



**Utility Advisory Committee Regular Meeting
Thursday, February 5th, 2026
5:30 PM – 7:30 PM**

City Hall Council Conference Room
280 Madison Ave N
Bainbridge Island, WA

and

Remote Meeting on Zoom

<https://bainbridgewa.zoom.us/j/83426304914>

or Telephone: US: +1 253 205 0468

Webinar ID: 834 2630 4914

Agenda

- 1) Call to Order / Roll Call**
- 2) Approval of Agenda / Conflict of Interest Disclosure**
- 3) Public Comment**

In person public comment is accepted at this time on any topic of public interest. Each commenter will have three minutes, or such amount as the meeting chair determines, to speak. Public comment is not taken on individual agenda items during the meeting. Public comment is simply received by the Committee, with no response, and the Committee cannot deliberate on items that are not on the agenda. The lack of comment is not an endorsement or a denial of the comment.

Please refer to guidelines and instructions for public comment, including orderly behavior and civility in remarks, on the City's website. Remote public comment is allowed with advance notice by 4:00 p.m. on the business day before the meeting by emailing cityadmin@bainbridgewa.gov, provided that all remote commenters shall be required to display their true name and to keep their camera turned on to show their true uncovered face while delivering their comments.

- 4) Council Liaison Report**
- 5) Regular Business**

- a) **Approve November 20, 2025 Meeting Minutes (5 min)**
 - b) **Review and approve recommended revisions to the Comprehensive Plan Utilities Element – see attached (15 min)**
 - c) **Review findings and response to Department of Ecology National Pollution Discharge Elimination System permit audit – see attached (30 min)**
 - d) **Introduction to the draft Water System Business Plan (20 min)**
 - e) **Consider request from Kitsap Public Utility District to attend and present on water system coordination request at March 19, 2026 meeting – see attached (10 min)**
 - f) **Public Works Update (10 min)**
 - i) **Capital/programmatic project updates**
 - ii) **Johnston Group B water extension request**
- 6) Good of the Order**
- 7) Adjournment**

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DEPARTMENT OF PUBLIC WORKS MEMORANDUM

Date: January 30, 2026 - **DRAFT**

To: Dave Epperson, Kitap Public Utility District

From: Christopher Wierzbicki, PE, Public Works Director
Peter Corelis, PE, City Engineer

**Subject: City of Bainbridge Island / Kitsap Public Utility District Water System
Coordination Planning and Interlocal Agreement Outline**

Purpose

The purpose of this memo is to document a discussion between City of Bainbridge Island and Kitsap Public Utility District (KPUD) staff on September 10, 2025, and a follow-up discussion on January 22, 2026. Present at the former meeting were City staff Chris Wierzbicki and Peter Corelis, and KPUD staff Dave Epperson, Berni Kenworthy, Todd Smith and Tom Colby; present at the latter meeting was Blair King, Ellen Schroer, Chris Wierzbicki, Dave Epperson and Angela Bennink.

Planning Goals Executive Summary

City and KPUD staff have individually and collectively determined that the current and future water customers on Bainbridge Island would be best served by a system of water infrastructure that is interconnected and managed collectively by both agencies. This cooperation reduces the need for redundant infrastructure, reduces the costs of service, and more effectively and responsibly manages the City's water resources. The agencies propose to work together through an inter-local agreement to develop a short and long-term plan for increased cooperation on supporting the consolidation of small water systems – including serving private well owners with water quantity or quality issues; improving emergency management as it relates to utility systems; and supporting conservation efforts.

Background

The City and KPUD currently provide water service, and have the rights to provide future water service, to different areas of the City. The Kitsap County Water Service Area Boundary Map (See Figure 1) identifies the water service provider boundary areas in the City, including some areas around the head of Eagle Harbor that do not have a designated provider. A significant portion of the Island, particularly in the west and northwest, have designated providers on the map, but no water infrastructure exists to serve the customer base.

In the areas served by water infrastructure, the City owns and operates the central Winslow-area water system, which includes Fletcher Bay, as well as the smaller Rockaway system on the south end (approximately 3,000 connections). KPUD owns and operates the largest system on the south end (the former Island Utility and South Bainbridge Water) and the largest system on the north end, the North Bainbridge Water System (approximately 5,000 connections). There is only one intertie between City and KPUD systems, which is located on the south end between the Rockaway and South Bainbridge systems – currently designated for emergency use only.

The City and KPUD are both performing near-term planning for their respective water systems serving Bainbridge Island. The City expects to complete two plans in the next several months that will inform water system planning. The City's Water System Business Plan (WSBP) is being developed to help identify opportunities for future expansion of the Winslow water system to serve smaller private systems and concentrations of private-party wells. The City's Groundwater Management Plan (GWMP) is being developed to help identify opportunities for increasing the long-term sustainability of water availability for human consumption and minimizing the environmental impacts of groundwater extraction by diversifying sources both geographically and from varying aquifer layers.

KPUD has approved 2-year and 6-year Capital Improvement Plans, which identify projects and funding sources for their north and south-end water system upgrades and expansion, including the need to supplement the south-end sources that are not sufficient to serve the long-term build-out of the system to serve primarily existing development, but also some limited new development. Coordinated planning and project efforts will have mutual benefits with regards to each agency's shared long-term goals.

