

STORMWATER MANAGEMENT PROGRAM PLAN 2025



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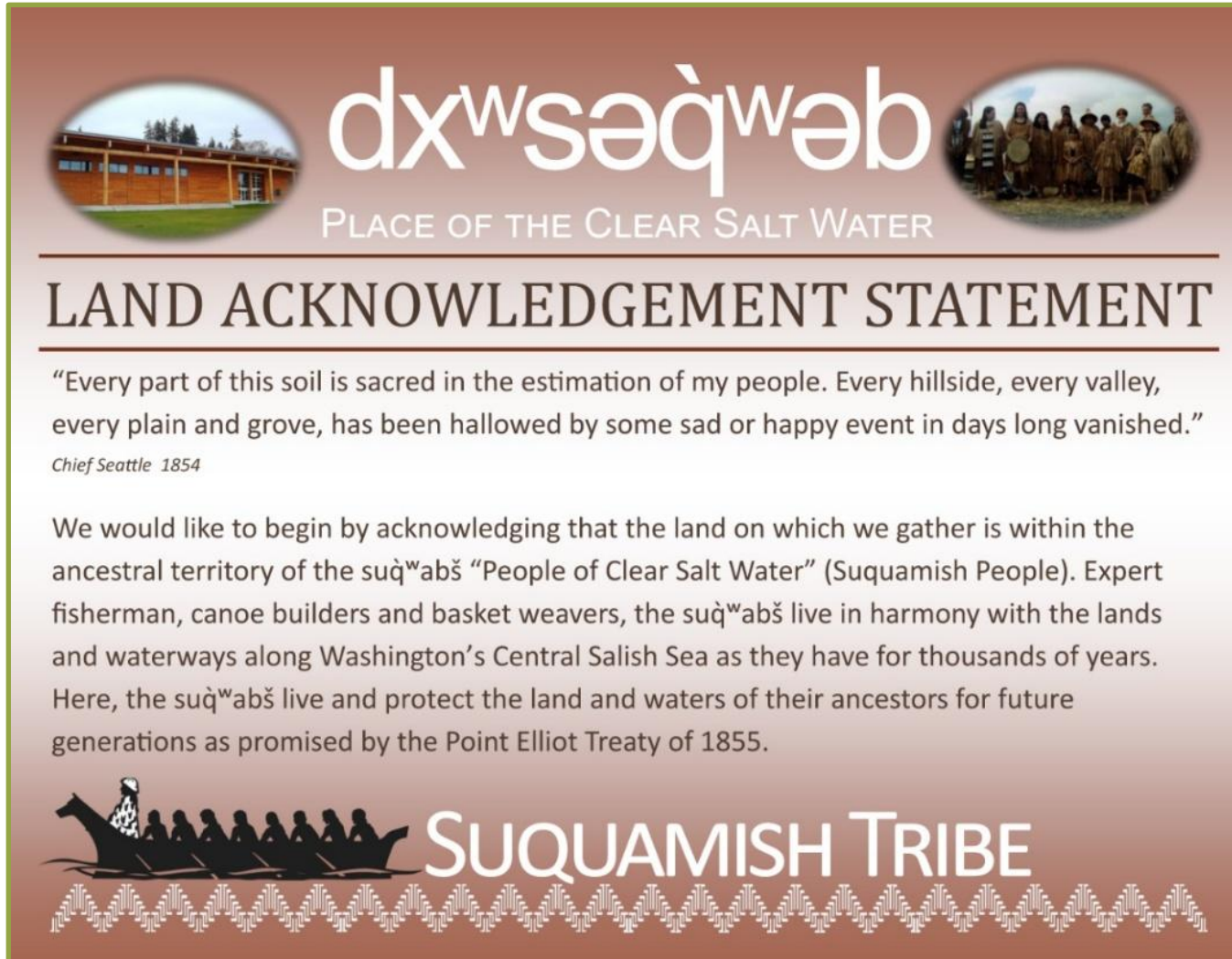
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Land Acknowledgement

This Stormwater Management Program Plan is produced and followed with respect of indigenous tribe sovereignty and rights through the combined contributions of stakeholders, consultants, and City of Bainbridge Island staff, appointed and elected officials.




The graphic features a brown background with a white border. At the top, there are two oval images: the left one shows a modern wooden building, and the right one shows a group of people in traditional Indigenous attire. Between them is the text 'dx^wsəq^wəb' in a stylized white font, with 'PLACE OF THE CLEAR SALT WATER' in a smaller, plain white font below it. A horizontal line separates this from the title 'LAND ACKNOWLEDGEMENT STATEMENT' in a large, bold, serif font. Below the title is a quote in a smaller serif font: "Every part of this soil is sacred in the estimation of my people. Every hillside, every valley, every plain and grove, has been hallowed by some sad or happy event in days long vanished." followed by 'Chief Seattle 1854' in an italicized serif font. A paragraph of text follows, acknowledging the ancestral territory of the suq^wabš (Suquamish People) and their relationship with the land and waterways. At the bottom, there is a silhouette of a person in a canoe with several paddlers, followed by the text 'SUQUAMISH TRIBE' in a large, bold, sans-serif font. A decorative wavy line runs along the bottom edge.

dx^wsəq^wəb
PLACE OF THE CLEAR SALT WATER

LAND ACKNOWLEDGEMENT STATEMENT

"Every part of this soil is sacred in the estimation of my people. Every hillside, every valley, every plain and grove, has been hallowed by some sad or happy event in days long vanished."
Chief Seattle 1854

We would like to begin by acknowledging that the land on which we gather is within the ancestral territory of the suq^wabš "People of Clear Salt Water" (Suquamish People). Expert fisherman, canoe builders and basket weavers, the suq^wabš live in harmony with the lands and waterways along Washington's Central Salish Sea as they have for thousands of years. Here, the suq^wabš live and protect the land and waters of their ancestors for future generations as promised by the Point Elliot Treaty of 1855.

 SUQUAMISH TRIBE

Glossary of Abbreviations and Acronyms

Abbreviation/Acronym	Description
AKART	All known, available and reasonable methods of prevention, control and treatment
APWA	American Public Works Association
BIFD	Bainbridge Island Fire Department
BIMC	Bainbridge Island Municipal Code
BMP	Best management practice
COBI	City of Bainbridge Island
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
GIS	geographic information system
IDDE	Illicit Discharge Detection and Elimination
LID	Low impact development
MEP	Maximum Extent Possible
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
Permit	Western Washington Phase II Municipal Stormwater Permit
Permittee	Jurisdictions with a Western Washington Phase II Municipal Stormwater Permit (i.e. City of Bainbridge Island)
Phase II Permit	Western Washington Phase II Municipal Stormwater Permit
RCW	Revised Code of Washington
RP	Retrofit Project
SAM	Stormwater Action Monitoring
SAR	Site Assessment Review
SMAP	Stormwater Management Action Planning or Stormwater Management Action Plan
SSWM	Storm and Surface Water Utility

Abbreviation/Acronym	Description
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
SWSP	Stormwater System Plan
TMDL	Total Maximum Daily Load
UIC	Underground Injection Control
WQFMP	Water Quality & Flow Monitoring Program
WSPER	West Sound Partners for Ecosystem Recovery
WSSOG	West Sound Stormwater Outreach Group



Background and Introduction

The City of Bainbridge Island (City or COBI) is an owner and operator of a small municipal separate storm sewer system (MS4). The MS4 discharges stormwater directly into streams, wetlands, and Puget Sound, which are Waters of the United States protected by the Federal Clean Water Act. Thus, the City's MS4 is regulated by State and Federal law under the [National Pollutant Discharge Elimination System \(NPDES\)](#). NPDES is a permit-based water quality program implemented under the authority of the Federal Clean Water Act, administered by the [United States Environmental Protection Agency \(EPA\)](#). The primary objective of NPDES is to reduce and eliminate the discharge of pollutants to Waters of the United States to protect and restore waters for beneficial uses, such as fishing and swimming. Under the authority of the EPA, in Washington State, NPDES is regulated by [Washington State Department of Ecology \(Ecology\)](#). Ecology requires different NPDES permits for various types of activities and industries that discharge stormwater and wastewater (e.g., cities, school districts, manufacturing, construction sites, maintenance facilities and storage yards, wastewater treatment plants, etc.). The City of Bainbridge Island is permitted to discharge stormwater by complying with the [Western Washington Phase II Municipal Stormwater Permit \(Phase II Permit\)](#). The current five-year Phase II Permit term is effective August 1, 2024 through July 31, 2029.

The Phase II Permit provides general and prescriptive guidance for accomplishing compliance. Section 5 (S5) of the Phase II Permit requires the City to develop and implement a Stormwater Management Program (SWMP) for its jurisdiction. Planned SWMP actions and activities to achieve Phase II Permit must be documented annually as the Stormwater Management Program Plan (SWMP Plan), which is this document. The SWMP and SWMP Plan must also include 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. The City's SWMP Plan is submitted to Ecology each year on or before March 31 as part of the Annual Report, a [questionnaire](#) regarding the City's compliance with the Phase II Permit for the previous year. Compliance as demonstrated by the Annual Report constitutes successful implementation of the previous year's SWMP Plan.

The City's Principal Executive Officer, City Manager, Blair King, has duly authorized as his representative, Chris Wierzbicki, the Director of the City's APWA Accredited Public Works Department, as responsible for the overall development and implementation of the stormwater management program. On behalf of the Director, Stormwater Management Program Coordinator, Stella Collier, as qualified personnel, prepares the written SWMP Plan and helps track and coordinate planned SWMP actions and activities and any additional planned actions and activities to meet applicable TMDL and Monitoring and Assessment requirements.

This City of Bainbridge Island SWMP Plan is a working document written to inform the public of the planned SWMP activities for the upcoming calendar year. In relation to the SWMP, on February 11, 2025, City Council approved the [Stormwater System Plan \(October 2024\)](#) that was created at their request; so, was not a [Phase II Permit requirement](#). The Stormwater System Plan (SWSP) includes recommendations for the SWMP beginning in 2025 through 2029 and beyond. It is anticipated that City Council and City Management will consider implementing some of the recommendations beginning in 2025 which may change some of the planned actions and activities in the SWMP Plan. As a result, the SWMP document may be updated throughout the year as needed; so, the most current SWMP Plan will always be made available for public review on the City's website and by request.

The SWMP Plan is organized according to the program components in Section 5 (S5) and Sections 7 through 9 of the [2024-2029 Western Washington Phase II Municipal Stormwater Permit](#):

- ❖ [S5.A Stormwater Management Program General Requirements](#)
- ❖ [S5.C.1 – Stormwater Planning](#)
- ❖ [S5.C.2 – Public Education and Outreach](#)
- ❖ [S5.C.3 – Public Involvement and Participation](#)
- ❖ [S5.C.4 – Municipal Separate Storm Sewer System \(MS4\) Mapping and Documentation](#)
- ❖ [S5.C.5 – Illicit Discharge Detection and Elimination \(IDDE\)](#)
- ❖ [S5.C.6 – Controlling Runoff from New Development, Redevelopment and Construction Sites](#)
- ❖ [S5.C.7 – Stormwater Management for Existing Development \(SMED\)](#)
- ❖ [S5.C.8 – Source Control Program for Existing Development](#)
- ❖ [S5.C.9 – Operations and Maintenance \(O&M\)](#)
- ❖ [S7 - Compliance with Total Maximum Daily Load \(TMDL\) Requirements](#)
- ❖ [S8 – Monitoring and Assessment](#)
- ❖ [S9 – Reporting Requirements](#)



Stormwater Management Program

“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.A. through C Stormwater Management Program General Requirements

2024-2029 Phase II Permit SWMP General Requirements	COBI SWMP 2025
S5.A.1. At a minimum, the Permittee’s SWMP shall be <u>implemented throughout the geographic area</u> subject to this Permit as described in S1.A.	COBI’s SWMP is implemented throughout the geographic area of the jurisdiction that comprises the entire island of Bainbridge Island.
<p>S5.A.2. Each Permittee shall <u>prepare written documentation</u> of the SWMP, called the SWMP Plan. The SWMP Plan shall be organized according to the program components in S5.C, or a format approved by Ecology and shall be updated at least annually for submittal with the Permittee’s annual reports to Ecology (see S9 – Reporting Requirements). The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year, and shall include a description of:</p> <p>S5.A.2.a. <u>Planned activities</u> for each of the program components included in S5.C.</p> <p>S5.A.2.b. Any <u>additional planned activities to meet the requirements of applicable TMDL pursuant to S7 – Compliance with Total Maximum Daily Load requirements</u>.</p> <p>S5.A.2.c. Any <u>additional planned actions to meet the requirements of S8 – Monitoring and Assessment</u>.</p>	This City of Bainbridge Island SWMP Plan is written to inform the public of the planned SWMP activities for the upcoming/current calendar year, 2025. The document may be updated throughout the year as needed; so, the most current SWMP Plan is always available for public review on the City’s website. The SWMP Plan is organized according to the program components in Section 5 (S5) and Sections 7 through 9 (S7, S8, S9) of the 2024-2029 Western Washington Phase II Municipal Stormwater Permit .
S5.A.3. The SWMP shall include an ongoing program for gathering, tracking, maintaining, and using information to	

