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures address the evaluation of whether the discharge must be immediately contained and the steps to be taken for containment of the discharge.

Procedures for tracing the source of an illicit discharge follow the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera, 2020). The program includes visual inspections, opening manholes, using mobile cameras, collecting samples and contracted laboratory services to analyze water samples. Where practical, field equipment and kits are used for basic water quality parameters, and surfactants. Staff who complete inspections are trained to follow the inspection process and are encouraged to think outside of the box to resolve issues.

Procedures are in place for correcting illicit connections and eliminating illicit discharges, including notification of appropriate authorities (including owners or operators of interconnected MS4s); technical assistance; follow-up inspections; and use of the compliance strategy developed pursuant to S5.C.5.c.iv, including escalating enforcement and legal actions if the discharge is not eliminated. Compliance with the provisions above is achieved by meeting the following timelines:

- Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.
- Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports, or monitoring information that indicates a potential illicit discharge.
- Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.
- Upon confirmation of an illicit connection, use the standard operating procedures to document the issue and effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

S5.C.5.e.ii.(a) – Notification of use of PFAS-containing AFFFs

No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.

In 2025 the City will begin development of reporting protocols working in collaboration with the Fire Department and Fire Marshall.

S5.C.5.f - Permittees shall train IDDE staff

Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

Presentations, training videos, and classes provided as needed to train staff who conduct IDDE program activities. Follow-up training is provided as needed to address changes in procedures, techniques, requirements, or staffing. New City staff complete Stormwater training, which

includes information on how to identify and report possible illicit discharges, as part of their onboarding process. In 2025, IDDE Staff training records will be reviewed and new and continuing training provided as needed.

S5.C.5.g - Record keeping

Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this (IDDE) Section. In the Annual Report, each Permittee shall submit data for the illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the Permittee during the previous calendar year. The data shall include the information and format specified in Appendix 13 and WQWeblDDE. Each Permittee may either use their own system or WQWeblDDE for recording this data.

All reported incidents are recorded in Cartegraph. Monthly and annual reports are automatically generated for all potential illicit stormwater discharges, and incidents can be viewed any time by logging into the tracking system. Cartegraph is used to record assignments of tasks, findings, and resolution for each incident. As part of the annual reporting process all potential IDDE incidents are manually entered into Ecology's IDDE reporting portal WQWeblDDE every year.

S5.C.6 - Controlling Runoff from New and Redevelopment, and Construction Sites

Each Permittee shall implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment, and construction site activities. The program shall apply to private and public development, including transportation projects.

S5.C.6.a - Implement an ordinance or other enforceable mechanism

Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.

No later than June 30, 2027, each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(i) through (iii), below, and shall apply to all applications22 submitted:

i. On or after July 1, 2027.
ii. Prior to January 1, 2017, that have not started construction by July 1, 2022.24
iii. Prior to July 1, 2022, that have not started construction by July 1, 2027.
iv. Prior to July 1, 2027, that have not started construction by July 1, 2032.

Bremerton has adopted Ecology's Stormwater Management Manual for Western Washington (SWMMWW) per BMC 15.04.020 – Adopted Manuals. Site development planning requires developers to submit an application which is reviewed by staff for acceptance and approval.

The City has developed, implemented, and enforces a program to reduce pollutants in stormwater runoff that enters the MS4 from new development, redevelopment, and construction site activities. The program applies to both private and public projects.

New and redevelopment must meet current stormwater regulations within the specified period from the date of project submission/approval. If the project is delayed beyond the accepted period of time, the stormwater portion will need to be updated to meet current requirements.

In 2025 the City will continue to implement escalating enforcement mechanisms for new development, redevelopment and construction sites as specified in its enforcement program.

S5.C.6.c - Permitting and Site Plan Review, and Inspection Program

The program shall include a permitting process with site plan review, inspection, and enforcement capability to meet the standards listed in S5.C.6.c(i-iv), for both private and public projects, using qualified personnel (as defined in Definitions and Acronyms).

Bremerton Municipal Code includes the adopted and implemented codes that provide legal authority for site plan review, inspection, and escalating enforcement procedures necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in the 2024 Ecology SWMMWW.