Inter-Local Agreement Outline of Terms for Consideration

In order to advance the water system planning process, the following issues should be considered in an inter-local agreement between the City and KPUD:

- Recognition of a mutual desire to interconnect the largest water systems owned by the City and KPUD to achieve benefits such as service expansion for both entities, as well as cost reduction, elimination of infrastructure redundancy, groundwater management opportunities, emergency preparedness, etc. The City is interested in diversifying and expanding source options in the north end of the Island to serve their central system, and KPUD is interested in supplementing their south-end system with water supply from the City's central system in the short-term, and the north systems in the longer term.
- Partnership on a technical and financial evaluation of the following:
 - Potential inter-tie locations and adjacent service opportunities;
 - Inter-tie functional agreements (expected usage, use conditions, etc.);
 - Inter-tie impacts on existing water system infrastructure and service delivery prior to the development of new sources;
 - Potential new source options and impacts on water system infrastructure and service delivery;

- Future ownership and management of the Meadowmeer water system; and,
- Challenges and options for managing water quality between systems.
- Infrastructure cost-sharing alternatives and opportunities for financial assistance through grants and loans;
- Revision of the Water Retail Service Area Map to include designated water service providers for all areas, and revisions to existing boundaries as necessary; and,
- Partnership opportunities and goals for water conservation across both agency's service areas.

High-Level Planning Timeline and Next Steps

- Q1 2026 – Engage agency committees and management on coordination issues; draft and adopt an inter-local agreement for water system coordination planning (Q2). Procure services for technical and financial evaluation of coordinated planning efforts, if needed (Q3).
- 2027 – Identify and prioritize project scoping (inter-ties; main extensions; source alternatives, ownership/management agreements for private systems) financing alternatives, budgeting and schedules.
- 2028-2030 – Project development and implementation.

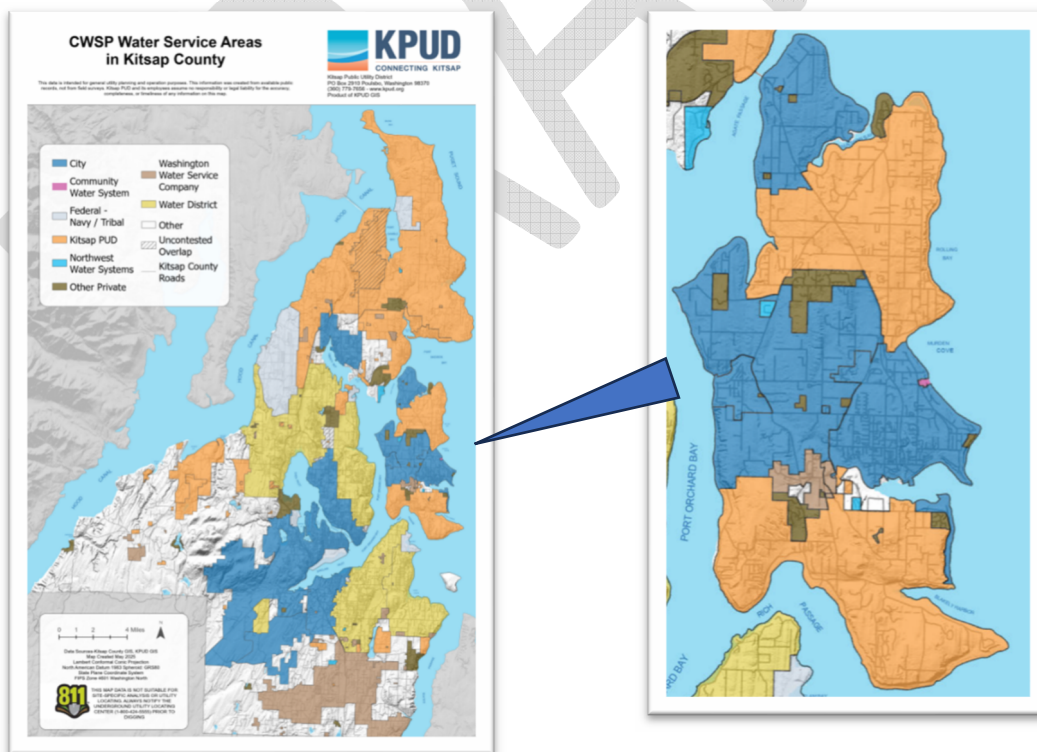


Figure 1. Kitsap Water Service Area Boundary Map

UTILITY ADVISORY COMMITTEE MINUTES

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Call to Order

Meeting called to order at 5:30 pm

Members Present: Wanda Schulze, Ted Jones, Andy Maron, Charlie Averill, Sheina Hughes, Svend Brandt-Erichsen

Also Present: Chris Wierzbicki, Public Works Director

Disclosure of Conflicts of Interest: None

Approval of Meeting Minutes: September meeting minutes were approved.

Council Liaison Report: There was no Council liaison report.

Public Comment: There was no public comment

Comprehensive Plan

The committee reviewed previous edits and added new edits throughout the Utility Element. Detailed wording was agreed to for each edit, including action items. The final draft of the Utility Element will be approved at the next meeting.

Water System Coordination Memo

KPUD will assume operational responsibilities for Sewer District (SD) 7 facilities on Jan 1, 2026. COBI wants to begin a dialogue on coordination with KPUD on drinking water systems and is drafting a memo to begin that process. Chris shared a draft memo with the committee. KPUD has recently completed a review of the condition of the SD 7 assets and would like to share that info with our committee. Regarding the sewer system, KPUD has indicated they would like to offer more connections to the City than is allowed for in our current agreement. This request may come to the UAC and Council in the future.

The Water System Business Plan is being finalized by the City's consultant and should be ready to share with the committee at the next meeting.

On other water-related matters, Chris is planning to re-present the wastewater reuse study to Council in December, along with some recommendations for some additional ground water work for Keta Waters – the peer review consultant for the Groundwater Management Plan. Chris is currently working on these recommendations with the Groundwater Subcommittee, but they would likely request that Keta perform a “steady state” analysis using the current model.

2026 UAC Work Plan

The committee reviewed and approved the draft 2026 workplan presented by Chris.