2024-2029 Phase II Permit SWMP General Requirements	COBI SWMP 2025
<p><u>evaluate SWMP</u> development, implementation, and permit compliance and to set priorities.</p> <p>S5.A.3.a Each Permittee shall <u>track the cost or estimated cost</u> of development and implementation of each component of the SWMP and sources of funding. <u>This information shall be provided with each Annual Report, no later than March 31, 2027.</u></p> <p>Permittees shall provide annual average costs (or estimates) to implement the SWMP and TMDL requirements.</p> <p>S5.A.3.b Each Permittee shall <u>track the number of inspections, follow-up actions because of inspections, official enforcement actions, and types of public education activities</u> as required by the respective program component. This information shall be included in the Annual Report.</p>	<p>SWMP actions and activities (including the number of inspections, follow-up actions because of inspections, official enforcement actions, and types of public education activities) and their cost, or estimated cost, are tracked and recorded in MS Excel and MS Word documents, Esri ArcGIS software, SmartGov software, and the City’s financial recordkeeping software, Munis.</p> <p>Sources of funding for the SWMP are tracked by the City’s Finance department; the primary source is Storm and Surface Water Utility (SSWM) Fee revenues.</p> <p>The City will plan to provide the tracked or estimated cost of development and implementation of each component of the SWMP and sources of funding no later than March 31, 2027.</p>
<p>S5.A.4 Permittees shall <u>continue implementation</u> of existing stormwater management programs until they begin implementation of the updated stormwater management program in accordance with the terms of this Permit, including implementation schedules.</p>	<p>COBI continues to implement existing stormwater management program components that meet previous Permit requirements while beginning to develop and implement updated stormwater management program components to meet the updated requirements of this Permit.</p>
<p>S5.A.5 <u>Coordination among Permittees</u></p> <p>S5.A.5.a. Coordination among entities covered under municipal stormwater NPDES permits may be necessary to comply with certain conditions of the SWMP. The SWMP shall include, when needed, coordination mechanisms among entities covered under municipal stormwater NPDES permit to encourage coordinated stormwater-related policies, programs, and projects within adjoining or shared areas, including:</p>	<p>The City’s Stormwater Management Program Coordinator, Stella Collier, regularly participates in coordinating among Permittees by attending meetings, trainings, events, and responding to communications. These include:</p> <ul style="list-style-type: none"> • Stormwater Work Group – Stella Collier was a voting member June, 2019 through February, 2025. • Stormwater Action Monitoring Pooled Resources Oversight Committee – Stella Collier was a voting member May, 2019 through February, 2025. • Central NPDES Permit Coordinators Forum

2024-2029 Phase II Permit SWMP General Requirements	COBI SWMP 2025
<p>S5.A.5.a.i. Coordination mechanisms clarifying roles and responsibilities for the control of pollutants between physically interconnected MS4s covered by a Municipal Stormwater Permit.</p> <p>S5.A.5.a.ii. Coordinating stormwater management activities for shared water bodies, or watersheds among Permittees to avoid conflicting plans, policies, and regulations.</p>	<ul style="list-style-type: none"> • West Sound Stormwater Managers Group – Stella Collier is the group’s current Chair. • West Sound Stormwater Outreach Group (WSSOG) – this is formal coordination group formed through an interlocal agreement contract. • Stormwater Outreach For Regional Municipalities (STORM) • Washington State Municipal Stormwater Conference (Municon) – Stella Collier has attended all biennial Municon events
<p>S5.A.5.b. The SWMP shall include coordination mechanisms among departments with each jurisdiction to eliminate barriers to compliance with the terms of this Permit. Permittees shall include a written description of internal coordination mechanisms in the Annual Report no later than March 31, 2026.</p>	<p>COBI work groups and meeting groups within and across City departments and divisions provide opportunities and mechanisms for internal coordination to identify and eliminate barriers to compliance with the Phase II Permit. These include:</p> <ul style="list-style-type: none"> • Water Resources Work Group (<i>occurring ongoing</i>) • Development Engineering Work Group (<i>occurring ongoing</i>) • Capital Work Group (<i>occurring ongoing</i>) • Public Works Managers’ Meetings (<i>occurs weekly and as needed</i>) • NPDES/O&M Check in Meetings (<i>occurs as needed</i>) • Development Review Coordination Meeting (<i>occurs monthly and as needed</i>) • Mapping Work Group (<i>occurs ongoing and as needed</i>) • IDDE Work Group (<i>occurs as needed</i>) • Water Resources Communications Work Group (<i>occurs as needed</i>) • Storm and Surface Water Utility Fee Work Group (<i>occurs as needed</i>) • Stormwater Planning Interdisciplinary Team (<i>occurs as needed</i>)

2024-2029 Phase II Permit SWMP General Requirements	COBI SWMP 2025
	<ul style="list-style-type: none"> • Code Enforcement Work Group (<i>occurs as needed</i>) • Pre-Construction Meetings (<i>occurs as needed</i>) • Utilities Advisory Committee (<i>meet monthly and as needed</i>) • Environmental Technical Advisory Committee (<i>meet monthly and as needed</i>)
<p>S5.B. Stormwater Management Program Standards</p> <p>The SWMP shall be designed to reduce the discharge of pollutants from regulated small MS4s to the MEP, meet state AKART requirements, and protect water quality.</p>	<p>COBI SWMP is designed to reduce the discharge of pollutants from regulated small MS4s to the MEP, meet state AKART requirements, and protect water quality.</p>
<p>S5.C. Stormwater Management Program Components</p> <p>The SWMP shall include the components listed below. To the extent allowable under state or federal law, all components are mandatory for city, town, or county Permittees covered under this Permit.</p>	<p>The City of Bainbridge Island SWMP is developed and implemented to address all of the below SWMP components as outlined in Section 5.C of the 2024-2029 Western Washington Phase II Municipal Stormwater Permit:</p> <ul style="list-style-type: none"> • S5.C.1 – Stormwater Planning • S5.C.2 – Public Education and Outreach • S5.C.3 – Public Involvement and Participation • S5.C.4 – Municipal Separate Storm Sewer System (MS4) Mapping and Documentation • S5.C.5 – Illicit Discharge Detection and Elimination (IDDE) • S5.C.6 – Controlling Runoff from New Development, Redevelopment and Construction Sites • S5.C.7 – Stormwater Management for Existing Development (SMED) • S5.C.8 – Source Control Program for Existing Development • S5.C.9 – Operations and Maintenance (O&M)

S5.C.1 – STORMWATER PLANNING

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

The following four subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 1 (S5.C.1), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.1.a – Inter-disciplinary team](#)
- [S5.C.1.b – Coordination with long-range plan updates](#)
- [S5.C.1.c – Low impact development \(LID\) code-related requirements](#)
- [S5.C.1.d – Stormwater Management Action Planning \(SMAP\)](#)

S5.C.1.a – Inter-disciplinary team

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Inter-disciplinary team	2025 COBI planned actions and activities for Stormwater Planning – Inter-disciplinary team
<p>S5.C.1.a. Each Permittee shall <u>continue to convene an inter-disciplinary team</u> to inform and assist in the development, progress, and influence of this program.</p>	<p>COBI may re-convene the inter-disciplinary team in 2025 to meet and oversee coordination with long-range plan updates and the development and implementation of COBI’s Stormwater Management Action Plan (SMAP). The Team includes the following staff:</p> <ul style="list-style-type: none"> • Christian Berg – Water Resources Specialist • Dave Marquis – Operations and Maintenance Supervisor • DeWayne Pitts – Finance Director • HB Harper – Planning Manager • 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

S5.C.1.b – Coordination with long-range plan updates

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Coordination with long-range plan updates	2025 COBI planned actions and activities for Stormwater Planning – Coordination with long-range plan updates
S5.C.1.b.i. Each Permittee shall <u>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</u> 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.	COBI will prepare written descriptions in a document to submit with the 2026 Annual Report submitted on or before March 31, 2027.

S5.C.1.c – Low impact development (LID) code-related requirements

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Low impact development (LID) code related requirements	2025 COBI planned actions and activities for Stormwater Planning – Low impact development (LID) code related requirements
S5.C.1.c.i. Permittees shall <u>continue to require LID Principles and LID BMPs</u> 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.	<p>COBI continues 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.</p> <p>COBI follows and enforces the following Bainbridge Island Municipal Code (BIMC) chapters to establish adherence to COBI-specific regulations regarding minimum requirement thresholds and LID standards in advance of construction activities and ensure minimum standards of maintenance for all stormwater facilities, including LID BMPs:</p> <ul style="list-style-type: none">• Chapter 15.19 – Site Assessment Review• Chapter 15.20 – Surface Water and Stormwater Management - All development and redevelopment within the thresholds established in

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Low impact development (LID) code related requirements	2025 COBI planned actions and activities for Stormwater Planning – Low impact development (LID) code related requirements
	<p>BIMC 15.20 shall be subject to low impact development (LID) standards regarding surface water and stormwater in order to mimic natural hydrology and to limit pollution of the Puget Sound.</p> <p>Furthermore, during and after construction activities, the City follows and enforces BIMC 15.21 for Stormwater Facilities Maintenance Program to ensure minimum standards of maintenance for all stormwater facilities, including LID BMPs.</p>
<p>S5.C.1.c.i.(a) Annually, each Permittee shall <u>assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs</u> since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.</p>	<p>COBI staff annually, or as needed, assess any newly identified administrative barriers or regulatory barriers to implementation of LID Principles or LID BMPs. If new administrative barriers or regulatory barriers to implementation of LID principles or LID BMPs are identified, staff work to address the barriers and document any new mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.</p>
<p>S5.C.1.c.iii. <u>No later than December 31, 2028, adopt and implement tree canopy goals and policies</u> to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management and water quality improvements in receiving waters.</p> <p>Establish a long-term (e.g. 5, 10 year or longer) goal of canopy, existing or future projection, to be used for stormwater management that is appropriate to the jurisdiction. Specific considerations for canopy for stormwater management on Permittee-owned or operated lands shall include (but are not limited to):</p>	<p>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). It is recommended here and in the Stormwater System Plan for City Council to adopt the tree canopy cover goal recommendations before December 31, 2028.</p>

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Low impact development (LID) code related requirements	2025 COBI planned actions and activities for Stormwater Planning – Low impact development (LID) code related requirements
<p>S5.C.1.c.iii.(a) Maintaining or increasing canopy in overburdened communities.</p> <p>S5.C.1.c.iii.(b) Maintaining existing mature canopy. Document considerations, reasoning, and rationale for goals and policies.</p>	

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

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Stormwater Management Action Planning (SMAP)	2025 COBI planned actions and activities for Stormwater Planning – Stormwater Management Action Planning (SMAP)
<p>S5.C.1.d. Permittees shall <u>conduct a similar process</u> 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 Stormwater Management Action Plan (SMAP). A purpose of the SMAP is to support implementation in the Stormwater Management for Existing Development (SMED) Program with the identification of strategic investments through the identification of projects and actions.</p> <p>S5.C.1.d.i. Stormwater Management Action Plan (SMAP). No later than March 31, 2027, Permittees shall <u>complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP</u>, that identifies all of the following:</p> <p>S5.C.1.d.i.(a) A <u>description of the stormwater facility retrofits needed</u> for the area, including the BMP types and preferred locations. Include projects that address transportation-related runoff from high traffic areas.</p> <p>S5.C.1.d.i.(b) <u>Land management/development strategies and/or actions</u> identified for water quality management.</p>	<p>In 2022, the City completed a receiving water inventory, assessment, and prioritization project for the Island’s twelve watersheds.</p> <ul style="list-style-type: none"> • Watershed Inventory and Assessment • Watershed Inventory and Assessment – Appendix A • Watershed Prioritization <p>This work led to the completion of the Stormwater Management Action Plan (SMAP) for Manzanita Watershed Eastern Catchment in early 2023. SMAP implementation is subject to City Council approval. City Council and/or City Management may decide in 2025 or 2026 to either update the existing SMAP or create an additional SMAP for another priority catchment to meet this requirement.</p>

2024-2029 Phase II Permit minimum performance measures for Stormwater Planning – Stormwater Management Action Planning (SMAP)	2025 COBI planned actions and activities for Stormwater Planning – Stormwater Management Action Planning (SMAP)
<p>S5.C.1.d.i.(c) <u>Focused, enhanced, or customized implementation of stormwater management actions</u> related to Permit sections within S5, including:</p> <ul style="list-style-type: none"> • IDDE field screening; • Prioritization of Source Control inspections; • O&M inspections or enhanced maintenance; or • Public Education and Outreach behavior change programs. <p>Identified actions shall support other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area in particular.</p> <p>S5.C.1.d.i.(d) If applicable, identification of changes needed to local long-range plans, to address SMAP priorities.</p> <p>S5.C.1.d.i.(e) A <u>proposed implementation schedule and budget sources</u> for:</p> <ul style="list-style-type: none"> • Short-term actions (i.e., actions to be accomplished within six years), and • Long-term actions (i.e., actions to be accomplished within seven to 20 years). <p>S5.C.1.d.i.(f) Actions in the SMAP that may benefit <u>overburdened</u> communities, including specifically vulnerable populations and highly impacted Communities.</p> <p>S5.C.1.d.i.(g) A <u>process and schedule to provide future assessment and feedback</u> to improve the planning process and implementation of procedures or projects.</p>	<p>The following stakeholder groups may be invited again to aid the City with Stormwater Management Action Planning work:</p> <ul style="list-style-type: none"> • Suquamish Tribe • Bainbridge Island Watershed Council • Bainbridge Island Land Trust • Bainbridge Island Metro Park & Recreation District • Kitsap Conservation District • Friends of the Farms • Washington Department of Fish and Wildlife

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 will participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.”

The following four subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 2 (S5.C.2), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.2.a – Education and outreach program](#)
- [S5.C.2.a.i – General awareness](#)
- [S5.C.2.a.ii – Behavior change](#)
- [S5.C.2.a.iii – Stewardship](#)

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 message in language(s) other than English, as appropriate to the priority audience.”

The City provides stormwater management public education and outreach by offering information, resources, support, and services for the general public as well as priority audiences and priority subjects. Below is a compilation of the many opportunities provided by the

City to support general awareness, encourage behavior change, and promote stewardship. If you want more detailed information on any of these items, please contact water resources via email at waterresources@bainbridgewa.gov.

