

Washington Department of Ecology

Electronic Submission Cover Letter



WQWebSubmittal - Submittal Submission Id: 1958834 - 3/26/2025 2:58:01 PM

Company Name	Signer Name	System Name
City of Bainbridge Island	Christopher Wierzbicki	WQWebPortal

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for City of Bainbridge Island	Copy of Record CityofBainbridgelsland Wednesday March 26 2025
WAR045503_2_03252025082701	Q2_2025 COBI Stormwater Manage_2_03252025082701
WAR045503_20_03212025104729	Q20_WSSOG 2024 Activities Repo_20_03212025104729
WAR045503_20_03212025112226	Q20_WSSOG 2024 Activities Repo_20_03212025112226
WAR045503_24a_03212025112226	Q24a_2024 Stewardship Opportun_24a_03212025112226
WAR045503_56_03212025133253	Q56_List of Projects for S5.C_56_03212025133253
WAR045503_58_03212025133332	Q58_Source Control Program Pol_58_03212025133332
WAR045503_59_03212025133332	Q59_Source Control_2024 Inspec_59_03212025133332
WAR045503_82_03212025133652	Q82_2024 TMDL Actions for S7_82_03212025133652
ImportedIDDEsWAR045503-2024-ImportedIDDEs_03212025133221	WAR045503-2024-ImportedIDDEs_03212025133221

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only



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Water Quality Program

Permit Submittal Electronic Certification

Permittee: BAINBRIDGE ISLAND CITY

Permit Number: WAR045503

Site Address: 280 MADISON AVE N
BAINBRIDGE ISLAND, WA 98110-1812

Submittal Name: MS4 Annual Report Phase II Western

Version: 1

Due Date: 3/31/2025

Questionnaire

Number	Permit Section	Question	Answer
1	S9.D.6	Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A.2; S9.D.1	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)	Q2_2025 COBI Stormwater Manage_2_0325202508 2701
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
5	S9.D.4	If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)	Not Applicable
6	S5.C.1.a	Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)	No
12	S5.C.1.c.i	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes
13	S5.C.1.c.i(a)	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
19	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes

19a	S5.C.2	If yes, list the elements, and the regional program.	The City has adopted all the elements through a regional program and ILA contract with West Sound Stormwater Outreach Group (WSSOG). See attachment for Q20.
20	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	Q20_WSSOG 2024 Activities Repo_20_03212025112226
24	S5.C.2.a.iii	Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
24a	S5.C.2.a.iii	Attach a list of stewardship opportunities provided.	Q24a_2024 Stewardship Opportun_24a_03212025112226
25	S5.C.3.a	Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP.	The City creates opportunities for the public by soliciting input on the SWMP Plan through Water Resources Listserv and the City's website. Opportunities also exist through City government meetings and online community forums such as: City Council, Committee, Ward, and Citizen Advisory Committee Meetings; City of Bainbridge Island Facebook Page, Bainbridge Island Nextdoor Page, and City of Bainbridge Island SeeClickFix.

25a	S5.C.3.a.i	Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)	The City creates opportunities for the public by soliciting input on the SWMP Plan through Water Resources Listserv and the City's website. Opportunities also exist through City government meetings and online community forums such as: City Council, Committee, Ward, and Citizen Advisory Committee Meetings; City of Bainbridge Island Facebook Page, Bainbridge Island Nextdoor Page, and City of Bainbridge Island SeeClickFix.
26	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
26a	S5.C.3.	List the website address in Comments field.	https://www.bainbridgewa.gov/stormwater
27	S5.C.4.	Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?	Yes
32	S5.C.5.b	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)	Yes
32a	S5.C.5.b	Describe actions in Comments field. (S5.C.5.b)	The City informs staff, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste through policies, codes, procedures, training programs, and education and outreach activities (for a complete list of those activities see City of Bainbridge Island SWMP Plan section S5.C.2).
33	S5.C.5.c	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5.d.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes

35a	S5.C.5.d.i	Cite field screening methodology in Comments field.	Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020).
36	S5.C.5.d.i(a)	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	93
36a	S5.C.5.d.i(a)	Cite field screening techniques used to determine percent of MS4 screened.	During MS4 catch basin, inlet, and flow control and treatment facility inspections, operations and maintenance, and IDDE investigations.
37	S5.C.5.d.ii	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	City website, social media, newsletters, City Hall displays and front counter, events, and documents (e.g., SWMP Plan and SWSP)
38	S5.C.5.d.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
39	S5.C.5.e	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
40	S5.C.5.f	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.	Yes
41	S5.C.5.g	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13.	WAR045503-2024-ImportedIDDEs_03212025133221
42	S5.C.6.b.i-iii	Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44		Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?	No
45	S5.C.6.b.i. and Section 5 of Appendix 1	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0
46	S5.C.6.b.i., and Section 6 of Appendix 1	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.c.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes

47a	S5.C.6.c.i	Number of site plans reviewed during the reporting period.	381
48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii?	No
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii.	476
49b	S5.C.6.c.iv	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.c.viii	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)	2
53	S5.C.6.c.vi	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.d	Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.e	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e)	Yes
56	S5.C.7.b	Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)	Q56_List of Projects for S5.C._56_03212025133 253
57	S5.C.8.b	Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years)	Yes

57a	S5.C.8.b	Number of total sites identified for the inventory.	374
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d.	Q58_Source Control Program Pol_58_0321202513333 2
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d.	Q59_Source Control_2024 Inspecc_59_0321202513 3332
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e?	Yes
61	S5.C.9.a	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.9.a?	Yes
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a)	No
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes
64a	S5.C.9.a.ii	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
65	S.5.C.9.b.i(a)	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)?	Yes
66	S5.C.9.b.i(b)	Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)	Yes
66a	S5.C.9.b.i(b)	Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?	No
66b	S5.C.9.b.i(b)	If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).	Not Applicable
67	S5.C.9.b.ii	Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
68	S5.C.9.c.i	Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	Yes
68a	S5.C.9.c.i	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	196
68b	S5.C.9.c.i	Number of facilities inspected during the reporting period.	190
68c	S5.C.9.c.i	Number of facilities for which maintenance was performed during the reporting period.	41

69	S5.C.9.c.i	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.	Not Applicable
70	S5.C.9.c.ii	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
71	S5.C.9.c.iii	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.9.c.iii)	Yes
71a	S5.C.9.c.iii	Number of known catch basins and inlets?	1978
71b	S5.C.9.c.iii	Number of catch basins and inlets inspected during the reporting period?	1833
71c	S5.C.9.c.iii	Number of catch basins and inlets cleaned during the reporting period?	319
72	S5.C.9.c.iii	Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.	Not Applicable
73	S5.C.9.d	Implemented 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. (S5.C.9.d)	Yes
79	S5.C.9.f	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f)	Yes
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)	Yes
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Yes
81a	S7.A	List any requirements that were not met.	Not Applicable
82	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	Q82_2024 TMDL Actions for S7_82_0321202513365 2
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8.A.2.a, S8.A.2.b	Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b.	Yes

85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
86	S8.B.2.a, or S8.B.2.b.	Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b.	Yes
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)	Not Applicable
89	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Yes
90	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
91	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Yes
92	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
93	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
94	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Not Applicable
95	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	0

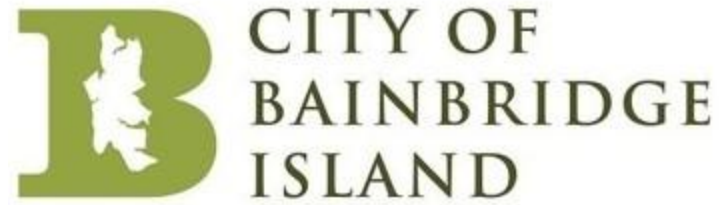
I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Christopher Wierzbicki

3/26/2025 2:58:00 PM

Signature

Date



STORMWATER MANAGEMENT PROGRAM PLAN 2025



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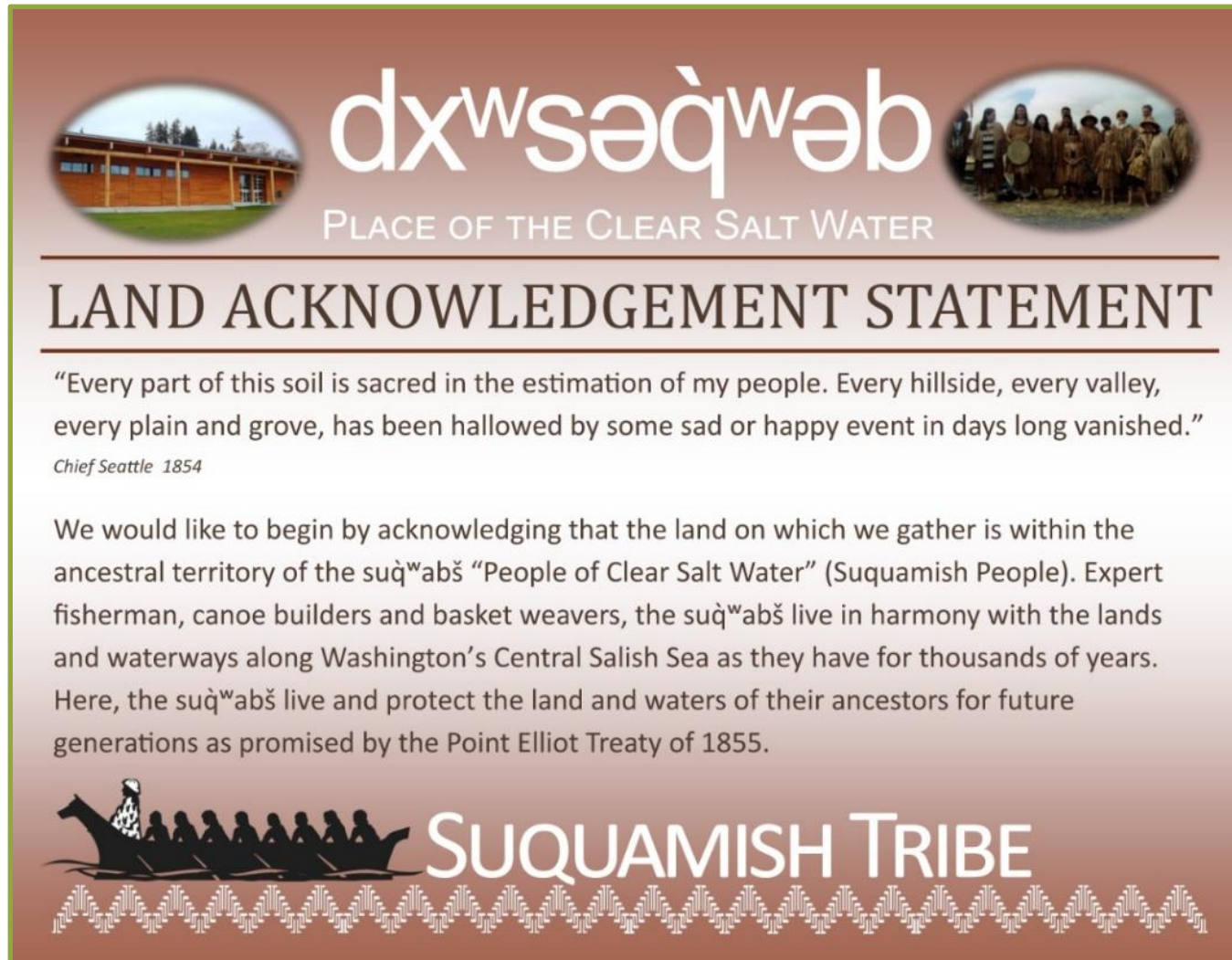
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Land Acknowledgement

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 two oval images at the top: a modern wooden building on the left and a group of people in traditional dress on the right. The text 'dx^wsəq^wəb' is written in a stylized white font, with 'PLACE OF THE CLEAR SALT WATER' underneath. A horizontal line separates this from the title 'LAND ACKNOWLEDGEMENT STATEMENT'. Below the title is a quote by Chief Seattle from 1854, followed by a paragraph of acknowledgment text. At the bottom, there is a silhouette of a canoe with rowers and the text 'SUQUAMISH TRIBE' above a decorative zigzag pattern.

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
Coordinator, Stella Collier

[2025 Stormwater Management Program Plan](#)

Last Updated: March 25, 2025

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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
<p>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.</p>	<p>COBI’s SWMP is implemented throughout the geographic area of the jurisdiction that comprises the entire island of Bainbridge Island.</p>
<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>	<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.</p>
<p>S5.A.3. The SWMP shall include an ongoing program for gathering, tracking, maintaining, and using information to</p>	

2024-2029 Phase II Permit SWMP General Requirements	COBI SWMP 2025
<p>evaluate SWMP 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> 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 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 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
<p>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.</p>	<p>COBI will prepare written descriptions in a document to submit with the 2026 Annual Report submitted on or before March 31, 2027.</p>

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
<p>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>	<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.</p> <p>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 <u>SMAP that may benefit 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="1398 475 1759 1040" data-label="Image"> <p>The image shows a sign with an orange top section containing the text 'KEEP THE LID SHUT' in white. Below this is a green trash bin with a black lid. Underneath the bin are three circular icons with red slashes: a nose for 'Less Smell', a bug for 'Fewer Pests', and a raindrop for 'No Rain Inside'. The sign is set against a grey brick wall background.</p> </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
<p>2. Develop a strategy and schedule to expand the existing campaign to a new priority audience or BMPs; or</p> <p>3. Develop a strategy and schedule for a new priority audience and BMP behavior change campaign.</p> <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.
<p>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.</p> <p>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.</p>	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
<p>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.</p> <p>Illicit connections and illicit discharges must be identified through, but not limited to, field screening, inspections, complaints/reports,</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) 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.</p>

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
<p>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:</p>	<p>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.</p>
<p>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,</p>	<p>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).</p>

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

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.

2025 COBI planned actions and activities for IDDE – Ongoing program detect non-stormwater discharges

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).

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

<p>2024-2029 Phase II Permit minimum performance measures for IDDE – Ongoing program to address non-stormwater discharges</p>	<p>2025 COBI planned actions and activities for IDDE – Ongoing program to address non-stormwater discharges</p>
<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
<p>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.</p>	<p>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.</p>

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

<p>2024-2029 Phase II Permit minimum performance measures for controlling runoff from construction – Enforcement mechanisms</p>	<p>2025 COBI planned actions and activities for controlling runoff from construction – Enforcement mechanisms</p>
<p>S5.C.6.a. <u>Implement an ordinance or other enforceable mechanism</u> that addresses runoff from new development, redevelopment, and construction site projects. <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 <ul style="list-style-type: none"> • 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.”