Other Business

Ted provided an update on our ongoing efforts to get neighborhood level reliability data from PSE. Although PSE continues to promise to provide the requested data, it has not yet been provided. However, in reviewing the latest list of proposed projects on their website, it appears that a few Bainbridge projects do involve undergrounding distribution lines. Ted recommends we continue to request the neighborhood level data via future meetings and correspondence.

Chris reported that the water tank off-site improvement work is progressing well. The tank is scheduled for disinfection soon, and could be operating in January (at a reduced capacity until the pressure reducing valves are all installed)

Meeting adjourned at 7:00 pm

UTILITIES ELEMENT

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UTILITIES INTRODUCTION

The *Growth Management Act* requires all comprehensive plans to include a utilities element consisting of the general location, proposed location, and capacity of all existing and proposed utilities, including but not limited to electrical lines, telecommunication lines, drinking water and sewer lines (RCW 36.70A.070(4)). ~~On Bainbridge Island, these utilities are provided by a combination of the City of Bainbridge Island, State regulated utilities, federally licensed communications companies and a municipally franchised cable television company.~~ Contrary to some other cities in Washington State, on Bainbridge Island, a multitude of governmental districts and other providers manage utility services – complicating management issues and the public’s understanding of their service provider network.

The City of Bainbridge Island provides ~~some~~ sewer and water services to portions of the community. Other public and privately held water and sewer purveyors on the Island also provide services to residents of the City. Private households provide ~~for a large~~ percentage of the City’s utility infrastructure with individual and on-site wells and septic systems.

A private corporation based on the Island provides solid waste disposal and recycling services to residents and businesses and is regulated by the Washington Utilities and Transportation Commission (WUTC).

Regional telecommunication and electric utilities serve the City of Bainbridge Island. The electric and telecommunication utilities are regulated by the WUTC.

The vision, goals and policies outlined in the Utilities Element are closely related, and in some cases overlap with the Water Resources Element of the Comprehensive Plan.

UTILITIES VISION 2044

The City of Bainbridge ~~Island has ensured~~ Island’s vision for utilities is to ensure that all residents have access to reliable ~~electric power, telecommunications services to meet their needs,~~ potable water, ~~solid waste and recycling services~~ wastewater processing, and stormwater facilities that prevent flooding and erosion, maximize infiltration and eliminate pollutants before the water enters Puget Sound. The vision also includes resident access to electric power and telecommunications services as well as solid waste and recycling services.

Coordinated water and sewer systems serve the more densely populated areas. ~~Some~~ In lower density areas, private homes continue to rely on septic systems, ~~but most are served by water purveyors that cover broad areas of the Island and private wells.~~ The City, working with other water purveyors, coordinates a groundwater monitoring program to ensure that the quantity and quality of potable water are sustained at safe levels for present and future generations.

The Groundwater Management Plan, which is informed by best available science, guides the public and private sector decision-making of water supply, stormwater management and sewage. Water use is managed to encourage conservation and limit consumption. Sewer systems provide for the reuse of treated water to recharge aquifers, for irrigation and to reduce

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outflow into Puget Sound. Tertiary treatment has been implemented to improve water quality in Puget Sound.

Materials in the waste stream continue to decline, while composting and recycling are standard practices on the Island. A Bainbridge Island moderate-risk waste facility encourages the proper disposal of materials such as paints, solvents and cleaners. ~~A state-of-the-art telecommunication network has increased cooperation among neighbors and across the Island; it has facilitated ride-sharing and reduced dependence on private automobiles for commuting and daily errands.~~

The telecommunications and broadband network is readily available for all homes and businesses. Persistent gaps in cell phone coverage have been mostly eliminated.

Hardened utility infrastructure serves emergency neighborhood hubs and disaster response facilities enabling rapid and sustained response to natural disasters and other emergencies that may interrupt the utility and transportation infrastructure.

Alternate ecological and innovative energy sources now supply much of the Island's electricity, and geo-thermal heating systems have proven their effectiveness in reducing demand for electric power.

GOALS & POLICIES

APPLICABLE TO ALL UTILITIES

GOAL U-1

Ensure that reliable and equitable utility services are available to all Bainbridge Island residents, businesses and institutions.

GOAL U-2

Ensure that the utility services are comparable ~~in terms of cost, quality, and technology to services to those~~ available in similar jurisdictions in the Puget Sound region. in terms of cost and technology, and leading other similar jurisdictions in terms of quality of service.

GOAL U-3

Ensure that utility services are adequate to meet current demands, and that utility providers plan for future demands.

GOAL U-4

Ensure that the provision of utility services is environmentally responsible and sustainable, and. Encourage utility services that are to be carbon neutral and ~~do not~~ contribute to climate change.

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GOAL U-5

Ensure that new or major renovations to existing utility facilities are designed to minimize adverse impacts on residents and the environment.

GOAL U-6

Ensure that permits and approvals for utility facilities are processed in a fair, timely manner and in accord with development regulations and this Plan.

GOAL U-7

Ensure that all utility providers give timely public notice and solicit community input on the siting of proposed facilities and on any other substantive projects before seeking City approval.

GOAL U-8

Cooperate with other jurisdictions and utility providers in planning and implementing utility-related facility additions, improvements, maintenance, and emergency response, so that such activities are coordinated for maximum efficiency and public benefit.

GOAL U-9

Ensure that sufficient staff and financial City resources are provided to implement the above goals by adopting systems and processes for meaningful and timely review of utility serviceservice performance, cost, scope, risk, resilience and opportunity, and by assigning to the Utility Advisory Committee (UAC) or other city organizationorganizations the responsibility for advising the City Council on matters regarding all utility services on Bainbridge Island.

