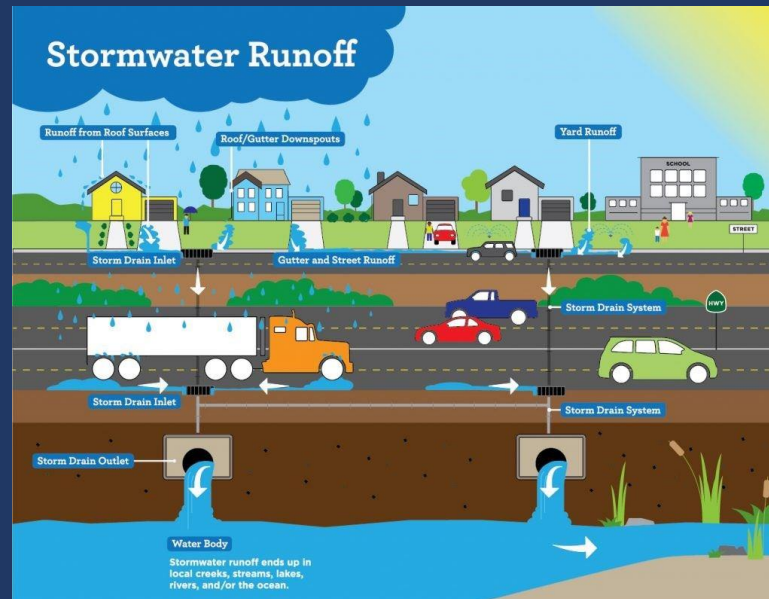


Watershed Council Meeting – September 19, 2024

National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit 2024-2029 Overview & City of Bainbridge Island Stormwater Management Program (SWMP)

Stella Collier, COBI Stormwater Management Permit Coordinator





Why do we have NPDES Permits?

Clean Water Act of 1972

- Restore and maintain integrity of our Nation's waters
- Goal is for waters to be fishable and swimmable





Why do we have NPDES Permits?

- **NPDES Permit System is under the Environmental Protection Agency (EPA)**
 - Permits regulate point source pollution
 - Authority delegated to State agencies





In Washington State, NPDES Permits are issued by Department of Ecology

- There are many types of NPDES permits
- For stormwater, COBI is permitted under the Western Washington Phase II Municipal Stormwater Permit and is now in its fourth permit cycle
 1. 2007-2012
 2. 2013-2018
 3. 2019-2024
 4. **2024-2029**



Stormwater Management Program (SWMP)

- Reporting Requirements
 - Annual SWMP Plan and Annual Report due March 31 every year
 - SWMP Cost Tracking Reporting – **New Requirement (sort of)!**
- 9 SWMP sections:
 1. Stormwater Planning
 2. Public Education and Outreach
 3. Public Involvement and Participation
 4. MS4 Mapping and Documentation
 5. Illicit Discharge Detection and Elimination
 6. Controlling Runoff from New Development, Redevelopment, and Construction Sites
 7. Stormwater Management for Existing Development – **New Section!**
 8. Source Control Program for Existing Development
 9. Operations and Maintenance



1. Stormwater Planning

“...to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.”

Minimum Performance Measures:

- Continue the interdisciplinary team
 - Christian Berg – Water Resources Specialist
 - Dave Marquis – Operations and Maintenance Supervisor
 - DeWayne Pitts – Finance Director
 - Jennifer Sutton – Senior Planner
 - Paul Nylund – Development Engineering and Water Resources Manager
 - Peter Best – Senior Planner
 - Peter Corelis – City Engineer
 - Stella Collier – Stormwater Management Program Coordinator
- Coordination with long-range plan updates
 - Reporting requirement by 3/31/2027
- Low impact development code-related requirements
 - Annual reporting requirement for identified administrative barriers and measures to address the barriers



1. Stormwater Planning continued

“...to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.”