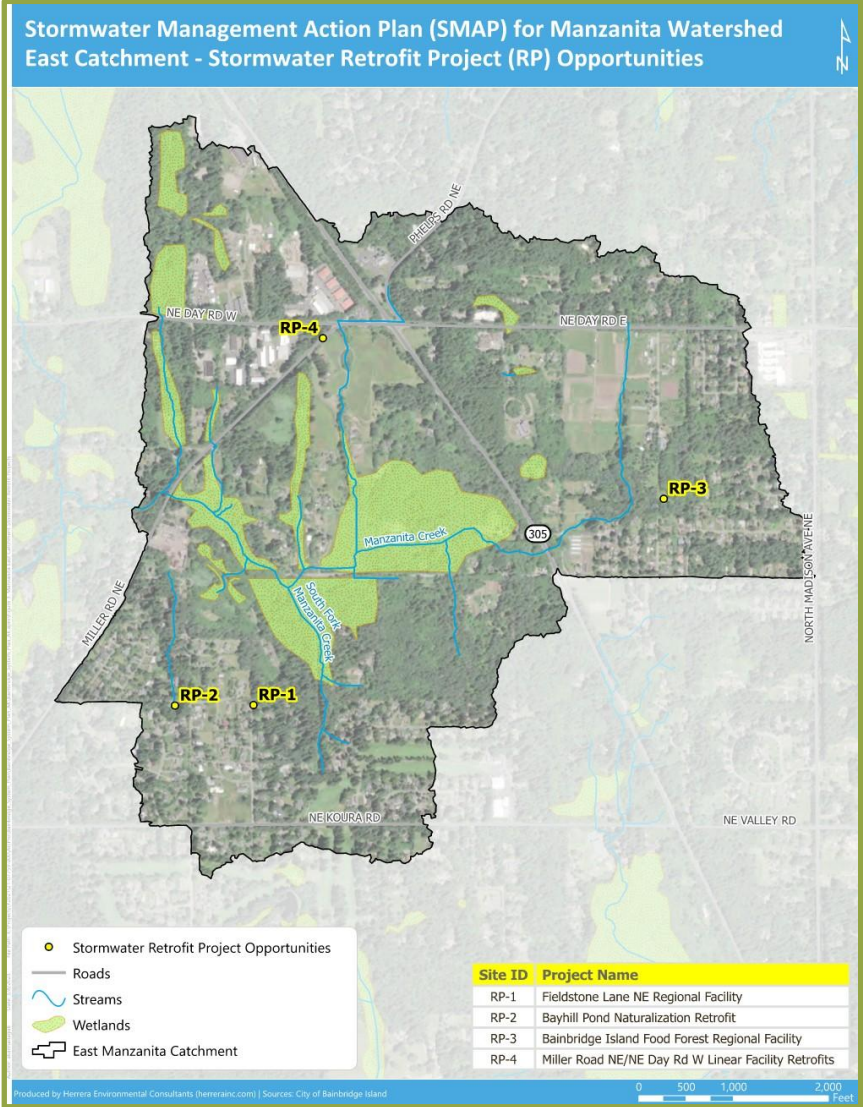
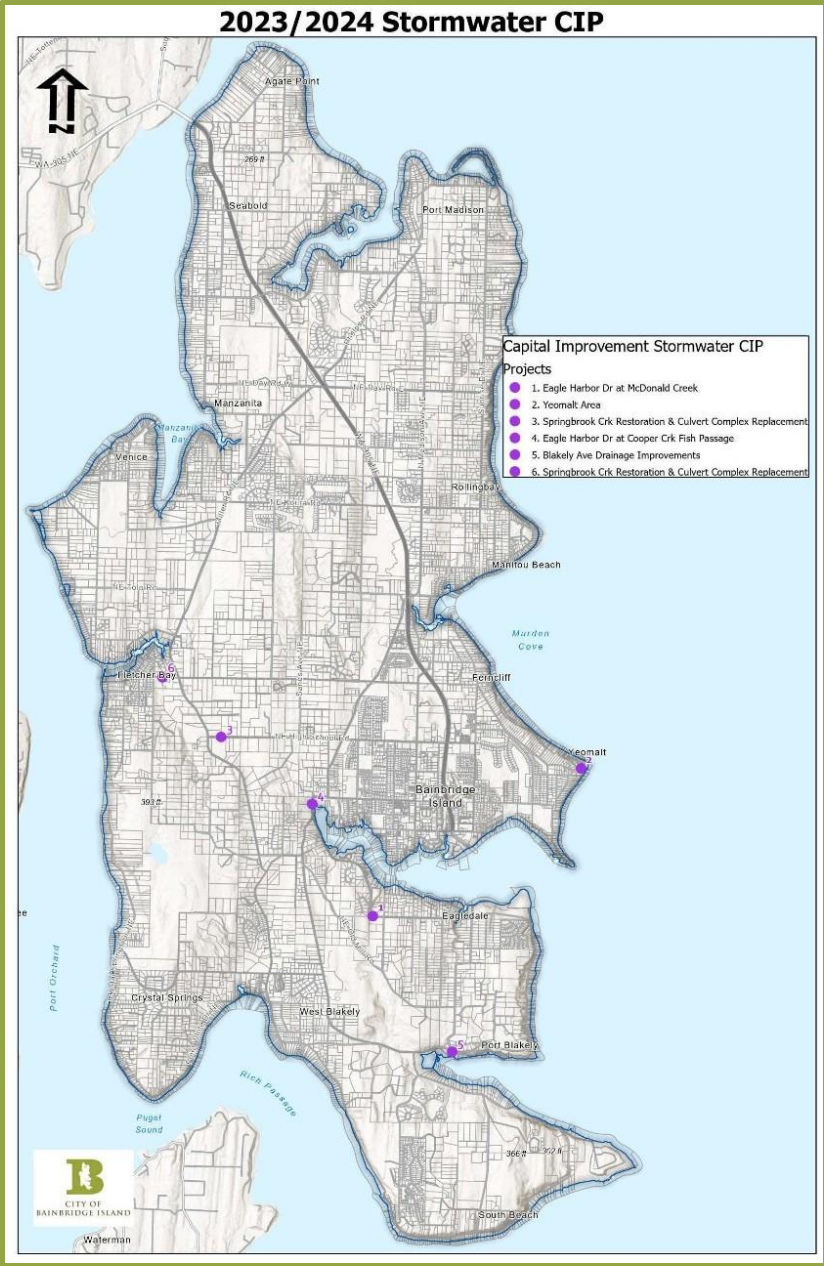
The following five subsections present the required minimum performance measures organized by these subjects as outlined in the 2024-2029 Phase II Permit, Section 5 Chapter 7 (S5.C.7), alongside the 2025 COBI planned actions and activities to meet the requirements:

- [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



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
<p>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).</p>	<p>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.</p>

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)
<p>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.</p> <p>S5.C.7.c.i. Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required.</p> <p>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.</p> <p>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.</p>	<p>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.</p>

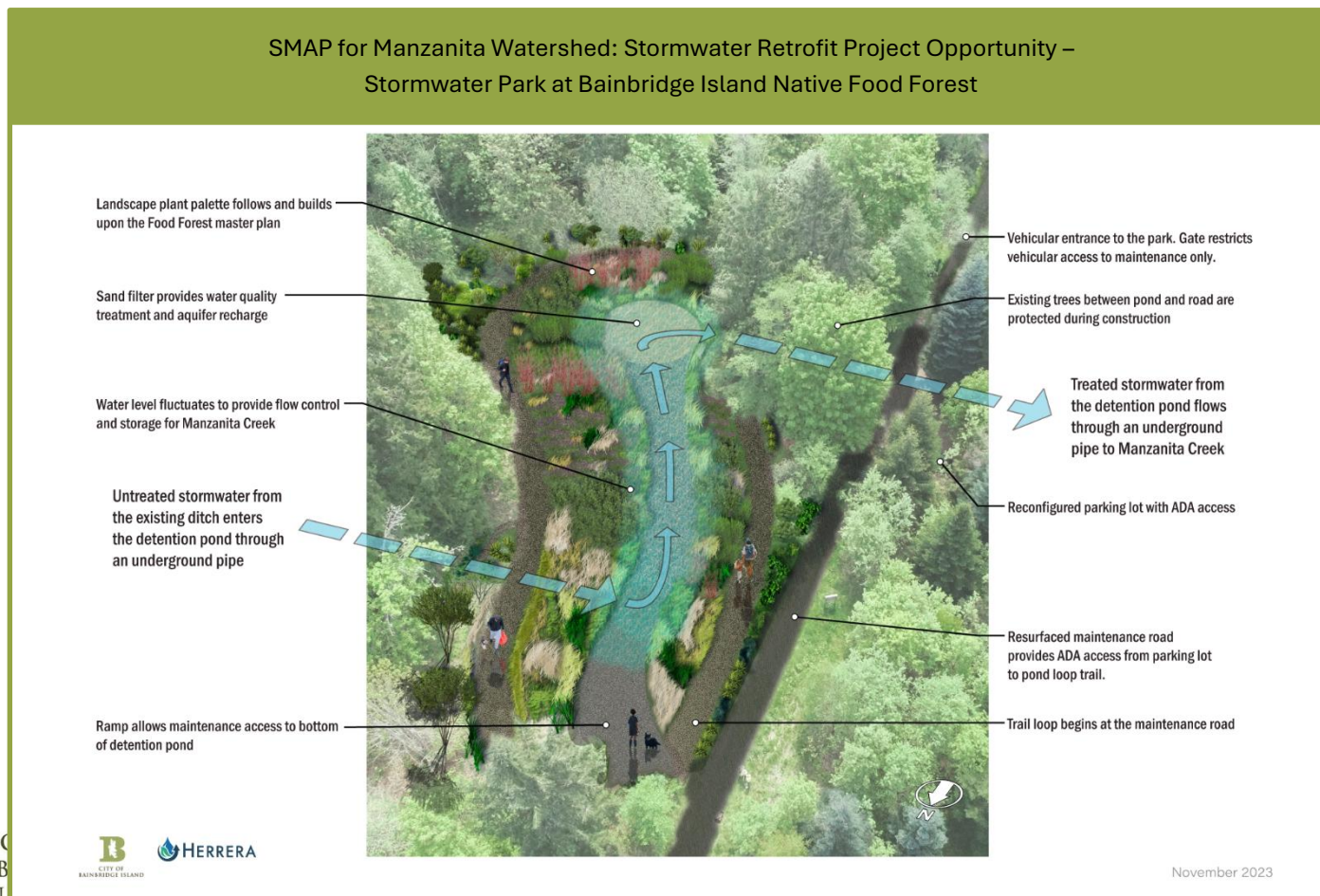
2024-2029 Phase II Permit minimum performance measures for SMED – Fully fund, start construction, or completely implement project(s)	2025 COBI planned actions and activities for SMED – Fully fund, start construction, or completely implement project(s)
<p>S5.C.7.c.iv. Permittees shall report which projects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

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). 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. 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. 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. 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 actions</u> 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

<p>2024-2029 Phase II Permit minimum performance measures for O&M – Practices, policies, and procedures to reduce stormwater impacts</p>	<p>2025 COBI planned actions and activities for O&M – Practices, policies, and procedures to reduce stormwater impacts</p>
<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> <ul 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 Priority areas: 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. (b) Streets that serve commercial or industrial land use areas.</p> <p>S5.C.9.e.ii. Program timing: Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the Permittee to provide additional water</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 <u>March 31, 2028</u>, 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
<p>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.</p>	<p>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.</p>

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
<p>S5.C.9.h. <u>Maintain records</u> of the activities conducted to meet the requirements of this Section.</p>	<p>Records of all the operations and maintenance activities outlined in this section are kept and retained as required by the Phase II Permit.</p>

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.



WEST SOUND STORMWATER OUTREACH GROUP

2024 SUMMARY OF ACTIVITIES

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WHO WE ARE

The West Sound Stormwater Outreach Group (WSSOG) is a regional partnership dedicated to improving water quality through education and outreach. Since 2008, Kitsap County and the cities of Bremerton, Gig Harbor, Port Orchard, and Poulsbo have collaborated to fund, develop, and implement public outreach efforts required by the Western Washington Phase II Municipal Stormwater Permit. In 2012, Bainbridge Island and Port Angeles joined the group, strengthening our collective impact. The U.S. Navy also participates as an informal member.

WSSOG's mission is to collaboratively fulfill the public education and outreach requirements of the Permit while maximizing cost savings and efficiency. By aligning efforts, the organization ensures consistent messaging and meaningful community engagement, ultimately safeguarding local waterways for future generations.



2024 HIGHLIGHTS

WSSOG remains committed to advancing stormwater education and outreach while adapting to evolving permit requirements and regional priorities. Below are key highlights of WSSOG’s efforts and accomplishments over the past year.

On July 1, 2024, Ecology issued the latest iteration of the Western Washington Phase II Municipal Stormwater Permit, which remains in effect until July 31, 2029. As part of the ongoing five-year permit cycle, this version continues to evolve to address regional water quality goals and incorporate feedback from prior implementations. While WSSOG successfully met all requirements of the 2019–2024 Permit, the new Permit introduces updates to the requirements impacting education and outreach, particularly in relation to behavior change, public involvement and participation and environmental justice.

One significant change is the updated definition of “overburdened communities” to align with the Washington HEAL Act. This change brings new obligations, including:

- Reporting on how overburdened communities were engaged in public involvement opportunities and the methods used to identify these populations.
- Designing outreach and behavior change campaigns that prioritize overburdened communities.
- Mapping overburdened communities in relation to stormwater infrastructure to ensure their needs are considered in stormwater planning and the development of the Stormwater Management Action Plan (SMAP).

WSSOG will utilize its Overburdened Communities Assessment and Kitsap County Equity Atlas to effectively implement these new Permit requirements and ensure meaningful community engagement.

In the fall of 2024, WSSOG launched an evaluation of its Natural Yard Care campaign to determine whether nutrient reduction should remain a top priority for member jurisdictions. Each jurisdiction assessed the effectiveness of the existing campaign while also identifying their own priority pollutants. Using a structured evaluation process, the group generated a list of potential pollutants and associated behaviors for targeted outreach. Each behavior was rated based on several criteria, including relevance, impact on water quality, influence on overburdened communities, and measurability.

Based on this analysis, WSSOG chose to focus its 2025 campaign on encouraging businesses to close their dumpster lids—an effort aimed at reducing stormwater contamination.

As WSSOG moves forward, its collaborative efforts will ensure that public education, outreach, and stormwater management continue to evolve in ways that protect water quality, engage communities, and align with regional and state environmental priorities.

STORMWATER OUTREACH FOR REGIONAL MUNICIPALITIES (STORM)

WSSOG actively connects to broader regional stormwater education and outreach efforts through participation in the Puget Sound Stormwater Outreach for Regional Municipalities (STORM) partnership. STORM is a collaborative of over 80 Puget Sound Area cities, counties, state agencies and nonprofits working together to understand and reach our shared audiences for clean water actions. STORM uses social marketing strategies using marketing practices for social benefit. This shared approach creates a disciplined and science-based approach to public outreach and understanding of influences on stormwater issues. Through sharing time, resources and projects, we can be more effective, consistent, cost efficient and learn together. STORM's vision is "People living and working in our communities will take actions that protect water quality within the Puget Sound basin." STORM's mission is "To work together with regional partners to address polluted runoff by advancing broad-scale behavior change."

Kitsap County represents the WSSOG on the STORM Steering Committee which meets twice a month to work on tasks that guide the regional STORM partnership. The STORM Steering Committee plans and facilitates quarterly STORM partnership meetings and the annual Symposium. WSSOG partners also participate in the STORM Pet Waste Workgroup. Significant accomplishments of the STORM partnership are summarized in Appendix A: STORM 2024 Annual Report.

PUGET SOUND STARTS HERE COMMITTEE

Puget Sound Starts Here is a Puget Sound-wide stormwater pollution prevention awareness campaign that provides recognizable branding and consistent messaging to raise awareness about the impacts of stormwater pollution. Kitsap County represents the WSSOG on the Puget Sound Starts Here (PSSH) Steering Committee. Notable projects accomplished by the PSSH Committee include coordinating a regional PSSH Month digital advertising campaign and bulk purchasing of PSSH branded promotional items.



WORK GROUPS

WSSOG partners also participate in several Washington Stormwater Center work groups. These include the Business Inspection Group (BIG) and the Environmental Justice Work Group.

PUGET SOUND STARTS HERE

Puget Sound Starts Here is a regional effort to raise awareness about actions residents can take to reduce their impact and keep Puget Sound. Local implementation of PSSH included a variety of



outreach approaches, including the promotion of Puget Sound Starts Here Month in September. Bainbridge Island issued a proclamation recognizing Puget Sound Starts Here Month.

Many jurisdictions distribute branded promotional items with the Puget Sound Starts Here logo through outreach events, at front desk counters and other mechanisms.

Collectively, these efforts placed over 10,379 Puget Sound Starts Here branded items in the hands of West Sound residents and visitors.

Jurisdiction	Coasters	Pens/ Pencils	Leash Bag Holders	Leash Bag Holder Refills	Bike Safety Lights	Other (Tote Bags, Stickers, etc.)	Total Impressions
Bainbridge Island	1,000	0	200	0	0	100	1,300
Bremerton	1,250	25	20	20	0	0	1,315
Gig Harbor	0	0	100	0	0	0	100
Kitsap County	3,500	0	0	0	0	1,750	5,250
Port Angeles	15	0	32	375	5	398	825
Port Orchard	0	0	0	189	0	1,300	1,489
Poulsbo	0	0	100	0	0	0	100
						Total	10,379

PUGET SOUND STARTS HERE MONTH DIGITAL CAMPAIGN

The regional Puget Sound Starts Here Committee coordinated PSSH Month in September. The committee coordinated a digital marketing campaign and jurisdictions were invited to financially participate in the campaign. Bainbridge Island, Bremerton, Kitsap County, Port Angeles, Port Orchard, and Poulsbo invested in the campaign.

This year's campaign focused on vehicle maintenance behaviors, "Don't Wait to Inflate," for Puget Sound Starts Here Month. The digital campaign's goals were to drive people to the [PSSH website](#) and encourage them to learn more about how to check their tire pressure and the importance of maintaining proper tire pressure.



The campaign combined a digital video and digital display ads and were shared on Facebook, Instagram and YouTube.

The campaign's audience were adults aged 18-64 in the Puget Sound region. The ads were run in English, Spanish, Korean and Vietnamese. A portion of the ad budget was allocated towards targeting overburdened communities using factors such as income, education, people of color and/or those who speak limited English.

PUGET SOUND STARTS HERE TRADITIONAL ADVERTISING

The WSSOG actively participated in the Puget Sound Starts Here campaign through diverse outreach efforts. Member jurisdictions displayed the PSSH banner on their websites, engaged with the public at community events, and promoted key stormwater messages, including proper tire inflation to reduce pollution.