GOAL U-10

Ensure regular and routine reviews of City-owned utility rates, with a specific focus on equitable outcomes and affordability programs as necessary to meet the needs of all community members.

GOAL U-11

Exercise the use of the City's Equity Toolkit evaluation and community engagement process as part of the development and implementation of utility projects and programs to ensure equitable outcomes for customers and the community.

POTABLE WATER

Currently, potable water is provided to citizens of Bainbridge Island by the City, Kitsap County Public Utility District, private for-profit water companies, not-for-profit companies or homeowner associations, and private wells. - approximately 75% of customers are served by Group A and Group B water systems. All water providers must comply with a variety of federal and state laws and regulations.

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GOAL U-1012

Ensure that ~~city-managed and to the extent possible, non-city managed utility services, are sufficient~~adequate, cost effective, and reliable, ~~and that safe water utility service is provided.~~ to those areas of Bainbridge Island served by public water systems and designated in the Water System Plan for future public water service.

GOAL Policy U-11 12.1

Require ~~utilities~~water utility managers and purveyors to operate in a manner that preserves and protects the water resources of the Island, and lead and inspire those entities to cooperate in a manner that recognizes water resources as a public good.

Policy U 1112.1

~~Map~~Maintain maps of public water systems service areas and evaluate modifications to their system boundaries based on maintaining sufficient and sustainable capacity to meet the present and future needs of the service ~~area~~areas.

Policy U 1112.2

~~As an~~Evaluate becoming a state approved Satellite System Management Area (SMA), so the City may elect to provide water system management services to other utility providers.

Policy U 1112.3

Encourage new development in previously unserved water service areas to connect to existing public water systems. ~~The City, at its discretion, may~~ Require new water systems to be dedicated to the City, at its discretion.

Policy U 1112.4

Require engineering specifications for new public water systems and expansions or improvements to existing public water systems that are to be located within the City's rights-of-way to meet standards set forth by the City.

Policy U 1112.5

~~Adopt standards that differentiate between urban and non-urban density fire flow requirements. A differential policy is needed to promote cost-effective water system upgrades by the many small water systems on the Island.~~

Policy U 11.6

Encourage and support water utilities to enter into cooperative activities, such as jointly managed operations, shared storage, and construction of interties, to manage water resources and systems more efficiently, economically, and safely, and devote resources to implementation of this policy.

Policy U 11.712.6

Encourage ~~and~~, facilitate, and devote resources to consolidation of water systems, with ~~particular~~ emphasis on mergers of contiguous and small systems, to manage water resources and systems more efficiently, economically, and safely.

Policy U 11.812.7

Conduct a study of consolidation of water systems owned by the City and Kitsap Public Utility District. Pursue long-term consolidation of ~~larger~~ water systems under City management or ownership.

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Policy U ~~11.912.8~~

Implement conservation measures through education and regulation with emphasis on limiting and reducing demand consistent with the Groundwater Management Plan.

PUBLIC SEWER

Currently, there are two public sewer systems on Bainbridge Island. One, owned by the City of Bainbridge Island, serves the Winslow area and the Rockaway Beach, Pleasant Beach, and Lynwood areas (“the Southend System.”) The other, owned and managed by the Kitsap County Sewer Public Utility District #7,(KPUD) serves the Fort Ward area.

The service area for the Winslow Public Sewer System is designated in the City’s General Sewer Plan. Treatment for this part of the system occurs at the Winslow Wastewater Treatment Plant. The sewer service area for the Southend System is also designated in the City’s General Sewer Plan. Treatment for ~~this~~the Southend System occurs at the ~~Kitsap County Sewer District #7~~KPUD wastewater treatment plant pursuant to an interlocal agreement.

GOAL U-~~1213~~

Ensure that adequate, cost effective, and reliable sewer service is provided to those areas of Bainbridge Island served by public sewer systems and designated in the General Sewer Plan for future public sewers.

Policy U ~~1213.1~~

Emergency service or other minor modifications to sewer service areas may be allowed with approval by the City Council via resolution so long as there is sufficient sewer facility capacity, and, with regard to the Southend System, sewage quality meets the standard outlined in the interlocal agreement with Kitsap County Sewer District #7.

Policy U ~~1213.2~~

Within public sewer system service areas, new construction should provide for eventual connection to public sewer systems.

Policy U ~~1213.3~~

Sewer connections will not be required where septic systems are fully functional and maintained, except as provided by law.

Policy U ~~1213.4~~

In planning and establishing a service area for a new public sewer facility, or major expansion of an existing public sewer facility, service area boundaries ~~will~~should be evaluated ~~taking the following into~~with consideration: of impacts to the environment, support for existing development and the expansion of affordable housing options.

- ~~a.—Areas that have an environmental need for sewer due to 1) a group of documented failing septic systems; or 2) proximity to sensitive bodies of water that are unsuitable for on-site septic systems according to the Kitsap County Health District.~~
- ~~b.—Areas used or planned for development that serve a public need, such as a public school.~~
- ~~c.—Areas designated for commercial and mixed use.~~

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- ~~d. Areas designated for residential use at densities of four units to the acre (R4) or greater.~~
- ~~e. Areas planned for an increase in density through a special planning area process.~~

Policy U ~~42~~13.5

When utilities plan, renovate, or build treatment facilities, ~~require~~ utilities ~~to~~ should consider constructing facilities that facilitate the re-use of treated wastewater for irrigation, recharge, and other non-potable uses. Require that facilities be consistent with health and safety considerations and consider financial impacts to ratepayers and taxpayers.

Policy U ~~42~~13.6

Improve the quality and reduce the quantity of effluent discharged to Puget Sound.