- City website webpages
 - [Stormwater Management](#)
 - [Water Quality and Flow Monitoring Program](#) (WQFMP)
 - [Climate Change Adaptation and Mitigation Program](#)
- Web links to, or access to copies of, legal and technical guidance and manuals:
 - [Bainbridge Island Municipal City Code](#)
 - [Low Impact Development \(LID\) guidance](#)
 - [City of Bainbridge Island Design and Construction Standards and Specification \(scheduled to be updated in 2025\)](#)
 - [2019 Stormwater Management Manual for Western Washington](#)
- City Council, Ward, Committee, Hearing Examiner, and other public meetings
 - [City Council](#)
 - [Citizen Advisory Committees](#)
 - [Meeting calendar](#)
- Social media outlets:
 - [City of Bainbridge Island Facebook Page](#)
 - [City of Bainbridge Island Nextdoor Page](#)
 - [City of Bainbridge Island SeeClickFix](#)
- Articles in [COBI Connects](#) publication and [City Manager's Report weekly newsletter](#)
- City Water Resources Listserv and other “notify me” Listserv notifications – sign up through this [link](#)
- Response to reported or found spills or drainage concerns
 - Web: [Kitsap 1 - pollution.kitsapgov.com](http://Kitsap1-pollution.kitsapgov.com) OR [SeeClickFix](#)
 - Spill Hotline Telephone: 360-337-5777
 - Email: waterresources@bainbridgewa.gov or help@kitsap1.com
- Information and education signs at parks, road ends, stormwater flow control and treatment facilities, and on pet waste bag stations
- Personal interactions (via telephone, email, and face-to-face)
- Letters and notices mailed or emailed to property owners as needed

- Private and Capital development, redevelopment, and construction project planning and Permitting procedures, including:
 - [Planning Conferences and Consultations](#)
 - [Site Assessment Review \(SAR\)](#) along with Stormwater Site Plan (SSP) review and approval
 - Pre and post construction meetings
 - Inspections and inspection reports for temporary and permanent stormwater best management practices (BMPs)
 - Operations and maintenance manuals
 - Declaration of Covenants for stormwater maintenance
 - Building inspections
- Participation in regional stormwater groups, programs, and campaigns:
 - [Puget Sound Starts Here](#) (PSSH)
 - [Stormwater Action Monitoring \(SAM\)](#) – Stormwater Work Group
 - [Stormwater Outreach For Regional Municipalities](#) (STORM) [regional coordination group]
 - [West Sound Partners for Ecosystem Recovery \(WSPER\) – West Central Puget Sound Local Integrating Organization and Lead Entity](#)
 - [West Sound Stormwater Outreach Group](#) (WSSOG) [regional coordination through an Interlocal Agreement]
- Collaboration with Kitsap County agencies and programs
 - [Kitsap Conservation District](#) (coordination also occurs through an Interlocal Agreement for agricultural water quality assistance)
 - Kitsap County Public Health District – [Pollution Prevention Assistance Program](#)
- Participation with Bainbridge Island community groups and organizations, including:
 - [Bainbridge Island Land Trust](#)
 - [Bainbridge Island Metro Park & Recreation District & Student Conservation Corps program](#)
 - [Bainbridge Island School District 303](#)
 - [Friends of The Farms](#)
 - [Sustainable Bainbridge Community Groups](#): Watershed Council, Weed Warriors, Zero Waste, Bainbridge Beach Naturalists
 - [Washington State University \(WSU\) Master Gardeners](#)
- Providing information at scheduled and special events, such as:
 - [KidiMu Fam Jam](#), March 15, 2025
 - Annual [Earth Month/Earth Day](#)(April)

- Annual [Kitsap Water Festival](#) (April)
- [Bainbridge Island Farmers Market](#) at Town Square (April – December)
- Annual [Puget Sound Starts Here](#) month (September)
- Annual [Pollution Prevention Week](#) (September)
- [Sustainable Bainbridge](#) Annual Beach Cleanup (September)
- Annual [spawning salmon monitoring](#) (Nov.-Dec.)
- [Land Use Notices](#)
- Enforcement of State, County, and City standards, laws, and codes
- [Source Control Program](#) inspections and enforcement
 - [Fats, Oils, and Greases Program](#) inspections and enforcement
 - [Waste reduction Program](#)
- [Private stormwater facility](#) inspections and enforcement
- Pet waste control: [Mutt Mitt Station Program](#)
- Visible operations and maintenance activities and interactions
- City Hall common areas information displays and often with free takeaway items
- Storm drain “No Dumping” markers
- Internships



Pet waste management education and outreach by
Stormwater Management Program Coordinator, Stella Collier,
at KidiMu Fam Jam event March 15, 2025

S5.C.2.a.i – General awareness

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – General awareness	2025 COBI planned actions and activities for Public Education and Outreach – General awareness
<p>S5.C.2.a.i. To build general awareness, Permittees shall <u>annually select, at a minimum, one priority audience and one subject area</u> from either (a) or (b):</p> <p>S5.C.2.a.i.(a) <u>Priority audiences</u>: General public (including overburdened communities, school age children, college/university, or trade students) or businesses (including home-based, or mobile businesses). Subject areas:</p> <ul style="list-style-type: none">• General impacts of stormwater on surface waters, including impacts from impervious surfaces.• Low impact development (LID) principles and LID BMPs. <p>S5.C.2.a.i.(b) <u>Priority audiences</u>: Engineers, contractors, developers, property owners/managers, or land use planners. Subject areas:</p> <ul style="list-style-type: none">• 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. <p>S5.C.2.a.i.(c) Permittees shall <u>provide subject area information</u> to the priority audience on an ongoing or strategic schedule.”</p>	<p>In 2025, the COBI selected priority audience is property owners/managers, and the selected priority subject is source control BMPs. General awareness education and outreach for this audience and subject will be strategized in conjunction with meeting the requirements for Source Control Program of Existing Development (see SWMP section S5.C.8).</p>

S5.C.2.a.ii – Behavior change

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – Behavior change	2025 COBI planned actions and activities for Public Education and Outreach – Behavior change
<p>S5.C.2.a.ii. To affect behavior change, Permittees shall <u>select, at a minimum, one priority audience and one BMP</u>:</p>	<p>The City is part of a regional group called West Sound Stormwater Outreach Group (WSSOG). The group decided to not continue the</p>

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – Behavior change	2025 COBI planned actions and activities for Public Education and Outreach – Behavior change
<p>S5.C.2.a.ii.(a) Priority Audiences: Residents, landscapers, property managers/owners, developers, school age children, college/university trade students, or businesses (including home-based or mobile businesses).</p> <p>BMPs:</p> <ul style="list-style-type: none"> • 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. <p>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. Each Permittee shall:</p> <ol style="list-style-type: none"> 1. Develop a strategy and schedule to implement the existing campaign more effectively; or 	<p>previous behavior change campaign for natural yard care from the past 3-4 years and to start a new campaign for the priority audience of property managers/owners for dumpster and trash compactor maintenance.</p> <div data-bbox="1386 467 1749 1036" data-label="Image"> </div> <p>In 2025, COBI’s Stormwater Management Program Coordinator will participate in WSSOG meetings and behavior change campaign program development then shall implement the adopted element(s) of the regional program in the local jurisdiction.</p>

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – Behavior change	2025 COBI planned actions and activities for Public Education and Outreach – Behavior change
<ol style="list-style-type: none"> 2. Develop a strategy and schedule to expand the existing campaign to a new priority audience or BMPs; or 3. Develop a strategy and schedule for a new priority audience and BMP behavior change campaign. <p>S5.C.2.a.ii.(c) Behavior change campaign implementation. <u>No later than September 1, 2025, begin to implement the strategy developed in S5.C.2.a.ii.(b).</u></p> <p>S5.C.2.a.ii.(d) Behavior change campaign evaluation. <u>No later than March 31, 2029, evaluate and submit report on:</u></p> <ol style="list-style-type: none"> 1. The changes in understanding and adoption of behaviors resulting from the implementation of the strategy; and 2. Any planned or recommended changes to the campaign to be more effective; describe the strategies and process to achieve the results. <p>S5.C.2.a.ii.(e) Behavior change campaign <u>adaptive management</u>. Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.</p>	

S5.C.2.a.iii – Stewardship

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – Stewardship	2025 COBI planned actions and activities for Public Education and Outreach – Stewardship
<p>S5.C.2.a.iii. <u>Provide and advertise stewardship opportunities and/or partner with existing organizations</u> (including non-permittees) to encourage</p>	<p>COBI will continue to promote, and when appropriate may partner with, local and regional stewardship groups and agency programs that provide stewardship opportunities, such as the following:</p> <ul style="list-style-type: none"> • The City’s Pet Waste Control Program includes a local and regional element. The program provides free pet waste bags at “Mutt Mitt” stations installed all around the island to help

2024-2029 Phase II Permit minimum performance measures for Public Education and Outreach – Stewardship	2025 COBI planned actions and activities for Public Education and Outreach – Stewardship
<p>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.</p>	<p>prevent fecal coliform bacteria release into the environment and TMDL area. In total, as part of this program there are 54 public pet waste bag stations around the island (this total does not include the many privately owned and maintained stations located around the island).</p> <ul style="list-style-type: none"> ▪ For the local element, Public Works staff regularly inspect and maintain 10 pet waste bag stations installed at City owned and operated lands adjacent to stream and marine shorelines and where there is a reasonable expectation to have domestic dogs use and the potential for pollution in stormwater within the TMDL area. ▪ For the regional element, the City is in partnership, through WSSOG, with the Kitsap County “Mutt Mitt” Program to promote and facilitate stewardship by reminding and assisting pet owners to pick up their pet waste and put it in the garbage to protect water quality. As part of the regional behavior change campaign “Mutt Mitt” Program with WSSOG, COBI purchases and promotes public access pet waste stations that are hosted and sponsored by volunteer private property owners. There are 44 stations installed around the island. <ul style="list-style-type: none"> • City Water Quality and Flow Monitoring Program (WQFMP) A dedicated group of volunteer stewards help with stream and stormwater discharge monitoring, stream repairs and restoration, and Salmon monitoring. • Sustainable Bainbridge Community Groups: Watershed Council, Weed Warriors, Zero Waste The City promotes, and sometimes partners with, the efforts of this dedicated volunteer steward group organizing waste reduction activities and events, invasive species management activities and events, and annual beach cleanup event. • WSU Master Gardeners Outreach and Assistance Program • Bainbridge Island Metro Park & Recreation District Student Conservation Corps Program • Kitsap Conservation District Outreach and Assistance Programs • West Sound Stormwater Outreach Group (WSSOG) • Washington Department of Fish and Wildlife habitat monitoring and improvement projects

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.”



City Council Meeting 9/10/2024: Proclamation of Puget Sound Starts Here Month [September 2024] by Deputy Mayor Fantroy-Johnson (middle) pictured with Development Engineering Manager, Paul Nylund, and Stormwater Management Program Coordinator, Stella Collier

The following table presents the required minimum performance measures as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 3 (S5.C.3), alongside the 2025 COBI planned actions and activities to meet the requirements.

S5.C.3.a and b – Create opportunities, and post SWMP Plan and Annual Report

2024-2029 Phase II Permit minimum performance measures for public involvement and participation	2025 COBI planned actions and activities for public involvement and participation
<p>S5.C.3.a. Permittees shall <u>create opportunities for the public, including overburdened communities, to participate in decision-making processes</u> involving development, implementation, and update of the Permittees SMAP to SWMP; and document specific outreach measures for overburdened communities.</p>	<p>The following are the many ways the City creates opportunities for the public to participate in the decision-making processes, receive information and notices, and to review and provide comment on the SMAP and SWMP.</p> <ul style="list-style-type: none"> • City of Bainbridge Island website • City of Bainbridge island Water Resources Listserv • City of Bainbridge Island SeeClickFix • City Council and Citizen Advisory Committees • Public Meetings • Email to Water Resources Work Group: waterresources@bainbridgewa.gov • Telephone: 206-842-2016 • Mail posted to: City of Bainbridge Island, Public Works-Engineering, Attn: Stormwater Management Program Coordinator, 280 Madison Ave N, Bainbridge Island, WA 98110 • In person at City Hall located at 280 Madison Ave N, Bainbridge Island, WA 98110
<p>S5.C.3.a.i. Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities.</p>	<p>In 2025, the City will begin annually documenting specific public involvement and participation opportunities provided to overburdened communities.</p>
<p>S5.C.3.a.ii. No later than December 31, 2026, document methods used to identify overburdened communities.</p>	<p>In 2025 or 2026, the City will document methods used to identify overburdened communities.</p>
<p>S5.C.3.b. Each Permittee shall <u>post on their website their SWMP Plan and Annual Report</u>, required under S9.A, no later than May 31 each year. All other submittals shall be available to the public upon request.</p>	<p>The City will post the 2025 SWMP Plan and 2024 Annual Report on the City of Bainbridge Island website, www.bainbridgewa.gov/stormwater, no later than May 31, 2025. All other submittals shall be provided to the public upon request in a timely manner.</p>

S5.C.4 – MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) MAPPING AND DOCUMENTATION

“The SWMP shall include an ongoing program for mapping and documenting the MS4”

The following three subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 4 (S5.C.4), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.4.a – Ongoing mapping](#)
- [S5.C.4.b – New mapping](#)
- [S5.C.4.c through e – Recordkeeping and Map Sharing](#)

In January 2025, the City hired its first full-time Public Works GIS Technician, Casey Blankenship, who will help support compliance with MS4 mapping and documentation requirements.