BEHAVIOR CHANGE - SECTION S5.C.2.a.ii

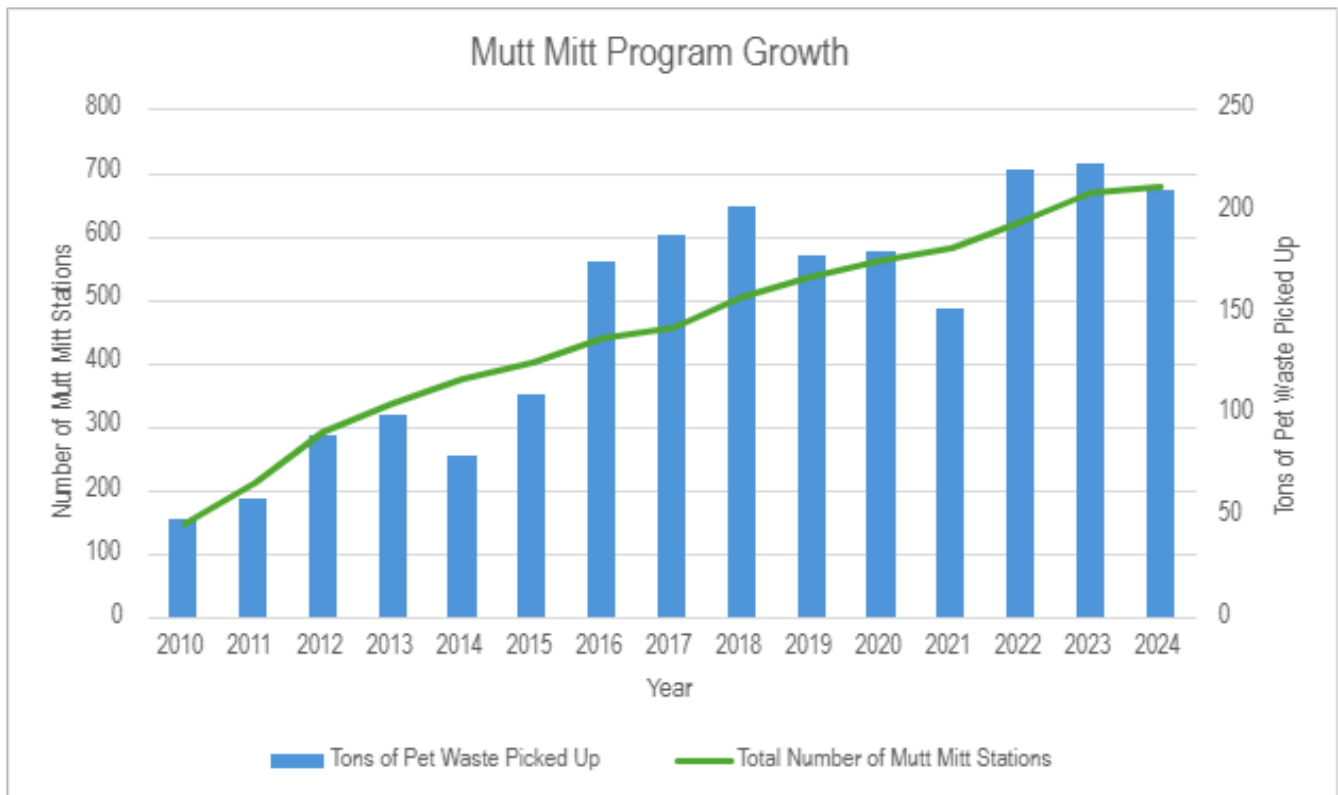
WSSOG coordinates two behavior change campaigns: the long-standing Mutt Mitt Program and the Natural Yard Care Campaign.

PET WASTE IN PUBLIC AREAS – MUTT MITT PROGRAM

In 2009, the WSSOG identified pet waste pick-up and proper disposal as a key behavior for reducing bacteria pollution in stormwater and surface water and adopted a successful and collaborative regional Mutt Mitt Program. Efforts related to this key behavior have continued annually and the program continues to be a primary behavior change campaign for the WSSOG. In 2014, the WSSOG conducted a survey that focused on two target audiences: Mutt Mitt station sponsors and Mutt Mitt station users. The report identified strategies to improve the Mutt Mitt Program, which were implemented in 2016. The Mutt Mitt Program continues to grow steadily and currently comprises 680 stations that have been distributed throughout the county and WSSOG partner cities. On average between 20-40 stations are added annually.

In 2024, the cities, County and residents that participate in the program distributed a total of 1,269,999 pet waste disposal bags. This effort represents 210 tons of dog waste diverted from the natural surface waters of Kitsap County.

Dog walkers depend upon stations that are reliably stocked with bags to help them adopt this behavior. It is essential that Mutt Mitt branded stations are continuously stocked and in good working order. Kitsap County typically conducts inspections of all Mutt Mitt stations located within Bainbridge Island, Bremerton, Port Orchard and Poulsbo on an annual basis and all other stations located within the County on a biennial basis



TALKING (AND TOSSING) POOP FOR WATER QUALITY

In 2024, the popular Poop Toss game continued to draw crowds at public events, using humor to spark conversations about responsible pet waste disposal, an often-avoided topic.

Featured at community events like PetsWalk (Poulsbo and Kitsap County), the Bainbridge Island Boaters' Fair, and the Clallam County Fair, the game engaged participants of all ages while reinforcing key environmental messages. At the Clallam County Fair alone, Port Angeles connected with approximately 885 attendees, while Kitsap County and Poulsbo reached 432 people at PetsWalk.

Participants not only learned proper pet waste disposal practices through play but also received a Puget Sound Starts Here branded clip-on bag dispenser, a practical tool that serves as a lasting reminder of their commitment to keeping waterways clean. In total, the game helped jurisdictions engage over 1,300 residents, making pet waste education both fun and impactful.

NATURAL YARD CARE CAMPAIGN

Per the requirements of the 2019-2024 Permit, the WSSOG looked at their current behavior change campaign and based on trends and the Backyard Pet Waste campaign evaluation, elected to develop a behavior change campaign focused on a new target audience and BMP. The group selected nutrient reduction as the goal, and improper/ combination fertilizer use as the new BMP, targeting homeowners who perform DIY-yard care. The group hired a consultant in 2019 and developed a new social marketing campaign to target this BMP.

The new Natural Yard Care campaign was set to pilot in 2020, however due to COVID-19 the pilot was postponed. As a pivot, the group elected to conduct additional research on the priority audience, barriers and potential ways to address these barriers. The consultant recruited respondents to participate in a paid research study to learn what barriers are discouraging people from choosing natural yard care over conventional methods. The barriers identified were cost and lack of information (about how natural lawn care products work and where to purchase the products). The study also found that Kitsap residents are interested and receptive to online Master Gardener events. Lastly, the study found that the target audience is concerned about the safety of chemical fertilizers on their kids and pets. The campaign and marketing strategy was designed based on the study's findings.

The Natural Yard Care behavior change campaign was piloted in Poulsbo in 2021 and expanded to the rest of the County in 2022. In 2023, the campaign ran during peak fertilizer season (spring/summer) and included three natural lawn care webinars hosted by WSU Kitsap Extension Master Gardeners; a tabling event at Bremerton City Nursery; an organic fertilizer discount offered through a partnership with six retailers; and campaign communications including a Facebook ad campaign, a postcard, e-

newsletters, social media, and utility bill messaging. In accordance with the Permit, Kitsap worked with a consultant to evaluate the effectiveness of the campaign and identify successes or develop recommended changes to the program to be more effective. The evaluation report summarizing the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the campaign was completed in February 2024. Based on the results of the evaluation report, Kitsap decided that 2024 would be the last year it would implement the NYC Campaign, and elected to select a new pollutant, behavior and target audience. In spring/summer 2024, the campaign ran with modifications per the evaluation. It included three webinars, one in person event. The full results are available in Appendix B: Natural Yard Care Summary 2024.

At the end of the 2024 NYC Campaign, the WSSOG began the process of selecting a new social marketing behavior change campaign. They selected bacterial pollution reduction as the goal, and encouraging businesses to keep dumpster lids closed as the best management practice (BMP). The group plans to hire a consultant in 2025 to help develop and implement the strategy and schedule for the new social marketing campaign to target this BMP.



STEWARDSHIP – SECTION S5.C.2.a.iii

Each partner jurisdiction offers stewardship opportunities that empower residents to take part in activities and events aimed at protecting and restoring surface waters, streams, and riparian corridors while fostering a strong sense of community connection.

CREATIVE WAYS TO ENGAGE

- Port Angeles participated in community events, including the Clallam County Fair and Dry Creek Elementary's *STEM Like Me* event.
- Poulsbo hosted over 300 attendees at the inaugural Earth Day celebration and 450 visitors at Poulsbo Fish Park for Salmon Tours.
- Port Orchard assisted with the Sinclair Clean-up event in both spring and fall.
- Bremerton engaged with 30 fourth and fifth graders in the *Highly Capable* program at Kitsap Lake Elementary.
- Bainbridge took part in the annual Beach Clean-up event in September.
- Gig Harbor partnered with Harbor WildWatch for stewardship opportunities and supported the salmon counting logbook at Donkey Creek Park.
- Kitsap County sponsors Stream Stewards and Salmon Docent Training programs which provide residents with opportunities to participate in activities and events that protect and restore surface waters, stream and riparian corridors and cultivate community connection. The training culminates with the opportunity to become a docent at the annual Kitsap Salmon Tours event, giving trainees the chance to share what they've learned with the public. Kitsap Salmon Tours is an annual event, held in November at seven steam sites across the county where the public can explore all things salmon with biologists, local organizations and trained docents. Salmon Tours provides the public with an opportunity to experience salmon in their habitat while learning about the sources and impacts of stormwater pollution.



ILLICIT DISCHARGE DETECTION AND ELIMINATION – SECTION S5.C.5.d.ii

All Permittees are required to implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections to the Permittee’s Municipal Separate Storm Sewer System, or MS4, including a publicly listed and publicized hotline for reporting spills and other illicit discharges.

SPILLS HAPPEN

All WSSOG jurisdictions have a publicly listed hotline, telephone number and/or app for reporting spills and other illicit discharges. Kitsap County, Bainbridge Island, Bremerton, Poulsbo, and Port Orchard share the Kitsap1 phone number and SeeClickFix app. Gig Harbor also utilizes SeeClickFix.

WSSOG shares common branding and publicity through a tagline and graphics called *Spills Happen*. This catchy phrase and graphics are intended to bring awareness and encourage residents to report spills. The partners post their spill reporting phone numbers and apps on their websites as well on print materials.



WSSOG utilizes outreach methods, including:

- Bainbridge Island publicizes their spills hotline and promotes the *Spills Happen* messaging on their City webpage, in their Stormwater Management Program Plan, and at their City Hall lobby display and front counter. They also shared spill reporting information at the Bainbridge Island Boater’s Fair.
- Bremerton features the *Spills Happen* branding on one sweeper truck and two signs downtown near the large parking garages. They also distributed Spills Happen branded paint sticks to remind community members to properly dispose of paint waste.
- Gig Harbor publicizes their spills hotline and promotes the *Spills Happen* messaging on their City webpage and provide branded magnets at the Civic Center and to businesses Source Control inspections.
- Kitsap County displays the *Spills Happen* graphics on three spill response trailers. The spill reporting hotline phone number is also on their spill response truck.
- Port Angeles promoted the program in their Stormwater Rains Utility Mailer which is sent to 11,278 utilities customers.
- Port Orchard publicized Spills Happen branding and promoted SeeClickFix and Kitsap 1 on their website, a public facing message board (in City Hall), on Facebook, handed out educational flyers, including spill, pressure washing, painting and IDDE pamphlets and 100 fridge magnets to interested parties.
- Poulsbo distributes *Spills Happen* magnets at City Hall and stocks field staff’s vehicles with BMP pamphlets to hand out to residents as needed.

SPILLS REPORTING CALLS

A total of 92 spill complaints were received in 2024. Of those, 45 came in via Kitsap1 phone number, 15 via Kitsap1 email, and 32 spill complaints were reported through the SeeClickFix app or web-based reporting form. (Kitsap County – 64, Bremerton – 14, Bainbridge Island – 2, Port Orchard – 8, Poulsbo – 4).



TRAINING PROGRAM



Jurisdictions coordinate an ongoing training program and follow up trainings to their field staff on how to recognize, respond to and report spills (S5.C.5.d.iii). WSSOG reported the following trainings held in 2024:

- Bainbridge Island – Provided on the job spills training for operations and maintenance staff.
- Bremerton – As part of the City's staff training program, 15 employees completed Municipal StormWatch training in 2024. Two City team members completed IDDE: A Grate Concern.
- Gig Harbor – Conducted spills training for 20 Public Works employees.
- Kitsap County – A total of 261 staff were trained in 2024, both online and in-person, which includes 30 Kitsap County Sheriff's officers who took the online training.
- Port Angeles – The city held a CESCL recertification training for 42 field staff.
- Poulsbo – Held a refresher training for 18 Public Works employees.

PLANNED ACTIVITIES FOR 2025

WSSOG has implemented all required actions under the Education and Outreach sections of the Permit. In 2025, the WSSOG will continue to collaborate and work on improving water quality through education and outreach. The WSSOG 2024 Work Plan is included in Appendix C.

Activities planned for the upcoming year will include maintaining and improving the programs outlined in the WSSOG 2025 Work Plan adapting it as necessary to meet Permit and program objectives. WSSOG plans to conduct the following new activities in 2025:

- Design and implement a new dumpster behavior change campaign.
- Implement a new Mutt Mitt station mini trash can pilot and design new MM station signs that promote proper pet waste disposal.

STORM

STORMWATER OUTREACH FOR REGIONAL MUNICIPALITIES

2024 ANNUAL REPORT

About STORM

STORM is a coalition of city and county governments working together to improve the health of our communities and protect our lakes, rivers, streams, and Puget Sound. The coalition supports efforts to meet the Education and Outreach requirements in the Washington Municipal Stormwater Permits.

STORM's Vision: People living and working in our communities take actions that protect water quality within the Puget Sound Basin.

STORM's Mission: Work together with regional partners to address polluted runoff and stormwater impacts by advancing broad-scale education & outreach and behavior change initiatives.

If your municipality would like to join STORM, or receive our updates, send your request to Anne Melrose, Statewide Municipal Stormwater E&O Coordinator, anne.melrose@wsu.edu.

Check out the STORM Resource Reservoir at pugetsoundstormgroup.org.

20 24 | STORM by the Numbers



78 participating jurisdictions

210 members



300+ attendees at STORM events

3,700

downloads from the Resource Reservoir



2024 STORM Symposium

2024 STORM Symposium Highlights

It was wonderful to see so many new faces and long-time STORMers at the 2024 Annual Symposium! Over **68** colleagues met to share ideas, learn and inspire each other. The bomb cyclone put a new spin on the title “STORM” Symposium. Despite the weather bomb messing with our lunch order, we had a successful event with an amazing line up of guest speakers and topics. Thanks to Mary Rabourn with King County and Becca Bolettieri with Kitsap County for the generous array of delicious snacks that carried us through the day!

We kicked off the Symposium presentations with **Ann Grodnik-Nagle**, Senior Policy Advisor in Climate Adaptation and Built Environment at Seattle Public Utilities. Anne explained climate change as an impact amplifier. Meaning we will experience more flooding, extreme storms (like bomb cyclones), sea levels rise, stress on water supplies, wildfire risks and urban heat island effects. While recognizing these impacts will hit the most vulnerable communities the hardest. Seattle’s climate action strategy is a community centered, one water approach focused on climate justice, climate adaptation and climate mitigation. The approach includes collaborating with frontline communities bearing the brunt of climate impacts to develop equitable climate strategies. Also adapting systems and operations to climate impacts and reducing greenhouse gas emissions in their citywide operations. Seattle is using scenario planning and climate modeling to project a range of future outcomes with a goal of making better climate informed decisions while working within the uncertainty of climate change. Current work includes nature-based strategies such as floodplain restoration, creating resilience districts to address systemic vulnerabilities and inequities, and developing GSI RainCity partnerships and projects.

Next, **Simone Des Roches** and **Jessica Sandoval** researchers with the Washington Department of Fish and Wildlife (WDFW) discussed findings from



the first year of a multi-year project. The project is studying the potential for stormwater ponds to provide suitable habitat for Washington’s native wildlife. In collaboration with city and county partners from the Cities of Olympia and Tumwater to the City of Bellingham, the hope is to learn how stormwater ponds can be created and managed to help address biodiversity loss, especially in urban centers.

The research team surveyed amphibians, birds, and beavers in over 200 stormwater ponds in the Salish sea watershed. Birds, from waterfowl to warblers, were identified visually or by their calls and songs. Frogs, salamanders, and fish were captured using dip-nets or small minnow traps, identified, counted, and released. Native amphibian species like the northwestern salamanders and the northern red-legged frogs were encountered frequently; however, so were invasive species including the American bullfrog and green frogs. Preliminary results of the study are encouraging, showing that conditions in many of our local stormwater ponds promote biodiversity. The research team will continue to collect data next year to help understand how essential urban infrastructure can promote pond biodiversity and access to wildlife for Puget Sound residents.