Policy U ~~42~~13.7

Adopt a pre-treatment policy that responds to the specific characteristics of the Island's sewer collection and treatment system and results in the reduction or postponement of large-scale centralized treatment capacity upgrades.

Policy U ~~13~~8

Investigate the development of tertiary ~~sewer and sewer greywater systems~~ wastewater treatment and the beneficial re-use of wastewater.

Policy U ~~42-8~~13.9

Study ~~cooperation (such as shared operations) or and~~ advance consolidation or joint ownership of sewer collection and treatment systems owned by the City and ~~Kitsap County Sewer District #7KPUD~~. Develop timeframes for a joint ownership agreement of the Fort Ward Wastewater Treatment Plant.

STORM AND SURFACE WATER

~~The City of Bainbridge Island operates a storm and surface water utility for the purposes stated in BIMC Section 13.24.010.~~

The City of Bainbridge Island operates a City-wide storm and surface water utility that is regulated through the State of Washington's National Pollution Discharge and Elimination System (NPDES) municipal stormwater permit. The revenue collected from all residents in the City contribute to the systems operations and maintenance, including minimizing property damage, promoting and protecting public health, safety, and welfare, minimizing water quality degradation by preventing siltation, contamination and erosion of the city's waterways, protect aquifers, and ensuring the safety of city roads and rights-of-way.

GOAL U-~~13~~14

Manage stormwater runoff to protect life, property and habitat from flooding and erosion; to channel runoff to minimize impacts to daily activities; to protect the quality of groundwater, surface water, and the waters of Puget Sound; and to provide recharge of groundwater where appropriate.

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Policy U ~~43~~14.1

~~Maintain a comprehensive storm drainage plan that identifies~~ Follow the guidance outlined in the Stormwater System Plan when identifying problems, ~~proposes~~proposing solutions, ~~provides~~providing a strategy for implementation and funding, and ~~establishes~~establishing design and development guidelines.

Policy U ~~43~~14.2

Require new development to provide both on-site and off-site improvements necessary to avoid adverse water quality and quantity impacts.

Policy U ~~43~~14.3

Use *low impact development* standards wherein infiltration of stormwater is preferred over surface discharge to downstream systems, so as to encourage the return of uncontaminated precipitation to the soil at natural rates near where it falls through the use of detention ponds, grassy swales, and infiltration facilities.

Policy U ~~43~~14.4

Design and construct stormwater systems that provide for removal of pollutants and sediment through bio-filtration or other means.

Policy U ~~43~~14.5

Minimize disruption and/or degradation of natural drainage systems, minimize impervious areas by restricting site coverage, and encourage site permeability by retaining natural vegetation and buffers, and specifying use of permeable materials.

Policy U ~~43~~14.6

Manage surface water ~~in~~through implementation of a ~~manner which~~source control program that prevents pollutants from industrial, commercial, and agricultural land uses from entering ground or surface waters.

Policy U ~~43~~14.7

Consider a program of retrofitting existing roads with water quality and quantity stormwater system improvements in order to minimize pollution from runoff from roadways to natural drainage systems and the waters of Puget Sound.

Policy U 14.8

Continue to expand a program of identifying, funding and implementing critical fish passage improvements.

ELECTRICAL

The City is currently served by Puget Sound Energy (PSE), which provides electricity generation sources, transmission, distribution and maintenance of electrical facilities throughout the island.

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PSE is regulated by the Washington Utilities and Transportation Commission (WUTC.) It is the commission's responsibility to ensure regulated companies provide safe and reliable service to customers at reasonable rates, while allowing them the opportunity to earn a fair profit.

GOAL U-1415

Ensure adequate, cost effective, reliable, and environmentally responsible electric service to the citizens of Bainbridge Island.

Policy U ~~14~~15.1

~~Develop a plan together~~Maintain regular communications with ~~the~~ electric service provider to ~~undertake energy efficiency improvements and other alterations of~~ensure information needed by COBI to achieve the goals of this comprehensive plan is available.

Policy U 15.2

Ensure electric utility facilities ~~to provider actions requiring permits or other approvals from COBI~~go through an equity evaluation, as appropriate, consistent with the City's equity policies and practices.

Policy U 15.3

Ensure adequate public outreach is conducted by electric provider for projects that will relocate, expand or provide capacity for future growth, new electrical infrastructure and ensure outreach is provided to all neighborhoods compliant with COBI equity guidelines.

Policy U ~~14.2~~15.4

Encourage the conservation of electrical energy, especially during periods of peak usage, ~~and encourage energy saving building code strategies, local renewable energy, and other cost effective approaches to meeting the island's energy needs,~~ Increase public awareness of existing conservation programs including distributed energy systems, energy audits, discounts, tax credits, etc. offered by the energy provider or government agencies.

Policy U ~~14.3~~15.5

Encourage the electric service provider to improve reliability, with particular attention to adding transmission redundancy and mitigating impacts on service from storms or other natural events.

Policy U ~~14.4~~15.6

Encourage undergrounding new and existing electric ~~transmission and~~ distribution power lines, ~~and~~ Encourage the electric energy provider to develop a long-term strategy for future undergrounding, ~~to include~~including maximizing opportunities with new construction, ~~and prioritizing the work that affects the greatest number of households and businesses.~~

Policy U ~~14.5~~15.7

Encourage the electric service provider and electricity users to use carbon neutral electricity generation, local electricity generation, solar, and innovative technologies such as ~~solar power~~ distributed energy systems that are reliable, cost effective, preserve resources, provide minimal environmental impact, and do not contribute to global warming.