Minimum Performance Measures:

- Adopt and Implement tree canopy goals and policies by 12/31/2028
 - Tree canopy cover goal recommendations were provided to City Council in May 2019 with the Tree Resource Code and Policy Revision Recommendations (COBI, December 2018).



1. Stormwater Planning continued

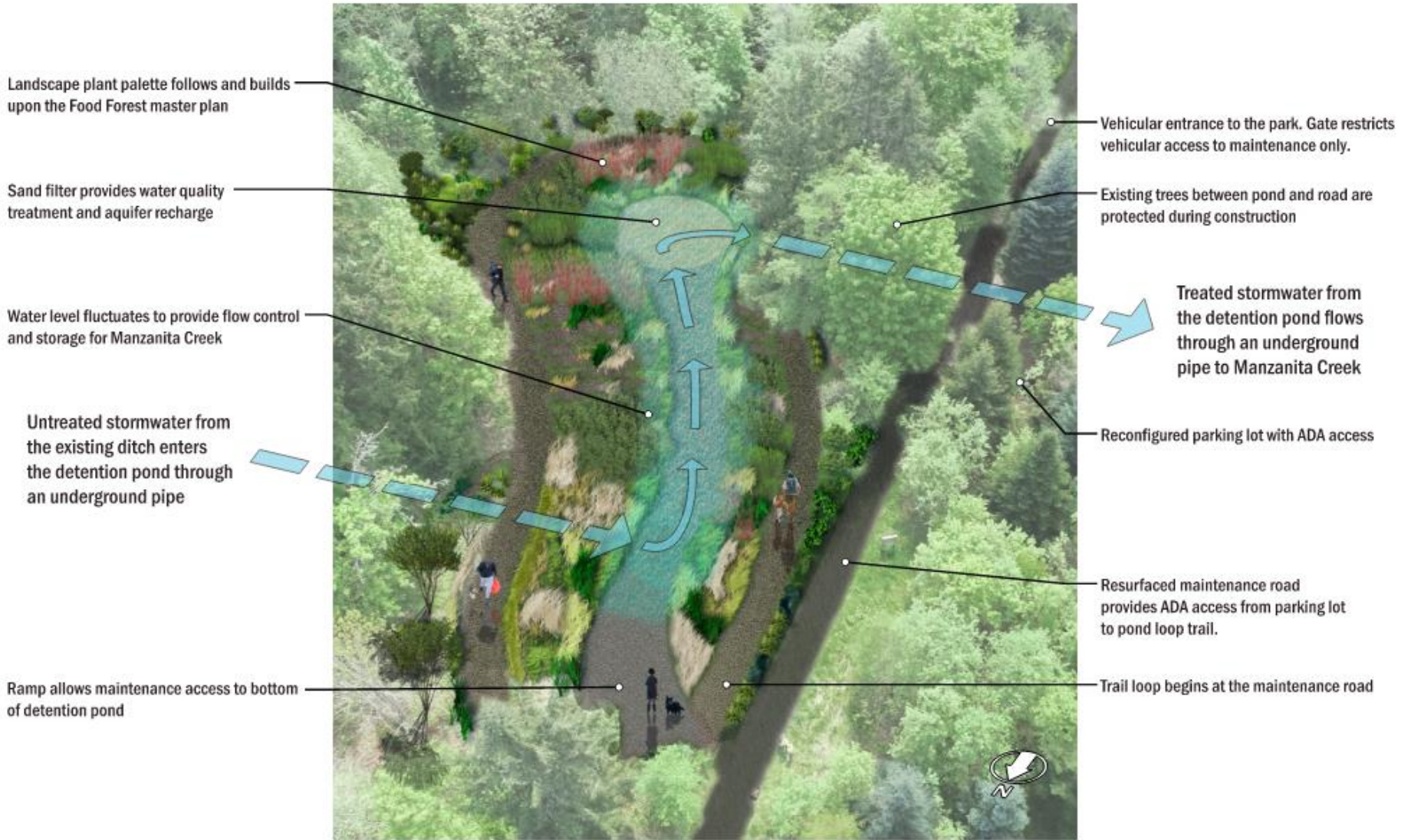
“...to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.”