Late morning, we introduced our behavior change panelists **Laurie Deveraux** - City of Bellevue, **Cammy Mills** - Kitsap County, **Peggy Campbell** - Snohomish County and **Jess Huybregts** - City



2024 STORM Symposium Highlights *(continued)*

of Seattle. Each panelist shared their lessons learned and unique experiences with four different behavior change campaigns implemented during the prior Permit cycle.

Cammy started us off with a social marketing primer and followed up with reflections on Kitsap's Natural Lawn Care Program. Cammy walked us through the important exercise of choosing a campaign focus. Sharing a strategic methodology adopted from social marketing experts Nancy Lee and Doug McKenzie-Morh.

Peggy shared a comprehensive overview of Snohomish county's RainScaping Program focused on Low impact development principals and best management practices. She walked us through "Development" including strategy, timeline, GIS Analysis and audience research which revealed key insights. "Launch" including guide & materials, website, expo & workshops. "Evaluate" including expo & workshops, site visits, evaluation. "Report" including lessons learned.

Laurie shared highlights from the Dumpster Lid Campaign focusing on why dumpster lids were selected, audience research and interventions and the evaluation process. Lessons learned included the benefits of regional collaboration, using survey monkey for data collection and you don't always know who the "make me's" are. Campaign materials can be found on the Washington Stormwater Center's website.

Jess wrapped up the panel with Seattle's Adopt a Drain behavior change campaign, focusing on how the program was designed to meet each evaluation objective and question in the Permit. She covered participant recruitment, survey design, partnerships, metrics and lessons learned. Explaining how the program was modified to fit Seattle's program priorities and engage historically underserved communities.

In the afternoon, **Parker Lynas**, King County's NextGen Climate intern gave a [presentation on his "Clean Water Connects Us All"](#) campaign about community and health. In 2024, Parker explored communications and how using clean water as the foundation for actions might connect communities to health, the environment and climate resilience. He tested messaging at events using a splash pad for cooling off in White Center, touring of Renton's stormwater infrastructure with members of ethnic media, learning social marketing basics and through partners' artwork. Parker investigated how to connect to an audience's feelings about health, sense of place and water, and how actions might create community. People act when they feel connected to the message, and he tested how the presence of people and art in messaging made a difference. He will be continuing his work in climate resilience and communications in his final work at the Evans School.

Our final presentation featured **Nancy Hardwick** of Hardwick Research. She shared her insights on how to develop program evaluations from start to finish. She covered topics including survey design, focus group moderation and qualitative and quantitative research as well as innovative data collection techniques.

Want to learn more? You can find our panelists presentations on the [STORM Resource Reservoir](#).



Puget Sound Starts Here & Ethnic Media Tour Update

Thank you to all the campaign contributors! The 2024 clean water awareness campaign took a new approach this year. The start date was delayed (contracting and payment challenges) but continues into 2025. The approach included:

- digital marketing using the audience details called out in the NPDES Municipal Permit for Phase 1 and 2 Permittees,
- advertising to those contributor zip codes,
- hosting an ethnic media event Nov 18 touring Renton stormwater infrastructure and examples of community benefits,
- introducing media to the 6PPD issue gathering survey feedback,
- combining budgets with King County to test outreach tactics.



Media folks were very interested when Jenee Colton, speaking for King County's Science Section at the Cedar River stop, talked about tires, 6PPD and its impacts on salmon. There was an audible reaction when we highlighted the active storm drain flushing runoff from the highway into the river. The survey responses echoed feedback from previous media surveys about who communities trust and underscores the value of working with trusted partners.

From the survey: They trust those who speak their language, understand their culture, and provide useful information that meets their needs

There will be a project summary early February for our partners.

2024 Trainings and Professional Development

Quarterly meetings through the year focused on providing networking opportunities, skill shares, and trainings covering a variety of topics.

Thank you 2024 Quarterly Presenters!

- The Radish Project - Daniel Feinberg
- Evaluation for Reporting - Nancy Hardwick
- Don't Wait to Inflate Campaign Report - Karen Rich
- Social Connections: Learning & Adapting as Social Media Evolves - Warren Kagerise
- Intro to Social Marketing - Brooke Tully

We hosted a **Drips and Drops** (informal virtual learning session) on Oct. 8, 2024 with Abbey Stockwell, the Phase II Municipal Stormwater Permit Writer from Ecology. She provided an hour webinar to about 35 STORM members to discuss changes that were made in the recently released Municipal Stormwater Permit. It was a wonderful opportunity to ask questions about behavior change requirements and gather clarity on other education and outreach pieces of the new permit.

Finally, we offered the following trainings:

Nancy Lee led two 2-day workshops that walked about 30 participants through the steps of creating a Social Marketing Campaign, with homework in between!

Culture2Culture Training & Consulting held two Government to Government workshops with Pam and Gordon James. They shared history and considerations on how to work together with Tribes, teaching about traditional and cultural perspectives, legal impacts, Tribal Sovereignty and Tribal Governments to over 80 participants.



2024 STORM Work Groups

STORM work groups are created on an ad hoc basis and facilitated by STORM members. They are member-driven and self-directed. The formation and focus of work groups often aligns with new permit requirements, initiatives of the STORM Steering Committee or from requests by STORM members.

Work group participation is voluntary and based on the interest of individual members. These groups tend to be task-oriented and may have end dates. Work group members determine their structure and function, meeting frequency, work plans and decision-making.

Pet Waste

In 2024, 25 members from 19 jurisdictions participated in the Pet Waste Work Group. The group met three times to share various approaches to Pet Waste Management and Outreach, discuss development of a 'toolkit', and gauge interest in shared grant applications for updating audience research in our region. The group will continue to meet in 2025 - contact Cammy Mills at cmills@kitsap.gov or Carston Curd at carston.curd@snoco.org to join.

Concrete

The Washington Stormwater Center has run a Concrete Workgroup in 2024 to work on developing outreach materials to address issues around truck washout into storm drains. Several STORM members have joined the effort and if anyone else finds concrete an issue in their jurisdiction and would like to join the group contact Anne Melrose at anne.melrose@wsu.edu.



Adopt-a-Drain (AAD)

Washington's Adopt-a-Drain (AAD) coalition continued to grow in 2024. We are now 21-members strong, with several new partners in Central Washington (Yakima County) and SW Washington (Clark County and several cities) joining the Puget Sound pioneers. Since we launched in 2021, almost 1,900 individuals, families, and businesses in Washington have "adopted" more than 3,100 catch basins. Volunteers have reported that they prevented almost 35,000 pounds of sediment, leaves, twigs, garbage, pet waste, recyclables, and other materials from clogging or falling into the MS4 since 2021. In 2024, alone, volunteers removed more than 14,500 pounds of debris from around adopted drains.

In 2024, we boosted our Spanish language outreach, through community events, radio, TV, social media and printed materials. The social media toolkit and videos in both English and Spanish is on the Washington Stormwater Center website. Seattle and Duvall also successfully reported to Ecology how Adopt-a-Drain performed as a behavior change campaign.

It's not too late to join the AAD coalition! Help us reach 5,000 adoptions! For more information, please contact Halley Kimball at Halley.kimball@maplevalleywa.gov or Ann Zawistoski, Director of Adopt-a-Drain & Community Outreach, azawistoski01@hamline.edu.

STORM Steering Committee



Marisa Allison
City of Kirkland

Marisa (she/her) is a new STORM Steering Committee member this year, joining the government stormwater sector after years of working for nonprofits. She's motivated by the opportunity to collaborate with the team and cultivate meaningful change in our communities.



Susan McCleary
City of Olympia

Susan (she/her) is hitting her ten-year mark with the City of Olympia. She is continuously astounded by the passion, excellence, drive and collaborative nature of the stormwater professional community. It has been the most inspirational, productive and beneficial part of her public career.



Rebecca Boletieri
Kitsap County

Rebecca (Becca, she/her) is the Stormwater Education and Outreach Coordinator for Kitsap County's Stormwater Division. A recent transplant from Georgia, she enjoys contributing her skills in creative writing and community involvement to STORM.



Mary Rabourn
King County

Mary (she/her) has spent over 30 years in public service, specializing in E&O around hazardous waste small quantity generator info, pesticides, stormwater, multicultural projects, PIO, and more.



Laurie Devereaux
City of Bellevue

Laurie (she/her) has worked for Bellevue Utilities for 22 years. Her favorite thing about STORM is that it is a constant source of knowledge and inspiration.



Ry Yahn
City of Seattle

Ry (they/them) is a new STORM Steering Committee member. They are passionate about working with communities to prevent stormwater pollution and promote stewardship of local waters.



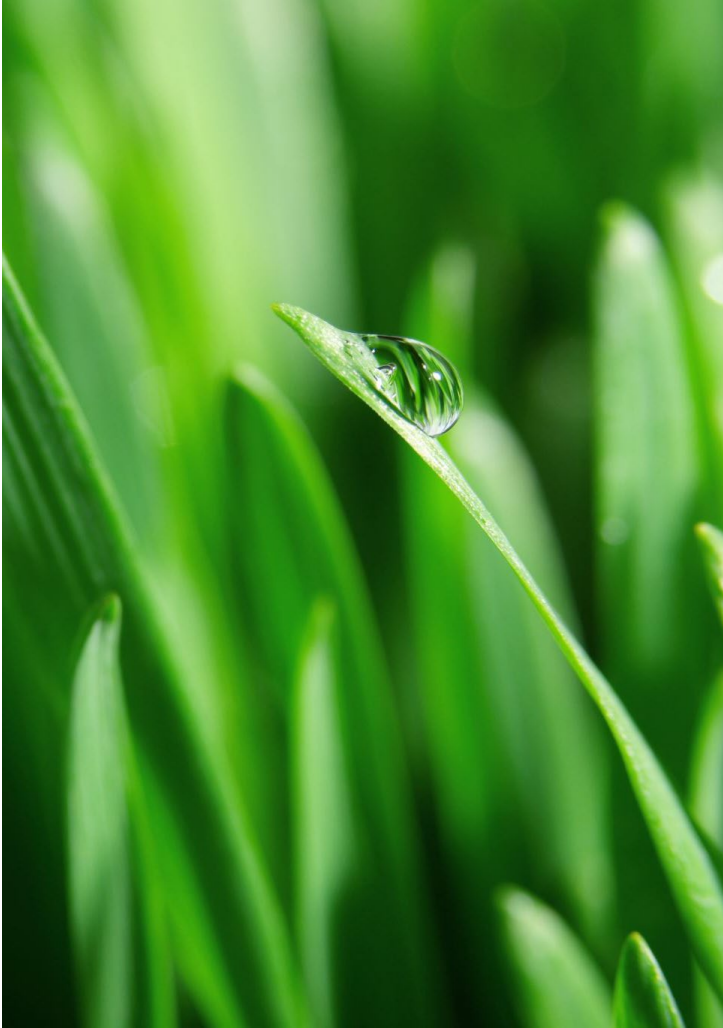
Bryan Hatchell
City of Bellingham

Bryan (he/him) has run environmental outreach campaigns for the past 8 years. As a new STORM Committee member, he is excited to form new connections and break down barriers to information as we promote behaviors that make our stormwater cleaner.



Anne Melrose
Washington Stormwater Center

Anne (she/her) spent a decade doing E&O in California. Now she has moved north into the rain of the NW to work on stormwater issues. She is inspired by the STORM Steering Committee and all that they do.



NATURAL YARD CARE SUMMARY 2024

Prepared by:

Cammy Mills

Kitsap County Public Works

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Executive Summary

The **Natural Yard Care campaign**, implemented by the West Sound Stormwater Outreach Group (WSSOG), successfully engaged residents across its jurisdictions through webinars, advertising, and partnerships with local retailers. Key highlights include:

- **High webinar satisfaction:** 84% of respondents rated the webinars a 7 or higher in meeting their expectations.
- **Behavior change progress:** 33% of post-webinar respondents reported planning to use natural/organic lawn care products, compared to 22% of attendees.
- **Advertising success:** The campaign reached over 367,000 people through social media, with a 63% increase in link clicks compared to 2023.

Despite these successes, challenges remain:

- **Low survey response rates** (36%) limited the ability to generalize findings.
- **Geographic gaps:** Port Angeles was underrepresented among registrants.
- **Barriers to adoption:** Concerns about weed control and slower results hindered confidence in using natural products.

Background/Strategy

The West Sound Stormwater Outreach Group, or WSSOG, is a multijurisdictional partnership between Kitsap County and the Cities of Bainbridge Island, Bremerton, Gig Harbor, Poulsbo, Port Angeles, and Port Orchard. The group works together to improve water quality by reducing pollutants in stormwater runoff, which are a major source of pollution to local waterways and the Puget Sound. The following report details results and findings from the second-year implementation of the Natural Yard Care campaign.

This program satisfies the current Western Washington Phase II Municipal Stormwater NPDES permit to affect behavior change (S5.C.2). Planning for the program began in 2018, and the pilot occurred in 2021. In 2022, the campaign was expanded to all the WSSOG-member jurisdictions and full implementation continued through 2024. The following activities were conducted through the multi-year effort:

- **Social Marketing Sessions/Campaign Planning** - The WSSOG conducted five social marketing planning sessions to define key project elements, including the campaign's focus on getting residents to reduce the use of chemical fertilizers on their lawns.
- **Initial Audience Research** - Research was conducted to better understand the priority audience's perceived barriers, benefits, and motivators in relation to the desired behavior.
- **Creative Development and Testing** - Based on research findings, creative concepts were developed then tested among the priority audience.

- **COVID-19 Pivot to Research** - Due to COVID-19, the 2020 pilot was delayed to 2021. While the pilot was delayed, additional research was conducted to further refine planned campaign tactics and messaging.
- **Pilot Campaign in Poulsbo** – A pilot was conducted in Poulsbo during peak fertilizer season in spring 2021, and included webinars hosted by WSU Kitsap County Extension Master Gardeners; an organic fertilizer discount offered through a partnership with a local retailer; and campaign communications including a Facebook ad campaign, a postcard, and government delivery channels such as e-newsletters, organic social media, and utility bill messaging.
- **Campaign Expansion** – 2022 - 2024, the campaign was expanded to include all WSSOG jurisdictions. Natural lawn and yard care webinars were hosted by WSU Kitsap County Extension Master Gardeners; an organic fertilizer discount was offered at local nurseries locations; and campaign communications included a postcard mailer, Facebook ad campaign and local government delivery channels. In 2024, a hands-on event was added. In-store advertising for coupons was also added in 2024.
- **Completion of High Level Evaluation** – In 2023 and 2024, Kathryn Owen Consulting was contracted to develop, implement and interpret a thorough evaluation of the effectiveness of the campaign and offer recommendations for improvement.

The current campaign strategy focuses on encouraging the adoption of natural lawn care techniques by offering coupons to residents in WSSOG jurisdictions to by natural/organic fertilizer at participating retailers. This is supported by natural lawn care webinars offered by Kitsap Master Gardeners, a hands-on natural lawn care demonstration event, and follow up email support from Master Gardeners for those interested.

Campaign Summary

Evaluation

Campaign Evaluation

Kathryn Owen consulting conducted a thorough evaluation of the effectiveness of this campaign during 2023 and 2024. (The evaluation was completed by March 2024. This left the WSSOG with limited ability to incorporate recommendations into the 2024 campaign.) Key findings are below.

Nearly half of respondents are interested in the target behavior: stopping weed and feed

Roughly 40% of survey respondents indicated an interest in adopting the target behavior of stopping use of weed and feed-type fertilizer and switching to natural/organic. Very few (5%) were uninterested in using organic fertilizer, though a third said they didn't want to use *any* fertilizer products.

Respondents found the ads compelling and a third said they would influence their lawn care behavior

Respondents (both with and without children or pets at home) found the ad campaign very compelling, citing the images of things they care about – in particular, protecting marine life and Puget Sound, and protecting their children and pets. A third said the campaign ads were “likely” or “very likely” to influence their own lawn care practices. Just under 30 people attended a webinar on natural yard care. While response rates were too low to make confident predictions about the impact on attendees as a whole, most of those who did respond had, six months later, taken steps towards natural yard care including stopping the use of weed and feed.

Participating nurseries and garden centers are interested in future events, and raised a few suggestions

All of the retailers interviewed after the campaign were interested in participating in future events and campaigns related to natural yard care. Some raised suggestions for future promotions, including changing the discount to a flat fee rather than a percentage, having discount coupons available on days when there is a workshop or demo on natural lawn care, and collecting additional info to find out whether the coupon is generating new customers for the retailers or new users of organic fertilizers.

Overall, responses showed significant interest in natural yard care & the topic of alternatives to lawns

Many respondents are taking additional natural yard care steps at home, such as setting the lawnmower higher, weeding by hand, overseeding with clover, etc. There was substantial interest in learning how to control weeds/invasive plants without toxic chemicals, which was a barrier for many in terms of consistently use of organic products. There was also substantial interest in alternatives to grass lawns.

A three-page summary of this evaluation, prepared by Kathryn Owen Consulting, is in Appendix A.

