

This is a copy of the City's Stormwater Management Program (SWMP) Plan. It defines what the City plans to do to reduce adverse stormwater runoff impacts on downstream receiving waterbodies.

We would like your input on methods to improve the quality of our stormwater and the environment.

Please let us know if you have any comments, ideas, or concerns! You can provide feedback directly to City Hall at 321 East Fifth Street, attention Stormwater Engineer. You can also call the stormwater hotline at 360-417-4830, or send an email to [stormwater@cityofpa.us](mailto:stormwater@cityofpa.us).

# **City of Port Angeles**

## **Stormwater Management Program Plan**

Revised: March 30, 2020



As required by the

Western Washington Phase II Municipal Stormwater Permit  
State of Washington – Department of Ecology

Permit Number: WAR045028  
Permit Cycle: 2019-2024

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## **BACKGROUND AND INTENT**

The City of Port Angeles (City) was issued a Western Washington Phase II Municipal Stormwater Permit (Permit) on January 17, 2007. The Permit was issued by the State of Washington's Department of Ecology (Ecology) in compliance with the State of Washington Water Pollution Control Law (Chapter 90.48 Revised Code of Washington) and the Federal Water Pollution Control Act (Title 33 United States Code, Section 1251 et seq). The Permit was renewed on August 1, 2013 for a five-year term (2013-2018), however, Ecology extended the permit an additional year into 2019. On August 1, 2019, Ecology updated and renewed the permit for another five-year term (2019-2024). The Permit authorizes the City to discharge from the municipal separate storm sewer system (MS4) to surface waters and ground waters of the state.

A Stormwater Management Program (SWMP) was developed by the City to meet the specific requirements of Special Condition S5 of the Permit: "Stormwater Management Program for Cities, Towns, and Counties." The SWMP Plan is a written set of planned actions and activities designed to reduce the discharge of pollutants to the maximum extent practicable and to protect water quality.

The organization of the City's SWMP reflects the eight core components required by Special Condition S5 under the active Permit; the corresponding permit sections are provided in parentheses:

1. Stormwater Planning (S5.C.1)
2. Public Education and Outreach (S5.C.2)
3. Public Involvement and Participation (S5.C.3)
4. MS4 Mapping and Documentation (S5.C.4)
5. Illicit Discharge Detection and Elimination (S5.C.5)
6. Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)
7. Operation and Maintenance (S5.C.7)
8. Source Control Program for Existing Development (S5.C.8)

The City's SWMP Plan is updated and submitted to the Department of Ecology annually, as required. A digital copy of the SWMP Plan is available on the City's stormwater web page. Updates to the Plan for each calendar year are posted by March 31<sup>st</sup>, as require by the Permit

Many of the activities described in the SWMP are planned activities, and their inclusion in this document does not guarantee that they will be implemented as described. A annual report of actual activities performed is submitted annually to Ecology.

The public is encouraged to participate in the ongoing development and improvement of the SWMP. To provide input, contact the Department of Public Works and Utilities with questions, comments, or suggestions at:

Address: 321 East Fifth St, Port Angeles, WA 98362

Phone: (360) 417-4830 (Stormwater Hotline)  
(360) 417-4745 (Illicit Discharge Hotline) **\*Report a Spill\***  
(360) 417-4701 (City Stormwater Engineer)

Email: [illicitdischarge@cityofpa.us](mailto:illicitdischarge@cityofpa.us)

Website: <http://www.cityofpa.us> .... CLICK >> [Business... Stormwater Management Program](#).

Digital Copy: SELECT >> [Stormwater Management Program planning document \(PDF\)](#).

Web Form: SELECT >> [Stormwater Plan Survey](#)

## **1) STORMWATER PLANNING**

The City is in the process of creating a Stormwater Planning Program designed to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. During the current permit cycle, this program will be developed and implemented within the allowable timeframes to meet the requirements of the new 2019-2024 Permit.

### ***a) STORMWATER PLANNING TEAM***

Within the City, inter-departmental communication and coordination regarding stormwater management (i.e. code changes, permit compliance, low-impact development standards, illicit discharges, pollution prevention, education and outreach, permitting, tracking, permit compliance, etc.) has been well-established, as documented by the City's Inter-Departmental Coordination Mechanism Policy included in Appendix A. This Stormwater Permit Coordination Group (SWPCG) is being expanded upon to include a committee dedicated to inform and assist in the development, progress, and influence the Stormwater Planning Program. A written purpose statement is currently being developed and the City's Stormwater Planning Committee is scheduled to be convened by August 1<sup>st</sup>, 2020.

### ***b) LONG-RANGE PLAN COORDINATION REPORT***

During this permit Cycle, the City will be monitoring, evaluating, and describing in a report to Ecology how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies.

The 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, or taking into account stormwater management needs or limitations.

Included in the City's 2020 annual report to Ecology (due on or before March 31, 2021), the City will respond to the series of Stormwater Planning Annual Report questions to describe how anticipated stormwater impacts on water quality were

addressed, if at all, during the 2013-2019 permit term in updates to the Comprehensive Plan (or equivalent) and in other locally initiated or state-mandated, long-range land use plans that are used to accommodate growth or transportation.

These same questions will be applied to the current permit cycle and used to generate a Long-range Plan Coordination Report to Ecology, due January 1<sup>st</sup>, 2023.

### **c) LID CODE-RELATED REQUIREMENTS**

The City will continue to require Low-impact Development (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 being to make LID the preferred and commonly-used approach to site development. The local development-related codes, rules, standards, or other enforceable documents will be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

#### **i) LID BARRIER ASSESSMENT**

Annually, the City will assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with Ecology's 2013 Permit, and the measures developed to address the barriers. If applicable, the assessment will describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.

### **d) STORMWATER MANAGEMENT ACTION PLANNING (SMAP)**

During this permit cycle, the City will develop a comprehensive stormwater planning approach that is focused on addressing impacts from the cumulative development in a watershed rather than on single site or subdivision impact. The purpose of this effort to determine:

- How the City can most strategically address existing stormwater problems, and
- How the City can meet future population and density targets while also protecting and improving conditions in receiving water.

The resulting SMAP will strategically identify approaches to accommodate future growth and development while preventing water quality degradation and/or improving conditions in receiving waters harmed by past development.

#### **i) RECEIVING WATER ASSESSMENT**

In order to develop and implement a strategic plan of action, the City will first identify receiving waters that are most likely to receive a benefit. To achieve this, the City will document and assess existing information related to our local receiving waters.

A tabulated watershed inventory that includes a brief description of the relative conditions of the receiving waters and the contributing areas will be consolidated,

per permit requirements, and submitted to Ecology by March 31<sup>st</sup>, 2022. The submittal will include a map of the delineated basins that references back to the watershed inventory table and identifies which receiving waters have a relatively low stormwater management influence and will not be included in the next step; prioritization.