S5.C.4.a – Ongoing mapping

2024-2029 Phase II Permit minimum performance measures for MS4 Mapping and Documentation – Ongoing mapping	2025 COBI planned actions and activities for MS4 Mapping and Documentation – Ongoing mapping
<p>S5.C.4.a. Ongoing Mapping: <u>Each Permittee shall maintain mapping data for the features listed below:</u></p> <p>S5.C.4.a.i. Known MS4 outfalls and known MS4 discharge points.</p> <p>S5.C.4.a.i(a) Map outfall size and material, where known.</p> <p>S5.C.4.a.ii. Receiving waters, other than groundwater.</p> <p>S5.C.4.a.iii. Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.</p> <p>S5.C.4.a.iv. Geographic areas served by the Permittee’s MS4 that do not discharge stormwater to surface waters.</p> <p>S5.C.4.a.v. Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:</p>	<p>In 2025 and ongoing, the Public Works GIS Technician will conduct ongoing mapping.</p>

2024-2029 Phase II Permit minimum performance measures for MS4 Mapping and Documentation – Ongoing mapping	2025 COBI planned actions and activities for MS4 Mapping and Documentation – Ongoing mapping
<p>S5.C.4.a.v.(a) Tributary conveyance type, material, and size where known.</p> <p>S5.C.4.a.v.(b) Associated drainage areas.</p> <p>S5.C.4.a.v.(c) Land use.</p> <p>S5.C.4.a.vi. Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.</p> <p>S5.C.4.a.vii. All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.</p> <p>S5.C.4.a.vii. All known connections from the MS4 to a privately owned stormwater system.</p>	

S5.C.4.b – New mapping

2024-2029 Phase II Permit minimum performance measures for MS4 Mapping and Documentation – New mapping	2025 COBI planned actions and activities for MS4 Mapping and Documentation – New mapping
<p>S5.C.4.b. New Mapping. Each Permittee shall:</p> <p>S5.C.4.b.i. <u>No later than March 31, 2026, submit locations of all known MS4 outfalls</u> according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.</p>	<p>In 2025, COBI staff will review existing outfall data and adapt and update as needed to comply with requirements.</p>
<p>S5.C.4.b.ii. <u>No later than December 31, 2026</u>, using available, existing data, <u>map tree canopy</u> to support stormwater management on Permittee-owned or operated properties. Permittees shall <u>develop and follow a methodology to intentionally identify canopy</u> for stormwater management purposes, which may be updated annually or as needed.</p>	<p>In 2025 or 2026, COBI staff will review existing tree canopy data to support stormwater management; and will develop and follow a methodology to identify canopy data for stormwater management purposes.</p>
<p>S5.C.4.b.iii. <u>No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins</u> to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional</p>	<p>No plans to accomplish this in 2025. Work may be accomplished in conjunction with and to support Stormwater Management Action Planning (see S5.C.1.d) and/or</p>

2024-2029 Phase II Permit minimum performance measures for MS4 Mapping and Documentation – New mapping	2025 COBI planned actions and activities for MS4 Mapping and Documentation – New mapping
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.	Stormwater Management for Existing Development (see S5.C.7).
S5.C.4.b.iv. No later than December 31, 2028, using available, existing data <u>map overburdened communities</u> in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.	This work may occur in 2025 or 2026 in conjunction with activities to comply with public involvement and participation requirements S5.C.3.a.i. and S5.C.3.a.ii.

S5.C.4.c through e – Recordkeeping and map sharing

2024-2029 Phase II Permit minimum performance measures for MS4 Mapping and Documentation – Recordkeeping and map sharing	2025 COBI planned actions and activities for MS4 Mapping and Documentation – Recordkeeping and map sharing
S5.C.4.c. The <u>required format for mapping is electronic</u> (e.g. Geographical Information System, CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes, with <u>fully described mapping standards</u>).	Mapping is done electronically using Esri ArcGIS software. COBI staff will continue to work toward fully described mapping standards.
S5.C.4.d. To the extent consistent with national security laws and directives, each Permittee shall <u>make available to Ecology, upon request, available maps</u> depicting the information required in S5.C.4.a through c, above. S5.C.4.e. Upon request, and to the extent appropriate, Permittees shall <u>provide mapping information</u> to federally recognized Indian Tribes, municipalities, and other Permittees.	Mapping is available upon request to Ecology, federally recognized Indian Tribes, municipalities, other Permittees, and to the public through public records requests.

S5.C.5 – ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

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

The following seven subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 5 (S5.C.5), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.5.a – Procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges](#)
- [S5.C.5.b – Informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste](#)
- [S5.C.5.c – Illicit discharge ordinance](#)
- [S5.C.5.d – Ongoing program to detect and identify non-stormwater discharges and illicit connections, spills, and other illicit discharges](#)
- [S5.C.5.e – Ongoing program to address non-stormwater discharges and illicit connections into the MS4](#)
- [S5.C.5.f – Train staff](#)
- [S5.C.5.g – Recordkeeping](#)

S5.C.5.a – Procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges

2024-2029 Phase II Permit minimum performance measures for IDDE – Procedures for reporting and correcting IDDE	2025 COBI planned actions and activities for IDDE – Procedures for reporting and correcting IDDE
S5.C.5.a. The program shall include <u>procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges</u> when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4. Illicit connections and illicit discharges must be identified through, but not limited to, field screening, inspections, complaints/reports,	In 2025, COBI staff will review and update as needed the <i>City of Bainbridge Island Illicit Discharge Detection and Elimination Manual</i> (IDDE manual) the procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified, as well as procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

2024-2029 Phase II Permit minimum performance measures for IDDE – Procedures for reporting and correcting IDDE	2025 COBI planned actions and activities for IDDE – Procedures for reporting and correcting IDDE
construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.	

S5.C.5.b – Informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste

2024-2029 Phase II Permit minimum performance measures for IDDE – Informing people about waste disposal	2025 COBI planned actions and activities for IDDE – Informing people about waste disposal
S5.C.5.b. Permittees shall <u>inform</u> public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste	In 2025, the Stormwater Management Program Coordinator will continue to make efforts through policies, codes, procedures, training, and education and outreach activities to inform staff, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

S5.C.5.c – Illicit discharge ordinance

2024-2029 Phase II Permit minimum performance measures for IDDE – Illicit discharge ordinance	2025 COBI planned actions and activities for IDDE – Illicit discharge ordinance
<p>S5.C.5.c. Each Permittee shall <u>implement an ordinance or other regulatory mechanism</u> 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 is 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.</p> <p>S5.C.5.c.i. Allowable discharges... (see Phase II Permit or BIMC 15.22 language)</p> <p>S5.C.5.c.ii. Conditionally allowable discharges... (see Phase II Permit or BIMC 15.22 language)</p> <p>S5.C.5.c.iii. The Permittee shall further address any category of discharges in (i) or (ii), above, if the discharges are identified as significant sources of pollutants to waters of the State.</p>	<p>The Illicit Discharge Detection and Elimination Ordinance No. 2008-14 (effective November 3, 2008) codified in BIMC 15.22 – Illicit Discharge Detection And Elimination is the City’s regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the MS4 to the maximum extent allowable under state and federal law. BIMC 15.22 was updated in late 2024 and meets S5.C.5.c. requirements.</p>

2024-2029 Phase II Permit minimum performance measures for IDDE – Illicit discharge ordinance	2025 COBI planned actions and activities for IDDE – Illicit discharge ordinance
S5.C.5.c.iv. The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.	

S5.C.5.d – Ongoing program to detect and identify non-stormwater discharges and illicit connections, spills, and other illicit discharges

2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to detect non-stormwater discharges	2025 COBI planned actions and activities for IDDE – Ongoing program detect non-stormwater discharges
S5.C.5.d. Each Permittee shall implement an <u>ongoing program designed to detect and identify non-stormwater discharges and illicit connections</u> into the Permittee’s MS4. The program shall include the following components:	To detect and identify non-stormwater discharges and illicit connections into the MS4, COBI relies on qualified City staff, the public, and those doing business in the jurisdiction to recognize and report suspect, real, or potential issues of pollution. Therefore, the detection program is focused on educating for awareness, training, and providing technical assistance to City staff, the public, and businesses. Detection is achieved by people reporting suspected non-stormwater discharges through the City’s spill hotline (360-337-5777) or other means such as SeeClickFix , and by COBI staff investigating reports and conducting field screening.
S5.C.5.d.i. <u>Procedures for conducting investigations</u> of the Permittee’s MS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections. The Permittee shall implement a <u>field screening methodology</u> appropriate to the characteristics of the MS4 and water quality concerns. Screening for illicit connections may be conducted using <i>Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual</i> (Herrera Environmental Consultants,	MS4 field screening is performed by City Public Works Engineering and Operations & Maintenance (O&M) staff during IDDE investigations, with scheduled business source control inspections, and inspections and maintenance activities for the operation and maintenance of catch basins and flow control and water quality treatment facilities. Staff utilize field screening methodologies consistent with the methods recommended in the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020).

2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to detect non-stormwater discharges	2025 COBI planned actions and activities for IDDE – Ongoing program detect non-stormwater discharges
Inc.; May 2020), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report.	
S5.C.5.d.i.(a) All Permittees shall complete <u>field screening</u> for an average of 12% of the MS4 each year.	In 2025, COBI staff will conduct field screening of at least an average of 12% of the MS4 in conjunction with planned inspection and maintenance activities, IDDE investigation reports, and source control inspections.
S5.C.5.d.ii. A <u>publicly listed and publicized hotline</u> or other telephone number for public reporting of spills and other illicit discharges.	<p>The City adopted the Kitsap County regional spill hotline, called Kitsap1. COBI publicly lists and publicizes the Kitsap1 reporting hotline telephone number 360-337-5777, email (help@kitsap1.com), and online portal through the OCBI website and on public education and outreach materials.</p> <p>All reports to Kitsap1 are promptly forwarded to the City and are investigated, documented, and tracked by City staff.</p> <p>In addition to Kitsap1, other spill reporting methods exist and are publicly advertised. The public is always encouraged to call 911 for emergency situations. To report non-emergency water pollution and spills, anyone may contact the City through the main telephone line (206-842-7366) or online through the City's SeeClickFix account, Public Works Engineering telephone line (206-842-2016), Public Works Operations & Maintenance telephone line (206-842-1212). The public may also report open water spills to the Pacific spill hotline number that is commonly posted at docks and marinas (1-800-OILS-911 or 1-800-645-7911), these reports are routed to Department of Ecology (Ecology), then Ecology will route to the City if needed.</p>
S5.C.5.d.iii. An <u>ongoing training program</u> for all municipal field staff who, as part of their normal job responsibilities, might come into contact with or otherwise observe an	The City provides training to staff who, as part of their normal job responsibilities, might come into contact with or observe an illicit discharge and/or connection to the MS4, on the proper procedures for

2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to detect non-stormwater discharges	2025 COBI planned actions and activities for IDDE – Ongoing program detect non-stormwater discharges
<p>illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. 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 trainings provided and the staff trained.</p>	<p>reporting and responding to the illicit discharge and/or connection. Staff also receive follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Training is delivered and documented pursuant to Phase II Permit requirements S5.C.5.f (staff training) and S5.C.5.g (recordkeeping).</p>

Detected illicit discharge of food waste



Detected illicit discharge of sediment debris



Detected illicit discharge of automotive fuel/liquids



S5.C.5.e – Ongoing program to address non-stormwater discharges and illicit connections into the MS4

2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to address non-stormwater discharges	2025 COBI planned actions and activities for IDDE – Ongoing program to address non-stormwater discharges
<p>S5.C.5.e. Each Permittee shall <u>implement an ongoing program</u> designed to address illicit discharges, including spills and illicit connections, into the Permittee’s MS4. The program shall include:</p> <p>S5.C.5.e.i <u>Procedures for characterizing</u> the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.</p> <p>S5.C.5.e.ii. <u>Procedures for the post-emergency clean-up</u> of firefighting activities: <u>No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments</u> that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities. No later than January 1, 2027, Permittee shall update and implement procedures to minimize discharges to the MS4 during post- emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4. The Permittee is not expected to deploy control measures during an emergency.</p> <p>S5.C.5.e.iii. <u>Procedures for tracing the source</u> of an illicit discharge; including visual inspections and, when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures.</p> <p>S5.C.5.e.iv. <u>Procedures for eliminating the discharge</u> including notification of appropriate authorities (including owners or operators of interconnected MS4s), notification of the property owner, 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.</p>	<p>In 2025, COBI staff will review and update as needed the <i>City of Bainbridge Island Illicit Discharge Detection and Elimination Manual</i> (IDDE manual) to account for changes in staffing, code and policy changes, and meet ongoing and new Phase II Permit requirements, such procedures for post-emergency clean-up of firefighting activities. The manual shall include:</p> <ul style="list-style-type: none"> • Procedures for the characterization and abatement of any illicit discharges • Procedures for source tracing of an illicit discharge • Procedures for eliminating the illicit discharge • Minimum response times for investigating and eliminating an illicit discharge <p>In February 2025, COBI staff initiated coordination with Bainbridge Island Fire Department regarding PFAS-containing AFFFs and according to Fire Chief, Jared Moravec, BIFD has not used AFFFs in well over a decade.</p>

2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to address non-stormwater discharges	2025 COBI planned actions and activities for IDDE – Ongoing program to address non-stormwater discharges
<p>S5.C.5.e.v. Compliance with the provisions in (i)-(iv) above shall be achieved by meeting the following timelines:</p> <p>S5.C.5.e.v.(a) <u>Immediately respond</u> 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.</p> <p>S5.C.5.e.v.(b) <u>Investigate</u> (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.</p> <p>S5.C.5.e.v.(c) <u>Initiate an investigation</u> 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.</p> <p>S5.C.5.e.v.(d) Upon confirmation of an illicit connection, use the <u>compliance strategy in a documented effort</u> to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.</p>	

S5.C.5.f – Staff training

2024-2029 Phase II Permit minimum performance measures for IDDE – Staff training	2025 COBI planned actions and activities for IDDE – Staff training
<p>S5.C.5.f. Permittees shall <u>train staff</u> 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 <u>document and maintain records</u> of the training provided and the staff trained.</p>	<p>Training opportunities are offered to staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Also see S5.C.5.d.iii.</p> <p>Training that is reported to the Stormwater Management Program Coordinator is recorded and tracked in an Excel spreadsheet. Also see S5.C.5.g (recordkeeping).</p>

S5.C.5.g – Recordkeeping

2024-2029 Phase II Permit minimum performance measures for IDDE – Recordkeeping	2025 COBI planned actions and activities for IDDE – Recordkeeping
S5.C.5.g. Each Permittee shall <u>track and maintain records</u> of the activities conducted to meet the requirements of this 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 specified in Appendix 13 and WQWebIDDE. Each Permittee may either use their own system or WQWebIDDE for recording this data.	The City tracks and records IDDE staff trainings, IDDE reports, investigations, and any resulting necessary corrective actions and/or enforcement actions. Since 2020, the City has been utilizing the Department of Ecology's WQWebIDDE reporting tool and database for recordkeeping and for Annual Reporting. To support the reports in WQWebIDDE, the City keeps investigation records in electronic file folders (i.e., photos, reports, correspondence, enforcement documentation, etc.) that cannot be uploaded and stored in WQWebIDDE.