2024 Evaluation

Evaluation of the 2024 campaign was conducted through pre and post webinar surveys, engagement metrics from advertising efforts, and coupon use.

Advertising

Social Media

The webinar, coupon, and in-person event ad sets each featured two ads with different copy to A/B test, with one set of copy from the 2023 campaign. The ads encouraged residents to reduce pollutants in stormwater by signing up for a \$15 coupon discount on organic or natural fertilizer, and to attend webinars and an in-person event to learn about spring lawncare tips from Master Gardeners.

The campaign reached a total of 367,138 people and received 10,948 link clicks, a 63% increase in link clicks from the 2023 campaign (6,691). This increase can be attributed to a variety of factors including incorporating interest targeting, expanding the ads set to 3 (6 ads overall) to test and therefore reach a broader audience using different messaging, and adding Instagram, exposing the

ads to a larger audience. Additionally, adjusting CTA copy from “Get 25% off” to “Get \$15 Off” and incorporating more direct, actionable messaging (e.g., “Make the healthier, safer choice”) may have also made the offers more compelling, contributing to higher link clicks.

For full results of the digital ad campaign, please see the report prepared by C+C in Appendix B.

Postcard

Jurisdiction	Relative Population	# Allocated	# Actual submitted with duplicates removed
Unincorporated Kitsap County	59.20%	8880	9142
Bremerton	14.00%	2100	2088
Bainbridge Island	8.20%	1230	1249
Port Angeles	6.50%	975	1030
Port Orchard	4.80%	720	558
Poulsbo	3.70%	555	553
Gig Harbor	3.60%	540	521
Extra for distribution at events		500	500
TOTAL	100%	15000	15141

Table 1 - Postcard Mailing by Jurisdiction

Postcards were sent out to advertise the webinars and which also served as a coupon. Each jurisdiction selected its mailing area based on locally relevant criteria. Some factors considered were proximity to water, lot size, and whether the area had received a mailing in the past. Return rate of postcard coupons is discussed in the coupon section.



Image 1 - Front of Postcard

In Store

Based on requests received from retailers for in store advertising a flyer was developed including a QR code link to the coupon, see Image 2. This may have helped contribute to a higher number of coupon redemptions in 2024. However, the challenge with offering in-store coupons is that, like other coupon promotions, it is not possible to discern whether coupon users are changing their behavior or simply using the coupon to purchase a product they already use.

Webinars

A total of three natural lawn care webinars were held on 4/20/2024, 4/27/2024 and 5/1/2024. One hundred two (102) unique individuals registered for these events. (Some people registered for multiple events but were only counted once.) A total of 51 unique individuals attended the sessions.

Webinar evaluation

Evaluation of the webinars was comprised of a set of questions that registrants answered as well as a post-webinar evaluation. The evaluation provided valuable information about the characteristics of those who registered for the webinar (referred to as “registrants”) and those who attended (referred to as “attendees”). However, because the post-webinar was administered through a different tool, before and after results could not be obtained for individual attendees. Those who took the post-webinar survey are referred to as “respondents.”

Eighteen (18) webinar attendees completed post-webinar evaluations, a 36% response rate. Their responses to the survey are below. Because of the low response rate, results should be considered qualitative rather than quantitative.

Satisfaction

Overall, the webinar was well-received. A significant majority of respondents (84%) rated the webinar a 7 or higher in terms of meeting their expectations. Similarly, a large portion of



Natural Yard Care

This retailer is proud to offer a \$15 discount on your first bag of natural lawn fertilizer.

Scan the QR code below to get the coupon and learn about upcoming events.

TERMS & CONDITIONS APPLY. WHILE SUPPLIES LAST. OFFER VALID UNTIL JUNE 17, 2024.

Sponsored by the West Sound Stormwater Outreach Group, a partnership between Kitsap County, and the cities of Bainbridge Island, Bremerton, Gig Harbor, Port Angeles, Port Orchard and Poulsbo.



Image 2 - In-Store Coupon Ad

respondents (72%) indicated they were likely to recommend the webinar, rating it an 8 or higher. This suggests that attendees found the content valuable and engaging. However, it is important to acknowledge that a small percentage of respondents (6% for each question) gave low ratings (1 or 2), indicating that the webinar did not meet their needs.

To what extent did this webinar meet your expectations?	# respondents	% respondents
1 - Did not meet my expectations	1	6%
Two	0	0%
Three	0	0%
Four	1	6%
Five	2	11%
Six	1	6%
Seven	3	17%
Eight	3	17%
Nine	4	22%
10 – Exceeded my expectations	3	17%

Table 2 - Satisfaction with Webinar

How likely are you to recommend webinar	# of respondents	% of respondents
One	1	6%
Two	1	6%
Three	0	0%
Four	1	6%
Five	1	6%
Six	2	11%
Seven	1	6%
Eight	2	11%
Nine	2	11%
Ten	6	33%

Table 3 - Likelihood to Recommend Webinar

Audience

The target audience for the webinar was households with kids and/or pets, as these households are often more concerned about the potential impacts of conventional lawn care products. While a substantial proportion of both registrants (71%) and attendees (67%) fell into this category, the post-webinar evaluation responses skewed towards individuals without kids or pets (72%).

	# of Registrants	% of Registrants	# of Attendees	% of Attendees	# of Respondents	% of Respondents
Have kids and/or pets at home	72	71%	34	67%	5	28%
No kids or pets at home	30	29%	17	33%	13	72%

Table 4 - Webinar Audience Demographics

Webinar registrants came from throughout the Puget Sound region, but primarily from the Kitsap Peninsula. All WSSOG jurisdictions were represented in the registrants with the exception of Port Angeles. This suggests an opportunity to increase outreach efforts in that specific area for future webinars.

Zip	City or area	Total from zip
98006	Bellevue	1
98092	Auburn	1
98110	Bainbridge Island	9
98310	Bremerton/East Bremerton	5
98311	Bremerton/Silverdale	7
98312	Bremerton/West of 16	10
98322	Burley	1
98332	Gig Harbor/Purdy	5
98335	Gig Harbor/Artondale	7
98337	Bremerton/Gorst	3
98340	Hansville	1
98346	Kingston	4
98353	Manchester	1
98359	Olalla	2
98366	Port Orchard east of Hwy 16	10
98367	Port Orchard west of Hwy 16	14
98370	Poulsbo	11
98380	Seabeck	3
98382	Sequim	1
98368	Port Townsend	1
98383	Silverdale	7

98391	Bonney Lake	1
98392	Suquamish	1
98436	Tacoma	1

Table 5 - Zip Code of Webinar Registrants

Behavior Change

The purpose of this campaign is to encourage people who currently use weed and feed to switch to organic lawncare products. The survey reveals a mixed bag of current lawn care practices among respondents. Among respondents to the webinar survey, 33% were using some type of conventional lawn care products, but only 11% had used weed and feed, meaning there was limited opportunity to reach people using weed and feed.

The "other" category, which includes individuals who don't use any products, highlights a segment of the population that may require different messaging. An early concern among WSSOG members in developing this campaign was the possibility that we could inadvertently increase fertilizer use (and therefore nutrient pollution) by encouraging those who currently do not apply any fertilizer to start using natural or organic fertilizer.

Which of these products, if any, have you used on your lawn in the past few years? Check all that apply.	# of respondents	% of respondents
Natural or organic fertilizer	9	50%
Non-organic fertilizer	4	22%
Fertilizer & herbicide combination (weed & feed)	2	11%
Weed killer	4	22%
Moss killer	5	28%
Other (please describe)*	7	39%
*Four of the "other" responses were people that indicated that they did not use anything on their lawn.		

Table 6 – Previous Behavior of Webinar Survey Respondents

When people change their behavior, there are often stages that they go through prior to adopting the behavior consistently. They may start at a point where they are not interested in the behavior, then move to thinking about the behavior, then planning the behavior, engaging in the behavior occasionally, and then adopting the behavior all of the time. To gauge the success of the webinars, respondents were asked if they planned to change their behavior, but also, if they had moved along this continuum of behavior change.

A positive shift was observed in the respondents' stage of behavior change. There's a notable increase in the percentage of people who are *planning* to use natural/organic products (33%) compared to attendees (22%). This suggests the webinar effectively motivated individuals to move closer to adopting natural lawn care practices. The absence of respondents in the "not interested" category and the emergence of an "N/A" category further indicate a shift in mindset towards considering or using natural/organic options.

	# of Registrants	% of Registrants	# of Attendees	% of Attendees	# of Respondents	% of Respondents
I am not interested in using any products on our lawn	9	9%	5	10%	0	0%
I've never thought about using natural/organic products on my lawn instead of non-organic	9	9%	4	8%	*	*
I am thinking about using natural/organic products on my lawn instead of non-organic	24	24%	13	25%	4	22%
I am planning on using natural/organic products on my lawn in the near future instead of non-organic	22	22%	11	22%	6	33%
I sometimes use natural/organic lawn products	23	23%	9	18%	2	11%
I only use natural/organic lawn products	20	20%	9	18%	3	17%
N/A (I don't use anything on my lawn)	**	**	**	**	2	11%
*This question was not asked in the post-webinar evaluation because by virtue of attending the webinar, respondents would have had to think about natural/organic lawn products.						
**This was not an option in the registration question.						

Table 7 - Stages of Change for Webinar Registrants, Attendees and Survey Respondents

People's confidence in their ability to make a change can be a barrier. Another goal was to find out if webinar attendees felt confident in their ability to achieve a healthy lawn using natural/organic products.

The varied confidence levels suggest that while some attendees felt empowered by the webinar, others still had reservations. The comments from those with lower confidence provide valuable insights into the specific barriers that need to be addressed through targeted messaging and resources.

How confident are you that you'll be able to create a healthy lawn using natural/organic products?	# of Respondents	% of Respondents	Percent in the top, middle and bottom thirds
1 - Not at all confident	0	0%	17%
Two	2	11%	
Three	0	0%	
Four	1	6%	
Five	5	28%	45%
Six	1	6%	34%
Seven	2	11%	
Eight	3	17%	
Nine	1	6%	
10 - Extremely confident	2	11%	

Table 8 - Confidence in Using Natural Lawn Care Techniques Post-Webinar

Among those who rated their confidence a five or lower, four respondents left comments that help indicate why they do not feel confident and may indicate topics that should be addressed in future webinars. Their reasons included:

- Uncertainty about whether their spouse would agree to using organic products
- Understanding that results will take longer than they anticipated to realize and that they may have to tolerate a less than perfect lawn
- Belief that the products would not get rid of dandelions or clover
- Concern about a problem area of the lawn

Initial audience research showed that changing from conventional lawn care methods to natural lawn care can take some time until people are happy with the look of their lawn. A key strategy in this campaign was offering follow ups with Master Gardeners for webinar attendees. Of the survey respondents, 6 (33%) were interested in receiving a follow up contact from Master Gardeners.

Coupon Use

A key part of the strategy for this campaign is offering a coupon to help offset the perceived higher cost of using organic/natural fertilizer. In 2024, more coupons were redeemed than in previous years. Tables 9 and 10 show coupon redemption rates. For a full report on retail partnerships and coupon redemptions, please see the report prepared by C+C in APPENDIX C.

Store	Digital (Phone/Printed)	Postcard	Printed In-store	Total
Airport Garden Center (Port Angeles)	-	-	12	12
Bay Hay & Feed (Bainbridge Island)	1	38	-	39
Bremerton City Nursery (Bremerton)	15	16	-	31
Gig Harbor Ace Hardware (Gig Harbor)	11	5	-	16
Vern's Organic Topsoil (Poulsbo)	1	6	-	7
TOTAL	28	65	12	105
Percent of Total	27%	62%	11%	

Table 9 - Coupon Use by Retailer

	Total # of Coupons Redeemed	# of Retailers	Average Coupons Redeemed per Retailer	Coupon Start	Coupon End	# of Days for Coupon	Average Coupons Redeemed per Store Each Day
2021	18	1	18	30-Mar-21	22-May-21	53	0.34
2022	70	5	14	1-Apr-22	30-May-22	59	0.24
2023	68	6	11	1-Apr-23	18-Jun-23	78	0.15
2024	105	5	21	1-Apr-24	30-Jun-24	90	0.23

Table 10 - Coupon Use by Year

Hands-On Event

One of the recommendations from the evaluation report, completed by Kathryn Owen Consulting in 2024 was to help people overcome doubts about their ability to effectively manage their lawns using natural yard care techniques by focusing on skill building.

The event was advertised via social media (see Appendix B) and Master Gardener email lists. A short presentation about natural lawn care was given by a Master Gardener twice during the event so that attendees did not have to attend the entire event to get the full content.

A variety of lawn care tools were purchased for the event so that attendees could try them, three different types of weeding tools, a dethatching tool, and an aerating tool.. The event was held at Frank Raab Park in Poulsbo and the Poulsbo Parks Department gave permission for attendees to use the tools on the lawn at the park. Once attendees had had a chance to try all the tools, they could enter a raffle to win the tool of their choice. It was helpful to have multiple styles of hand-weeding tools since some attendees preferred one over the other, but there was not a clear consensus on which one people liked best. This also helped avoid the perception that any of the organizing entities (the county, cities, WSU Extension or Master Gardeners) were endorsing one particular brand.

A total of nine people attended the event. Several were Master Gardeners, so it is possible that they were already using some natural lawn care techniques. However, there was enough enthusiasm for the event among those present that we recommend continuing this event.

Post-Campaign Decision Making

In the fall of 2024, the WSSOG embarked on a process to evaluate the Natural Yard Care and determine if focusing on nutrient reduction was still a priority for the WSSOG jurisdictions. Each jurisdiction reviewed the evaluation of the existing campaign. They also gathered information about priority pollutants within their jurisdiction. Based on these priorities, the group came up with a list of potential pollutants and related behaviors on which to focus the upcoming campaign.

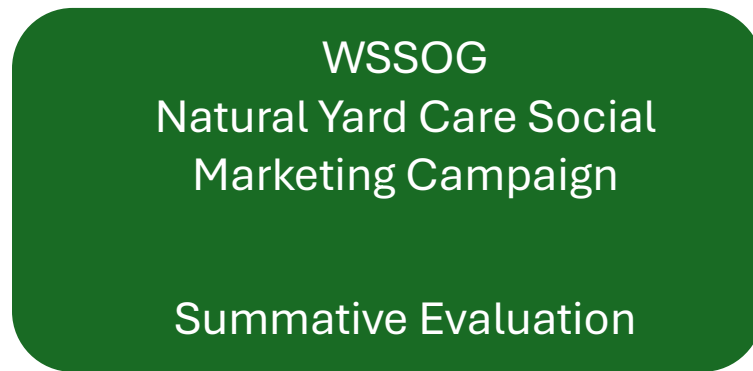
Potential Behaviors and Pollutant	Nutrients	Bacteria	Herbicide
Installing pet waste stations on shorelines		X	
Discouraging wildlife feeding		X	
Managing compost bins to discourage wildlife		X	
Close dumpster lids to discourage vermin and minimize leaks	X	X	
Pick up pet waste at home		X	
Use organic fertilizer - current program	X		
Hand pull weeds	X		X
Grass cycling	X		
Preventing fertilizer overspray	X		

Table 11 - Potential Areas of Focus for Future WSSOG Social Marketing Campaigns

Each WSSOG jurisdiction then rated each of these behaviors based on the following criteria: relevance in their jurisdiction, impact on water quality, impact on overburdened communities, ability to perform size of market not doing the behavior, measurability of the behavior (or behavior change and their confidence in their answers. Each behavior was assessed across all criteria for each relevant audience including, residents, businesses, property owners/managers, and the general public. An average score was calculated for each potential behavior. Based on these results, the group decided to move forward in 2025 with a campaign that focuses on encouraging businesses to close their dumpster lids.

After several years of implementing the natural yard care campaign with the WSSOG, Kitsap County will continue to support an education-only natural yard care campaign through its interlocal agreement with Washington State University Extension. This campaign will retain the educational elements of the existing campaign (webinars and hands-on events) but will not include a coupon, will not be advertised with a postcard, and will have a much smaller capacity for advertising.

Appendix A



Overview

Project purpose & evaluation goals

Kitsap County contracted with Kathryn Owen Consulting LLC to conduct a summative evaluation of the Natural Yard Care Social Marketing Campaign carried out by the West Sound Stormwater Outreach Group (WSSOG), a multi-jurisdictional partnership between Kitsap County, the Cities of Bainbridge Island, Bremerton, Gig Harbor, Poulsbo, Port Angeles, and Port Orchard. The aim of this campaign was to help reduce nutrient runoff - a major source of pollution to local waterways and to Puget Sound as a whole.

The target behavior for the Natural Yard Care (NYC) campaign was to encourage homeowners to switch from weed-and-feed type products to natural or organic fertilizer.¹ The target audience was initially identified as households who a) have a lawn, b) maintain the lawn themselves, and c) have children or pets with access to the yard as part of the household.

