



Public Works
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December 16, 2025

Jay Fennell, Watershed Protection Unit Supervisor
Northwest Region Office, Washington State Department of Ecology
PO Box 330316
Shoreline, WA 98133-9716

Re: Response to Phase II Municipal Stormwater Permit No. WAR045503 Audit

Dear Mr. Fennell and Department of Ecology Staff,

Thank you for the opportunity to participate in the Department of Ecology's audit of the City's Stormwater Management Program on September 16, 2025. It was our pleasure to meet with Ecology staff and review our program and compliance records, as well as provide a tour of our decant facility.

Accompanying this letter, we are enclosing a summary of responses to the nineteen findings, recommendations and areas of potential non-compliance noted in the audit. We are pleased to report that many of the program critiques and recommended areas of improvement highlighted in the audit findings are known challenges that our limited staff were already working to address (see attached response #2 for a summary of staff resources). Highlights of our response summary include the following:

- Utilizing recently acquired staff resources to accelerate the advancement and accuracy of our stormwater mapping and documentation processes, and transition to the development of a stormwater asset management system;
- Improving processes for identifying, planning, and tracking staff training, and developing a formal training program for certain staff roles and responsibilities;
- Updating compliance procedures for our decant site, including best management practices for storage, housekeeping and permit-related record keeping.

Thank you again for your staff's support in helping the City maintain compliance with our municipal stormwater permit. Please let us know if there are questions or comments on our audit responses.

Sincerely,



Christopher Wierzbicki, PE
Public Works Director

Phase II Municipal Stormwater Permit NO. WAR045503 Audit Findings – 19 Follow up Items

Audit Findings Item #	Audit Findings Item Description	Audit Findings Page #	Item Response by City of Bainbridge Island	Relevant Stormwater System Plan Recommendation(s)
1	Mapping – Recommendation: We strongly encourage Bainbridge Island to implement the MS4 mapping and documentation recommendations included in its Stormwater System Plan (SWSP) (October 2024).	Page 5	Recommendation noted. City intends to implement those recommendations based on available staff and resources.	B4-R1 through B4-R12
2	Mapping – Potential Areas of Non-Compliance: The City does not have a current GIS map of their MS4 assets and has not maintained this map since 2018. (SS.C.4.a).	Page 6	<p>The City’s new Public Works GIS Technician, hired in January 2025, is working on Ongoing Mapping (SS.C.4.a) for compliance. Current work involves verifying the ongoing mapping work completed by a summer intern in 2024. The City does have a GIS map of MS4 assets, but acknowledges the backlog dating back to 2018. Staffing resources dedicated to the administrative elements of the City’s NPDES permit compliance are limited, and include the following;</p> <ul style="list-style-type: none"> • Stormwater Management Program Coordinator (1FTE) • GIS Specialist (0.80 FTE) • Storm and Surface Water Technician (0.60 FTE – new hire in 2026) • Engineering Manager (0.10 FTE) 	B4-R1 B4-R2 B4-R3

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3	<p>Mapping – Potential Areas of Non-Compliance:</p> <p>The City's online map presently does not differentiate between MS4 outfalls and MS4 discharge points; both are represented within the same map layer using identical symbology. (S5.C.4.a.i).</p>	Page 6	<p>The City's Stormwater Management Program Coordinator has begun undertaking the Outfalls and Discharge Points Update Project, to clean-up the City's mapped/inventoried outfalls and discharge points to then be able to identify and use different symbols for outfalls and discharge points. It is intended for the project to be completed no later than March 31, 2026, the due date for the new mapping requirement for MS4 outfalls (S5.C.4.b.i).</p> <p>Outfalls and Discharge Points Update Project Steps:</p> <ol style="list-style-type: none"> 1. The first step of the project was completed in April, 2025, to develop, implement, and document the internal process on how to identify MS4 assets vs non-MS4 assets in the map/inventory. 2. The second step currently being worked on is to identify and document terms and definitions for stormwater assets to incorporate into the City's mapping standards (this step was needed to inform staff on how to correctly identify and map outfalls and discharge points) 3. The third step will be to analyze existing outfalls and discharge points map/inventory data, conduct document research and field reconnaissance to verify outfalls and discharge points with their location, size, and material; and research, identify, and assign the asset as MS4 or not. Lastly, data will be updated accordingly and new symbology labels will be used to visually differentiate outfalls and discharge points. 	B4-R3