S5.C.6 – CONTROLLING RUNOFF FROM NEW DEVELOPMENT, 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.”

The following four subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 6 (S5.C.6), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.6.a and b – Enforceable mechanisms to address runoff from construction projects](#)
- [S5.C.6.c – Permitting process with site plan review, inspection, and enforcement](#)
- [S5.C.6.d – Notice of intent \(NOIs\)](#)
- [S5.C.6.e – Staff training](#)



Before and after enforcement of temporary erosion and sediment control BMPs



S5.C.6.a and b – Enforceable mechanisms to address runoff from construction projects

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Enforcement mechanisms	2025 COBI planned actions and activities for controlling runoff from construction – Enforcement mechanisms
<p>S5.C.6.a. Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.</p> <p><u>No later than June 30, 2027</u>, 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 applications submitted:</p> <p>S5.C.6.a.i. On or after July 1, 2027.</p> <p>S5.C.6.a.ii. Prior to January 1, 2017, that have not started construction by July 1, 2022.</p> <p>S5.C.6.a.iii. Prior to July 1, 2022, that have not started construction by July 1, 2027.</p> <p>S5.C.6.a.iv. Prior to July 1, 2027, that have not started construction by July 1, 2032</p> <p>S5.C.6.b. The ordinance or other enforceable mechanism shall include, at a minimum:</p> <p>S5.C.6.b.i The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and exceptions criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances</p>	<p>The City utilizes a combination of effective municipal and Washington State codes and adopted standards to establish local legal authority to administer and enforce requirements for controlling stormwater runoff from development, redevelopment, and construction site projects pursuant to Phase II Permit requirements. The following local requirements include limitations, and criteria that, and when used to implement the minimum requirements in Appendix 1 of the Phase II Permit, will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment prior to discharge.</p> <ul style="list-style-type: none"> • BIMC 15.16, Flood Damage Protection – To minimize public and private losses due to flood conditions in specific areas. • BIMC Code 15.19, Site Assessment Review – This ensures that the provisions in Chapter 15.20 Bainbridge Island Municipal Code (BIMC), including BIMC 15.20.010, are understood and effectively adhered to as part of the planning related to development or redevelopment of a site, and prior to the undertaking of clearing and grading that occurs in advance of construction activities on a site. • BIMC 15.20, Surface Water and Stormwater Management – Establishes enforcement of required stormwater management system design and construction standards by adopting the Department of Ecology 2019 Stormwater Management Manual for Western Washington, the code also includes some standard

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Enforcement mechanisms	2025 COBI planned actions and activities for controlling runoff from construction – Enforcement mechanisms
<p>through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.</p> <p>S5.C.6.b.ii. The local requirements shall include the following requirements, limitations, and criteria that, when used to <u>implement the minimum requirements</u> in Appendix 1 (or program approved by Ecology under the 2024 Phase I Permit), will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge:</p> <ul style="list-style-type: none"> (a) Site planning requirements; (b) BMP selection criteria. (c) BMP design criteria. (d) BMP infeasibility criteria. (e) LID competing needs criteria. (f) BMP limitations. <p>Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the state AKART requirements.</p> <p>Permittees who choose to use the requirements, limitations, and criteria above in the <i>Stormwater Management Manual for Western Washington</i>, or a Phase I program approved by</p>	<p>modifications on project thresholds that exceed the manual requirements.</p> <p>No later than June 30, 2027, the City plans to adopt the Department of Ecology 2024 Stormwater Management Manual for Western Washington to comply with Phase II Permit requirements to provide an update to the standards criteria and requirements for the City to continue to require all new development, redevelopment, and construction site projects to meet stormwater management standards that are substantively equivalent to the “Minimum Technical Requirements for New Development and Redevelopment” in Appendix 1 of the Phase II Permit.</p> <ul style="list-style-type: none"> • BIMC 15.21, Stormwater Facilities Maintenance Program – Requires maintenance of all stormwater facilities within the City and to set minimum standards for the inspection and maintenance of stormwater facilities. • BIMC 15.22, Illicit Discharge Detection and Elimination – Establishes the prohibition of illicit connections and discharges to the storm water drainage system and receiving waters; and establishes enforcement and authority to require source control BMPs for existing development. • BIMC 16.20, Critical Areas – Establishes recognition of and protections for ecologically sensitive areas that provide beneficial functions including, but not limited to, water quality protection and enhancement, conveyance and attenuation of flood waters, groundwater recharge and discharge, and erosion control.

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Enforcement mechanisms	2025 COBI planned actions and activities for controlling runoff from construction – Enforcement mechanisms
<p>Ecology, may cite this choice as their sole documentation to meet this requirement.</p> <p>S5.C.6.b.iii. The <u>legal authority</u>, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this section that discharge to the Permittee’s MS4.</p>	<ul style="list-style-type: none"> • BIMC 18.15, Development Standards and Guidelines & BIMC 18.18, Design Standards and Guidelines – These chapters establish and reinforce standards that are protective of water quality. • City of Bainbridge Island Design and Construction Standards – The design and construction standards further establish, and may exceed, the standards adopted from the Department of Ecology 2019 Stormwater Management Manual for Western Washington.

S5.C.6.c – Permitting process with site plan review, inspection, and enforcement

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Permitting process	2025 COBI planned actions and activities for controlling runoff from construction – Permitting process
<p>S5.C.6.c. The <u>program shall include a permitting process with site plan review, inspection and enforcement capability</u> to meet the standards listed in (i) through (iv) below, for both private and public projects, using qualified personnel (as defined in <i>Definitions and Acronyms</i>). At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i, above.</p> <p>S5.C.6.c.i. <u>Review of all stormwater site plans</u> for proposed development activities.</p> <p>S5.C.6.c.ii. <u>Inspect</u>, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential. As an alternative to evaluating each site according to Appendix 7, Permittees may choose to inspect all construction sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i, above.</p>	<p>The City’s permitting process for all public and private projects includes all the required provisions for:</p> <ul style="list-style-type: none"> • Site assessment and plan reviews • Inspection prior, during, and post construction, and enforcement as necessary based on inspection • Regulate maintenance activities at least twice per 12-month period • Enforcement strategy to respond to issues of non-compliance, including but are not limited to: <ul style="list-style-type: none"> ▪ Denial or revocation of engineering plan approvals and Permits

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Permitting process	2025 COBI planned actions and activities for controlling runoff from construction – Permitting process
<p>S5.C.6.c.iii. <u>Inspect all permitted development sites during construction</u> to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection.</p> <p>S5.C.6.c.iv. Each Permittee shall <u>manage maintenance activities</u> to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments <u>at least twice per 12-month period with</u> no less than 4 months between inspections, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.</p> <p>S5.C.6.c.v. <u>Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy</u> to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce, as necessary, based on the inspection.</p> <p>S5.C.6.c.vi. Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the <u>presence and records</u> of an established inspection program designed to inspect all sites. Compliance shall be determined by <u>achieving at least 80% of required inspections</u> annually. The inspections may be combined with other inspections provided they are performed using qualified personnel.</p> <p>S5.C.6.c.vii. The program shall include a procedure for <u>keeping records of inspections</u> and enforcement actions by staff including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.</p> <p>S5.C.6.c.viii. An <u>enforcement strategy</u> shall be implemented to respond to issues of non-compliance.</p>	<ul style="list-style-type: none"> ▪ Stop-work orders ▪ Withholding of release of financial guarantees ▪ Delay of final inspection ▪ Delay or denial of final approval ▪ Denial of occupancy certificates (temporary and permanent) ▪ Notice to surety or other financial institution and/or legal action for forfeiture of financial guarantees • Recordkeeping of all the above activities using SmartGov software <p>COBI staff conducting these activities are Development Engineering Manager, Capital Work Group Manager, Development Engineers, Capital Engineers, Construction Inspectors, Building Inspectors, Stormwater Management Program Coordinator, Water Resources Specialist, and O&M Supervisors.</p>

S5.C.6.d – Notice of intent (NOIs)

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – NOIs	2025 COBI planned actions and activities for controlling runoff from construction – NOIs
<p>S5.C.6.d. The program shall make available to representatives of proposed new development and redevelopment, as applicable: the link to the online Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity, a link to the online Industrial Stormwater General Permit NOI form for industrial activity, and a link to the online registration requirements for Underground Injection Control (UIC) wells. Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.</p>	<p>The City will make available to representatives of proposed development and redevelopment, the link to Department of Ecology’s electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and, as applicable, the link to the electronic Industrial Stormwater General Permit Notice of Intent (NOI) form for industrial activity, and the link to the online registration requirements for UIC wells. The City will continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater Permits issued by Ecology.</p>

S5.C.6.e – Staff training

2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Staff training	2025 COBI planned actions and activities for controlling runoff from construction – Staff training
<p>S5.C.6.e. Each Permittee shall ensure that <u>all staff</u> 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, <u>are trained</u> to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, or staffing. Permittees shall document and <u>maintain records</u> of the training provided and the staff trained.</p>	<p>COBI staff responsible for 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 maintains records of the training provided and the staff trained. All staff who oversee plan reviews and conduct inspections and enforcement are qualified as Certified Erosion Sediment Control Leads (CESCLs).</p>

S5.C.7 – STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT (SMED)

“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.”

The following five subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 7 (S5.C.7), alongside the 2025 COBI planned actions and activities to meet the requirements:

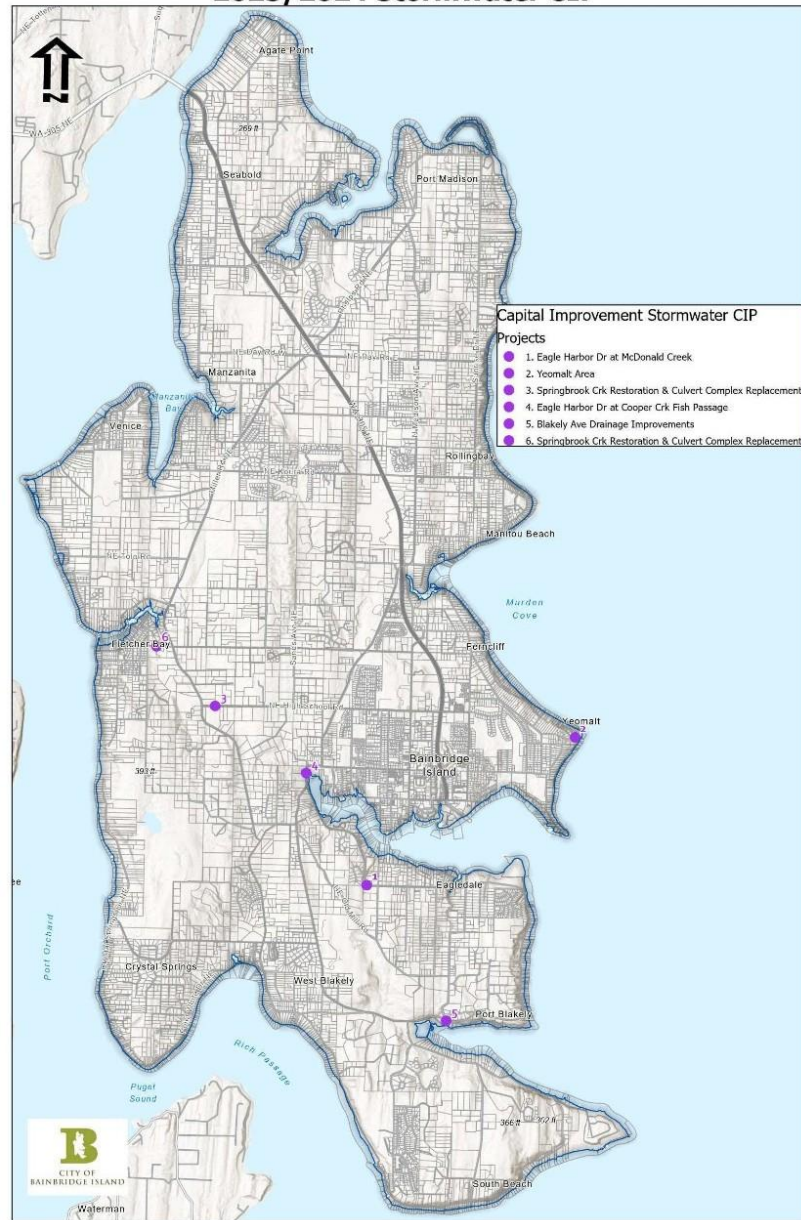
- [S5.C.7.a – Implement stormwater facility retrofits, or tailored SWMP actions](#)
- [S5.C.7.b – Annually list the planned, individual projects scheduled for funding or implementation](#)
- [S5.C.7.c – Fully fund, start construction, or completely implement project\(s\)](#)
- [S5.C.7.d – Option to collaborate on regional goal](#)
- [S5.C.7.e – Report the amount of estimated or projected equivalent acres management by stormwater facility retrofits for the next Permit term](#)