## ii) RECEIVING WATER PRIORITIZATION

Informed by the assessment of receiving water conditions, and other local and regional information, the City will develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions. The retrofits and actions shall be designed to:

- Conserve, protect, or restore receiving waters through stormwater and land management strategies that act as water quality management tools,
- reduce pollutant loading, and 3) address hydrologic impacts from existing development as well as planned for and expected future buildout conditions.

This prioritized and ranked list of receiving waters will be documented no later than June 30, 2022, along with the process used to identify high priority receiving waters. Additionally, the ranking process will include the identification of high priority catchment area(s) for focus of the Stormwater Management Action Plan (SMAP).

## iii) SMAP DEVELOPMENT

In this step, the City will develop an SMAP for at least one high-priority catchment area that will:

- Identify specific stormwater management actions to protect water quality in the selected receiving water, and
- Determine an appropriate schedule and budget source(s) for implementing the activities and projects identified.

As required by the Permit, this SMAP will be developed by March 31<sup>st</sup>, 2023 and will include the following:

1. A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations.
2. Land management/development strategies and/or actions identified for water quality management.
3. Targeted, enhanced, or customized implementation of stormwater management actions related to permit sections within section S5 of the Permit, including:
  - a. IDDE field screening,
  - b. Prioritization of Source Control inspections,
  - c. O&M inspections or enhanced maintenance, or



d. Public Education and Outreach behavior change programs.

Identified actions will support other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area in particular.

4. If applicable, identification of changes needed to local long-range plans, to address SMAP priorities.
5. A proposed implementation schedule and budget sources for:
  - a. Short-term actions (accomplished within 6 years)
  - b. Long-term actions (accomplished within 7-20 years)
6. A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

## 2) PUBLIC EDUCATION AND OUTREACH

The City’s public education and outreach program has been developed consistent with the original Permit goal: “to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.” The program’s foundational goals are to:

- build general awareness within the community about methods to address and reduce impacts from stormwater runoff,
- effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts,
- create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

The City is a member of the West Sound Stormwater Outreach Group (WSSOG); a regional group facilitated by Kitsap County that consolidates resources, knowledge, and experience in an effort to achieve a robust, engaging, and consistent education and outreach program. Regionally developed strategies and materials are tailored to meet the City’s needs and implemented locally.

### a) GENERAL AWARENESS

At a minimum, the City will annually select one target audience from the list below and implement an education and outreach program designed to provide general awareness regarding stormwater issues and solutions. The content of the program will be relevant to the target audience selected and will be implemented on an ongoing or strategic schedule. The target audiences included in the permit and relevant subject areas to be covered are detailed below.

#### General Public or Businesses

Including overburdened communities, or school age children and including home-based or mobile businesses, respectively.

Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces.
- Low impact development (LID) principles and LID BMPs.

Land Development Professionals

Engineers, contractors, developers, 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

The following is a list of means and methods the City may employ in their annual targeted education and outreach program:

- **Stormwater website:** the City’s stormwater website contains information on general stormwater impacts, impervious surfaces, and opportunities for the public to help improve stormwater quality within the watershed. The webpage may be found at (<http://www.cityofpa.us> CLICK>> Departments...Public Works & Utilities...Divisions...Stormwater Utility). The website will be updated as more information becomes available. Specific updates are planned to include a list of frequently asked questions, a list of upcoming stormwater-related events, additional links to other websites, and copies of educational materials developed under this program.
- **Presentations / Meetings:** Annually, the City may hold public meetings to discuss the stormwater management program plan, stormwater management requirements, permitting, stormwater templates, ordinances, LID, etc. In these meetings we may discuss local water quality, the effects of impervious surfaces on stream health, and stormwater pollutants generated by home and automobile owners. Meetings may be held with local interest groups such as Streamkeepers, EcoNet, and the North Peninsula Builders Association.
- **Informational handouts:** Take-home fliers and brochures and will be made available to the public at facilities such as Port Angeles City Hall (customer service and billing desk, Public Works and Utilities reception area), Clallam County Courthouse, Port Angeles Public Library, City Pier (Arthur D. Feiro Marine Life Center), Peninsula College, and others. The informational brochures are designed to address the education goals listed above. As new brochures and other informational materials are developed, electronic copies will be made available through the City’s stormwater webpage.
- **Media advertisements:** The City may periodically place stormwater-related information in the local newspaper (Peninsula Daily News), on paid cable and satellite, and at local movie theatres. This information will be designed to address the education goals listed above and will be timed to reflect the greater impact during the wet winter season. Electronic copies of media advertisements may be made available through the City’s stormwater webpage.

- **Utility bill mailers:** One month of the year, typically October, educational mailers will be sent out with the monthly utility bills, thereby reaching the City’s utility customers. The mailers will be developed to create a progressive flow of general stormwater related information with practical tips for home and business owners to help improve water quality. Copies of mailers will also be made available on the City’s stormwater website and as handouts. The 2020 utility bill mailer may feature topics such as: LID code update, BMPs, dog waste, car washing, and natural yard care.
- **Local event participation:** Educational materials (posters, brochures/handouts, maps, etc) will be distributed at existing local and regional events that attract members of the target audiences. City representatives will be present to answer questions. Typical events include: Clallam County Fair, Clallam County Home and Lifestyle Show, and others. Event-specific materials will be developed and distributed as appropriate. Announcements of upcoming events and copies of materials used at events will be available on the City’s stormwater website.

A matrix has been prepared to show planned activities for the current year and their relationship to the target audiences. This matrix is attached as Appendix B to this document. Updates of actual education and outreach activities performed will be provided with the Annual Report for the year.

In addition to the means and methods listed above (whose primary purpose is to provide stormwater education and meet permit requirements), throughout a typical year, the City also indirectly provides education outreach, such as:

- **Pollution prevention site visits:** The City receives grant funding through the State Department of Ecology to support a Pollution Prevention Specialist position. This person schedules site visit appointments at businesses within the City. The purpose will be to educate them about stormwater pollution and their connection to the local water ways, to educate them about the impacts of illicit discharges and how to report them, to help them implement BMPs on use and storage of hazardous materials, to fill out the Department of Ecology’s Source Control Checklist and to report that information to Ecology and the City. Under the current permit cycle, Source Control is now a permit condition and starting in Jan. 2023, this program will become an active component to the City’s overall stormwater management program. See Section 8 for more details.
- **Illicit discharge information for the general public:** General information regarding illicit discharges to stormwater is provided to the public in an ongoing manner under the City’s IDDE program. Information includes a description of illicit discharges, applicable laws, environmental effects, preventative measures, reporting measures, and links to other sources of information. A “Stormwater Pollution Hotline” is available for public reporting of illicit discharges (360-417-4745). See Section 5 for more details.