Regulations are in place with provisions to verify adequate long-term Operations and Maintenance (O&M) of new post-construction permanent stormwater facilities and BMPs in accordance with Permit conditions. The program includes an annual inspection and/or approved alternative inspection frequency and maintenance standards for private drainage systems that are outlined in the 2024 Ecology SWMMWW. Current actions include:

- Recording and tracking all inspections, maintenance, and enforcement actions by staff for inclusion in the Annual Report.
- Providing information to permit applicants regarding NDPES Construction and Industrial permits and the Notice of Intent (NOI) requirement.
- Implementing all existing stormwater codes and programs in compliance with Section S5.C.6 of the Permit.
- Inspecting all new development for permit compliance.
- Providing stormwater training for staff and external partners in the development community.
- Collaborating between Development Engineering and Community Development to update workflow, including tracking total and allowable impervious surface per site.

Planned Activities:

Development Engineering and Community Development will continue to review plats, short plats, new site development and redevelopment. Projects that trigger various thresholds will be required to provide stormwater control measures, install/use BMPs, use LID techniques and practices to meet Permit requirements.

Active construction sites will be inspected once per week (at minimum), during and after large rain events, or as needed to enforce compliance with the approved Temporary Erosion Sediment Control (TESC) plan. Exceedance of water quality or sediment standards will require modification of BMPs through the adaptive management process or the project will be stopped

by notice from the City. Projects that hold a Construction Stormwater General Permit, issued by Ecology, will be checked for appropriate installation and maintenance of BMPs, and good housekeeping practices. TESC inspections that identify BMP deficiencies will be provided to the site developer's Certified Erosion and Sediment Control Lead (CESCL) or site manager to be corrected. If they are unresponsive, the city will notify Ecology of the issue/s through the Environmental Report Tracking System (ERTS). It is expected that the Ecology inspectors will respond to the report and work with the developer to correct these issues, with Bremerton's support, until the issue is resolved. Bremerton strives to work with developers to meet all permit requirements using the most cost-effective approaches.

Good housekeeping practices are enforced for construction sites and all locations in Bremerton through inspections and code enforcement. Division 2 of Bremerton's Engineering Design and Construction Standards was updated to reflect these requirements and provides a good tool for developers. Refresher training and program review will be completed in 2025.

In 2025, Bremerton will conduct the following activities required under this section of the Permit:

- Review and update codes and policies to maintain, improve and adapt programs as necessary to meet permit and program objectives.
- Continue annual inspection of all privately-owned stormwater facilities.
- Implement and review Bremerton codes updated after December 31, 2016, to ensure consistency with LID requirements.
- Review and update the Stormwater Maintenance Manual to reflect changes to the Ecology Manual and add more proprietary treatment systems in 2025.
- Continue to implement the enforcement process for Bremerton staff to align with the updated stormwater code.

S5.C.7 – Stormwater Management for Existing Development

Each Permittee shall implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program shall aim to focus on strategic stormwater investments over longer planning timeframes.

S5.C.7.a Stormwater Retrofits

Permittees shall implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12, using one or a combination of the following:

i. *Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d.), or similar stormwater planning process; and/or*
ii. *Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.*

Bremerton began Stormwater Management Action Planning for the West Narrows stormwater basin in 2024. West Narrow was ranked third for SMAP in the Basin Prioritization completed in 2023. Targeted stormwater retrofit options will be evaluated in the West Narrows SMAP, to be completed in 2025.

S5.C.7.b List of projects for assigned equivalent acres

With each Annual Report, each Permittee shall provide a list of planned, individual projects scheduled for funding or implementation during this Permit term for the purpose of meeting the assigned equivalent acreage in Appendix 12. This list shall include at a minimum the information and use the formatting specified in Appendix 12 (.xlsx file format).

Per Table 1 of Appendix 12 of the Permit, the equivalent acreage for the City of Bremerton is 7.2 acres.