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4	<p>Mapping – Potential Areas of Non-Compliance:</p> <p>The City has not mapped “geographic areas served by the MS4 that do not discharge stormwater to surface water.” Further investigation by the City is needed to determine if the “geographic areas...” need to be included on its map. (S5.C.4.a.iv).</p>	Page 6	<p>City staff, to the best of their knowledge, believe all geographic areas served by the MS4 that do not discharge stormwater to surface water are mapped or are being mapped with the ongoing mapping project being worked on by the Public Works GIS Technician. As staff begin to undertake the Outfalls and Discharge Points Update Project, it is anticipated that updates to the data will identify any and all geographic areas served by the MS4 that do not discharge stormwater to surface water.</p>	<p>B4-R1 B4-R2 B4-R3</p>
5	<p>IDDE – Recommendation:</p> <p>We strongly encourage Bainbridge Island to implement the IDDE recommendations included in its SWSP (October 2024).</p>	Page 5	<p>Recommendation noted. City intends to implement those recommendations based on available staff and resources.</p>	<p>B5-R1 through B5-R22 plus B8-R3 and B11-R8</p>
6	<p>IDDE – Recommendation:</p> <p>We encourage Bainbridge Island to include in BIMC Chapter 15.22 the permit requirement that the City implement its compliance strategy in a documented effort to eliminate any illicit connection within six (6) months of confirmation per Section SS.C.5.e.v.(d).</p>	Page 5	<p>City has not typically codified into ordinances or code any compliance timelines as part of enforcement. Instead, the City includes compliance timelines as a procedural element of a progressive enforcement strategy to gain compliance for a code violation. Staff will consider the adoption of Resolution in the first half of 2026 that outlines our IDDE compliance strategy and goals for elimination.</p>	<p>B5-R11</p>
7	<p>IDDE – Recommendation:</p> <p>We encourage Bainbridge Island to revise BIMC 15.22.050 to accurately reflect the publicly advertised regional spill hotline number as the preferred method for the public to report illicit discharges.</p>	Page 5	<p>City does not typically codify into ordinances or code contact phone numbers, primarily because phone numbers can become outdated. The spill hotline is publicly advertised by the City in many places on the website and other communication materials.</p>	<p>B5-R13</p>

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8	IDDE – Recommendation: Bainbridge Island should ensure that training documentation includes a description of the training offered, dates the training was offered or completed, and staff in attendance.	Page 5	Operations and Maintenance leadership will expand the training record to consistently include types of training offered, date completed, training provider, and other relevant information is included in future training documentation.	B5-R17 through B5-R21
9	O&M – Recommendation: We recommend that the City implement an asset management software system to enhance tracking and recordkeeping of stormwater BMP/facility inspections, maintenance, and enforcement activities, as well as to streamline the scheduling of maintenance tasks and reporting processes. Implementing an asset management software system compatible with GIS and connected to inspection reporting will enhance quality control and strengthen the overall integrity of the City's stormwater asset management program.	Page 9	The City's Stormwater Management Program Coordinator and Public Works GIS Technician are working on developing a stormwater asset inspection and maintenance recordkeeping and tracking system for the City using ArcGIS software and other existing tools in the ESRI software ecosystem. Once this work is complete, the City is planning to implement a stormwater asset management system.	B4-R11 B7-R7
10	O&M – Recommendation: We strongly encourage the City to establish a formal system to track and document all O&M staff training events including on-the-job training. Additionally, the City is encouraged to establish a standardized training framework to ensure continuity of knowledge in the event of staff turnover.	Page 10	The O&M Utilities Supervisor will track, plan, conduct, and document staff training; and to coordinate this work with the Stormwater Management Program Coordinator who tracks permit compliance for the City.	B5-R17 through B5-R21 plus B11-R8

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11	O&M – Potential Areas of Non-Compliance: The City lacks documentation of O&M staff on-the-job training. (S5.C.9.g).	Page 10	The O&M Utilities Supervisor will expand the tracking, planning, and documentation of staff training; and to coordinate this work with the Stormwater Management Program Coordinator, who tracks permit compliance for the City.	B5-R17 through B5-R21 plus B11-R8
12	O&M – Recommendation: We encourage the City to review its Practices, Policies, and Procedures document to ensure that it is up to date and reflects all current field activities and operational protocols.	Page 10	The City’s O&M Manual for Practices, Policies, and Procedures to Reduce Stormwater Impacts is updated as needed to reflect the current field activities and operational protocols for the activities that must be addressed by the permit. The City will plan for a full review and update of the O&M Manual for Practices, Policies, and Procedures to Reduce Stormwater Impacts before the December 31, 2027 due date S5.C.9.d).	B7-R18 through B7-R20
13	Decant Facility – Potential Areas of Non-Compliance: Page 10: The SWPPP prepared for the City’s decant facility is inaccurate and lacks relevancy to the operation occurring which includes disposal method of decant liquids, and status of inactive treatment BMPs. (S5.C.9.f.i). Page 5 of Decant Insp.: SWPPP Revision: Update the decant facility SWPPP to accurately reflect the current and ongoing operational activities, including the procedure for vector trucking decant liquids to the sanitary sewer for off-site disposal and the status of the inactive treatment BMPs. (S5.C.9.f.i)	Page 10 & Page 5 Decant Insp.	Asst Public Works Director/Utilities Supervisor will work to update the Decant Facility Stormwater Pollution Prevention Plan (SWPPP) to accurately reflect current and ongoing operational activities by March 31, 2026.	B7-R21