- **Direct mail:** Mailers designed to address specific stormwater education goals or stormwater ordinance updates may be sent directly to a specific target audience or City wide (i.e. car washes, golf courses, LID code changes, etc.). The audience will be selected based on classification in directories such as telephone books, web searches, or utility information.
- **BMP and LID incentives programs:** the City will continue to implement a stormwater rebate program that will offer financial incentives to small development projects who implement certain stormwater LID BMPs, on their properties. This program will be advertised on the City website and at local public events. The City has also implemented a rain garden rebate program for existing homes and businesses to further encourage LID. The rain garden rebate reimburses an approved applicant the cost of up to \$1000 for the material required. Program details can be found on the City's Stormwater webpage.
- **Stormwater Management Manual for Western Washington:** a copy of the most recent version of the Department of Ecology's manual is available at the City's Public Works and Utilities Department's Engineering Services Office so that designers can access the manual without purchasing or printing it. Staff are available by appointment to assist with the use of the manual.
- **Workshops or one-on-one meetings with developers:** The city stormwater engineer meets regularly with developers and engineers to help them interpret the City stormwater regulations, and to recommend low impact development techniques as generally lower cost stormwater solutions.

## ***b) BEHAVIOR CHANGE***

At a minimum, the City will annually select one target audience and one Best Management Practice (BMP) from the list below and implement an education and outreach program designed to effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.

### Target Audiences

Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses).

### Best Management Practices (BMPs):

- Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- Prevention of illicit discharges.
- Yard care techniques protective of water quality.
- Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings.
- Pet waste management and disposal.

- LID Principles and LID BMPs.
- Stormwater facility maintenance, including LID facilities.
- Dumpster and trash compactor maintenance.
- Litter and debris prevention.
- Sediment and erosion control.
- (Audience specific) Source control BMPs (refer to S5.C.8).
- (Audience specific) Locally-important, municipal stormwater-related subject area.

As required by the permit, behavior change effectiveness studies will be performed at the time intervals specified. The City anticipates continuing to meet behavior change and program evaluation requirements in collaboration with the regional West Sound Stormwater Outreach Group (WSSOG), facilitated by Kitsap County. The City's inter-local Agreement with Kitsap County was re-signed at the beginning of the year through Dec. 2022.

Tailoring of the program to meet the City's needs may be necessary to ensure the content is applicable to Port Angeles. Results from the effectiveness study will be used to optimize the strategy and schedule of our existing education and outreach program. Social marketing practices and methods will be incorporated, and a program evaluation plan will be developed and implemented to monitor ongoing performance. Progress reports regarding the program evaluation results and improvements will be submitted to Ecology at specified intervals.

### **c) STEWARDSHIP**

Empowering and encouraging local citizens to take ownership in their community is known to have long-term positive impacts that can be felt for generations to come. The permit requires the City provide and advertise stewardship opportunities and/or partner with existing organizations (including nonpermittees) to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities. To meet this permit requirement, the City intends to continue its partnership with *Streamkeepers of Clallam County*; a citizen-based watershed monitoring program that provides volunteer opportunities and project assistance in the effort to protect and restore the local watersheds in Clallam County. However, new ideas for new partnerships and ways to support local stewardship opportunities are always welcome and can be submitted to the City's Stormwater Engineer.

### **d) RECORDKEEPING**

The City will track and maintain records of all public education and outreach activities conducted. An electronic database of this information is maintained by the City's Public Works and Utilities Department. The database contains the following entries, where applicable:

- Name of outreach activity/distribution/event

- Date(s)
- Location(s)
- City personnel involved
- Target audience(s)
- Contact information for other group(s)
- Subject area(s)
- Attendance/distribution (actual or approximate)
- Educational materials used (flyers, handouts, slide shows, posters, etc)
- Notes/other

The public education and outreach database is available from the City upon request. An updated version will be included with each annual report. Copies of all material used during public education and outreach activities will be maintained, as well as photos, descriptions of feedback, lessons learned, and other information.

### **3) PUBLIC INVOLVEMENT AND PARTICIPATION**

The SWMP will include opportunities for public involvement and participation to ensure that the program addresses the goals and expectations of the public as well as the requirements of the Permit. Public comments will be tracked and responded to as appropriate.

#### ***a) PUBLIC INVOLVEMENT IN SWMP***

The City seeks public involvement and participation in developing and managing stormwater within the community. The permit describes ongoing opportunities for participation may be provided through advisory councils, public hearings, watershed committees, developing rate-structures, or other similar activities. Ways to engage and include overburdened communities, as defined in the permit, will be considered when providing a means for involvement. Currently, common ways the public have opportunities for participation are:

- Direct contact with City staff: An email address, phone number, and mailing address will be provided on all City stormwater information distributed. The public will be encouraged to contact City staff at any time with questions or concerns.
- Web page: The City's stormwater web page (<http://www.cityofpa.us> CLICK >> Departments.... Public Works & Utilities.... Divisions.... Stormwater Utility) includes an updated copy of the SWMP, encourages public involvement, elicits feedback, and gives contact information.
- Public hearings: All City policy decisions will follow standard City procedure and will be brought before City Council through the public hearing process. This includes rate changes, new or revised ordinances, and other official policy decisions. The public are notified, as required, and will have a chance to comment during the hearings.

- Engineering counter handout: The SWMP is available at Cty Hall in the Public Works and Utilities (PW&U) reception area.
- Stormwater workshops: The City stormwater engineer may hold public information sessions on the stormwater management program to local professionals, the public, and stakeholder groups such as Streamkeepers, EcoNet, and North Peninsula Builders Association.

All opportunities for public involvement and comments received will be tracked on a spreadsheet maintained by the Department of Public Works and Utilities. The City will consider comments as they are received and will follow up with the public as appropriate.

***b) AVAILABILITY OF INFORMATION TO THE PUBLIC***

The most recent annual report to Ecology, the SWMP, and other submittals required by the Permit are made available to the public on the City’s stormwater webpage. The documents are also be available to the public at the Department of Public Works and Utilities (321 East Fifth St, Port Angeles), upon request. Staff will be available by appointment to discuss the documents with any interested parties.

**4) MS4 MAPPING AND DOCUMENTATION**

Accountability of a municipality’s existing and developing stormwater network is necessary to build upon the past, maintain what’s existing, and plan for the future. In the late 90’s and early 2000’s, the City began collecting field stormwater infrastructure data and recording it electronically using data management and spatial mapping software. Today, the City’s inventoried and mapped stormwater system consists of approximately:

- 65 miles of stormwater conveyance
- 2,600 catch basins
- 170 outfalls
- 190 treatment and flow control facilities

Maintaining accountability and updating the mapping system is an ongoing collaborative effort that relies heavily on communication and established information processing pathways.

***a) MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) MAP***

The City’s stormwater system is mapped electronically in the City’s Geographic Information System (GIS). The data contained in the map is updated and corrected continuously as information is gathered in the field or as new development occurs. Updates are made based on field sketches, design plans, as-built plans, aerial photography, and/or other sources of information that become available.