PERMITTEE	POPULATION[4]	ASSIGNED EQUIVALENT ACRES BASED ON 8 ACRES/50,000 POP.
CITY OF KENMORE	24,090	3.9
CITY OF OAK HARBOR	24,760	4
CITY OF BAINBRIDGE ISLAND	25,060	4
CITY OF MERCER ISLAND	25,780	4.1
CITY OF TUMWATER	26,360	4.2
CITY OF CAMAS	27,250	4.4
CITY OF MAPLE VALLEY	28,920	4.6
CITY OF SEATAC	31,910	5.1
CITY OF DES MOINES	33,160	5.3
CITY OF UNIVERSITY PLACE	35,420	5.7
CITY OF MOUNT VERNON	35,500	5.7
CITY OF LONGVIEW	37,780	6
CITY OF LYNNWOOD	38,740	6.2
CITY OF LAKE STEVENS	40,700	6.5
CITY OF ISSAQUAH	40,950	6.6
CITY OF EDMONDS	42,980	6.9
CITY OF PUYALLUP	43,260	6.9
CITY OF BREMERTON	45,220	7.2

Figure 1 Assigned Equivalent Acres from Appendix 12, Table 1

S5.C.7.c Document projects for assigned equivalent acres

No later than March 31, 2028, Permittees shall fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report (due on March 31, 2028) as described in Appendix 12.

S5.C.7.c.i Implementation of projects

Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required.

The City completed an SMAP for the Kitsap Lake stormwater basin in 2023, which included a stormwater retrofit project at Francis Street which will treat 69.3 acres at the northwest corner of the Kitsap Lake basin. Project design was initially funded by the stormwater utility fund. An application for Ecology grant funding for construction was submitted in October 2023. The grant was awarded, and funding became available in July 2024. The project is currently (2024) in final design with an anticipated design completion date of January 2025. Bidding is planned for February 2025.

S5.C.8 - Source Control Program for Existing Development

The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas of existing development that discharge to the MS4. The program shall include application of source control BMPs, inspections, and enforcement.

Bremerton's Source Control Program was implemented in January of 2023. A regional approach to program content is being used to assure that all local jurisdictions provide similar educational materials and guidance.

S5.C.8.a Require source control BMPs

Permittees shall enforce ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities (see Appendix 8 to identify pollutant generating sources).

Permittees shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirements of this Section no later than August 1, 2027.

The City's source control program began inspections in January of 2023. Staff work with business owners to ensure BMPs are in place and provide technical assistance at potential pollution generating properties. City codes support program implementation, and updates will be considered in 2025 to provide clarity where needed.

S5.C.8.b Inventory of potential pollutant generating sites

Permittees shall implement a program to identify publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. Permittees shall update the inventory at least once every 5 years. The inventory shall include:

i. Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8); and

ii. Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.

The City established an inventory in 2022 of public and private institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory includes:

- Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8 of the 2019 Municipal Phase II Stormwater Permit for Standard Industrial Codes).

- Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.

S5.C.8.c Implement an inspection program

Permittees shall implement an inspection program, performed by qualified personnel, for sites identified pursuant to 55.C.8.a.i.

S5.C.8.c.i – Provide all businesses with information about pollutant generating activities

All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the Permit term to allow for tailoring and distribution of the information during site inspections.

Bremerton participated in a regional collaboration group to produce educational materials providing guidance on operational and structural source control measures and BMPs. In 2025 staff will continue to work with business owners and managers to ensure BMPs are in place and provide technical assistance at potential pollution generating properties.

S5.C.8.c.ii – Inspect 20% of businesses per year

The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.

The City's updated Source Control program began in 2023. The program actively promotes education and BMP implementation in the business community. Staff bring education materials for training, limiting spill potential, accessing potential pollutants, and reviews recommended BMPs based on business type and site-specific issues. That City keeps track of the percent of businesses inspected in Cartegraph. In 2024 the 20% goal was achieved in September. This program will continue in 2025.

S5.C.8.d Progressive Enforcement Policy

Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:

i. *If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.*
ii. *When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s) the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.*
iii. *Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.*
iv. *A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.*
v. *Application and enforcement of local ordinances at sites identified pursuant to S5.C.8.a.i., including sites with discharges authorized by a separate NPDES permit.*

Appropriate operational source control BMPs are required for all pollutant generating businesses per Permit requirements. Structural source control BMPs and/or treatment BMPs/facilities, will be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards. Implementation of source control requirements uses education and technical assistance programs to support formal enforcement as needed.