Minimum Performance Measures:

- Stormwater Management Action Plan (SMAP)
 - SMAP for Manzanita Watershed eastern catchment awaiting City Council Approval with Stormwater System Plan
 - Short (1-6 years) and long term (7-20 years) actions
 - Retrofit project opportunities
 - Enhanced stormwater management
 - Land management/development strategies
 - Due 3/31/2027 – Create new SMAP for one new high priority catchment or update existing SMAP

SMAP Retrofit project opportunity for Manzanita Watershed eastern catchment

STORMWATER PARK BAINBRIDGE ISLAND NATIVE FOOD FOREST (BINFF)





2. Public Education and Outreach

Minimum Performance Measures:

- Build General awareness
 - Annually select 1 priority audience + 1 best management practice (BMP) and provide information ongoing or scheduled
- Effect behavior change
 - Social marketing campaign implementation by 9/1/2025
 - Continue Natural Yard Care?
 - Pet Waste Program/Mutt Mitt Program
- Provide and/or partner and promote stewardship opportunities
 - Salmon monitoring program
 - Beach cleanup event
 - Parks and Weed Warriors weeding/planting events
 - Plant sales



3. Public Involvement and Participation

Minimum Performance Measures:

- **Create opportunities for the public, including overburdened communities, to participate in decision-making processes**
 - Public forums including:
 - City Council and Environmental Technical Advisory Committee meetings
 - Community Groups public meetings – like this one!
 - Online through City webpages and Engage Bainbridge, social media outlets, and listservs
- **Keep most current SWMP Plan posted on website**



www.bainbridgewa.gov/stormwater



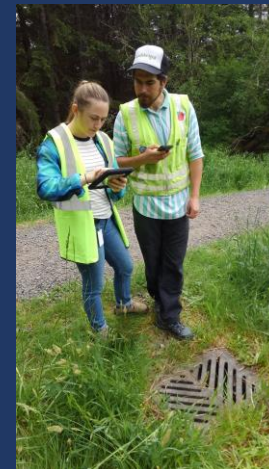
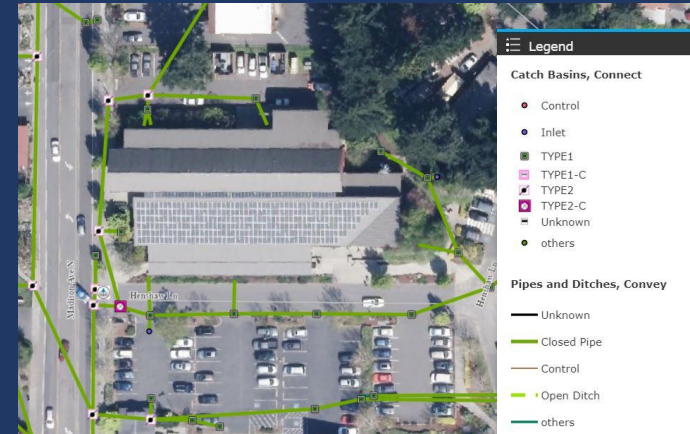
4. MS4 Mapping and Documentation

Minimum Performance Measures:

• Ongoing and New Mapping

- Outfalls data standardization by 3/31/2026
- Tree canopy with existing data 12/31/2024
- Tributary basins by 3/31/2028
- Overburdened communities by 12/31/2028

❖ Due to not having mapping staff, the City is currently out of compliance on mapping and has notified Department of Ecology





5. Illicit Discharge Detection and Elimination

Minimum Performance Measures:

- Program for identifying, reporting, correcting or removing illicit connections, spills, and discharges
- Publicly listed and publicized hotline for public reporting of spills and discharges
 - **Kitsap1: 360-337-5777**







5. Illicit Discharge Detection and Elimination

Minimum Performance Measures:

- Have and enforce regulatory mechanisms to prohibit illicit discharges
 - BIMC 15.22 – Illicit Discharge Detection and Elimination
 - ✓ Updated in 2024 for PCBs/building washing and Source Control
- Inform people on hazards of improper waste disposal

Help water quality by keeping drugs out of the water cycle.