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Policy U ~~14.615.8~~

~~Periodically undertake comparative evaluations of electric service reliability, cost, and environmental impact, customer service and customer support and evaluate opportunities to provide improved and less costly electrical service from alternative service providers.~~

~~Policy U 14.7~~

~~New taxpayer-funded buildings shall use carbon-neutral energy for heating, cooling, and operational use.~~
Incorporate energy conservation measures for new construction or significant remodels of taxpayer-funded buildings to the maximum extent practical within site specific and existing technology limitations.

Policy U 14.815.9

Encourage new development to integrate environmentally responsible and innovative energy systems.

Policy U 14.915.10

~~Explore ways to obtain 100% green electricity including investing in new renewable energy projects.~~

Work with electricity provider to ensure climate resiliency is being address for electrical equipment and infrastructure on the Island

SOLID WASTE DISPOSAL, RECYCLING AND COMPOSTING

Currently, Bainbridge Disposal, Inc., a private corporation based on the Island, is the exclusive provider of solid waste ~~disposal and recycling~~collection services to City, and the owner of the waste transfer center. Bainbridge Disposal is regulated by the Washington Utilities and Transportation Commission (WUTC), which is charged with ensuring the utility provides reliable, safe and economical service.

GOAL U-1516

Ensure adequate, convenient, cost effective, reliable, and environmentally responsible solid waste, recycling and composting service to the citizens of Bainbridge Island.

Policy U 1516.1

Seek a method to provide on-island collection site for moderate risk waste or common household hazardous waste ~~including oil based paints, stains, adhesives, aerosols, paint thinner, corrosive cleaners, yard chemicals, and pool/spa chemicals~~ and a means for transferring these substances in a timely manner to the Kitsap County site.

Policy U 1516.2

Encourage solid waste collection policies and practices, including development requirements, that require and ensure the proper space planning for recycling and yard waste/composting options for all multi-family residential properties.

Policy U 16.3

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Support ~~non-governmental organizations that provide~~ outreach and education to citizens to ensure that the populace is informed about the latest waste reduction, composting, recycling and hazardous waste practices.

Policy U ~~15.316.4~~

~~In addition to WUTC regulation, the City should~~ Perform periodic reviews to ensure that Bainbridge Disposal is providing safe, reliable, cost effective and responsive solid waste, compost and recycling collection. Evaluate opportunities to provide improved and cost-effective services from alternative providers.

Policy U ~~15.416.5~~

Coordinate with Bainbridge Disposal and the County to improve access to updated information on solid waste, recycling and composting collection and disposal services. Obtain information from Bainbridge Disposal regarding where collected material is sent for recycling and reuse rates for recyclable materials. Increase visibility and outreach for special events for hard-to-recycle materials such as hazardous waste or polystyrene foam.

Policy U ~~15.516.6~~

Consider methods to reduce the amount of solid waste ~~disposed~~ disposal, e.g. material bans, composting or compaction, or by the conversion of solid waste to energy, ~~e.g. using a~~ biodigester.

TELECOMMUNICATION

Telecommunication is the technology of communication at a distance by electronic transmission of alphanumeric, audio, video and other data over wired and wireless delivery systems. On Bainbridge Island, telecommunication utilities provide telephone, television, and internet services.

Telephone utilities are regulated by the WUTC. The Federal Communications Commission (FCC) regulates wireless service providers.

Comcast (d.b.a Xfinity) and CenturyLink are the largest telecommunication service providers on Bainbridge Island.

KPUD also provides a public wi-fibroadband services to a growing service in Winslow area on Bainbridge Island.

GOAL U-~~1617~~

Ensure adequate, cost effective, reliable, and environmentally responsible telecommunication service to the citizens of Bainbridge Island.

Policy U ~~1617.1~~

Encourage shared use of facilities and the use of existing utility corridors, public rights-of-way and city owned properties.

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Policy U ~~46~~17.2

Require the placement of cellular and/or wireless communication facilities in a manner that minimizes the adverse impacts on adjacent and surrounding land uses.

Policy U ~~16~~17.3

Encourage major telecommunication utility providers to work with the City to identify potential sites for infrastructure and facility expansion to address future growth and development and meet the demands for additional utility service.

Policy U ~~46~~17.4

Encourage all providers to serve all parts of the City equally. well, including providing options for telecommunications that retain service during power outages.

Policy U ~~46~~17.5

~~The City expects all providers to~~ Evaluate the capacity of their facilities regularly to ensure that new facilities are installed in a timely basis to meet new and future demand. Providers are expected to provide facilities to accommodate growth within the City.

Policy U ~~46~~17.6

Pursue internet and cellular service of the highest standards for governmental and educational institutions, business and commerce and personal use.

Policy U ~~46~~17.7

Require new development to have underground conduits suitable for existing and foreseeable new utilities such as cable and broadband.

Policy U ~~46~~17.8

Ensure that emergency communication services are universally available to assist residents in emergencies. Work with cell phone providers to ensure more robust coverage at all emergency neighborhood hubs and emergency response facilities.

Policy U ~~46~~17.9

~~In addition to WUTC regulation, the City should~~ Perform periodic reviews to ensure that various telecommunication providers are providing safe reliable, cost effective, and responsive telecommunication services. During such reviews, ~~the City should~~ evaluate opportunities to obtain improved and cost-effective services from alternative providers.

~~Policy U 16.10~~

~~Conduct a study to support the creation of an Island-wide high-speed internet service.~~

UTILITIES IMPLEMENTATION

To implement the goals and policies in this Element over the 10-year period leading up to the next Comprehensive Plan update, the City must take a number of actions, including adopting or amending regulations, creating partnerships and educational programs, and developing staffing or other budgetary decisions. plans and budgets. Listed following each action are ~~several of~~ the

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comprehensive plan policies that support that action – some actions are identified as “high” priorities.