Bremerton has a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable amount of time. The current level of penalties is being reviewed for regional consistency, and changes may be made in 2025.

S5.C.8.e Source control staff training

Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned,

typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

Staff training for the source control program was provided in 2022 by WSU Puyallup and Herrera Environmental Consultants. Ongoing training will be provided as it becomes available.

S5.C.9 - Operations and Maintenance

Each Permittee shall implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts.

Bremerton has an Operation and Maintenance (O&M) program with the goal of preventing or reducing pollutant runoff from municipal operations. The maintenance program is divided into three groups: Stormwater, Facilities, and Parks Maintenance. Each group has their own system components and stormwater facilities to operate and maintain. The groups are trained to provide maintenance service for each of their facilities and features. Cartegraph and GIS are used to track activity and provide a centralized record of all activities and outcomes.

S5.C.9.a - Establish Maintenance Standards

Each Permittee shall implement maintenance standards that are as protective, or more protective, of facility function than those specified in the Storm water Management Manual for Western Washington, or a Phase I program approved by Ecology. For facilities which do not have maintenance standards, the Permittee shall develop a maintenance standard. No later than June 30, 2027, Permittees shall update their maintenance standards as necessary to meet the requirements of this Section.

Bremerton has adopted the 2024 edition of the SWMMWW which meets this requirement. Bremerton's O&M Manual was updated in 2024 and will continue to evolve as new technologies are developed and approved. The O&M Manual is provided to private system owners when requested and is available as a downloadable document from the City's website under Public Works and Utilities in the Stormwater section.

In 2025 Bremerton will continue implementing its maintenance standards, as well as the maintenance standards from the 2024 SWMMWW.

S5.C.9.a.ii - Maintenance needs identified during inspections

Unless there are circumstances beyond the Permittee's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed:

- *Within 1 year for typical maintenance of facilities, except catch basins.*
- *Within 6 months for catch basins.*
- *Within 2 years for maintenance that requires capital construction of less than $25,000.*

Bremerton completes maintenance on its permanent stormwater treatment and flow control BMPs/facilities annually or as needed based on inspection results. When deficiencies are found they are corrected immediately when possible, or within the next 30 days.

S5.C.9.b.i - Maintenance of stormwater facilities regulated by the Permittee

The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S5.C.6.c and shall be maintained in accordance with S5.C.9.a.

Maintenance is conducted in accordance with maintenance standards established in the SWMMWW and Bremerton's O&M Manual, and private system owners are compelled to keep their systems in good operating condition. Review of the manual was completed in 2022, and the guidance was updated to clarify requirements and expectations.

All stormwater treatment and flow control BMPs/facilities that discharge to Bremerton's MS4, regardless of when they were constructed, are inspected, and maintenance is performed when needed. Inspections and correspondence with property owners are documented.

S5.C.9.c – O&M of stormwater facilities owned or operated by the Permittee

City owned and operated stormwater treatment and flow control BMPs/facilities are inspected and appropriately maintained on an annual basis. Stormwater ponds are inspected after major storms to ensure they are fully functional and operating as designed. Repairs and appropriate maintenance actions are completed in accordance with maintenance standards in Bremerton's Stormwater O&M Manual, based on the results of the inspections and/or as needed to keep the facilities operating as designed.

S5.C.9.c.i - Annual inspection program

Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities. Permittees shall implement appropriate maintenance action(s) in accordance with the adopted maintenance standards. The inspection program shall be implemented by qualified personnel.

An annual inspection program ensures these sites are operating and in good working condition. Maintenance of all municipally owned or operated stormwater treatment and flow control BMPs/facilities is completed in accordance with the adopted maintenance standards.

S5.C.9.c.ii - Spot checks after major storm events

Each Permittee shall spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24- hour storm event with a 10 year or greater recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.

City staff routinely check permanent stormwater treatment and flow control BMPs/facilities during and after large storms to verify facility function and integrity. Maintenance and/or repairs are completed as needed to maintain facility operation and functionality.