The stormwater GIS layers contain information on storm drain manholes, catchbasins, outfalls, pipes, ditches, culverts, detention ponds, treatment facilities, and drainage basins. Other layers within the City’s overall GIS dataset contain information relevant to stormwater as well, for example: land use, land cover, zoning, impervious

surfaces, topography, natural hydrology, and combined sewers. Aerial photography is also available, with the most recent flyover performed in 2019.

**i) LOCATION OF KNOWN OUTFALLS, RECEIVING WATERS AND STRUCTURAL BMPs**

The locations of all known outfalls, receiving waters, and structural BMPs owned, operated and/or maintained by the City have been mapped in the GIS. Additional information regarding tributary conveyances (pipes, ditches, etc), associated drainage areas, and land use will be developed as part of the program's ongoing refinement process. During the course of normal business, Stormwater Operations staff are in the process of collecting and recording more detailed information specifically regarding outfalls such as material type, diameter, condition, etc.

**ii) NEW CONNECTIONS TO THE MS4**

The City continuously updates the stormwater GIS with all new connections or infrastructure permitted or otherwise authorized by the City. New connections are mapped from development plans, project plans, field reports, and/or other sources as appropriate.

**iii) AREAS NOT DISCHARGING TO SURFACE WATERS**

Most of the areas served by the City-owned MS4 discharge into surface waters, however there are four west side retention basins which provide an unmeasured level of infiltration: Lincoln Park Pond, Big Boy Pond, M & 10<sup>th</sup> St. Wetland, and the 10<sup>th</sup> and N St. Quarry). All of these areas have overflow structures that allow stormwater to discharge to surface waters. Also, the City has many surface water catch basins which drain to the City's wastewater plant. These basins have been mapped.

***b) AVAILABILITY OF INFORMATION***

The City's stormwater mapping with associated infrastructure information is available to anyone at anytime on the City's website or via the following web address:

<https://pawa.maps.arcgis.com/apps/webappviewer/index.html?id=e58c0d47915c44cf833174513da11086>

Additionally, City staff are available by appointment to provide assistance with navigating the GIS mapping database and in providing more-detailed project specific information, if available.

Upon request, and to the extent appropriate, the City is able provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees, however, depending on the extent of the request, the City may recover reasonable costs associated with fulfilling these mapping information requests.

Upon request, the City can provide available stormwater maps to Ecology. The City can provide the required mapping information in electronic format that meets or



exceeds Ecology's GIS mapping standards, with the exception of metadata, which the City does not have available in electronic format at this time.

## **5) ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)**

An illicit discharge is any direct or indirect discharge into the City's stormwater system that is not comprised entirely of stormwater, with some exceptions explicitly described in the Phase II permit and reiterated in municipal code. This section of the stormwater management program is designed to prevent, detect, characterize, trace, and eliminate illicit discharges to the City's municipal separate storm sewer system (MS4).

### ***a) IDDE POLICY AND PROCEDURES***

In 2010, the City developed a written IDDE Response Policy and Procedure Manual for the Department of Public Works and Utilities. This manual details the City's standard operating procedures for reporting, responding, and correcting or removing illicit connections, spills, or other illicit discharges, whether suspected or confirmed. The most recent comprehensive update to the policy occurred in Dec. 2014, however, a re-evaluation and update is planned during the current permit cycle to ensure the City's policy is consistent with current techniques, methods, and standards. A copy of this policy is included as **Appendix B** to this document. In compliance with the Permit, implementation of this Policy will continue through the 2019-2024 permit cycle. Each element is discussed in the following sections.

### ***b) IDDE EDUCATION***

The City will primarily utilize its established Education and Outreach Program, as described in Section 2, to proactively disseminate information about illicit discharges, associated hazards, and improper disposal of waste. Additional education opportunities are taken under the City's Source Control Program (Section 8) and, reactively, during IDDE investigations.

### ***c) ILLICIT DISCHARGE ORDINANCE***

The City developed a comprehensive stormwater ordinance including an illicit discharge provision for the MS4 (PAMC 13.63). The ordinance was written to satisfy the criteria listed in the original Permit, including: illegal discharges, allowable discharges, categories of discharge identified as significant sources of pollution to waters of the State, escalating enforcement procedures, and enforcement strategies. The ordinance was passed by the City Council on June 16<sup>th</sup>, 2009. Additional permit driven updates to the stormwater code were enacted on December 20<sup>th</sup>, 2016.

### ***d) ILLICIT DISCHARGE DETECTION***

Within the City's IDDE program, mechanisms for the detection and identification of non-stormwater discharges and illicit connections have been established and are being implemented.

## i) FIELD SCREENING AND POTENTIAL SOURCES

The City's established field screening methodology is described in full detail in the City's IDDE Response Policy, attached in [Appendix B](#), and in the City's IDDE screening strategy that is updated annually and submitted to Ecology as part of the annual report.

Prioritization of receiving waterbodies was completed on February 12, 2010. Prioritization is based on the Department of Ecology's 303d list, as well as the significance of the waterbody for potential salmon recovery.

### 303(d) listed waterbodies

- Peabody Creek
- Tumwater Creek
- Port Angeles Harbor
- Dry Creek
- Valley Creek
- Ennis / White Creek

### Creeks with high salmon recovery potential

- Ennis / White Creek system

### Proposed highest priority waterbodies for visual inspection:

- Peabody Creek
- Tumwater Creek
- Ennis / White Creek system

Starting in 2014, the City was broken up into 8 annual screening basins based on equal distribution of stormwater infrastructure. This enabled the City to begin annually screening, on average, 12.5% of its MS4 system for illicit connections and discharges. When a basin contains or borders a creek, a field assessment of the creek from its outfall to the basin limit is performed as part of the screening program. Field assessments of the Peabody, Tumwater, Valley, Mill, Dry, White, and Ennis Creeks have been completed at least once within City limits. Field assessment activities include visual inspection during dry weather and field screening for illicit discharges in accordance with the City's "Illicit Discharge Detection and Elimination (IDDE) Response Policy". To date, 83% of the City's MS4 has been screened for illicit discharges and connections.

Screening of these basins is accomplished through the use of existing City inspection programs. Every Stormwater catch basin within the priority screening basin is visually inspected during its years screening. Existing programs and tasks are also leveraged to fulfill this requirement including Business Inspections, Manhole Inspections, Outfall Inspections, and Stormwater BMP Inspections.