Saturday, October 27 | 10 a.m. – 2 p.m.
DEATakeBack.com

Drop off at BIPD station at 625 Winslow Way E.



Household Chemical Collection Event SATURDAY, June 15th, 2019
10am - 4pm
7305 Hidden Cove Rd., Bainbridge Island



ACCEPTED AT NO CHARGE:

- ✓ Adhesives
- ✓ Aerosols
- ✓ Automotive fluids (excludes motor oil, antifreeze)
- ✓ Corrosive Cleaners
- ✓ Flammable liquids
- ✓ Lawn and garden chemicals
- ✓ Oil-based paints and stains
- ✓ Paint thinner
- ✓ Pool and spa chemicals

NOT ACCEPTED

- ✗ LATEX PAINT
- ✗ MOTOR OIL
- ✗ ANTIFREEZE
- ✗ BATTERIES
- ✗ LIGHT BULBS, TUBES
- ✗ PROPANE TANKS
- ✗ NEEDES
- ✗ MARINE FLARES
- ✗ NO BUSINESS OR NON-PROFIT WASTE
- ✗ NO CONTAINERS > 5 GALLONS

SAFETY

- Do not mix products
- Transport items in leak-proof tubs
- Keep in original containers, or label containers

What Do I Do With It? Recycle KitsapGov.com
Kitsap County Public Works - Kitsap | 360.537.5277



5. Illicit Discharge Detection and Elimination

Minimum Performance Measures:

- Field screening for detection
 - 12% of MS4 annually
 - Inspections of catch basins, ditches, outfalls, video, business, etc.
- Reporting
- Record keeping
- Ongoing training programs for staff in identifying, investigating, cleanup, and reporting of illicit discharges, connections, and spills





6. Controlling Runoff from Development, Redevelopment, and Construction Sites

Minimum Performance Measures:

- Enforceable mechanisms that address runoff from development and construction and the use of minimum requirements as defined by the Stormwater Management Manual of Western Washington (SWMMWW)
 - **BIMC 15.19 – Site Assessment Review**
 - **BIMC 15.20 – Surface Water and Stormwater Management**
 - ❖ Need to update and adopt 2024 SWMMWW by 6/30/2027
 - **BIMC 15.21 – Stormwater Facilities Maintenance Program**
(more to ensure long-term operations and maintenance)



6. Controlling Runoff from Development, Redevelopment, and Construction Sites

Minimum Performance Measures:

- Program for site plan review, inspection, and enforcement
- Training for staff





6. Controlling Runoff from Development, Redevelopment, and Construction Sites

Site Plan Review and potential 9 Minimum Requirements:

1. Prepare a stormwater site plan
2. Construction stormwater pollution prevention
3. Source control of pollution
4. Preservation of natural drainage systems and outfalls
5. On-site stormwater management
6. Runoff treatment
7. Flow control
8. Wetlands protection
9. Operations and maintenance



7. Stormwater Management for Existing Development – **New Section!**

Minimum Performance Measures:

- Implement stormwater facility retrofits
 - Recommended to select one already identified in SMAP
- By 3/31/2028 needs to start construction or have completed construction on retrofit project
- Annual reporting documentation to report equivalent acreage (4 acres for COBI)



8. Source Control Program for Existing Development

“...shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to MS4.”