This evaluation summarizes findings from the most recent year of this multiyear campaign, which began in 2018. The evaluation centered on exploring the campaign's impact on audience receptivity to the messages, intent to engage in the target behavior, and actual engagement in the target behavior. Towards this end, we surveyed 2481 households within WSSOG jurisdictions. We also conducted in-person and phone interviews with partners (i.e., nurseries and garden centers involved in distribution of a discount coupon for organic fertilizer).

Evaluation findings

In spite of significant challenges posed by the COVID 19 pandemic, this campaign was able to produce a compelling ad campaign that spoke to the target audiences' interests and concerns and that many said would influence their behavior; to hold a series of webinars on natural lawn care that participants found valuable and that encouraged the target behavior; and to begin developing successful partnerships with local nurseries and other retailers. Key findings include:

¹ The campaign used the phrase "natural/organic" in most of its marketing literature, which has been shortened to "organic" for readability, unless quoting campaign materials.

- ❖ Roughly 20% of survey respondents have used weed and feed, moss killer, weed killer, or a nonorganic, slow-release fertilizer. Only 5%, however, identified themselves as “*not interested*” in using organic fertilizer.
- ❖ In all, 40% of the audience falls into the “willingness to change” category. They have already thought about doing the target behavior, have planned to start doing it, or have started doing it at least some of the time. Among those who are willing to engage in the target behavior, the challenge of controlling weeds and/or invasive plants was the most frequently mentioned barrier. Among the audience as a whole, the most prominent barriers were the perceptions that a) organics don’t work as well as chemical fertilizer, and b) are too expensive.
- ❖ One-third of survey respondents said they were not interested in using *any type* of fertilizer on their lawns, and there was significant interest in alternatives to grass lawns.
- ❖ Over a third of the audience said the NYC campaign ads were “*likely*” or “*very likely*” to influence their lawn care practices. Not counting those who were already using organic exclusively, 19% of the audience showed intent to adopt this new behavior. This translates to a potential 3,457 pounds or 1.72 tons of nutrient runoff diverted from local waterways; if extrapolated to the entire audience reached (not just survey respondents) the figure comes to 23,673 pounds or 11.8 tons.
- ❖ The aspect of the ad campaign the audience found particularly compelling was the focus on things they cared about: protecting marine life and Puget Sound; protecting their children, pets, and families; and protecting nature in general. People also liked the use of direct and compelling words like “*healthy*” and “*safe*,” and some appreciated the offers for fertilizer discounts and webinars. In addition, we found that households with and without children or pets were equally likely to find the ad campaign compelling.
- ❖ When given the opportunity to make general comments about their own lawn care practices or about natural yard care in general, the most frequent topics that emerged were:
 - Comments on NYC steps the respondent was taking aside from not using weed and feed-type products
 - Comments about wanting to reduce or remove their lawn
 - Comments about topics the respondent would like help with, including learning and/or resources
 - Comments about the perceived benefits of not using weed and feed-type products or other lawn chemicals
 - Comments of appreciation and/or agreement with WSSOG’s NYC campaign
- ❖ While comments did not vary greatly by jurisdiction, there were a few differences:
 - Respondents from Bainbridge Island were the most likely to share additional NYC steps they have taken, and to make comments of agreement or appreciation for the campaign.
 - Respondents from Gig Harbor and Port Orchard were the most likely to make comments reflecting lack of agency. I.e., referencing their HOA’s rules – or a housemate’s control – as barriers to taking action.

- ❖ The three webinars on natural yard care offered by a Master Gardener were attended by 29 individuals, out of 103 registering. While they reached a fairly small audience, the webinars had a high satisfaction rate, and the majority of attendees said they were likely to recommend the webinars to others. Of the attendees surveyed six months later, the majority reported having taken one or more steps towards natural lawn care.
- ✚ All of the nurseries and garden centers were interested in participating in future campaigns. Retailers' suggestions included changing the discount to a flat fee rather than a percentage, having discount coupons available on days when there is a workshop or demo on natural lawn care, and collecting additional info to find out whether the coupon is generating a) new customers for the retailers, and b) new users of organic fertilizers.

Recommendations

- ✚ While there were people who *were not* interested in the target behavior because they don't agree that nonorganic fertilizers pose a hazard – to their households or to Puget Sound – this group was quite small. For this reason, we **recommend focusing future efforts on moving beyond awareness to skill building**. To address the needs of the audience most likely to engage in the target behavior, the campaign could offer follow-up activities that can help people learn how to treat areas of concern (weeds, invasive plants, moss) without using toxic chemicals. These are most likely to be successful if they feature one-on-one conversations, which are able to respond to individualized conditions (e.g., lawn size, slope, proximity to water) and can contextualize the behavior.
- ✚ If WSSOG wants to continue using a social marketing approach, we recommend revisiting the target behavior and **identifying a behavior that is non-divisible (doesn't contain multiple steps) and end-state**. That is, the behavior will produce the desired outcome for the audience without requiring additional action. If the desired outcome is caring for the lawn without chemicals, the current target works; we suspect, however, that the desired outcome among these households is for a lawn that looks good (weeds are under control, for instance).
- ✚ **Continue and expand the use of social marketing tools**, including social diffusion and norms, public commitment, and making the behavior convenient. If the campaign were to adopt a non-divisible and end-state behavior, some of these additional tools could be employed more effectively. For instance, if the campaign were to encourage the behavior of adjusting lawnmower height to crowd out weeds, households could make a public commitment and help establish norms by putting up a small yard sign. Or the behavior could be prompted through reminders placed in nurseries and garden centers and take-home stickers.

Clarify the intent of the fertilizer discount. The discount coupon for 25% off organic fertilizer was provided as a way to reduce the barrier of cost for people interested in switching to organic. But because the coupon is for one-time use, it may not maintain the behavior beyond one application. If unfamiliarity with the products and where to find them were the main barrier, simply introducing people to the organic options through a coupon would be helpful. But with a product consumers buy repeatedly, the discount may be seen as having limited value. If WSSOG feels it would be helpful in convincing people of the benefits of organics, a cost comparison for customers showing organic and nonorganic costs over time could also be helpful.

In addition, because the participating nurseries focus on organic products already, it was unclear whether the discount coupons were encouraging first-time customers or first-time organic users – rather than people who already use organics and appreciate the discount. Our suggestion is to collect data during coupon redemption to find out the percentage of a) first time customers to that retailer, and b) first-time organic users, to find out whether the coupon is having the desired effect.

Appendix B

Kitsap Natural Yard Care 2024 Advertising

Following the success of the Kitsap Natural Yard Care campaign in 2023, C+C leveraged a paid Meta campaign in 2024 to reach priority audiences across Kitsap County, Port Angeles and Gig Harbor on Facebook and Instagram. The 2024 campaign introduced a new ad set for the in-person event, alongside the webinar and coupon ads. The campaign consisted of six static ads, using images from the spring 2023 campaign.

The webinar, coupon, and in-person event ad sets each featured two ads with different copy to A/B test, with one set of copy from the 2023 campaign. The ads encouraged residents to reduce pollutants in stormwater by signing up for a \$15 coupon discount on organic or natural fertilizer, and to attend webinars and an in-person event to learn about spring lawncare tips from Master Gardeners.

Results

The campaign reached a total of 367,138 people and received 10,948 link clicks, a 63% increase in link clicks from the 2023 campaign (6,691). This increase can be attributed to a variety of factors including incorporating interest targeting, expanding the ads set to 3 (6 ads overall) to test and therefore reach a broader audience using different messaging, and adding Instagram, exposing the ads to a larger audience. Additionally, adjusting CTA copy from “Get 25% off” to “Get \$15 Off” and incorporating more direct, actionable messaging (e.g., “Make the healthier, safer choice”) may have also made the offers more compelling, contributing to higher link clicks.

The average cost per link click (CPC) was \$0.50, outperforming last year’s average CPC of \$0.75 and the Meta CPC benchmark of \$1.72. This means that the ads were very cost-efficient and there was strong audience interest in the content.

The A/B testing for the webinar, coupon, and in-person event ads all resulted in approximately the same amount of link clicks and people reached. Since both versions of the ads performed well, we decided to keep both ads running through campaign duration within each ad set to maximize reach and engagement. This approach helped to maintain fresh creative content for the audience by having multiple versions running.

Webinar Ad Set (April 1, 2024 to April 30, 2024)

- Link clicks: 2,505
- Media Budget: \$1,497.91
- Impressions: 396,615
- Reach*: 181,553
- Cost Per Link Click: \$0.60
- Engagements: 165
 - 4 comments
 - 139 reactions

- 8 shares
- 14 saves
- Frequency: ~2

Coupon Ad Set (April 1, 2024 to June 30, 2024)

- Link clicks: 7,142
- Media Budget: \$3,249.25
- Impressions: 489,338
- Reach*: 220,381
- Cost Per Link Click: \$0.45
- Engagement: 142
 - 13 comments
 - 110 reactions
 - 17 shares
 - 2 saves
- Frequency: ~2

In-person Event Ad Set (May 13, 2024 to June 7, 2024)

- Link Clicks: 1,301
- Media Budget: \$748.52
- Impressions: 170,252
- Reach*: 81,654
- Cost Per Link Click: \$0.58
- Engagement:
 - 4 comments
 - 67 reactions
 - 7 shares
 - 3 saves
- Frequency: ~2

**116,450 people saw multiple ads resulting in 367,138 total people reached*

Webinar Ad 1 (2023 copy)

Kitsap County - Government
Sponsored

Get your green thumb ready because lawn care season is almost here! That's why we're bringing you 'Pull the Weeds, Not Your Hair', a FREE webinar about natural lawn care. Catch one of our webinars in April and May, or in-person event in June, to get expert advice on weed control, soil health, organic fertilizing, and more.

🌱 April 20, 10am - 11am
🌱 April 27, 10am - 11am
🌱 May 1, 6pm - 7pm

📅 June 8, 10am - 12pm - Join us for an in-person, hands-on weeding and natural lawn care demonstration

kitsap.gov
JOIN OUR FREE WEBINAR
Get Lawn Advice from Master... [Sign up](#)

Webinar Ad 2 (Top Performer)

Kitsap County - Government
Sponsored

Control pesky weeds the natural way by catching one of our free 'Pull the Weeds, Not Your Hair' webinars in April and May, and free in-person demonstration event in June. Don't miss out on tips, tricks, and proven tactics from Master Gardeners.

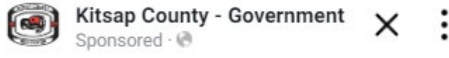
🌱 April 20, 10am - 11am
🌱 April 27, 10am - 11am
🌱 May 1, 6pm - 7pm

📅 June 8, 10am - 12pm - Join us for an in-person, hands-on weeding and natural lawn care demonstration

kitsap.gov
Free Lawn Care Webinar
Learn natural gardening from ... [Sign up](#)

Coupon Ad 1 (2023 copy)

Coupon Ad 2 (Top Performer)



One simple way to reduce your family's exposure to harmful chemicals is choosing lawn and garden care products labeled "natural" or "organic."

Save now on fertilizers that are safer for your family, your lawn and wildlife.



kitsap.gov
GET \$15 OFF ORGANIC FERTILIZER

[Sign up](#)



Ditch the harmful chemicals. Make the safer, healthier choice by switching to organic or natural lawn and garden care products. Right now, we're offering \$15 off organic fertilizer at partnering retailers.



kitsap.gov
Save \$15 on organic fertilizer
Fertilize your lawn, not our w...

[Get offer](#)

In-person Event Ad 1



Get your green thumb ready because lawn care season is here! That's why we're bringing you 'Pull the Weeds, Not Your Hair,' a FREE in-person, hands-on demonstration event about weed control, soil health, organic fertilizing, and more.

🌱🌿 Join us on June 8 between 10am – 12pm for expert advice and techniques on weeding and natural lawn care. Space is limited –reserve your spot today!



kitsap.gov
JOIN OUR FREE EVENT
Get Hands-on Advice from M...

[Sign up](#)



Control pesky weeds the natural way by joining our free 'Pull the Weeds, Not Your Hair' in-person, hands-on demonstration event on June 8 between 10am – 12pm. 🌱🌿 Don't miss out on tips, tricks, and proven tactics from Master Gardeners. Space is limited—reserve your spot today!



kitsap.gov
Free Lawn Care Event
Learn natural gardening techn...

[Sign up](#)

2023 – 2024 Campaign Comparison

This year's ad campaign budget was \$5,500—a 10% increase over the 2023 budget of \$5,000. Interest targeting was introduced this year and the campaign runtime was extended for an additional week. The 2024 campaign generated over 4,200 more link clicks than the 2023 campaign, and reached over 272,000 more people.

Recommendations for Further Evaluation and Next Steps

- Refresh the visuals for the ads, since the images have now been used for both the 2023 and 2024 campaigns and the target audience remains the same each year.
- Continue to leverage interest targeting to introduce the ads to qualified audiences.
- Continue to use A/B testing with multiple sets of ad creative to maximize and optimize performance.
 - The 2024 ad copy performed slightly better than the 2023 ad copy, so for the next campaign we recommend using the high performing 2024 ad copy and A/B test with a new set of ad copy.

Appendix C

Kitsap Natural Yard Care 2024 Retail & Coupon Redemption

Retail Store Outreach and Coupon Redemption Results

In 2024, C+C and WSSOG conducted another year of robust outreach to solicit retailer participation in Kitsap’s Natural Yard Care campaign. This year, five stores across the West Sound participated in Kitsap’s Natural Yard Care coupon promotion, providing coverage across the county and into Port Angeles.

Through these retailers, customers (West Sound residents) could receive \$15 off select natural or organic lawn fertilizer.

To support the retailer promotions in-store, the team provided an 8.5”x11” flyer for every retail partner to put in their stores as another touchpoint for customers to see messaging related to the campaign.

During the 13-week period the coupon was active (between April 1 and June 30), 105 total coupons were redeemed at participating stores—a significant increase from both the 2022 campaign (drove 70 coupon redemptions) and the 2023 campaign (68 redemptions).



In-store Flyer

C+C and the WSSOG tracked which kinds of coupons were turned in to get a sense where customers received coupons; of the 105 coupons redeemed, 28 customers received it through digital ads and the website (presenting the coupon on their phone or printed out) and 65 customers received it as a mailed postcard or in person at Master Gardening events hosted by WSSOG at Gig Harbor Ace Hardware and Airport Garden Center in Port Angeles. 17 received a printed coupon in-store from Airport Garden Center staff.

Store	Digital (Phone/Printed)	Postcard	Printed In-store	Total
Airport Garden Center (Port Angeles)	-	-	12	12
Bay Hay & Feed (Bainbridge Island)	1	38	-	39
Bremerton City Nursery (Bremerton)	15	16	-	31
Gig Harbor Ace Hardware (Gig Harbor)	11	5	-	16
Vern's Organic Topsoil (Poulsbo)	1	6	-	7
TOTAL	28	65	12	105

Percent of Total	27%	62%	11%	
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Two new features were added to the 2024 campaign:

- Increased Redemption Timeline:** This year, the team increased the time customers had to redeem the coupon from 11 weeks in the spring 2023 campaign (April 1, 2023 to June 18, 2023) to 13 weeks for the spring 2024 campaign (April 1, 2024 to June 30, 2024).
- ‘\$15 off’ Offer:** To help move past any cost barriers associated with natural or organic fertilizer, the project team adjusted the incentive offer to provide a flat ‘\$15 off’ on all eligible products. This “\$15 off” offer was new in 2024, replacing the “25% off (up to \$15)” offer used in previous years of the Natural Yard Care campaign.

\$15 Off Your first bag of natural lawn fertilizer

At these participating retailers:

Bainbridge Island: Bay Hay & Feed 10355 NE Valley Road	Poulsbo: Vern's Organic Topsoil 22622 Bond Road NE
Bremerton: Bremerton City Nursery 912 Adele Avenue	Port Angeles: Airport Garden Center 2200 W Edgewood Drive
Gig Harbor: Ace Hardware 4816 Point Fosdick Drive	

While supplies last. Limited time offer valid 4/1/24-6/30/24. Limit one discounted bag per household. May not be combined with other offers. Void if transferred, exchanged, sold or reproduced. Retailer reserves the right to modify the promotion at any time. Cash value 1/100th of a cent. Discounted products vary by location. Eligible products include: 40 lb G&B Organics - Organic Lawn Fertilizer (Airport Garden Center); 20 lb E.B. Stone Organics Nature's Green Lawn Food OR 32 oz Dr. Earth Super Natural Lawn Food (Bay Hay & Feed); 40 lb or 18 lb G&B Organics - Organic Lawn Fertilizer OR 18 lb Dr. Earth Organic Lawn Fertilizer (Bremerton City Nursery); 18 lb G&B Organics - Organic Lawn Fertilizer OR 18 lb Dr. Earth Organic Lawn Fertilizer (Gig Harbor Ace Hardware); 20 lb or 4 lb Hendrikus Organics Nitrogen Plus Organic Fertilizer for Turf & Plants (Vern's Organic Topsoil).