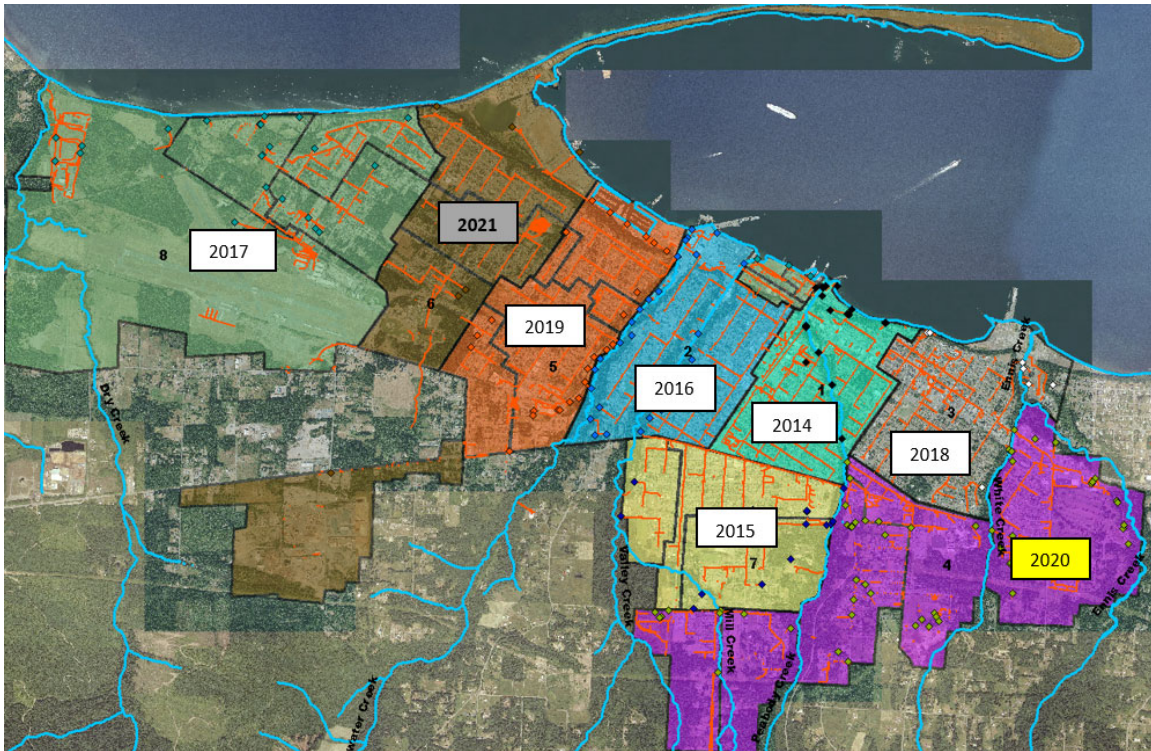


Figure 1. IDDE Screening Strategy: Screening basin boundary map and schedule.

**ii) HOTLINE FOR PUBLIC REPORTING OF DISCHARGES AND SPILLS**

The City’s Illicit Discharge Hotline (360-417-4745) is available for public reporting of discharges and spills. Outside of traditional working hours, this number is forwarded to the Public Works On-Call number for after-hours response. The hotline number will be published with all stormwater information and is available on the City’s stormwater website. The public will also be able to report discharges, spills, or other concerns via the City’s storm water webpage, utilizing an online form, where information on the spill and photos can be submitted. Direct reporting via email is also available: [illicitdischarge@cityofpa.us](mailto:illicitdischarge@cityofpa.us). Both the hotline and email are forwarded directly to City staff to ensure a timely response.

**iii) IDDE STAFF TRAINING**

Municipal staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, improper disposal, and illicit connections are specifically trained to conduct these activities. Follow-up training will be provided as needed to address changes in procedures, techniques, or requirements. The City documents and maintain records of training provided and staff trained. Refresher training for City field staff is performed annually.

Municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system are provided on-going annual IDDE

trainings. This training is intended to educate staff members in the basics of the City's policy, IDDE identification, and the proper procedures for reporting to response teams.

**e) *ILLICIT DISCHARGE RESPONSE***

Following IDDE detection or notification, the City's response plan includes characterization, threat assessment, source tracing, discharge elimination or disconnection, spill clean-up, and reporting.

**i) NATURE OF DISCHARGE**

Any illicit discharges discovered by or reported to the City will be characterized using the City's IDDE Response Policy in terms of potential public or environmental threat. The City will investigate any complaints, reports, or monitoring information that indicates a potential illicit discharge, spill, or illegal dumping within seven days. Problems and violations determined to be emergencies or otherwise judged to be urgent or severe will be investigated immediately.

**ii) SOURCE TRACING**

The City will trace the source of illicit discharges using one or more of the following means and methods:

- Visual observation
- Tracing upstream from manhole to manhole
- Dye testing
- Sewer inspection camera
- Water sampling and analysis
- Site inspections of potential sources

Additional tracing methods will be employed as available and applicable. The results of the tracing investigation will be entered onto the appropriate data base and used for follow-up activities. A drainage contaminate survey was performed on Peabody Creek with a goal of detecting and eliminating illicit connections contributing to high levels of fecal coliform. An inter-local agreement with Streamkeepers of Clallam County facilitates ongoing sampling of priority areas identified in the contaminate survey alongside routine sampling of Tumwater and Valley Creeks.

**iii) DISCHARGE ELIMINATION**

Once identified, sources of illicit discharges and illicit connections will be eliminated using all allowable means made available by municipal code. If necessary, escalating enforcement and legal actions will be used if discharge elimination/disconnection cannot be achieved voluntarily and within allowable frames.

#### iv) PERMIT COMPLIANCE TIMEFRAMES

Regarding IDDE response, Permit compliance 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 compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

#### **f) RECORDKEEPING**

The City will track the following information, as required by the 2019-2024 Permit:

1. Jurisdiction name and permit number
2. Date incident discovered or reported to you
3. Date of beginning your response
4. Date of end of your response
5. How was the incident discovered or reported to you?
6. Discharge to MS4?
7. Incident Location
8. Pollutants Identified
9. Source or Cause
10. Source tracing approach(es) used
11. Correction/elimination methods used
12. Field notes, explanations, and/or other comments

More details regarding the information tracked is described in Appendix 12 of the Permit.

In years past, reporting of illicit discharges were tracked using the form developed by the Center for Watershed Protection and incorporated into the City's IDDE Policy. To include all the recently required information listed above, the existing form may need to be updated or the City will begin using Ecology's WQWebIDDE form. Electronic and paper copies of all records, including follow up reports and actions, will be maintained at the Public Works and Utilities office. A summary of this information will be included in the City's Annual Report to Ecology.

## **6) CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES**

The City has developed and will continue to implement and enforce a program to reduce pollutants in stormwater runoff from new development and redevelopment construction projects, in accordance with Appendix 1 of the Permit. The program will apply to both private and public development, including transportation projects.

### ***a) STORMWATER ORDINANCE REGULATING DEVELOPMENT***

The City developed and adopted an ordinance that addresses runoff from new development, redevelopment, and construction site activities at sites 2,000 sq-ft and greater. The ordinance adopts most of the Department of Ecology's 2014 Stormwater Management Manual for Western Washington and the Low Impact Development Technical Guidance Manual. For more details, review Port Angeles Municipal Code, Section 13.63.