S5.C.7.a – Implement stormwater facility retrofits, or tailored SWMP actions

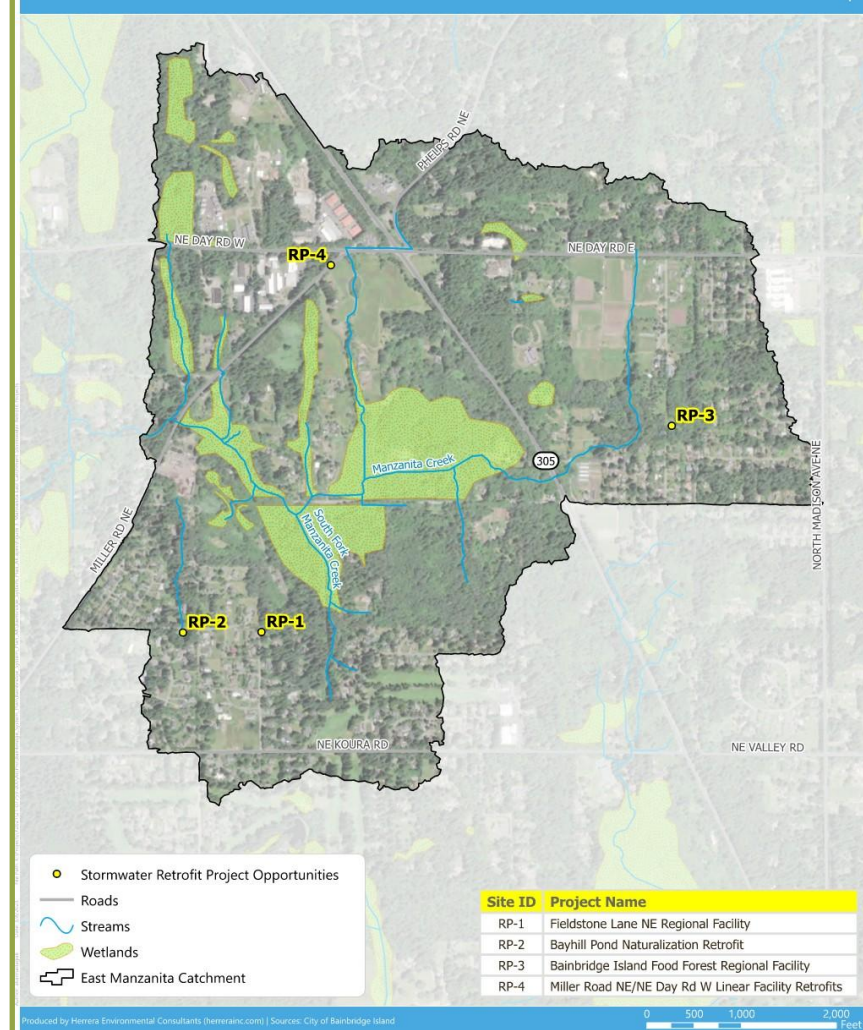
2024-2029 Phase II Permit minimum performance measures for SMED – Implement stormwater facility retrofits, or tailored SWMP actions	2025 COBI planned actions and activities for SMED – Implement stormwater facility retrofits, or tailored SWMP actions
<p>S5.C.7.a. Permittees shall <u>implement stormwater facility retrofits, or tailored SWMP actions</u> that meet the criteria described in Appendix 12, using one or a combination of the following:</p> <p>S5.C.7.a.i. Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d.), or similar stormwater planning process; and/or</p> <p>S5.C.7.a.ii. Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.</p>	<p>Four acres is the assigned equivalent acreage for City of Bainbridge Island in Appendix 12.</p> <p>The City’s Capital Improvement Plan and Stormwater Management Action Plan (SMAP) for Manzanita Watershed Eastern Catchment both identify retrofit projects to consider that may meet the Permit required assigned equivalent of 4 acres to control or reduce stormwater discharges to waters of the State from areas of existing development.</p>

CIP Stormwater (SSWM) Utility Projects locations & proposed SMAP Stormwater Retrofit Project Opportunities locations

2023/2024 Stormwater CIP



Stormwater Management Action Plan (SMAP) for Manzanita Watershed East Catchment - Stormwater Retrofit Project (RP) Opportunities



2025 Stormwater Management Program Plan

Last Updated: March 25, 2025

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S5.C.7.b – Annually list the planned, individual projects scheduled for funding or implementation

2024-2029 Phase II Permit minimum performance measures for SMED – Annually list the planned, individual projects scheduled for funding or implementation	2025 COBI planned actions and activities for SMED – Annually list the planned, individual projects scheduled for funding or implementation
S5.C.7.b. With each Annual Report, each Permittee shall <u>provide a list of planned, individual projects scheduled for funding or implementation</u> 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).	In 2025, starting with the project lists on the Capital Improvement Project Plan and SMAP for Manzanita Watershed East Catchment, COBI staff will begin to develop the list of planned, individual stormwater retrofit projects scheduled for funding or implementation during this Permit term for the purpose of meeting the assigned equivalent 4 acres.

S5.C.7.c – Fully fund, start construction, or completely implement project(s)

2024-2029 Phase II Permit minimum performance measures for SMED – Fully fund, start construction, or completely implement project(s)	2025 COBI planned actions and activities for SMED – Fully fund, start construction, or completely implement project(s)
S5.C.7.c. No later than March 31, 2028, Permittees shall <u>fully fund, start construction, or completely implement project(s)</u> that meet the assigned equivalent acreage and submit documentation with the Annual Report (due March 31, 2028) as described in Appendix 12 . S5.C.7.c.i. Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required. S5.C.7.c.ii. Permittees may contribute to meeting an overall regional goal to satisfy this permit requirement as described in S5.C.7.d . S5.C.7.c.iii. Permittees that completely implement stormwater facility retrofit projects by the expiration date of this Permit that will exceed the area required for this Permit term may apply the excess as a credit to be used for the next Permit term (e.g. 2029-2034 Permit term), not to exceed 50% of the next Permit’s requirement.	Actions to meet these requirements will occur in conjunction with meeting S5.C.7.b , and will include reviewing construction projects that started on or before January 1, 2023.

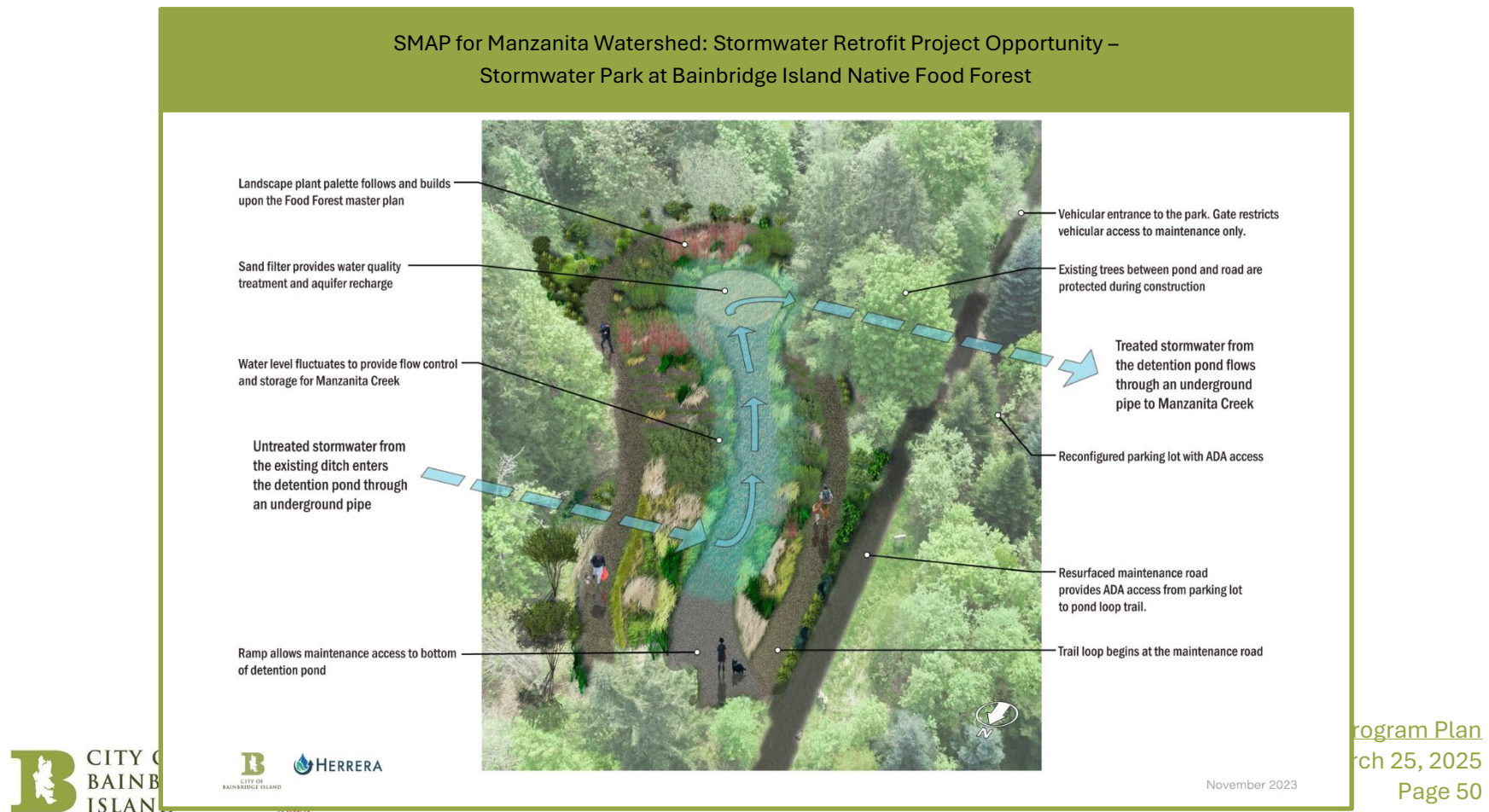
2024-2029 Phase II Permit minimum performance measures for SMED – Fully fund, start construction, or completely implement project(s)	2025 COBI planned actions and activities for SMED – Fully fund, start construction, or completely implement project(s)
S5.C.7.c.iv. Permittees shall report which projects may provide Tribal benefits and benefits to overburdened communities including specifically Vulnerable Populations and Highly Impacted Communities.	

S5.C.7.d – Option to collaborate on regional goal

2024-2029 Phase II Permit minimum performance measures for SMED – Collaborate on regional goal	2025 COBI planned actions and activities for SMED – Collaborate on regional goal
<p>S5.C.7.d. Permittees may collaborate to meet a regional goal.</p> <p>S5.C.7.d.i. Each Permittee is required to manage at least 0.5 equivalent acres within their own jurisdiction but may receive acreage credit for contributing to meeting an overall regional goal outside their defined MS4 Permit coverage area. For Permittees assigned 0.5 acres, participation and in-kind services to regional collaboration projects may count as the contribution for this Permit term if there is regional agreement on the strategy.</p> <p>S5.C.7.d.ii. Permittees may contribute to a regional goal, that is the sum of Phase II partners assigned acreage from Appendix 12. Projects may be implemented outside of Permit coverage areas to meet their individual requirement as part of a regional goal where benefits to receiving waters within the Permit coverage areas are identified and anticipated.</p>	<p>The City appreciates this option and may exercise the option.</p>

S5.C.7.e – Report the amount of estimated or projected equivalent acres management by stormwater facility retrofits for the next Permit term

2024-2029 Phase II Permit minimum performance measures for SMED – Report on stormwater facility retrofits for the next Permit term	2025 COBI planned actions and activities for SMED – Report on stormwater facility retrofits for the next Permit term
<p>S5.C.7.e. Permittees shall <u>report</u> the amount of estimated or projected equivalent acres management by stormwater facility retrofits for the next Permit term (e.g. 2029-2032). This report shall be submitted to Ecology <u>no later than March 31, 2028.</u>"</p>	<p>This work will likely occur in 2027.</p>



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.”

The following five subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 8 (S5.C.8), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.8.a – Enforcement mechanisms to require pollutant source control](#)
- [S5.C.8.b – Inventory of source control business sites](#)
- [S5.C.8.c – Inspection program](#)
- [S5.C.8.d – Progressive enforcement policy](#)
- [S5.C.8.e – Staff Training](#)

S5.C.8.a – Enforcement mechanisms to require pollutant source control

2024-2029 Phase II Permit minimum performance measures for source control – Enforcement mechanisms to require pollutant source control	2025 COBI planned actions and activities for source control – Enforcement mechanisms to require pollutant source control
<p>S5.C.8.a. Permittees shall <u>enforce ordinance(s), or other enforceable documents requiring the application of source control BMPs</u> for the pollutant generating sources associated with existing land uses and activities (see Appendix 8 to identify pollutant generating sources).</p> <p>Permittees shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirement of this Section no later than August 1, 2027.</p> <p>The requirements of this subsection are met by using 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 Permittee shall work with the owner/operator to implement or adapt BMPs based on the best professional judgement of the Permittee.</p>	<p>BIMC 15.22 – Illicit Discharge Detection And Elimination is the City’s regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the MS4 to the maximum extent allowable under state and federal law; and require source control BMPs for all pollutant generating surfaces from existing development.</p>

2024-2029 Phase II Permit minimum performance measures for source control – Enforcement mechanisms to require pollutant source control	2025 COBI planned actions and activities for source control – Enforcement mechanisms to require pollutant source control
<p>Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall 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 Permittee and is used as determined necessary by the Permittee, in accordance with S5.C.8.d., below.</p>	

Source control BMPs are needed by the business that stores these food waste storage containers outside unsheltered from rain and snow, and not secured from tampering or tipping over



S5.C.8.b – Inventory of source control business sites

2024-2029 Phase II Permit minimum performance measures for source control – Inventory of source control business sites	2025 COBI planned actions and activities for source control – Inventory of source control business sites
<p>S5.C.8.b. Permittees shall implement a program to <u>identify publicly and privately owned institutional, commercial, and industrial sites</u> 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:</p> <p>S5.C.8.b.i. Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8); and,</p> <p>S5.C.8.b.ii. Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.</p>	<p>COBI’s business site inventory identifies the publicly and privately owned institutional, commercial, and industrial sites which have potential to generate pollutants to the MS4. The inventory is documented on an Excel spreadsheet. In 2025, the City plans to continue to improve the source control sites inventory while conducting inspections.</p>