Coupon Offer

WSSOG and C+C also received other valuable insights from retailers about spring sales overall for 2024. Airport Garden Center and Vern’s Organic Topsoil both reported that excessive rain and cloudy days in April and May may have contributed to a slower spring gardening season this year. To help boost awareness, Airport Garden Center designed a front-of-store display just for the WSSOG promotion.



Airport Garden Center Display

West Sound Stormwater Outreach Group (WSSOG) 2025 Work Plan

Objectives from Exhibit “A”

West Sound Stormwater Outreach Group Scope of Work & Budget for 2023-2025

Sustain Successful Efforts with Pet Waste Outreach (Objective 2)

- Review data and other programs (2.1)
 - Develop an updated Mutt Mitt program plan.
 - Consider adopting updated Mutt Mitt program plan.
- Continue Pet Waste Outreach (2.2)
 - Continue to implement Mutt Mitt program plan.
 - Participate in the regional STORM Pet Waste workgroup as appropriate.

Continue Social Marketing Campaign Development (Objectives 3 and 6)

- Launch Dumpsters Campaign (3.1)
 - Review and adapt original Dumpsters campaign.
 - Coordinate adaptation of any printed materials.
 - Develop RFP (consultant for evaluation).
 - Review submissions with WSSOG.
 - Manage consultant contract.
 - Prior to full implementation, have consultant collect baseline data.
 - Develop strategy and schedule for new campaign and program evaluation plan by ****July 1, 2025****.
 - Implement campaign by ****September 1, 2025****.
 - Follow-up evaluation by ****March 31, 2029****.

Collaborate on Joint Outreach for the Business Inspection Program (Objective 4)

- Look for new opportunities to develop materials to support the business inspection program (4.1).

Collaborate on Mutually Beneficial Outreach Opportunities (Objectives 5 and 6)

- Continue Spills Hotline Outreach (5.2)

- Distribute paint sticks, when feasible.
- Promote the SeeClickFix application and spills reporting phone number via social media, print, or digital communications.
- Continue Participation in Puget Sound Starts Here (PSSH) Outreach (6.3)
 - Promote PSSH Month.
 - Distribute PSSH-branded merchandise (e.g., coasters, pet waste bag holders) when feasible.
 - Participate in STORM-sponsored regional ad buys and/or place local ads.

Strengthen Coalition and Represent WSSOG on Regional Efforts (Objective 6)

- Participate in the STORM Steering Committee and PSSH committee (6.1).
- Participate in STORM's regional workgroups as appropriate (6.4).
- Provide STORM and PSSH support and attend quarterly meetings (6.1).

Track and Maintain Records of Education and Outreach Activities (Objective 7)

- Provide an ****annual summary of activities****, track and maintain records, and report on programs as appropriate.
- Ensure compliance with the ****Washington State Phase II Municipal Stormwater Permit****, as required by the ****National Pollutant Discharge Elimination System (NPDES)**** under the ****Clean Water Act (40 CFR Part 122)****.
- Kitsap County will provide a draft summary of activities to WSSOG jurisdictions by ****March 2025****, with the final report submitted no later than ****mid-March**** to align with ****annual NPDES permit reporting requirements****.

CITY OF BAINBRIDGE ISLAND
PHASE II MUNICIPAL STORMWATER NPDES PERMIT #WAR045503
Permit Term 8/1/2024 – 7/31/2029
2024 ANNUAL REPORT – RESPONSE TO QUESTION #24a

Q24a: Attach a list of stewardship opportunities provided.

Stewardship Opportunities Provided and/or Promoted by City of Bainbridge Island in 2024:

- Puget Sound Starts Here Month – September 2024
 - City Proclamation at City Council Meeting September 10, 2024
 - Contributed \$2,000 to the regional Puget Sound Starts Here (PSSH) ad campaign with STORM
 - Promoted local events and activities in four City Manager Friday e-newsletters
 - Hosted a table at Farmer’s Market to promote stewardship opportunities on October 5th
- Promoted the Sustainable Bainbridge Beach Cleanup September 15th
- [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 (Nov.-Dec.).
- Natural Yard Care Behavior Change Campaign in partnership with West Sound Stormwater Outreach Group (WSSOG)
- The City’s Pet Waste Control Program includes a local and regional element to promote stewardship. The program provides free pet waste bags at “Mutt Mitt” stations installed all around the island to help 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).
 - 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.
- Interlocal agreement contract with Kitsap Conservation District to provide outreach and assistance to agricultural property owners/managers regarding best management practices for water quality.

CITY OF BAINBRIDGE ISLAND
PHASE II MUNICIPAL STORMWATER NPDES PERMIT #WAR045503
Permit Term 8/1/2024 – 7/31/2029
2024 ANNUAL REPORT – RESPONSE TO QUESTION #56

Q56: Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)

Projects by City of Bainbridge Island for consideration to fully fund, start, complete and/or schedule for implementation during this permit term pursuant to S5.C.7.:

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 Appendix 12 required assigned equivalent of 4 acres to control or reduce stormwater discharges to waters of the State from areas of existing development.

- **SMAP for Manzanita Watershed East Catchment Strategic Stormwater Retrofit Project (RP) Opportunities:**
 - RP-1. Design and construct Fieldstone Lane NE Regional Facility
Construct a biofiltration facility to provide water quality treatment for runoff from 9 acres of residential development draining to Manzanita Creek. Include educational signage and improve an existing trail connection. Protect and relocate existing underground utilities.
 - RP-2. Design and construct Bayhill Pond Naturalization Retrofit
The existing pond in this residential neighborhood may not meet current stormwater standards. This project will examine options for improving water quality treatment and flow control by creating additional volume or expanding treatment processes, including potentially expanding the footprint across the road.
 - RP-3. Construct Bainbridge Island Food Forest Regional Facility
Create a stormwater park to provide water quality treatment and flow control for stormwater runoff from 18 acres of residential land, will also reduce storm event flows to Manzanita Creek by increasing stormwater infiltration and providing stormwater detention. Additional benefits of this project include an ADA path and native plantings with a focus on edible varieties. The project would be a partnership between COBI's SSWM Utility and Friends of the Farms.
 - Feb. 2025 – City received draft approval of Ecology Water Quality Combined Stormwater Financial Assistance Program (SFAP) Grant funding of \$752,730 for State Fiscal Year 2026 (application number WQC-2026-BainIs-00333).

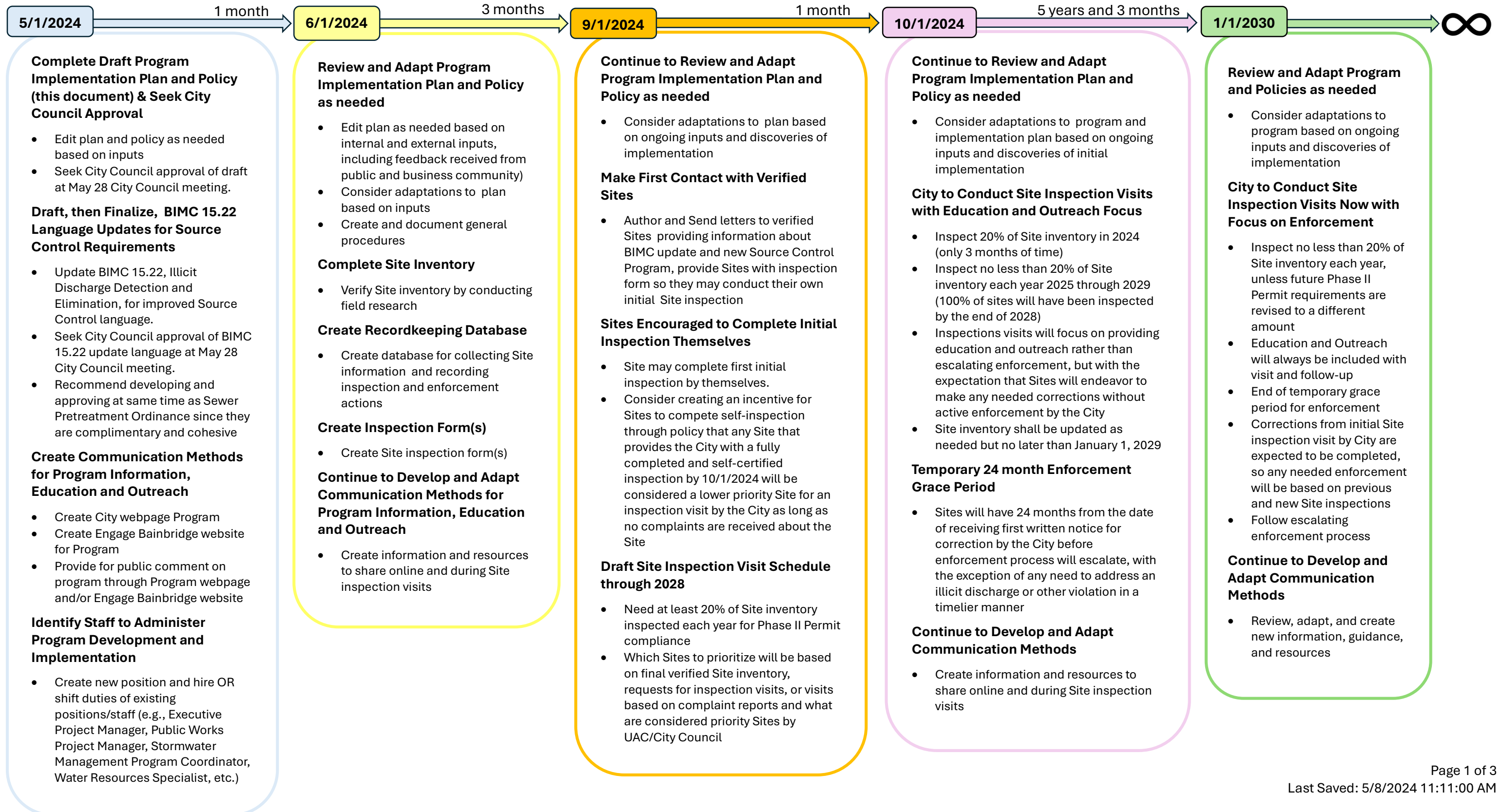
- RP-4. Design and construct Miller Road NE/NE Day Rd W Linear Facility Retrofits
Unmanaged stormwater from a high use area of Miller Road NE and the southern portion of the intersection of Miller Road NE and NE Day Road flows to Manzanita Creek. This project would construct linear facilities to improve water quality and flow control.

- **Revised 2024 Capital Improvement Plan**

- Eagle Hrbr. Dr. @ McDonald Creek Culvert
Replacement of an existing deep concrete culvert that shows signs of failure. Preservation of roadway and drainage system.
- Yeomalt Area Drainage Improvements
Provides for storm drainage improvements in the Yeomalt area. The City completed design in 2014 with funds received from a DOE grant for water quality. Much of the Wing Point area above Yeomalt Point was developed before regulations required conveyance systems. Currently there are drainage problems in many areas and/or existing conveyances are lacking or inadequate.
- Springbrook Creek Restoration and Culvert Complex Replacement
Upgrade failing complex of culverts across High School and Fletcher Bay Roads to fish passage culverts and restore section of creek that has been degraded. Preserve roadway and improve environmental conditions
- Springbrook Fish Passage
The Springbrook Fish Weir/Passage project proposes to replace the existing culvert at Springbrook Creek with an open box/bridge structure and streambed restoration. Provide a more adequate infrastructure for fish passage
- Eagle Harbor Drive Cooper Creek Fish Passage
Replace existing undersized culvert with a fish passage box culvert wide enough to accommodate non- motorized improvements on Eagle Harbor Drive. Addresses flooding, provides for fish passage, and accommodates future non-motorized improvements.
- Blakely Ave. Drainage Improvements
Restoration of downstream drainage channel and potential culvert replacement across Blakely Avenue near the intersection with Halls Hill Road. Portions of the improvements may be located outside of the ROW and on Park property. Addresses water on roadway and poor drainage.