In conjunction with the Stormwater Ordinance, the City has developed and implemented a permitting program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The program is being applied to development or re-development projects with greater than or equal to 7,000 sq. feet of land disturbance or projects that install 2,000 sq. feet of new or replaced hard surface. The program applies to both private and public development, including transportation projects. The program is enforced through the City Ordinance described above as well as through the City's development standards (The City of Port Angeles Urban Services Standards and Guidelines, USSG).

### ***i) MINIMUM REQUIREMENTS, TECHNICAL THRESHOLDS, AND DEFINITIONS***

The minimum requirements, technical thresholds, and definitions in Appendix 1 of the permit have been in-effect in Port Angeles since 2009. As required by the previous Permit, the lowered stormwater management thresholds were adopted and enforced January 1<sup>st</sup>, 2017.

To ensure the City's program satisfies the State's requirements under Chapter 90.48 RCW regarding water quality protection and reducing discharge of pollutants, the City utilizes Ecology's Stormwater Management Manual for Western Washington (SWMMWW) for:

- Site planning requirements
- BMP selection criteria
- BMP design criteria
- BMP infeasibility criteria
- LID competing needs criteria
- BMP limitations

The City has utilized the SWMMWW since 2009 to meet these permit requirements.

ii) **LEGAL AUTHORITY TO INSPECT PRIVATE FACILITIES**

The City's stormwater ordinance includes provisions providing City inspectors legal authority to inspect private stormwater facilities that discharge into the City's MS4.

ii) **LID REQUIRED**

As of December 31, 2016 the City updated its development codes to require LID where feasible, as determined by the SWMMWW criteria.

iii) **EROSIVITY WAIVER**

The City does not allow developers to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2 of the permit. Therefore, the City does not plan to include enforcement sanctions for construction sites that provide notice of intent to apply the waiver but do not meet the requirements.

**b) PERMITTING**

The City has developed a permitting process with plan review, inspection, and enforcement capability as described herein. The permitting process is applied to both private and public projects that consist of greater than or equal to 7,000 sq. feet of land disturbance or projects that install 2,000 sq. feet of new or replaced hard surface. Permitting is administered by qualified personnel.

i) **REVIEW OF STORMWATER SITE PLANS**

The City reviews stormwater site plans as part of the permitting process. Plans are reviewed for compliance with the stormwater ordinance (PAMC 13.63) and the City's Urban Services Standards and Guidelines (USSG), which implement the ordinance. The review includes the minimum requirements, technical thresholds, and definitions in Appendix 1 of the Permit. The City works with developers to ensure that stormwater site plans meet the criteria established by both Ecology and the City.

ii) **EROSIVITY WAIVER**

At this time, the City does not allow developers to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2 of the Permit. Therefore, the City will perform review and inspection tasks for all construction sites as described above.

iii) **NOTICE OF INTENT**

When applicable and during permitting, the City directs applicants also triggering Ecology's Construction Stormwater General Permit (CSWGP) and Industrial Stormwater General Permit (ISWGP) thresholds to submit a Notice of Intent (NOI) with Ecology. The City's stormwater website also directs owners of construction sites and industrial facilities to the Ecology websites where they can find additional information and electronic copies of the notices of intent. In

instances where a development project is covered by both local and State permits, the City continues to enforce local ordinances.

### **c) INSPECTIONS**

Construction related inspections required by the City's Phase II Permit include pre-construction, during construction, and post construction site visits, where applicable. Follow-up inspections may be warranted if a project does not meet minimum standards or is in violation of their permit requirements. Additionally, the City may perform inspections of treatment or flow control facilities during installation and connection to the City's MS4.

#### **i) PRE-CONSTRUCTION INSPECTIONS**

During site plan review, City staff uses the definitions and requirements in Appendix 7 of the Permit (Identifying Construction Site Sediment Transport Potential) to determine which sites have a high potential for sediment transport. These high priority sites are inspected by qualified personnel prior to permitting and before commencement of land disturbing activities.

#### **ii) DURING CONSTRUCTION INSPECTIONS**

Qualified City staff inspect all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Escalation of enforcement is described in Ordinance and is implemented when necessary.

The City inspects new residential developments at least once every six-months for maintenance needs and compliance with development standards, until 90% of the lots are constructed or when construction has stopped and the site is fully stabilized.

#### **iii) POST-CONSTRUCTION INSPECTIONS**

Qualified City staff inspect all permitted development sites upon completion of construction and prior to final approval or occupancy. The purpose of the inspection is to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs. City staff also verifies that a maintenance agreement and plan is completed for all treatment and flow control facilities and that responsibility for maintenance is clearly assigned. Enforcement is used as necessary.

#### **iv) INSPECTION COMPLIANCE**

The City maintains permit compliance by the presence and records of an established inspection program designed to inspect all sites and achieving at least 80% of scheduled inspections.



#### v) ENFORCEMENT STRATEGY

The City has developed an enforcement strategy to respond to cases of non-compliance. This enforcement strategy is included in the City's Stormwater Ordinance PAMC 13.63.

#### d) **STAFF TRAINING**

Staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training is provided as needed to address changes in procedures, techniques or staffing. The City documents and maintains records of the training provided and the staff trained.

#### e) **RECORDKEEPING**

The City keeps and maintains permitting records as required by Ecology's permit and State laws. This includes inspection reports, warning letters, notices of violations, and other enforcement actions. Records of maintenance inspections and maintenance activities are also maintained.

### **7) OPERATIONS AND MAINTENANCE**

The City has developed and implemented a program to regulate and conduct maintenance activities to prevent or reduce stormwater impacts. The program elements are described below.

#### a) **MAINTENANCE STANDARDS**

The City has adopted Ecology's Stormwater Management Manual for Western Washington (SWMMWW), including maintenance standards. The City uses Ecology's maintenance standards to determine if and when maintenance is required. It is important to note that the maintenance standard is not a measure of the facility's required condition at all times between inspections and an exceedance of the maintenance standard between inspections and/or maintenance is not a permit violation

When an inspection identifies an exceedance of a maintenance standard, maintenance shall be performed within the following timeframes:

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

These timeframes may be exceeded if there are circumstances that are beyond the City's control. Such circumstances may include, but not be limited to, denial or delay of access by property owners, denial or delay of necessary permit approvals, and

unexpected reallocations of maintenance staff to perform emergency work. For each such exceedance of the required timeframes, the City will document the extenuating circumstances.

**b) PERMITTED STORMWATER FACILITIES**

The City has developed and implemented a program to verify adequate long-term operation and maintenance of privately-owned stormwater facilities and BMPs that are regulated pursuant to the City’s permitting process.

**i) OPERATIONS AND MAINTENANCE ORDINANCE**

The City developed and enacted a comprehensive stormwater ordinance which requires projects installing treatment or detention facilities to record an O&M agreement and manual that clearly identifies the party responsible for ongoing inspection and maintenance, details maintenance standards per Ecology’s SWMMWW, and acknowledges the City’s annual inspection requirements and enforcement procedures.

**ii) MAINTENANCE STANDARDS**

The City has adopted Ecology’s Stormwater Management Manual for Western Washington (SWMMWW).