HIGH PRIORITY ACTIONS

U Action #1 – ~~Develop a~~ (HIGH) – Utilize the equity and climate lens “toolkits” on relevant projects and programs and engage the Utility Advisory Committee in the evaluation process ~~for periodic review of Island~~ and decision-making.

GOAL U-1

Ensure that reliable and equitable utility services are available to all Bainbridge Island residents, businesses and institutions.

GOAL U-5

Ensure that new or major renovations to existing utility facilities are designed to minimize adverse impacts on residents and the environment.

U Action #2 (HIGH) – Fund and prepare a utility rate study every 3-years in accordance with the City’s financial policies and engage the Utility Advisory Committee in the evaluation process and decision-making.

GOAL U-9

Ensure that sufficient staff and financial City resources are provided to implement the above goals by adopting systems and processes for meaningful and timely review of utility ~~services~~service performance, cost, scope, risk, resilience and opportunity, and by assigning to the Utility Advisory Committee (UAC) or other city ~~organization~~organizations the responsibility for advising the City Council on matters regarding all utility services on Bainbridge Island.

U Action #2 – ~~Support~~3 (HIGH) – Fund the ~~development~~action items identified in the Water System Business Plan and the Groundwater Management Plan that advance the coordination and consolidation of ~~sewer tertiary treatment and sewer greywater~~water systems.

Policy U 12.1

Maintain maps of public water systems service areas and evaluate modifications to their system boundaries based on maintaining sufficient and sustainable capacity to meet the present and future needs of the service areas.

Policy U 12.2

Evaluate becoming a state approved Satellite System Management Area (SMA), so the City may elect to provide water system management services to other utility providers.

Policy U 12.6

Encourage, facilitate, and devote resources to consolidation of water systems, with emphasis on mergers of contiguous and small systems, to manage water resources and systems more efficiently, economically, and safely.

Policy U 12.7

Conduct a study of consolidation of water systems owned by the City and Kitsap Public Utility District. Pursue long-term consolidation of water systems under City management or ownership.

November 17, 2025

U Action #4 – Fund the completion of the preliminary and final design of the Wastewater Beneficial Re-use project.

Policy U 13.5

When utilities plan, renovate, or build treatment facilities, require utilities to consider constructing facilities that facilitate the re-use of treated wastewater for irrigation, recharge, and other non-potable uses. Require that facilities be consistent with health and safety considerations and consider financial impacts to ratepayers and taxpayers.

Policy U 13.6

Improve the quality and reduce the quantity of effluent discharged to Puget Sound.

~~**U Action #3 – Facilitate cooperation among or Policy U 13.9**~~
Study and advance consolidation or joint ownership of water systems.

~~**Policy U 11.6**~~

~~Encourage and support water utilities to enter into cooperative activities, such as jointly managed operations, shared storage, sewer collection and construction of interties, to manage water resources and systems more efficiently, economically, and safely.~~

~~**U Action #4 – Continue the investigation of the creation of an Island-wide high-speed internet service.**~~

~~**Policy U 16.10**~~

~~Conduct a study to support the creation of an Island-wide high-speed internet service.~~

MEDIUM PRIORITY ACTIONS

~~**U Action #5 – Proactively encourage, study, and facilitate consolidation of water systems to manage water resources and systems more efficiently, economically and safely.**~~

~~**Policy U 11.7**~~

~~Encourage and facilitate consolidation of water systems, with particular emphasis on mergers of contiguous and small systems, to manage water resources and systems more efficiently, economically, and safely.~~

~~**Policy U 11.8**~~

~~Conduct a study of consolidation of watertreatment systems owned by the City and Kitsap Public Utility District. Pursue long-term consolidation of larger water systems KPUD. Develop timeframes for a joint ownership agreement of the Fort Ward Wastewater Treatment Plant.~~

U Action #4 – Implement the recommendations in the Stormwater System Plan.

Policy U 14.1

Follow the guidance outlined in the Stormwater System Plan when identifying problems, proposing solutions, providing a strategy for implementation and funding, and establishing design and development guidelines.

November 17, 2025

U Action #5 – Continue organizing annual, or more regular, coordination meetings between the City and Puget Sound Energy in accordance with the Memorandum of Understanding.

Policy U 15.1

Maintain regular communications with electric service provider to ensure information needed by COBI to achieve the goals of this comprehensive plan is available.

UTILITIES ELEMENT

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UTILITIES INTRODUCTION

The *Growth Management Act* requires all comprehensive plans to include a utilities element consisting of the general location, proposed location, and capacity of all existing and proposed utilities, including but not limited to electrical lines, telecommunication lines, drinking water and sewer lines (RCW 36.70A.070(4)). Contrary to some other cities in Washington State, on Bainbridge Island, a multitude of governmental districts and other providers manage utility services – complicating management issues and the public’s understanding of their service provider network.

The City of Bainbridge Island provides sewer and water services to portions of the community. Other public and privately held water and sewer purveyors on the Island also provide services to residents of the City. Private households provide a percentage of the City’s utility infrastructure with individual and on-site wells and septic systems.

A private corporation based on the Island provides solid waste disposal and recycling services to residents and businesses and is regulated by the Washington Utilities and Transportation Commission (WUTC).

Regional telecommunication and electric utilities serve the City of Bainbridge Island. The electric and telecommunication utilities are regulated by the WUTC.

The vision, goals and policies outlined in the Utilities Element are closely related, and in some cases overlap with the Water Resources Element of the Comprehensive Plan.

UTILITIES VISION 2044

The City of Bainbridge Island’s vision for utilities is to ensure that all residents have access to reliable potable water, wastewater processing, and stormwater facilities that prevent flooding and erosion, maximize infiltration and eliminate pollutants before the water enters Puget Sound. The vision also includes resident access to electric power and telecommunications services as well as solid waste and recycling services.