Minimum Performance Measures:

- Enforcement Mechanisms
 - BIMC 15.22 – Illicit Discharge Detection and Elimination
 - ✓ Updated in 2024 for PCBs/building washing and Source Control
- Site Inventory – update every 5 years
- Inspection Program – inspect 20% of inventory every year
- Progressive Enforcement Policy
- Recordkeeping
- Staff Training



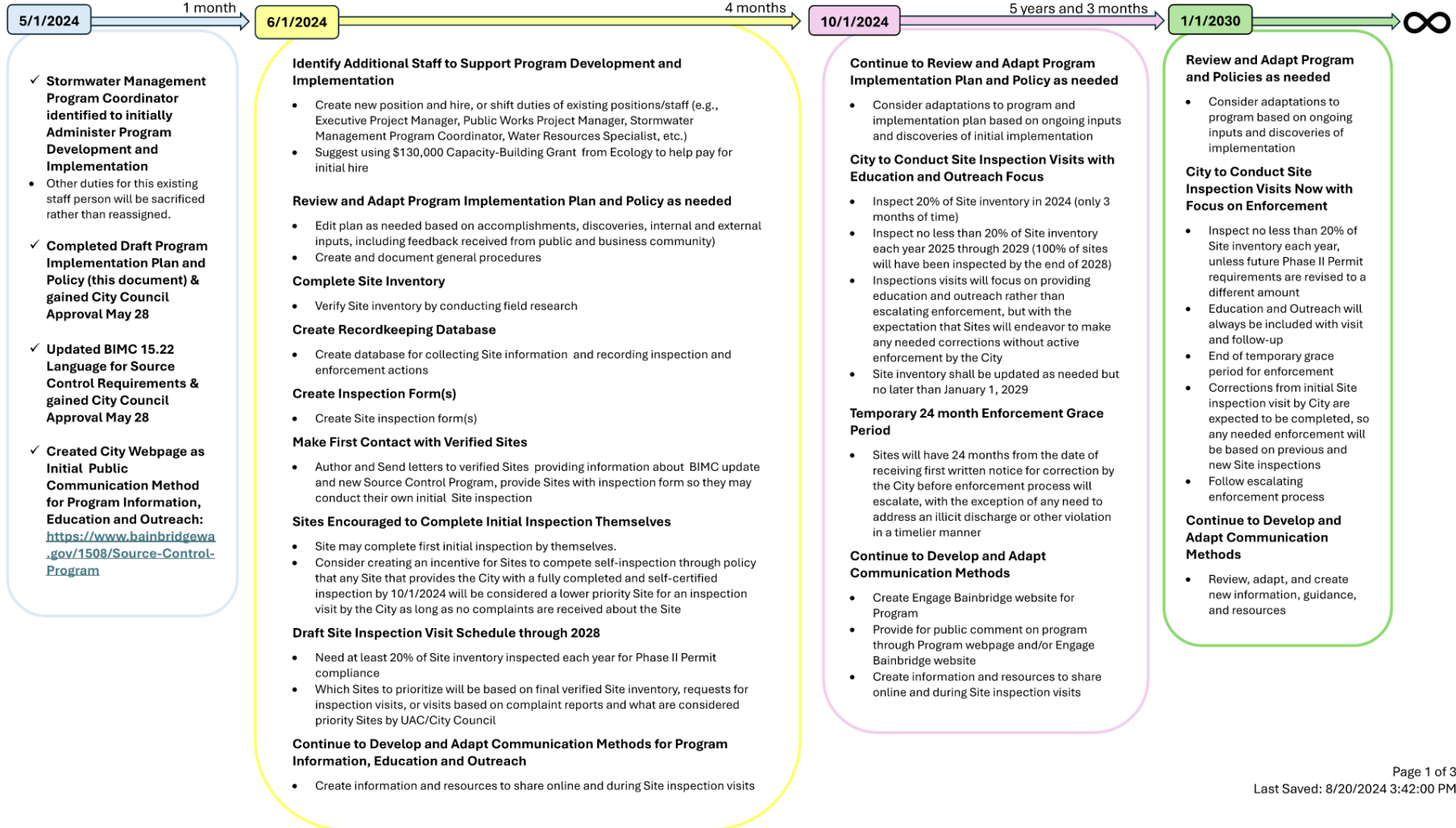
8. Source Control Program for Existing Development