S5.C.8.c – Inspection program

2024-2029 Phase II Permit minimum performance measures for source control – Inspection program	2025 COBI planned actions and activities for source control – Inspection program
<p>S5.C.8.c. Permittees shall <u>implement an inspection program</u>, performed by qualified personnel, for sites identified pursuant to S5.C.8.b.i., above.</p> <p>S5.C.8.c.i. 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.</p> <p>S5.C.8.c.ii. The Permittee shall annually <u>complete the number of inspections equal to 20% of the businesses</u> 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.</p>	<p>In 2025, the City plans to conduct inspections of no less than 20% of the number of businesses sites in the source control business site inventory, and 100% of sites identified through credible complaints.</p>

2024-2029 Phase II Permit minimum performance measures for source control – Inspection program	2025 COBI planned actions and activities for source control – Inspection program
<p>The Permittee may select which sites to inspect each year and is not required to <u>inspect 100% of sites over a 5-year period</u>. 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.</p> <p>S5.C.8.c.iii. Each Permittee shall <u>inspect 100% of sites identified through credible complaints</u>.</p> <p>S5.C.8.c.iv. Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.</p> <p>S5.C.8.c.v. <u>Annual Reporting of inspections</u> shall be organized by business type or activities with potential to generate pollutants to the MS4. Standard Industrial Code (SIC), Major Group, and NAICS numbers may be provided for reference as noted in Appendix 8.</p>	

S5.C.8.d – Progressive enforcement policy

2024-2029 Phase II Permit minimum performance measures for source control – Progressive enforcement policy	2025 COBI planned actions and activities for source control – Progressive enforcement policy
<p>S5.C.8.d. Permittees shall <u>implement a progressive enforcement policy</u> that requires sites to comply with stormwater requirements within a reasonable time period as specified below:</p> <p>S5.C.8.d.i. If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall <u>take appropriate follow-up action(s)</u>, which may include phone calls, reminder letters, emails, or follow-up inspections.</p> <p>S5.C.8.d.ii. When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s) the Permittee shall <u>take enforcement action</u> as established through authority in its municipal codes or ordinances, or through the judicial system.</p>	<p>The City will continue to implement a progressive enforcement policy to enforce local ordinances for source control business sites.</p>

2024-2029 Phase II Permit minimum performance measures for source control – Progressive enforcement policy	2025 COBI planned actions and activities for source control – Progressive enforcement policy
<p>S5.C.8.d.iii. Each Permittee shall <u>maintain records</u>, 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.</p> <p>S5.C.8.d.iv. A Permittee may <u>refer non-emergency violations of local ordinances to Ecology</u>, 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.</p> <p>S5.C.8.d.v. <u>Application and enforcement of local ordinances</u> at sites identified pursuant to S5.C.8.b.i., including sites with discharges authorized by a separate NPDES permit.</p>	

S5.C.8.e – Staff training

2024-2029 Phase II Permit minimum performance measures for source control – Staff Training	2025 COBI planned actions and activities for source control – Staff Training
<p>S5.C.8.e. Permittees shall <u>train staff</u> 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 <u>maintain records of the training</u> provided and the staff trained.</p>	<p>Training opportunities are offered to staff who are responsible for implementing the source control program. Training is recorded and tracked in an Excel spreadsheet.</p>

S5.C.9 – OPERATIONS AND MAINTENANCE (O&M)

”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.”

The following eight subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 9 (S5.C.9), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [S5.C.9.a – Maintenance standards](#)
- [S5.C.9.b – Maintenance of stormwater treatment and flow control BMPs/facilities regulated by the City](#)
- [S5.C.9.c – Maintenance of stormwater facilities owned and operated by the City](#)
- [S5.C.9.d – Practices, policies, and procedures to reduce stormwater impacts](#)
- [S5.C.9.e – Street sweeping program](#)
- [S5.C.9.f – Stormwater Pollution Prevention Plan](#)
- [S5.C.9.g – Staff training](#)
- [S5.C.9.h – Maintain records](#)

S5.C.9.a – Maintenance standards

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance standards	2025 COBI planned actions and activities for O&M – Maintenance standards
<p>S5.C.9.a. Each Permittee shall implement maintenance standards that are as protective, or more protective, of facility function than those specified in the <i>Stormwater Management Manual for Western Washington</i>, or a Phase I program approved by Ecology. For facilities which do not have maintenance standards, the Permittee shall develop a maintenance standard. <u>No later than June 30, 2027</u>, Permittees shall <u>update their maintenance standards</u> as necessary to meet the requirements of this Section.</p> <p>S5.C.9.a.i. The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a</p>	<p>The City adopts and adheres to the maintenance standards for stormwater facilities as specified in the Department of Ecology 2019 Stormwater Management Manual for Western Washington (the manual); these standards establish criteria for identifying deficiencies and maintenance needs to help the City make sure facilities are operated and maintained for efficient conveyance, storage, and, in some cases, treatment of stormwater before it is discharged to surface or ground waters, to reduce localized flooding, decrease instances of erosion, and allow treatment processes to function properly.</p>

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance standards	2025 COBI planned actions and activities for O&M – Maintenance standards
<p>measure of the facility’s required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance is not a Permit violation.</p> <p>S5.C.9.a.ii. Unless there are circumstances beyond the Permittee’s control, when an inspection identifies an exceedance of the maintenance standard, <u>maintenance shall be performed</u>:</p> <ul style="list-style-type: none"> • 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. <p>Circumstances beyond the Permittee’s control include 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 exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.</p>	<p>The City regularly inspects public and private stormwater facilities and has developed and implemented inspection checklists for the various facilities based on the maintenance standards within the manual; for facilities without maintenance standards within manual, the City will develop a maintenance standard and inspection checklist for those facilities.</p> <p>When during an inspection a deficiency or maintenance need is identified, the City makes every effort to ensure the facility is returned to standard within the following timelines:</p> <ul style="list-style-type: none"> • Within 6 months for catch basins. • Within 1 year for typical maintenance of facilities, except catch basins. • Within 2 years for maintenance that requires capital construction of less than \$25,000. <p>For any exceedance of the above timeline for maintenance, the City will document the circumstances and include that documentation with the Annual Report.</p>

S5.C.9.b – Maintenance of stormwater treatment and flow control BMPs/facilities regulated by the City

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance of private stormwater facilities	2025 COBI planned actions and activities for O&M – Maintenance of private stormwater facilities
<p>S5.C.9.b.i. The program shall include provisions to <u>verify adequate long-term O&M</u> of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.9.a.</p> <p>The provisions shall include:</p>	<p>The City’s private stormwater facility inspection program works to verify long-term operation and maintenance of privately owned and operated Permitted and permanent stormwater treatment and flow control BMPs/facilities, and especially those connected to the small municipal separate storm sewer system (MS4).</p>

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance of private stormwater facilities	2025 COBI planned actions and activities for O&M – Maintenance of private stormwater facilities
<p>S5.C.9.b.i.(a) Implementation of an <u>ordinance or other enforceable mechanism</u> that:</p> <ul style="list-style-type: none"> Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.9.a. Requires inspection of facilities in accordance with the requirements in (b), below. Establishes enforcement procedures. <p>S5.C.9.b.i.(b) <u>Annual inspections</u> of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6.c., including those permitted in accordance with requirements adopted pursuant to the 2007-2024 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency. Inspections shall be conducted by qualified personnel or a qualified third party.</p> <p>Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency...</p> <p>SC.C.9.b.ii. Compliance with the inspection requirements in (b) above shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and <u>achieving at least 80% of required inspections annually.</u></p>	<p>The private stormwater facility inspection program involves trained COBI staff conducting annual inspections and enforcing required maintenance, or verifying annual inspection and maintenance by private parties, of private stormwater facilities to ensure maintenance plans, maintenance standards, and maintenance timelines are upheld.</p> <p>Enforcement mechanisms and strategies are in place to address issues of non-compliance by private stormwater facility owners. The City’s primary enforcement mechanisms to regulate private stormwater facilities are municipal codes BIMC 15.20 – Surface Water and Stormwater Management, and BIMC 15.21 – Stormwater Facilities Maintenance Program. In part, these codes establish inspection and maintenance requirements, and where appropriate, establish necessity for, and adherence to, an operations and maintenance plan, for private stormwater facilities.</p> <p>The City tracks and records all activities, as part of this program; and achieves at least 80% of all required inspections per Phase II Permit minimum requirements.</p>
<p>S5.C.9.b.iii. The program shall include a <u>procedure for keeping records of inspections and enforcement</u> actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.</p>	<p>COBI staff keep all private stormwater system inspection and enforcement action records in file folders and Excel spreadsheet, and in some cases Smartgov software.</p>

S5.C.9.c – Maintenance of stormwater facilities owned or operated by the City

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance of public (MS4) stormwater facilities	2025 COBI planned actions and activities for O&M – Maintenance of public (MS4) stormwater facilities
<p>S5.C.9.c.i. Each Permittee shall implement a program to <u>annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities</u>. Permittees shall implement appropriate maintenance action(s) in accordance with the adopted maintenance standards. The inspection program shall be implemented by qualified personnel.</p> <p>Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee 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 G19 – <i>Certification and Signature</i>.</p>	<p>Trained COBI staff complete annual inspections of all, or at least 95% of all, public stormwater treatment and flow control BMPs/facilities. The 2025 beginning inventory count of all known public stormwater treatment and flow control BMPs/facilities is 198.</p> <p>When deficiencies or maintenance issues are identified during any inspection, staff address those needs within the maintenance standards timelines identified in S5.C.9.a, or sooner if necessary.</p>
<p>S5.C.9.c.ii Each Permittee shall <u>spot check</u> 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</p>	<p>Trained COBI staff conduct spot check inspections of potentially damaged public stormwater flow control and treatment facilities during or after major storm events (10-year 24-hour event), for Bainbridge that comes out to about 3 inches within 24 hours. Spot checks may be performed for lesser storm events at the discretion of the Public Works Director, such as after 1 inches of rain within 24 hours. If spot checks indicate widespread damage or maintenance needs, other stormwater flow control and treatment</p>

2024-2029 Phase II Permit minimum performance measures for O&M – Maintenance of public (MS4) stormwater facilities	2025 COBI planned actions and activities for O&M – Maintenance of public (MS4) stormwater facilities
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.	facilities in the area that may be affected will also be inspected and maintained as needed. When deficiencies or maintenance issues are identified during any inspection, staff address those needs within the maintenance standards timelines (S5.C.9.a).
<p>S5.C.9.c.iii. Each Permittee shall continue to <u>inspect all catch basins and inlets owned or operated by the Permittee by December 31, 2025 and every two years after</u>. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the <i>Stormwater Management Manual for Western Washington</i>. Decant water shall be disposed of in accordance with Appendix 6 – Street Waste Disposal.</p> <p>The following alternatives to the standard approach of inspecting all catch basins every two years may be applied to all or portions of the system...</p>	<p>Trained COBI staff complete biennial inspections of at least 95% of all known public catch basins and inlet facilities. The 2025 beginning inventory count of all known known public catch basins and inlet facilities is 2,556. The current biennial inspection cycle period started August 1, 2023 and ends December 31, 2025.</p> <p>When deficiencies or maintenance issues are identified during any inspection, staff address those needs within the maintenance standards timelines identified in S5.C.9.a, or sooner if necessary.</p>
<p>S5.C.9.c.iv. Compliance with the inspection requirements in S5.C.9.c.i-iii, above, shall be determined by the presence of an established inspection program <u>achieving at least 95% of required inspections</u>.</p>	<p>In 2025, the City plans to achieve no less than 95% of the needed MS4 inspections.</p>

S5.C.9.d – Practices, policies, and procedures to reduce stormwater impacts

2024-2029 Phase II Permit minimum performance measures for O&M – Practices, policies, and procedures to reduce stormwater impacts	2025 COBI planned actions and activities for O&M – Practices, policies, and procedures to reduce stormwater impacts
<p>S5.C.9.d. 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. <u>No later than December 31, 2027, document the practices, policies, and procedures.</u> 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.</p> <p>The following activities shall be addressed:</p> <ol style="list-style-type: none"> i. Pipe cleaning ii. Cleaning of culverts that convey stormwater in ditch systems iii. Ditch maintenance iv. Street cleaning v. Road repair and resurfacing, including pavement grinding vi. Snow and ice control vii. Utility installation viii. Pavement striping maintenance ix. Maintaining roadside areas, including vegetation management x. Dust control xi. Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts xii. Sediment and erosion control xiii. Landscape maintenance and vegetation disposal xiv. Trash and pet waste management 	<p>The City makes all known and reasonable efforts through policy, procedure, and practices to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City and documents this in the <i>Manual for O&M Practices, Policies, and Procedures to Reduce Stormwater Impacts</i>.</p> <p>COBI staff are trained and expected to follow the <i>Manual for O&M Practices, Policies, and Procedures to Reduce Stormwater Impacts</i>.</p> <p>The <i>Manual for O&M Practices, Policies, and Procedures to Reduce Stormwater Impacts</i> will be reviewed and updated by City staff as needed, and no later than December 31, 2027, to ensure it most adequately addresses all O&M activities pursuant to S5.C.9.d.</p>

2024-2029 Phase II Permit minimum performance measures for O&M – Practices, policies, and procedures to reduce stormwater impacts	2025 COBI planned actions and activities for O&M – Practices, policies, and procedures to reduce stormwater impacts
<p>xv. Building exterior cleaning and maintenance (a) For Permittee-owned buildings built or renovated between 1950- 1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB-containing materials.</p> <p>xvi. Preparing Permittee-owned buildings for renovation or demolition. (a) Update policies, practices, or procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.</p>	

S5.C.9.e – Street sweeping program

2024-2029 Phase II Permit minimum performance measures for O&M – Street sweeping program	2025 COBI planned actions and activities for O&M – Street sweeping program
<p>S5.C.9.e. 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 maximum water quality benefits to receiving waters. The following program elements shall be included:</p> <p>S5.C.9.e.i <u>Priority areas</u>: Apply street sweeping program to curbed municipal streets that discharge to outfalls and meet any of the following criteria:</p> <p>(a) High traffic streets, such as arterials or collectors.</p> <p>(b) Streets that serve commercial or industrial land use areas.</p> <p>S5.C.9.e.ii. <u>Program timing</u>: 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</p>	<p>In 2025 or 2026, the City will begin to review its street sweeping program and reporting to identify any potential adaptations or improvements needed to develop and implement to achieve Permit compliance no later than July 1, 2027.</p>