S5.C.9.c.iii - Inspection of catch basins and inlets owned by the Permittee

Each Permittee shall continue to inspect all catch basins and inlets owned or operated by the Permittee by December 31, 2025 and every two years after. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the Stormwater Management Manual for Western Washington. Decant water shall be disposed of in accordance with Appendix 6 – Street Waste Disposal.

Prior to 2022, catch basins and MS4 inlets owned and operated by Bremerton were cleaned annually as the method for managing the system. Beginning in 2023, catch basin inspections were used to determine maintenance needs. The cleaning schedule meets permit requirements and cycles through the entire MS4 every 2-years.

All Decant water is disposed of in accordance with Appendix 6 – Street Waste Disposal, at the Oyster Bay Public Works complex decant facility. Sediment in decant water settles in the basin and water is discharged to the sanitary sewer system where it is treated at the wastewater treatment plant. All catch basin sediment, debris, and street sweeping spoils are disposed of in accordance with Department of Ecology's Dangerous Waste Regulations (Chapter 173-303-016 WAC) with a disposal permit through Waste Management. The decant facility is operated under a permit and annually inspected by the Kitsap Public Health District.

S5.C.9.c.iv - Compliance with inspection requirements criteria

Compliance with the inspection requirements in S5.C.9.c.i-iii, above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.

Inspection of the MS4 is completed during regular maintenance operations and recorded in the City's GIS map throughout the year. In 2025, assigned maintenance staff will inspect stormwater catch basins for sediment load and damage. Results of the inspection will provide a list of sites in need of cleaning or identify deficiencies that need repairs. Work will be scheduled to complete needed maintenance and repair, prioritized based on significance of the issue.

A GIS based map of all city stormwater assets is available to staff on desktop computers, laptops, smart phones, and handheld tablets. In 2025, maintenance, inspections, correspondence documentation, and tracking will continue to be incorporated into the GIS system databases via the Asset Management system.

Facilities Division and Parks Department stormwater assets are inspected and documented in a cloud-based system to centralize data archiving. Private stormwater systems are inspected by the Public Works Compliance Division. All correspondence and reports from these private inspections are kept in both paper and electronic files attached to a GIS layer. In 2023 the City began digitizing these documents and storing them in the City's Asset Management Software. These efforts continue in 2025.

S5.C.9.d - Implement practices to reduce stormwater impacts from City properties

Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. No later than December 31, 2027, document the practices, policies, and procedures. Lands owned or maintained by the Permittee include but are not limited to: streets; parking lots; roads; highways; buildings; parks; open space; road rights-of-way; maintenance yards; and stormwater treatment and flow control BMPs/facilities.

The following activities shall be 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*
- *Preparing Permittee-owned buildings for renovation or demolition*

The City has been a member of the Regional Road Maintenance Program - Endangered Species Act (RRMP ESA) Program, since December 2001, and has implemented the program elements and has followed the RRMP procedures in its maintenance activities. The program includes the activities listed under section S5.C.9.d and training.

The City has policies and procedures in place for building and grounds maintenance, including parks, trash management, and sediment control. Only certified personnel, in compliance with City policies, may use fertilizers, pesticides, and herbicides. Good housekeeping practices are in place at all City owned properties and facilities. Municipal O&M staff are trained to use pollution prevention techniques to help reduce and prevent pollution of stormwater runoff. All City streets are swept at least twice per year, with major roadways being swept twice per week. Sweeping spoils are disposed of in accordance with Department of Ecology's Dangerous Waste Regulations (Chapter 173-303-016 WAC). During the fall months and into the winter, sweepers are actively collecting leaves and debris 16 hours a day, five days per week or more if warranted. This keeps catch basins clear for stormwater, helps protects water quality, and keeps the MS4 and City streets functioning.

In 2025 Bremerton will continue to follow its guidance procedures and policies that are in place to meet the requirements of this section and reduce stormwater impacts associated with stormwater runoff from jurisdictional activities.

S5.C.9.e – Municipal Street Sweeping Program

No later than July 1, 2027, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.