- ❖ Due to not having mapping staff, the City is currently out of compliance on developing and implementing its source control program and has notified Department of Ecology

COBI Source Control Program – Initial Policies and Implementation Plan as of August 20, 2024

Program Development and Implementation Timeline



Program Development and Implementation Policies

❖ Site Inventory

- Sites are individual businesses identified based on [North American Industry Classification System](#) (NAICS) Code as provided with approved COBI business license
- Site inventory is currently only those businesses that are identified by a NAICS Code that is included on the list provided in the Appendix of the [Western Washington Phase II Municipal Stormwater Permit](#)
 - The City can decide to include businesses not included on the list at any time

❖ Site Inspections

- Sites will be asked to complete an initial Site inspection by themselves and they may submit the inspection to the City for the incentive benefit of putting off a Site inspection visit by the City until an otherwise later date, thus extending the timeline for enforcement of any potential needed corrections.
- First Site inspection visits by the City between 10/2024 through 12/2029 will focus on education and outreach with the exception of any need to enforce addressing an illicit discharge or other violation.
- Sites will be prioritized for inspection based on business type, location, complaints, and known or perceived risk to MS4.
 - When the Site inventory is verified, the City will have a clearer understanding of the Sites – and will then work to identify a reasonable prioritization order that will be made public for the public to comment on
- Sites that are not standalone but are part of a larger business complex will be inspected as individual Sites based on their business activities, and the complex will be considered the parent Site and will also be inspected and expected to comply with requirements for the property as well as hold their tenants responsible for compliance of their business activities on their property.
- Between the years of 2024–2029, inspections will focus on these compliance areas, and additions may be made based on inspection results:
 - Following BIMC 8.24 for Disposable Food Service Ware and Waste Reduction
 - Documented Spill Prevention and Response Plans
 - Staff training
 - On-Site spill supplies/kits
 - Site/property sanitary sewer pre-treatment and maintenance, especially for fats, oils, and grease (F.O.G.)
 - Site/property stormwater system maintenance
 - Completely covered dumpster/waste collection areas for protection from coming into contact with precipitation
 - Completely covered hazardous materials and waste storage and disposal areas for protection from coming into contact with precipitation, and secondary containment for protection from leaks or spills
 - Prevent and control runoff and illicit discharges from outside cleaning activities
 - Keep parking areas and business accessways swept and clear of sediment and trash debris
 - Reducing and eliminating the application of pesticides, herbicides, and fertilizers at and around the site.
- Beginning 2030, inspections may begin to also include these compliance areas, and additions may be made based on inspection results:
 - Secondary containment or connection to sanitary sewer for dumpster/waste collection areas
 - Inside cover and secondary containment for hazardous materials and waste storage and disposal areas
 - Prevent and control runoff from hood vent cleaning and other roof cleaning activities
 - Operations and maintenance plans for Site sewer pretreatment system(s)
 - Operations and maintenance plans for Site/property stormwater system
 - Eliminating the application of pesticides, herbicides, and fertilizers at and around the site, unless otherwise authorized by the City, by using preferred natural and organic methods, and products, if necessary.