2024-2029 Phase II Permit minimum performance measures for O&M – Street sweeping program	2025 COBI planned actions and activities for O&M – Street sweeping program
<p>quality benefits. For calendar year 2027, only one sweeping event is required between July and December.</p> <p>(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.</p> <p>(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.</p> <p>S5.C.9.e.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.</p> <p>S5.C.9.e.iv. Street Waste Disposal: Dispose of sweeper waste material in accordance with Appendix 6 – Street Waste Disposal.</p>	
<p>S5.C.9.e.v. Reporting: No later than March 31, 2028, submit with the Annual Report the following information about the priority areas:</p> <p>(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).</p> <p>(b) Sweeping date(s).</p> <p>(c) Sweeping frequency.</p> <p>(d) Type of sweeper.</p> <p>(e) Total curb miles of priority areas and curb miles swept.</p> <p>(f) Approximation of street waste solids removed for each sweeping event (indicate unit of measurement and wet or dry weight, where available).</p>	<p>The City plans to submit street sweeping reporting no later than March 31, 2028.</p>

City of Bainbridge Island Street Sweeper that is affectionately called “Toaster”



S5.C.9.f – Stormwater Pollution Prevention Plan

2024-2029 Phase II Permit minimum performance measures for O&M – Stormwater Pollution Prevention Plan	2025 COBI planned actions and activities for O&M – Stormwater Pollution Prevention Plan
<p>S5.C.9.f. Implement a <u>Stormwater Pollution Prevention Plan (SWPPP)</u> 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 <i>Industrial Stormwater General Permit</i> or another NPDES permit that authorizes stormwater discharges associated with the activity. SWPPPs shall include the following information, at a minimum:</p> <p>S5.C.9.f.i. A detailed <u>description of the operational and structural BMPs</u> in use at the facility and a schedule for implementation of additional BMPs when needed. BMPs selected shall be consistent with the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology. The SWPPP shall be updated as needed to maintain relevancy with the facility.</p> <p>S5.C.9.f.ii. At minimum, <u>annual inspections of the facility</u>, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections shall be documented in an inspection report or check list.</p> <p>S5.C.9.f.iii. An <u>inventory of the materials and equipment stored on-site, and the activities conducted at the facility</u> which may be exposed to precipitation or runoff and could result in stormwater pollution.</p> <p>S5.C.9.f.iv. A <u>site map</u> showing the facility’s stormwater drainage, discharge points, and areas of potential pollutant exposure.</p> <p>S5.C.9.f.v. A <u>plan for preventing and responding to spills</u> at the facility which could result in an illicit discharge.”</p>	<p>COBI has two heavy equipment maintenance and storage yard SWPPPs:</p> <ul style="list-style-type: none"> • SWPPP for Public Works Operations & Maintenance Facility at 7305 Hidden Cove Rd NE • SWPPP for Vactor Truck Decant Facility at 6400 Don Palmer Ave NE <p>Trained O&M staff complete SWPPP inspections at both sites at least once annually for the Phase II Permit. Inspections are documented and kept on record.</p>

S5.C.9.g – Staff training

2024-2029 Phase II Permit minimum performance measures for O&M – Staff training	2025 COBI planned actions and activities for O&M – Staff training
S5.C.9.g. Implement an <u>ongoing training program for employees</u> 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 <u>staff training records</u> to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.	The City continues to develop and implement an on-going training program for employees whose primary construction, operations, or maintenance job-functions may impact stormwater quality. Awareness and practical trainings help inform and prepare staff with skills and knowledge in operations and maintenance standards, inspection procedures, Stormwater Pollution Prevention Plans (SWPPPs), selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Training and follow-up trainings are provided regularly or as needed to address changes in staffing, procedures, techniques, or requirements. Training efforts are tracked and documented in Excel spreadsheets.

S5.C.9.h – Maintain records

2024-2029 Phase II Permit minimum performance measures for O&M – Maintain records	2025 COBI planned actions and activities for O&M – Maintain records
S5.C.9.h. <u>Maintain records</u> of the activities conducted to meet the requirements of this Section.	Records of all the operations and maintenance activities outlined in this section are kept and retained as required by the Phase II Permit.

S7 – Compliance with Total Maximum Daily Load (TMDL) 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).”

[Phase II Permit Appendix 2](#) identifies actions required for City of Bainbridge Island for the Watershed Resource Inventory Area (WRIA) 15 - Sinclair and Dyes Inlets Fecal Coliform Bacteria Total Maximum Daily Load (TMDL). The required actions are intended to help identify, reduce, and eliminate sources of fecal coliform bacteria into Sinclair and Dyes Inlets from COBI’s jurisdiction.

2024-2029 Phase II Permit minimum performance measures for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island	2025 COBI planned actions and activities for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island
<p>Business Inspections: The Permittee shall <u>inspect facilities</u> 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 <u>re-inspect the facility at least once more during the permit term to verify compliance</u>, and/or initiate enforcement action.</p> <p>Public Education and Outreach: Each Permittee shall <u>include public education and outreach activities that increase awareness</u> of bacterial pollution problems and promote proper pet waste management as a BMP under General Awareness.</p> <p>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.</p>	<p>All areas of the known MS4 that discharge to the TMDL area are field screened for observable sources of fecal coliform bacteria by COBI staff while conducting activities for the IDDE Program, O&M Program, Source Control Program, and the City’s voluntary discretionary Water Quality and Flow Monitoring Program (WQFMP). As part of the City’s WQFMP, COBI staff and volunteers conduct quarterly stormwater discharge monitoring at 16 sites for water quality indicators, including sampling and testing for fecal coliform (now E.coli) bacteria. The City provides public education and outreach information in City Hall displays, and public events, and City newsletters to encourage people to collect their pet’s waste in a plastic bag then dispose of it in a garbage can.</p>

2024-2029 Phase II Permit minimum performance measures for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island	2025 COBI planned actions and activities for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island
<p>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 <u>screen for bacteria sources</u> 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).</p> <p><u>Qualitative and quantitative information</u> about the source identification and elimination activities, including procedures followed, sampling locations, and results shall be <u>annually documented</u> in TMDL reporting as required in the Permittees’ Annual Report.</p>	<p>The City has installed public pet waste collection stations to promote and facilitate pet waste pick up all around the island and TMDL area at City owned or operated lands that are reasonably expected to have domestic dog use and the potential for pollution to stormwater. Public Works staff regularly inspect and maintain 10 of the 54 pet waste stations; and volunteers maintain the other 44 of the 54 pet waste stations as part of the larger regional effort , “Mutt Mitt Program” that the City is involved with through the West Sound Stormwater Outreach Group.</p> <p>In 2025, the City will continue to develop and implement methods to gain and document the qualitative and quantitative information related to the actions and activities conducted for TMDL required actions and annual reporting.</p>

S8 – Monitoring and Assessment

2024-2029 Phase II Permit minimum performance measures for Monitoring and Assessment	2025 COBI planned actions and activities for Monitoring and Assessment
<p>S8.A. Regional Status and Trends Monitoring</p> <p>S8.A.2. All City and County Permittees covered under the <i>Phase II Western Washington Municipal Stormwater Permit</i>, August 1, 2019 – July 31, 2024, except the Cities of Aberdeen and Centralia, shall notify Ecology in writing which of the following two options for regional status and trends monitoring (S8.A.2.a or S8.A.2.b) the Permittee chooses to carry out during this Permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2024. Either option will fully satisfy the Permittee’s obligations under this Section (S8.A.2). Each Permittee shall select a single option for this Permit term.</p> <p>S8.A.2.a. Make annual payments into the Stormwater Action Monitoring (SAM) collective fund to implement regional receiving water status and trends monitoring or either: small streams and marine nearshore areas in Puget Sound, or urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin, depending on the Permittee’s location. The annual payments into the collective fund are due on or before August 15 each year beginning in 2025. Submit payments according to Section S8.D.</p> <p><i>Or</i></p> <p>S8.A.2.b. Conduct stormwater discharge monitoring per the requirements in Section S8.C.</p>	<p>The City notified Ecology by posted letter dated November 7, 2024, the City’s choice of S8.A.2.a., to continue to pay into the SAM collective fund rather than conduct stormwater discharge monitoring per the requirements of Section S8.C.</p> <p>The City will submit payments according to Section S8.D; which is \$6,265 each year based on the amount listed for City of Bainbridge Island in Appendix 11.</p>
<p>S8.B. Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies</p> <p>S8.B.2. All City and County Permittees covered under the <i>Phase II Western Washington Municipal Stormwater Permit</i>, August 1, 2019 – July 31, 2024, shall notify Ecology in writing which of the following two options (S8.B.2.a or S8.B.2.b) for effectiveness and source identification studies the Permittee chooses to carry out during this Permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2024. Either</p>	<p>The City notified Ecology by posted letter dated November 7, 2024, the City’s choice of S8.B.2.a., to continue to pay into the SAM collective fund rather than conduct stormwater discharge monitoring per the requirements of Section S8.C.</p>

2024-2029 Phase II Permit minimum performance measures for Monitoring and Assessment	2025 COBI planned actions and activities for Monitoring and Assessment
<p>option will fully satisfy the Permittee’s obligations under this Section (S8.B.2). Each Permittee shall select a single option for this Permit term.</p> <p>S8.B.2.a. Make annual payments into the SAM collective fund to implement effectiveness and source identification studies. The annual payments into the collective fund are due on or before August 15 each year beginning in 2025. Submit payments according to Section S5.D.</p> <p><i>Or</i></p> <p>S8.A.2.b. Conduct stormwater discharge monitoring per the requirements in Section S8.C.</p>	<p>The City will submit payments according to Section S8.D; which is \$9,272 each year based on the amount listed for City of Bainbridge Island in Appendix 11.</p>
<p>S8.B.3. All Permittees shall provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects. These requests will be limited to records of SWMP activities and associated data tracked and/or maintained in accordance with S5 – Stormwater Management Program for Cities, Towns, and Counties and/or S9 – Reporting Requirements. A maximum of three requests during the Permit term from the SAM Coordinator will be transmitted to the Permittee’s permit coordinator via Ecology’s regional permit manager. The Permittee shall have 90 days to provide the requested information.</p>	<p>The City will provide information as requested for effectiveness and source identification studies.</p>

S9 – Reporting Requirements

2024-2029 Phase II Permit Reporting Requirements	2025 COBI planned actions and activities for Reporting Requirements
<p>S9.A. Annual Report Submittal</p> <p>S9.A.1. No later than March 31 of each year beginning in 2025, each Permittee shall submit an Annual Report. The reporting period for the first Annual Report will be from January 1, 2024, through December 31, 2024. The reporting period for all subsequent Annual Reports will be the previous calendar year unless otherwise specified.</p> <p>S9.A.2. Permittees shall submit Annual Reports electronically using Ecology’s Water Quality Permitting Portal (WQWebPortal) available on Ecology’s website.</p>	<p>COBI prepares and submits an Annual Report on or before the due date every year.</p>
<p>S9.B. Records Retention</p> <p>Each Permittee is required to keep all records related to this Permit and the SWMP for at least five years after the expiration date of this Permit.</p>	<p>COBI will keep all records related to this Permit and the SWMP until 2035.</p>
<p>S9.C. Records Available to the Public</p> <p>Each Permittee shall make all records related to this Permit and the Permittee’s SWMP available to the public at reasonable times during business hours. The Permittee will provide a copy of the most recent annual report to any individual or entity, upon request.</p> <p>S9.C.1. A reasonable charge may be assessed by the Permittee for making photocopies of records.</p> <p>S9.C.2. The Permittee may require reasonable advance notice of intent to review records related to this Permit.</p>	<p>COBI makes records available to the public, other Permittees, and Ecology.</p>
<p>S9.D. Annual Report for Cities, Towns, and Counties</p> <p>Each annual report shall include the following:</p> <p>S9.D.1. A copy of the Permittee’s current Stormwater Management Program Plan (SWMP Plan), as required by S5.A.2.</p> <p>S9.D.2. Submittal of the annual report form as provided by Ecology pursuant to S9.A., describing the status of implementation of the requirements of this Permit during the reporting period.</p>	<p>COBI’s Annual Report will continue to meet the requirements of S9.</p>

2024-2029 Phase II Permit Reporting Requirements	2025 COBI planned actions and activities for Reporting Requirements
<p>S9.D.3. Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of this Permit during the reporting period, or as a required submittal. Refer to Appendix 3 for annual report questions.</p> <p>S9.D.4. If applicable, notice that the MS4 is relying on another entity to satisfy any of the obligations under this Permit.</p> <p>S9.D.5. Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.</p> <p>S9.D.6. A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the Permittee’s geographic area of Permit coverage during the reporting period.</p>	

Conclusion

This Stormwater Management Program Plan outlines how the City of Bainbridge Island plans to comply with NPDES regulations to uphold the Clean Water Act of 1972. Yet, the SWMP Plan provides only cursory descriptions of the many actions and activities conducted by COBI staff and decision makers to reduce stormwater impacts and protect water resources and water quality for island residents, businesses, and visitors.

As islanders, surrounded by water and reliant on a sole source aquifer system for drinking water, water plays a vital role in the quality of life on Bainbridge Island. This is reflected in the culture of the community and exemplified in the [City Comprehensive Plan](#) goals and policies that prioritize water resources, environment, and utilities. The City strives to educate staff and the general public on stormwater management and ways to prevent pollution, to help people make the most informed and thoughtful decisions in our work, personal lives, and daily activities that are protective of water quality.

Collectively we all play a role in helping or hindering water resources and water quality. We benefit ourselves and future generations when we always consider and respect our water resources, especially when reducing impacts from stormwater runoff.