The following program elements shall be included:

i. *Priority areas: Apply street sweeping program to curbed municipal streets that discharge to outfalls and meet any of the following criteria:*
    a. *High traffic streets, such as arterials or collectors.*
    b. *Streets that serve commercial or industrial land use areas.*
ii. *Program timing: Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required between July and December.*
    a. *Compliance during this Permit term shall be determined by records of a sweeping program designed to sweep all priority areas identified and sweeping at least 90% of priority areas each sweeping event.*
    b. *Permittee may document reasoning for alternative sweeping timing and frequency based on local conditions (e.g., climate) and estimated pollutant deposition quantities. Documentation shall also be based on actual maintenance experience and be certified in accordance with G19 – Certification and Signature.*

iii. *Operational Procedures: Procedures to follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.*

iv. *Street Waste Disposal: Dispose of sweeper waste material in accordance with Appendix 6 – Street Waste Disposal.*

v. *Reporting: No later than March 31, 2028, submit with the Annual Report the following information about the priority areas:*

   a. *Priority areas swept identified on a map (i.e. streets that are considered high traffic (estimated number of vehicles served/or arterials or collectors, and streets serving commercial or industrial land use).*
   b. *Sweeping date(s).*
   c. *Sweeping frequency.*
   d. *Type of sweeper.*
   e. *Total curb miles of priority areas and curb miles swept.*
   f. *Approximation of street waste solids removed for each sweeping event (indicate unit of measurement and wet or dry weight, where available).*

The City of Bremerton is currently evaluating and revising its current street sweeping program to address new and revised practices, targeted pollutants and pollutant reduction goals, sweeping area prioritization, and more. This program will be drafted into a comprehensive manual and be implemented prior to July 1, 2027.

S5.C.9.f - Implement a SWPPP for all equipment maintenance or storage yards

Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity.

SWPPPs have been developed and implemented for all maintenance, and material storage facilities. City owned facilities and Parks have SWPPPs to define requirements for good housekeeping measures, inspections, and maintenance. Stormwater system inspection and maintenance are included in SWPPPs activities and are documented by assigned staff. The Oyster Bay Public Works Facility SWPPP was updated in 2022 and was issued a Conditional No-Exposure exemption.

SWPPPs will continue to be reviewed and updated in 2025 and as needed due to changes in staff and/or requirements. The City will maintain its regular inspection schedule throughout the calendar year.

S5.C.9.g - Implement an ongoing training program for employees

Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, street sweeper operation, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.

Staff complete trainings on basic stormwater pollution prevention, IDDE, spill response, Temporary Erosion and Sediment Control BMP installation and maintenance, and good housekeeping measures. A new training system was implemented in 2021 to further improve staff education opportunities and tracking. Training modules are assigned to city staff and management through NeoGov. Personnel are assigned training based on their job function to expand stormwater knowledge. All Bremerton inspectors are CESCL certified as well as Public Works supervisors and specific Parks Department staff.

The City's comprehensive ongoing training program assures a well-trained workforce. This program reduces or prevents pollution of stormwater runoff and degradation of water quality from City operations and maintenance activities.

S5.C.9.h - Record inspections and maintenance

Maintain records of the activities conducted to meet the requirements of this section.

Facilities, Parks, Compliance, and Stormwater divisions complete inspections and document the results for their locations. Work orders are submitted to the Stormwater Maintenance group by Facilities and Parks staff for assistance beyond their abilities. Tracking and documentation are recorded in Cartegraph and the City's GIS database.

In 2025, the Asset Management System (AMS) will be updated and improved according to user feedback as the system continues to develop.

S7. Compliance with TMDL requirements

The following requirements apply if an applicable TMDL is approved for stormwater discharges from MS4s owned or operated by the Permittee. Applicable TMDLs are TMDLs which have been approved by EPA on or before the issuance date of this Permit or prior to the date that Ecology issues coverage under this Permit, whichever is later.

S7.A.1 TMDL Specific Requirements

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).

Appendix 2 Requirements for the City of Bremerton

Business Inspections:

The Permittee shall inspect facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities) as part of their ongoing inspection program identified in S5.C.8. If the Permittee determines, through inspections or otherwise, that a facility has failed to adequately implement BMPs to prevent bacteria source potential, the Permittee shall re-inspect the facility at least once more during the permit term to verify compliance, and/or initiate enforcement action.