**iii) ANNUAL INSPECTIONS**

The City performs annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency.

Reduction of the inspection frequency will be based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the City may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with Permit requirements.

**iv) COMPLIANCE & RECORDKEEPING**

Permit compliance is determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections.

The City maintains records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities are also maintained.

### **c) CITY OWNED STORMWATER FACILITIES**

The City has developed and implemented a program to inspect and maintain all municipally owned and operated stormwater facilities to ensure functionality and prevent or reduce stormwater impacts.

In addition to Ecology's permit requirements, the City also has an existing large diameter culvert inspection program. The major culverts that conduct the City creeks under roads are visually inspected in the late summer every two to three years. Maintenance deficiencies are corrected before the wet winter season begins.

#### **i) TREATMENT AND FLOW CONTROL INSPECTIONS**

The City performs annual inspections of all municipally owned or operated permanent stormwater treatment and flow control facilities. The City will take appropriate maintenance actions in accordance with Ecology's maintenance standards described in the SWMMWW.

The City may reduce the inspection frequency based on inspection records of double the length of time of the proposed inspection frequency, or upon written and certified statements based on actual inspection and maintenance experience.

#### **ii) SPOT CHECKS**

The City performs "spot checks" of potentially damaged permanent treatment and flow control facilities (other than catch basins) after major storm events (greater than 24-hour storm event with a 10-year or greater recurrence interval). If the spot checks indicated widespread damage and/or maintenance needs, the City will inspect all stormwater treatment and flow control facilities that may be affected. Repairs and other maintenance actions will be taken based on inspection results and in accordance with the City's maintenance standards.

#### **iii) CATCH BASIN INSPECTIONS**

On a two-year interval, the City inspects all catch basins and inlets owned and/or operated by the City. Catch basins and inlets are cleaned based on inspection results and in accordance with Ecology's SWMMWW maintenance standards. Decant water is disposed of in accordance with Appendix 6 of the Permit – *Street Waste Disposal*.

#### **iv) COMPLIANCE**

Compliance is determined by the presence of an established inspection program achieving at least 95% of permit required inspections.

### **d) STORMWATER IMPACT REDUCTION FROM PUBLIC LANDS**

The City has implemented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the City's functional control.

The City is in the process of developing a method for documenting these practices, policies, and procedures.

Lands owned or maintained by a municipality typically 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 have been addressed:

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

#### ***e) TRAINING PROGRAM***

The City has implemented an on-going operations and maintenance training program for employees whose construction, operations, or maintenance job functions may impact stormwater quality. The training addresses the importance of protecting water quality, the requirements of the permit, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns, including potential illicit discharges. Follow-up training will be provided as needed to address changes in procedures, techniques, or requirements. Training is documented and training records include dates, activities or course descriptions, and names and positions of staff in attendance.

#### ***f) STORMWATER POLLUTION PREVENTION PLANS***

The City has developed and implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities that it owns and/or operates. The City's applicable facilities and current status of SWPPPs or similar documents for each are summarized in the following table. While not all of the documents listed are specifically SWPPPs, they all have relevance to the prevention, containment, and handling of substances that could result

in the pollution of municipal stormwater. The City has SWPPPs for all facilities required.

Table 1: Status of Stormwater Pollution Prevention Plans for City Facilities

<b>Facility Name</b>	<b>Facility Use</b>	<b>Document</b>	<b>Status</b>
Sanitary and Storm Sewer Collection System	Collection of sanitary and combined sewerage	“Illicit Discharge Detection and Elimination (IDDE) Response Policy”	Most Recent Revision: December 2014
Corp Yard	Maintenance, equipment & materials storage for water, wastewater, & streets utilities	“City of Port Angeles Maintenance Facility Stormwater Pollution Prevention Plan”	Updated February 2016
Port Angeles Wastewater Treatment Plant	Wastewater treatment plant (secondary treatment)	“City of Port Angeles Wastewater Treatment Plant SWPPP”	December, 2001
Regional Transfer Station	Solid waste transfer station (previously a landfill)	“Port Angeles Transfer Station/ Landfill Stormwater Pollution Prevention Plan”	Updated July 2018
Electric Utility Handling & Warehouse Building	Electric transformer storage and handling	“Spill Prevention Control and Countermeasure Plan”	Completed November 2003
CSO Facilities	Combined sewer collection, storage, and conveyance, and discharge	“Amendment to the 2006 CSO Facilities Reduction Plan”	Updated August 2012

Several of these facilities are regulated by their own environmental permits. See Table 2 below for a listing of individual stormwater or other related permits.

Table 2: Existing Individual Stormwater and Stormwater-Related Permits

Facility Name	Type of Permit	Permit Number
Regional Transfer Station	NPDES General Permit for Stormwater Discharges Associated with Industrial Activities	WAR005613
City of Port Angeles Municipal Solid Waste Facility	Solid Waste Handling Facility Permit	SLW98-0001
Port Angeles Wastewater Treatment Plant/CSO Facilities	NPDES Waste Discharge Permit	WA0023973

In addition, there are approximately twenty non-City-owned facilities in Port Angeles that are regulated by NPDES General Industrial Stormwater Discharge Permits. Because these facilities are regulated directly by the Department of Ecology, their individual stormwater collection infrastructure is not considered part of the municipal stormwater system, although in some cases they discharge into the MS4.

***g) RECORDKEEPING***

The City maintains records of inspections, maintenance, and repair activities performed in accordance with this section of the SWMP.

**8) SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT**

The City is in the process of developing a Source Control Program that is designed to prevent and reduce pollutants in runoff from areas that discharge to the City’s MS4, as required by the 2019-2024 Permit. While this is a new permit requirement, the City has had an established pollution prevention presence in the community that can be built upon.

Since 2012, the City of Port Angeles has been a member of the Pollution Prevention Assistance (PPA) Partnership, formerly called Local Source Control, which is a grant funded program designed to help small businesses reduce and manage potential wastes to protect water, soil, and air quality. Under Washington State’s Hazardous Waste and Toxics Reduction Program, Ecology is able to fund local jurisdictions on a biennium basis to provide free, one-on-one technical assistance to small businesses regarding waste management, pollution prevention, and stormwater-related issues.