COBI Source Control Program - Policies and Implementation Plan

Program Development and Implementation Timeline



Program Development and Implementation Policies

❖ Site Inventory

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

❖ Site Inspections

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

❖ Enforcement

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

❖ Financial Incentives for Sites

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

❖ **Financial Costs for City**

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

❖ **COBI Compliance**

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

COBI 2024 Source Control Inspections and Enforcement Records

UBI	Name1	Name2	Phys_addr1	Phys_addr2	Phys_addrCity	Phys_ad drState	Phys_add rZip	Latitude	Longitude	COBI_SCProgram_BusinessTy pe	Initial_Assess ment_Complet ed_Date	Initial_Assessm ent_Completed _By_Name	Enforc ement _Actio ns
578073701	CAR WASH ENTERPRISES, INC.	HUNGRY BEAR MARKET	406 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.63619	-122.5166805	Auto Service	12/19/2024	Stella Collier	None
602653226	CLARK CONSTRUCTION INC.	CLARK CONSTRUCTION INC.	901 HILDEBRAND LN NE	STE 100	BAINBRIDGE ISLAND	WA	98110	47.632374	-122.5176	Construction Related	12/19/2024	Stella Collier	None
604227074	COGWHEEL REAL ESTATE, LLC	COGWHEEL	143 ERICKSEN AVE NE	STE 107	BAINBRIDGE ISLAND	WA	98110	47.625169	-122.517622	Construction Related	12/19/2024	Stella Collier	None
603619479	ISLAND FIX-IT LLC	ISLAND FIX-IT LLC	261 MADISON AVE S STE 106		BAINBRIDGE ISLAND	WA	98110	47.62340993	-122.5213	Construction Related	12/19/2024	Stella Collier	None
603456371	NELSON CONSTRUCTION AND PLANNING, INC.	NELSON CONSTRUCTION AND PLANNING, INC.	330 MADISON AVE S	STE 201	BAINBRIDGE ISLAND	WA	98110	47.62241092	-122.5206468	Construction Related	12/19/2024	Stella Collier	None
603074401	REESE CONSTRUCTION, LLC	REESE CONSTRUCTION LLC	682 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62506996	-122.5129199	Construction Related	12/19/2024	Stella Collier	None
605373941	TOOLBOX DISPATCH LLC	TOOLBOX	143 ERICKSEN AVE NE	STE 107	BAINBRIDGE ISLAND	WA	98110	47.625228	-122.517729	Construction Related	12/19/2024	Stella Collier	None
601757204	WING POINT CONSTRUCTION COMPANY	WING POINT CONSTRUCTION COMPANY INC	321 HIGH SCHOOL RD NE	#174 STE D3	BAINBRIDGE ISLAND	WA	98110	47.634775	-122.517457	Construction Related	12/19/2024	Stella Collier	None
602874073	REDSIDE CONSTRUCTION LLC	REDSIDE CONSTRUCTION, LLC	600 WINSLOW WAY E	STE 237	BAINBRIDGE ISLAND	WA	98110	47.62535991	-122.51346	Construction Related	12/19/2024	Stella Collier	None
601175290	MICHELLE ANN CODDINGTON	EAGLE HARBOR WINDOW COVERINGS	937 HILDEBRAND LN NE		BAINBRIDGE ISLAND	WA	98110	47.63379077	-122.5172188	Construction Related	12/19/2024	Stella Collier	None
601862423	MADRONA SCHOOL	MADRONA SCHOOL	105 WINSLOW WAY W	STE 1	BAINBRIDGE ISLAND	WA	98110	47.62434	-122.521411	Educational Services	12/19/2024	Stella Collier	None
604297452	ALL ENCOMPASS LLC	ALL ENCOMPASS	219 MADISON AVE S		BAINBRIDGE ISLAND	WA	98110	47.62384995	-122.521436	Educational Services	12/19/2024	Stella Collier	None
604297452	ALL ENCOMPASS LLC	BAINBRIDGE ISLAND MONTESSORI	191 WINSLOW WAY W		BAINBRIDGE ISLAND	WA	98110	47.624652	-122.52195	Educational Services	12/19/2024	Stella Collier	None
602554933	BAINBRIDGE ISLAND GENEALOGICAL SOCIETY	BAINBRIDGE ISLAND GENEALOGICAL SOCIETY	221 WINSLOW WAY W	STE 301	BAINBRIDGE ISLAND	WA	98110	47.62422017	-122.5226937	Educational Services	12/19/2024	Stella Collier	None
604967263	AGATE RESTAURANT, LLC	AGATE RESTAURANT	500 WINSLOW WAY E	STE 170	BAINBRIDGE ISLAND	WA	98110	47.625012	-122.515875	Food & Drink	12/19/2024	Stella Collier	None
604947793	NETTLE LLC	AMELIA WYNN WINERY BISTRO	390 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62503	-122.517225	Food & Drink	12/19/2024	Stella Collier	None
604192782	BASA RESTAURANT LLC	BA SA	101 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62465107	-122.5208412	Food & Drink	12/19/2024	Stella Collier	None
604343214	FINDERS KEEPERS FOOD AND BEVERAGE LLC	BABA YAYA	380 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.625013	-122.517763	Food & Drink	12/19/2024	Stella Collier	None
603095810	BAINBRIDGE ISLAND BREWING COMPANY LLC	BAINBRIDGE BREWING ALEHOUSE	500 WINSLOW WAY E BLDG B	STE 110	BAINBRIDGE ISLAND	WA	98110	47.62501711	-122.5149148	Food & Drink	12/19/2024	Stella Collier	None
604681973	WIT INDUSTRIES, LLC	BAINBRIDGE SUBWAY	321 HIGH SCHOOL RD NE	STE D5	BAINBRIDGE ISLAND	WA	98110	47.634775	-122.517457	Food & Drink	12/19/2024	Stella Collier	None
601515659	BAINBRIDGE THAI CUISINE, INC.	BAINBRIDGE THAI CUISINE	330 MADISON AVE S #103		BAINBRIDGE ISLAND	WA	98110	47.62241092	-122.5206468	Food & Drink	12/19/2024	Stella Collier	None
604387017	COWBOY BILL LLC	BENE PIZZA	937 HILDEBRAND LN NE	STE 104	BAINBRIDGE ISLAND	WA	98110	47.63379085	-122.5172188	Food & Drink	12/19/2024	Stella Collier	None
604783121	STEVEN FACER WILLIAM GIBSON LLC	BI BAKERY	278 WINSLOW WAY E	STE 107	BAINBRIDGE ISLAND	WA	98110	47.62512	-122.518771	Food & Drink	12/19/2024	Stella Collier	None
602917174	BAINBRIDGE ISLAND MUSEUM OF ART	BIMA BISTRO	550 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62512038	-122.5145672	Food & Drink	12/19/2024	Stella Collier	None
605013923	BAINBRIDGE ISLAND FUDGE LLC	BON BON CANDIES	230 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.625048	-122.5193895	Food & Drink	12/19/2024	Stella Collier	None
603561549	PIZZERIA BRUCIATO LLC	BRUCIATO	236 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62501728	-122.5192306	Food & Drink	12/19/2024	Stella Collier	None
604427366	CINNAROHLS LLC	CINNAROHLS	465 WINSLOW WAY E	APT 201	BAINBRIDGE ISLAND	WA	98110	47.624499	-122.51627	Food & Drink	12/19/2024	Stella Collier	None
604695987	LITTLE ELM, LLC	COMMUNITY SPORTS PROS	123 BJUNE DR SE	STE 109	BAINBRIDGE ISLAND	WA	98110	47.62404	-122.5206045	Food & Drink	12/19/2024	Stella Collier	None
602168208	COMMUTER COMFORTS INC.	COMMUTER COMFORTS	701 WINSLOW WAY E	STE A	BAINBRIDGE ISLAND	WA	98110	47.624604	-122.512774	Food & Drink	12/19/2024	Stella Collier	None
605007903	COQUETTE BAKE SHOP LLC	COQUETTE BAKE SHOP	140 WINSLOW WAY W		BAINBRIDGE ISLAND	WA	98110	47.625471	-122.521959	Food & Drink	12/19/2024	Stella Collier	None
604347388	HARRIS FAMILY CAFES INC.	CUPS ESPRESSO & CAFE	123 BJUNE DR SE	STE 105	BAINBRIDGE ISLAND	WA	98110	47.62404304	-122.5206045	Food & Drink	12/19/2024	Stella Collier	None
602276187	TA RESTAURANTS INC.	DOCS MARINA GRILL	403 MADISON AVE S		BAINBRIDGE ISLAND	WA	98110	47.62230423	-122.5211808	Food & Drink	12/19/2024	Stella Collier	None
602641145	EAGLE HARBOR WINE COMPANY LLC	EAGLE HARBOR WINE COMPANY LLC	400 WINSLOW WAY E	STE 115	BAINBRIDGE ISLAND	WA	98110	47.625021	-122.516793	Food & Drink	12/19/2024	Stella Collier	None
603133954	ELEVEN WINERY, INC.	ELEVEN WINERY	287 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62469705	-122.5185473	Food & Drink	12/19/2024	Stella Collier	None
604333773	LINH T TRAN	EMMY'S VEGE HOUSE	100 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62508	-122.520741	Food & Drink	12/19/2024	Stella Collier	None
602849088	FLETCHER BAY WINERY, LLC	FLETCHER BAY WINERY	500 WINSLOW WAY E	STE 130	BAINBRIDGE ISLAND	WA	98110	47.62501709	-122.5149148	Food & Drink	12/19/2024	Stella Collier	None
602636165	HARBOR SQUARE WINE SHOP & TASTING ROOM, L.L.C.	HARBOR SQUARE WINE SHOP & TASTING ROOM	756 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62503718	-122.5119644	Food & Drink	12/19/2024	Stella Collier	None
601195399	PARFITT WAY MANAGEMENT CORPORATION	HARBOUR MARINA	233 PARFITT WAY SW		BAINBRIDGE ISLAND	WA	98110	47.62172302	-122.5224581	Food & Drink	12/19/2024	Stella Collier	None
603398391	MAKOTZ CORPORATION	HILIFE	220 OLYMPIC DR SE		BAINBRIDGE ISLAND	WA	98110	47.624137	-122.512959	Food & Drink	12/19/2024	Stella Collier	None
601538863	LOS COMPADRES RESTAURANT #3, INC.	ISLA BONITA	316 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62498835	-122.5180377	Food & Drink	12/19/2024	Stella Collier	None
605285505	ISLAND COOL ICE CREAM BI LLC	ISLAND COOL ICE CREAM	139 MADRONE LN N		BAINBRIDGE ISLAND	WA	98110	47.625489	-122.51979	Food & Drink	12/19/2024	Stella Collier	None
602287068	ANGEL'S FOOD LLC	JAKE'S PICKUP	406 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.63618724	-122.5166798	Food & Drink	12/19/2024	Stella Collier	None
602519835	MARROW LLC	L'ATELIER TR	380 WINSLOW WAY E	STE 102	BAINBRIDGE ISLAND	WA	98110	47.625013	-122.517763	Food & Drink	12/19/2024	Stella Collier	None
605194635	BAINBRIDGE ICE CREAM COMPANY, LLC	LIZZY'S REAL FRUIT ICE CREAM	278 WINSLOW WAY E	STE 106	BAINBRIDGE ISLAND	WA	98110	47.625075	-122.518737	Food & Drink	12/19/2024	Stella Collier	None
602087492	GOMEZ NORTHWEST, INC.	MCDONALDS #11367	601 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.635434	-122.5148265	Food & Drink	12/19/2024	Stella Collier	None
604128022	M & A MEXIFOOD LLC	MIGUELITO'S COCINA MEXICANA	321 HIGH SCHOOL RD NE	STE D4	BAINBRIDGE ISLAND	WA	98110	47.634775	-122.517457	Food & Drink	12/19/2024	Stella Collier	None
604488397	HUANG'S SUMMER PALACE, LLC	PAU'S ASIAN KITCHEN	321 HIGH SCHOOL RD NE	STE D6	BAINBRIDGE ISLAND	WA	98110	47.63477452	-122.5174555	Food & Drink	12/19/2024	Stella Collier	None
604680233	PEGASUS COFFEE VENTURES, LLC	PEGASUS COFFEE HOUSE	131 PARFITT WAY SW		BAINBRIDGE ISLAND	WA	98110	47.622176	-122.521498	Food & Drink	12/19/2024	Stella Collier	None
604630384	KISSES HUGS LLC	PROPER FISH	112 MADISON AVE N		BAINBRIDGE ISLAND	WA	98110	47.62517424	-122.5199907	Food & Drink	12/19/2024	Stella Collier	None
603096467	RESTAURANT MARCHE LLC	RESTAURANT MARCHE	150 MADRONE LN N		BAINBRIDGE ISLAND	WA	98110	47.62542085	-122.5194198	Food & Drink	12/19/2024	Stella Collier	None
601637571	THRIFTY PAYLESS, INC.	RITE AID #5215	301 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.63479178	-122.5181417	Food & Drink	12/19/2024	Stella Collier	None
600643518	SAFEWAY INC.	SAFEWAY STORE #1252	253 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.635247	-122.519619	Food & Drink	12/19/2024	Stella Collier	None
604568253	DIP DIP PREMIUM FOODS LLC	SAUCE NOUVELLE	278 WINSLOW WAY E	STE 109	BAINBRIDGE ISLAND	WA	98110	47.625075	-122.518737	Food & Drink	12/19/2024	Stella Collier	None
603003953	HITCHCOCK RESTAURANT LLC	SEABIRD	133 WINSLOW WAY E #100		BAINBRIDGE ISLAND	WA	98110	47.62471351	-122.520608	Food & Drink	12/19/2024	Stella Collier	None
600611109	STARBUCKS CORPORATION	STARBUCKS COFFEE #21929	323 HIGH SCHOOL RD NE STE F3		BAINBRIDGE ISLAND	WA	98110	47.63551825	-122.5176906	Food & Drink	12/19/2024	Stella Collier	None
604924763	AKB, LLC	STREAMLINER DINER	397 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.624554	-122.517028	Food & Drink	12/19/2024	Stella Collier	None

COBI 2024 Source Control Inspections and Enforcement Records

UBI	Name1	Name2	Phys_addr1	Phys_addr2	Phys_addrCity	Phys_ad drState	Phys_add rZip	Latitude	Longitude	COBI_SCProgram_BusinessTy pe	Initial_Assess ment_Complet ed_Date	Initial_Assessm ent_Completed _By_Name	Enforc ement _Actio ns
604026546	SUSHI AVENUE, INCORPORATED	SUSHI AVENUE, INCORPORATED	343 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.624345	-122.51763	Food & Drink	12/19/2024	Stella Collier	None
604686101	MIRIAM, LLC	TERIYAKI TOWN	278 WINSLOW WAY E	STE 102	BAINBRIDGE ISLAND	WA	98110	47.62512	-122.518771	Food & Drink	12/19/2024	Stella Collier	None
601540116	THE CHANDLERY INC	THE CHANDLERY	133 PARFITT WAY SW		BAINBRIDGE ISLAND	WA	98110	47.6220955	-122.5214782	Food & Drink	12/19/2024	Stella Collier	None
603432134	MUSKETAQUID LLC	THE PLATE & PINT	321 HIGH SCHOOL RD NE STES 1&2		BAINBRIDGE ISLAND	WA	98110	47.6347745	-122.5174555	Food & Drink	12/19/2024	Stella Collier	None
602131379	THE STAND AT BAINBRIDGE ISLAND LLC	THE STAND AT BAINBRIDGE ISLAND	701 WINSLOW WAY E	STE A	BAINBRIDGE ISLAND	WA	98110	47.624604	-122.512774	Food & Drink	12/19/2024	Stella Collier	None
603554395	SNUG, LLC	THUY'S	120 MADRONE LN N	STE 100	BAINBRIDGE ISLAND	WA	98110	47.62526001	-122.5195236	Food & Drink	12/19/2024	Stella Collier	None
189002735	TOWN & COUNTRY MARKETS, INC.	TOWN & COUNTRY MARKET	343 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.624577	-122.51798	Food & Drink	12/19/2024	Stella Collier	None
601400944	WALGREEN CO.	WALGREENS #15673	1315 WINTERGREEN LANE NE		BAINBRIDGE ISLAND	WA	98110	47.6367907	-122.514251	Food & Drink	12/19/2024	Stella Collier	None
603285287	WESTSIDE L&D LLC	WESTSIDE PIZZA	323 HIGH SCHOOL RD NE STE E-1		BAINBRIDGE ISLAND	WA	98110	47.63551825	-122.5176906	Food & Drink	12/19/2024	Stella Collier	None
604876388	BICH THI NGOC DANG	YOYO POKE	160 WINSLOW WAY W		BAINBRIDGE ISLAND	WA	98110	47.62526	-122.522206	Food & Drink	12/19/2024	Stella Collier	None
604774929	SISTERS' CIDER HOUSE LLC	SISTERS' CIDER HOUSE LLC	921 HILDEBRAND LN NE	STE 105&111	BAINBRIDGE ISLAND	WA	98110	47.633127	-122.517239	Manufacturing	12/19/2024	Stella Collier	None
604906490	BIKE BARN RENTALS, LLC	BIKE BARN RENTALS, LLC	260 OLYMPIC DR SE		BAINBRIDGE ISLAND	WA	98110	47.623591	-122.511779	Property Services	12/19/2024	Stella Collier	None
605561539	JB CYCLES LLC	JB CYCLES LLC	124 BJUNE DR SE		BAINBRIDGE ISLAND	WA	98110	47.624409	-122.5206405	Repair & Maintenance	12/19/2024	Stella Collier	None
601309725	KANAMONO INC.	BAINBRIDGE ISLAND ACE HARDWARE	635 HIGH SCHOOL RD NE		BAINBRIDGE ISLAND	WA	98110	47.63503711	-122.5136952	Retailer-Hazardous Materials	12/19/2024	Stella Collier	None
602961502	BFS GROUP LLC DBA BFS GROUP OF WASHINGTON LLC	BUILDERS FIRSTSOURCE	10060 NE HIGH SCHOOL RD		BAINBRIDGE ISLAND	WA	98110	47.63591993	-122.51474	Retailer-Hazardous Materials	12/19/2024	Stella Collier	None
604080257	LITTLE ISLAND CRAFTS, LLC	LITTLE ISLAND CRAFTS	124 MADRONE LN N		BAINBRIDGE ISLAND	WA	98110	47.62509689	-122.5192964	Retailer-Hazardous Materials	12/19/2024	Stella Collier	None
602577136	MALLORY PAINT STORE, INC.	MALLORY PAINT STORE, INC.	937 HILDEBRAND LN NE	STE 100	BAINBRIDGE ISLAND	WA	98110	47.633787	-122.5172205	Retailer-Hazardous Materials	12/19/2024	Stella Collier	None
178089072	HEMPHILL BROTHERS, INC.	HEMPHILL BROTHERS, INC.	123 BJUNE DR SE	STE 111	BAINBRIDGE ISLAND	WA	98110	47.62404	-122.5206045	Wholesale	12/19/2024	Stella Collier	None
601309147	PAUL JOHN SVORNICH	F/V OCEAN	230 LOVELL AVE SW		BAINBRIDGE ISLAND	WA	98110	47.62362528	-122.5259528	Wholesale	12/19/2024	Stella Collier	None
603126310	NORTH SOUND RESOURCES LLC	NORTH SOUND RESOURCES LLC	175 PARFITT WAY SW	STE S145	BAINBRIDGE ISLAND	WA	98110	47.622295	-122.522072	Wholesale	12/19/2024	Stella Collier	None
603071697	CIRCLE CREATIVE CONSULTING, INC.	WILLOW TREE	169 WINSLOW WAY E		BAINBRIDGE ISLAND	WA	98110	47.62444974	-122.5201816	Wholesale	12/19/2024	Stella Collier	None

CITY OF BAINBRIDGE ISLAND

PHASE II MUNICIPAL STORMWATER NPDES PERMIT #WAR045503

Permit Term 8/1/2024 – 7/31/2029

2024 ANNUAL REPORT – RESPONSE TO QUESTION #82

Q82: For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)

<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</p>	<p>2024 COBI actions and activities for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island</p>
<p>Business Inspections: The Permittee shall inspect facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities) as part of their ongoing inspection program identified in S5.C.8. If the Permittee determines, through inspections or otherwise, that a facility has failed to adequately implement BMPs to prevent bacteria source potential, the Permittee shall re-inspect the facility at least once more during the permit term to verify compliance, and/or initiate enforcement action.</p> <p>Public Education and Outreach: Each Permittee shall include public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP under General Awareness.</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>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</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).</p> <ul style="list-style-type: none"> • 77 source control business inspections in 2024 • 93% of the MS4 screened in 2024 • 24 illicit discharge detection and elimination investigations completed in 2024 <p>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.</p> <p>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	2024 COBI actions and activities for TMDL – WRIA 15 - Sinclair and Dyes Inlets Fecal Coliform TMDL Actions Required for City of Bainbridge Island
<p>required by S5.C.9.c for Phase I Permittees) in a TMDL area, Permittees are shall screen for bacteria sources when at the drainage circuit’s most downstream sampling location. For the purposes of IC/IDDE, stormwater quality sampling is defined as obtaining grab samples of stormwater within the conveyance system of the MS4, at discharge points, and/or outfalls (if there is flow) at each drainage circuit’s most downstream accessible sampling location. Permittees shall follow their adopted IDDE procedures to conduct source tracing efforts if bacteria levels and/or observations trigger a response (see IDDE guidance manual for bacteria trigger levels).</p> <p>Qualitative and quantitative information about the source identification and elimination activities, including procedures followed, sampling locations, and results shall be annually documented in TMDL reporting as required in the Permittees’ Annual Report.</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> <ul style="list-style-type: none"> • In 2024, the City provided 12,400 free pet waste bags through the ten stations it maintains.