Public Education and Outreach:

Each Permittee shall include public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP under General Awareness.

The City sets up and staffs information tables at water-related public events such as Kids Fishing Day and Kitsap Salmon Tours. A variety of posters and handouts raise awareness of stormwater and receiving water quality and encourage behavior changes in the attendees. The City will continue the established and successful Mutt Mitt program in 2025 which builds awareness of the potential for stormwater pollution by waste left on sidewalks and streets.

Operations and Maintenance:

Each Permittee shall maintain Pet Waste collection stations at Permittee owned or operated lands that are reasonably expected to have domestic animal (dog and horse) use and the potential for pollution to stormwater.

The City has 50 mutt mitt stations across Bremerton, with a special focus on Parks, waterfront locations, and areas where stormwater drains to sensitive areas and waterways. These stations are regularly filled and maintained by City staff in multiple departments. The City also provides additional stations for housing developments, business districts, and residents who request to sponsor a station through an ILA with Kitsap County.

Bremerton provided 238,000 to the public in 2024, resulting in an estimated 79,333 lbs. of pet waste being collected instead of left to pollute the MS4 and local waterways. This program will continue in 2025 and will expand as development or demand increase.

Illicit Connection/ Illicit Discharge Detection and Elimination:

When conducting IDDE field screening during normal course of business (as required by S5.C.5.d for Phase II Permittees, and IC/IDDE as required by S5.C.9.c for Phase I Permittees) in a TMDL area, Permittees are shall screen for bacteria sources when at the drainage circuit's most downstream sampling location. For the purposes of IC/IDDE, stormwater quality sampling is defined as obtaining grab samples of stormwater within the conveyance system of the MS4, at discharge points, and/or outfalls (if there is flow) at each drainage circuit's most downstream accessible sampling location. Permittees shall follow their adopted IDDE Procedures to conduct source tracing efforts if bacteria levels and/or observations trigger a response (see IDDE guidance manual for bacteria trigger levels).

Qualitative and quantitative information about the source identification and elimination activities, including procedures followed, sampling locations, and results shall be annually documented in TMDL reporting as required in the Permittees' Annual Report.

Bremerton's IDDE program follows the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants and Aspect Consulting, LLC, 2020). The program includes visual inspections, opening manholes, using mobile cameras, collecting samples and contracted laboratory services to analyze water samples. Where practical, field equipment and kits are used for basic water quality parameters, and surfactants. Staff who complete inspections are trained to follow the inspection process and are encouraged to think outside of the box to resolve issues.

Procedures are in place for correcting illicit connections and eliminating illicit discharges, including notification of appropriate authorities (including owners or operators of interconnected MS4s); technical assistance; follow-up inspections; and use of the compliance strategy developed pursuant to S5.C.5.c.iv, including escalating enforcement and legal actions if the discharge is not eliminated.

Additional Activities Planned for 2025

Stormwater Comprehensive Plan Update

Bremerton completed the Stormwater Comprehensive Plan update in 2023. The plan includes:

- Updated 6- and 20-year capital improvement plans with treatment retrofit opportunities,
- Inventory of surface waters and known water quality problems,
- Inventory of salmon migration and habitat barriers within the city limits,
- Stormwater Permit compliance program elements,
- Overall review of Bremerton's stormwater program,
- Water quality restoration activities as required by the Sinclair Dyes Inlets Fecal Coliform TMDL.

Code Review/Updates

In 2025, relevant sections of the BMC will be reviewed and updated as needed to address deficiencies, clarify the permitting process, adopt new programs, and enhance escalating enforcement measures.

Asset Management Program

Bremerton will continue the development of the Asset Management Program in 2025 for the Stormwater Utility. The program will become the center point used for implementing and tracking work orders for maintenance and repair, inspection scheduling, records and documentations, as well as financial tracking.

Resources

Links to the current Annual Report, Stormwater Management Program, and Municipal NPDES Phase II permit can be found on the City's website at: www.bremertonwa.gov. Printed copies are available for a per-page cost and may be requested by calling the Public Works office.

Request for Comments

The public is encouraged to participate in the development of the SWMP Plan. Please contact the Public Works Department with questions, comments or suggestions.

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