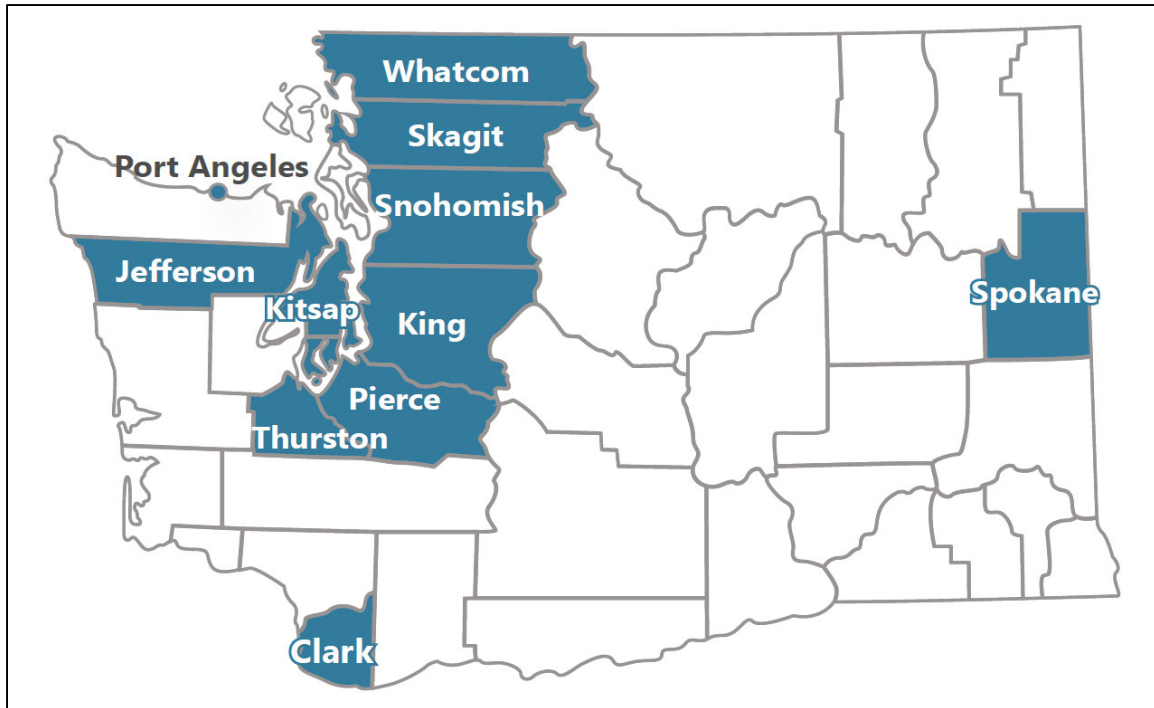


Figure 2. Pollution Prevention Assistance partners for 2017-2019 biennium.

**a) PROGRAM GOALS**

With the intent to prevent and reduce pollutants in runoff from areas that discharge into the City’s MS4, the Source Control Program will include:

1. Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
2. Inspections of pollutant generating sources at publicly and privately owned institutional, commercial, and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
3. Application and enforcement of local ordinances at sites, identified pursuant to the Permit, including sites with discharges authorized by a separate NPDES permit.
4. Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.

**b) PROGRAM COMPONENTS AND MILESTONES**

The program’s minimum performance measures, as defined by the Permit, are:

#### i) ORDINANCE TO APPLY BMPs

The City will adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. These ordinances will be adopted no later than August 1, 2022,

The City will use the source control BMPs in the SWMMWW, or a Phase I Program approved by Ecology. In cases where the manual(s) lack guidance for a specific source of pollutants, the City will work with the owner/operator to implement or adapt BMPs based on the best professional judgement of the City.

Applicable operational source control BMPs will be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, 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 because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs, provided that formal enforcement authority is available to the City and is used as determined necessary by the City, in accordance the Permit.

#### ii) INVENTORY OF SITES

The City will establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. This inventory will be compiled by August 1, 2022 and will include:

1. Businesses and/or sites identified based on the presence of activities that are pollutant generating.
2. Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.

#### iii) INSPECTION PROGRAM

The City will develop an inspection program for sites identified in the inventory. The inspection program will be implemented by January 1<sup>st</sup>, 2023, and will entail the following components:

1. All identified sites with a business address will be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information will 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.
2. The City will 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



City 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.

3. The City will inspect 100% of sites identified through credible complaints.
4. The City may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.

#### **iv) PROGRESSIVE ENFORCEMENT POLICY**

By January 1<sup>st</sup>, 2023, the City will implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period, as specified below:

1. If the City determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the City will take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.
2. When the City determines that a site has failed to adequately implement BMPs after a follow-up inspection(s), the City will take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.
3. The City will 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. The City will also maintain records of sites that are not inspected because the property owner denies entry.
4. The City may refer non-emergency violations of local ordinances to Ecology, provided, the City also makes a documented effort of progressive enforcement. At a minimum, the City's enforcement effort will include documentation of inspections and warning letters or notices of violation.

#### **c) STAFF TRAINING**

The City will train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program will 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. The City will document and maintain records of the training provided and the staff trained.

## **STORMWATER NPDES AND CAPITAL NEEDS ASSESSMENT**

The City retained Herrera Environmental Consultants to complete a comprehensive study of the Stormwater Utility. This project utilized Ecology grant funding to develop a functional resourcing and financial analysis of the staffing, equipment and funding mechanisms necessary to meet the requirements outlined in the NPDES Phase II Municipal Stormwater Permit. Additionally, the analysis included a capital facilities program (CFP) component defining a range of funding support options for CFP projects. The analysis assessed the gap between current resources and the resources necessary to meet operating costs and capital costs under the current (2013-2018) Phase II Permit regulatory requirements. In 2012, the City's stormwater rate was \$6 per month for each equivalent residential unit (ERU). This analysis showed a funding gap and resulted in sequential stormwater rate increases to cover necessary expenses:

-Effective January 2020. \$17.01 per month for each ERU

This revenue is not sufficient to implement all projects in the 6 year Capital Facilities Plan. The City plans to evaluate the Stormwater Utility revenues and obligations again in 2021 to seek public input.

## DOCUMENTS REFERENCED

“City of Port Angeles Maintenance Facility SWPPP” City of Port Angeles, 2016

“Amendment to the 2006 CSO facilities Reduction Plan” City of Port Angeles, June 2007

“Illicit Discharge Detection and Elimination – A Guidance Manual for Program Development and Technical Assessments” Center for Watershed Protection, October 2004

“Port Angeles Transfer Station/ Landfill Stormwater Pollution Prevention Plan” City of Port Angeles, July 2018

“Spill Prevention Control and Countermeasure Plan” (Electric Utility) City of Port Angeles, November 2003

“Western Washington Phase II Municipal Stormwater Permit” State of Washington Department of Ecology, Effective August 1, 2019.

“Stormwater Management Manual for Western Washington” Washington State Department of Ecology 2019

“City of Port Angeles Municipal Code Title 13.63, Stormwater Ordinance” last modified in December 2016

“City of Port Angeles Urban Service Standards and Guidelines” last modified in 2017

“Stormwater NPDES and Capital Needs Assessment” Prepared for City of Port Angeles December 2012

**SWMP APPENDIX A : INTER-DEPARTMENTAL COORDINATION  
MECHANISM POLICY**

**SWMP APPENDIX B : PUBLIC OUTREACH PLAN ACTIVITY  
MATRIX**

**SWMP APPENDIX C : ILLICIT DISCHARGE DETECTION AND  
ELIMINATION (IDDE) RESPONSE POLICY**