❖ Enforcement

- Source Control BMPs will be enforced primarily by BIMC 15.22, Illicit Discharges Detection and Elimination, and if necessary, other relevant City codes.
- Site business owners will be considered the primary responsible party for compliance with their business activities.
- Property owners will be considered the primary responsible party for compliance with their property and with any Sites, if any Sites in the Site inventory are located on their property.
- Site business owners and property owners, if they are different, are expected to work together on compliance issues related to the property. Property owners are considered the Parent Site, and are responsible for ensuring business Sites on their property are in compliance.
- Before, January 1, 2030, Sites will have 24 months from the date of receiving first written notice for correction by the City before enforcement process will escalate, with the exception of any need to address an illicit discharge or other violation in a timelier manner.
- After January 1, 2030, Sites will no longer have an extended grace period to make corrections. Sites will receive written notice of correction that will include a reasonable timeframe to complete corrections before enforcement will escalate based on BIMC.

❖ Financial Incentives for Sites

- COBI could consider reducing or eliminating permit cost for needed permits for certain correction activities (e.g., cover for dumpster areas, new connections to sanitary sewer or storm sewer, accessory buildings for materials or waste storage and secondary containment)

❖ **Financial Costs for City**

- Staff and technology to administer the Source Control Program
- Education and outreach materials
- Ongoing additional POTW and MS4 operations and maintenance cost due to the absence of pretreatment and source control by Sites
- If City uses financial incentives for Site there will be cost to the City, but the benefit should outweigh the cost (such as the City will see reductions in cost to operate and maintain POTW and MS4)
- Cost for City to bring City facilities into compliance

❖ **COBI Compliance**

- City will endeavor to be in compliance with corrections by January 2026 to be an example and to learn from the process.
 - Need to inspect City first before any other Site (known already are dumpster/waste areas to be covered as well as Spill Prevention and Response Plans for all Sites)
 - The date of January 2026 provides the City time to plan, budget, schedule, and complete corrections in a reasonable timeframe.
 - If correction process is discovered to be difficult, the City may consider adaptations to ease the process for Sites



9. Operations and Maintenance

“...shall implement and document a program to regulate maintenance activities and to conduct maintenance activities... to prevent or reduce stormwater impacts.”

Minimum Performance Measures:

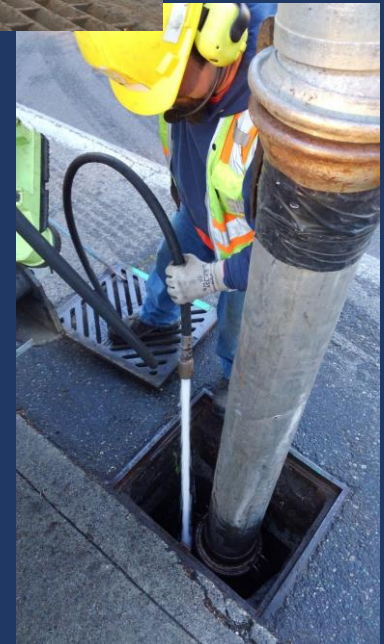
- Staff Training
- Recordkeeping
- Maintenance Standards update by 6/30/2027
- Policy Practices and Procedures update by 12/31/2027
- Stormwater Pollution Prevention Plan (SWPPP) for heavy equipment maintenance and storage yards
 - Annual Inspections



9. Operations and Maintenance

Minimum Performance Measures:

- Program to verify and enforce maintenance of private systems
 - BIMC 15.21 – Stormwater Facilities Maintenance Program
 - Stella conducts inspections and coordinates enforcement
- Inspections and maintenance on public system
 - Annual inspections for flow control and treatment facilities
 - Biennial inspections for catch basins
 - Spot checks after heavy rain events





9. Operations and Maintenance

Minimum Performance Measures:

- Street Sweeping Program – **New Requirement!**
 - Develop and implement program by 7/1/2027
 - Sweep priority areas 3 times each year





How does COBI pay for SWMP staff and activities?





How does COBI pay for SWMP staff and activities?



Storm and Surface Water Utility Fee – collected with property taxes

- Fee rate for 2024 is \$236 for residential properties
- Fee rate for commercial properties varies depending on amount of impervious surface
- COBI collects over \$2 million in fees annually

Chance of

Rain: 100%