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14	<p>Decant Facility – Potential Areas of Non-Compliance: Page 10: Bainbridge Island does not have inspection records of decant facility inspections for 2022, 2023, and 2024. Records shall be kept for at least five years after the Permit's expiration date. (S5.C.9.f.ii, S9.B). Page 5 of Decant Insp.: Documentation: The City shall record and keep inspection documents for at least five years after the Permit's expiration date. The Permit expires July 31, 2029. (SS.C.9.f.ii, S9.B)</p>	Page 10 & Page 5 Decant Insp.	<p>Staff recollects performing SWPPP inspections for 2022, 2023, and 2024 but those inspection records were not accurately maintained. Starting now and into 2026, the City will identify an O&M lead staff person to track, plan, complete, and document SWPPP inspections, maintenance activities, and training; and coordinate this work with the Stormwater Management Program Coordinator who tracks permit compliance for the City. The City does retain permit compliance records for at least five years after the Permit's expiration date.</p>	B7-R24 B11-R8
15	<p>Decant Facility – Recommendation: Page 10: We strongly encourage the City store stockpiled materials generated from maintenance activities below the six-foot concrete stem walls of the decant facility.</p> <p>Decant Facility – Potential Areas of Non-Compliance: Page 5 of Decant Insp.: Source Control and Good Housekeeping: Ensure that soil stockpiles are maintained below the six-foot concrete stem walls within the decant facility to preserve containment. (SS.C.9.f.ii)</p>	Page 10 & Page 5 Decant Insp.	<p>The City will perform this work as part of Item #14 to improve SWPPP compliance. The City will either raise the height of the wall or keep the stockpile lower than the wall through more frequent removal of the material away from the facility.</p>	B7-R18 through B7-R20 B7-R21 B7-R24

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16	<p>Decant Facility - Potential Areas of Non-Compliance:</p> <p>Page 10: Storage of sand, gravel, mulch and other materials on site are exposed to stormwater. Review and implement SWMMWW BMP S429: BMPs for Storage or Transfer of Solid Raw Materials, Byproducts, or Finished Products. (SS.C.9.f.ii).</p> <p>Page 5 of Decant Insp.: Source Control and Good Housekeeping: Review and implement in accordance with the SWMMWW S429 BMPs for Storage or Transfer (Outside) of Solid Raw Materials, Byproducts, or Finished Products, appropriate BMPs to ensure that all erodible materials stored in uncovered areas are protected from contact with stormwater or collecting runoff to ensure that no direct discharge of contaminated stormwater to catch basins exists without conveying runoff through an appropriate treatment BMP. (S5.C.9.f.ii)</p>	Page 10 & Page 5 Decant Insp.	The City will follow BMP S429 as part of Item #14 to improve SWPPP compliance.	B7-R18 through B7-R20 B7-R21 B7-R24

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17	<p>Decant Facility - Potential Areas of Non-Compliance:</p> <p>Page 10: The City shall ensure that all drums and storage containers located on site are properly labeled, regardless of content or whether they are empty in accordance with SWMMWW BMP S427. (S5.C.9.f.ii).</p> <p>Page 5 of Decant Insp.: Source Control and Good Housekeeping: Ensure that all drums and storage containers located on site are properly labeled, regardless of content or whether they are empty. (S5.C.9.f.ii)</p>	Page 10 & Page 5 Decant Insp.	The City will follow BMP S427 as part of Item #14 to improve SWPPP compliance. Existing drums onsite have been labeled or removed as of 12/1/2025.	B7-R18 through B7-R20 B7-R21 B7-R24
18	<p>Decant Facility - Potential Areas of Non-Compliance:</p> <p>Page 10: Leaking vehicles on site do not have proper secondary containment, nor have spills been cleaned up. (S5.C.9.f.v).</p> <p>Page 5 of Decant Insp.: Source Control and Good Housekeeping: Ensure that surplus vehicles and equipment stored onsite that contain fluids either be removed or have appropriate secondary containment beneath them in accordance with the SWMMWW S1D2 BMPs for Preventative Maintenance and Good Housekeeping. (SS.C.9.f.v)</p>	Page 10 & Page 5 Decant Insp.	The City will continue to follow SWMMWW S1D2 BMPs as part of Item #14 to improve SWPPP compliance. Stored vehicles have been relocated offsite and prepared for surplus 12/1/2025.	B7-R18 through B7-R20 B7-R21 B7-R24

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19	Decant Facility - Potential Areas of Non-Compliance: Source Control and Good Housekeeping: Prevent track out of sediment and debris from the decant facility to the adjacent paved surfaces in accordance with the SWMMWW 5102 BMPs for Preventative Maintenance and Good Housekeeping. (S5.C.9.f.ii)	Page 5 Decant Insp.	The City will perform this work as part of Item #14 to improve SWPPP compliance.	B7-R18 through B7-R20 B7-R21 B7-R24