Coordinated water and sewer systems serve the more densely populated areas. In lower density areas, private homes continue to rely on septic systems, and private wells. The City, working with other water purveyors, coordinates a groundwater monitoring program to ensure that the quantity and quality of potable water are sustained at safe levels for present and future generations.

The Groundwater Management Plan, which is informed by best available science, guides the public and private sector decision-making of water supply, stormwater management and sewage. Water use is managed to encourage conservation and limit consumption. Sewer systems provide for the reuse of treated water to recharge aquifers, for irrigation and to reduce outflow into Puget Sound. Tertiary treatment has been implemented to improve water quality in Puget Sound.

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Materials in the waste stream continue to decline, while composting and recycling are standard practices on the Island. A Bainbridge Island moderate-risk waste facility encourages the proper disposal of materials such as paints, solvents and cleaners.

The telecommunications and broadband network is readily available for all homes and businesses. Persistent gaps in cell phone coverage have been mostly eliminated.

Hardened utility infrastructure serves emergency neighborhood hubs and disaster response facilities enabling rapid and sustained response to natural disasters and other emergencies that may interrupt the utility and transportation infrastructure.

Alternate ecological and innovative energy sources now supply much of the Island's electricity, and geo-thermal heating systems have proven their effectiveness in reducing demand for electric power.

GOALS & POLICIES

APPLICABLE TO ALL UTILITIES

GOAL U-1

Ensure that reliable and equitable utility services are available to all Bainbridge Island residents, businesses and institutions.

GOAL U-2

Ensure that the utility services are comparable to those available in similar jurisdictions in the Puget Sound region in terms of cost and technology, and leading other similar jurisdictions in terms of quality of service.

GOAL U-3

Ensure that utility services are adequate to meet current demands, and that utility providers plan for future demands.

GOAL U-4

Ensure that the provision of utility services is environmentally responsible and sustainable. Encourage utility services to be carbon neutral and not contribute to climate change.

GOAL U-5

Ensure that new or major renovations to existing utility facilities are designed to minimize adverse impacts on residents and the environment.

GOAL U-6

Ensure that permits and approvals for utility facilities are processed in a fair, timely manner and in accord with development regulations and this Plan.

GOAL U-7

Ensure that all utility providers give timely public notice and solicit community input on the siting of proposed facilities and on any other substantive projects before seeking City approval.

GOAL U-8

Cooperate with other jurisdictions and utility providers in planning and implementing utility-related facility additions, improvements, maintenance, and emergency response, so that such activities are coordinated for maximum efficiency and public benefit.

GOAL U-9

Ensure that sufficient staff and financial City resources are provided to implement the above goals by adopting systems and processes for meaningful and timely review of utility service performance, cost, scope, risk, resilience and opportunity, and by assigning to the Utility Advisory Committee (UAC) or other city organizations the responsibility for advising the City Council on matters regarding all utility services on Bainbridge Island.

GOAL U-10

Ensure regular and routine reviews of City-owned utility rates, with a specific focus on equitable outcomes and affordability programs as necessary to meet the needs of all community members.

GOAL U-11

Exercise the use of the City's Equity Toolkit evaluation and community engagement process as part of the development and implementation of utility projects and programs to ensure equitable outcomes for customers and the community.

POTABLE WATER

Currently, potable water is provided to citizens of Bainbridge Island by the City, Kitsap County Public Utility District, private for-profit water companies, not-for-profit companies or homeowner associations, and private wells - approximately 75% of customers are served by Group A and Group B water systems. All water providers must comply with a variety of federal and state laws and regulations.

GOAL U-12

Ensure that adequate, cost effective, and reliable water service is provided to those areas of Bainbridge Island served by public water systems and designated in the Water System Plan for future public water service.

Policy U 12.1

Require water utility managers and purveyors to operate in a manner that preserves and protects the water resources of the Island, and lead and inspire those entities to cooperate in a manner that recognizes water resources as a public good.

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Policy U 12.1

Maintain maps of public water systems service areas and evaluate modifications to their system boundaries based on maintaining sufficient and sustainable capacity to meet the present and future needs of the service areas.

Policy U 12.2

Evaluate becoming a state approved Satellite System Management Area (SMA), so the City may elect to provide water system management services to other utility providers.

Policy U 12.3

Encourage new development in previously unserved water service areas to connect to existing public water systems. Require new water systems to be dedicated to the City, at its discretion.

Policy U 12.4

Require engineering specifications for new public water systems and expansions or improvements to existing public water systems that are to be located within the City's rights-of-way to meet standards set forth by the City.

Policy U 12.5

Encourage and support water utilities to enter into cooperative activities, such as jointly managed operations, shared storage, and construction of interties, to manage water resources and systems more efficiently, economically, and safely, and devote resources to implementation of this policy.

Policy U 12.6

Encourage, facilitate, and devote resources to consolidation of water systems, with emphasis on mergers of contiguous and small systems, to manage water resources and systems more efficiently, economically, and safely.

Policy U 12.7

Conduct a study of consolidation of water systems owned by the City and Kitsap Public Utility District. Pursue long-term consolidation of water systems under City management or ownership.

Policy U 12.8

Implement conservation measures through education and regulation with emphasis on limiting and reducing demand consistent with the Groundwater Management Plan.

PUBLIC SEWER

Currently, there are two public sewer systems on Bainbridge Island. One, owned by the City of Bainbridge Island, serves the Winslow area and the Rockaway Beach, Pleasant Beach, and Lynwood areas ("the Southend System.") The other, owned and managed by the Kitsap Public Utility District (KPUD) serves the Fort Ward area.

The service area for the Winslow Public Sewer System is designated in the City's General Sewer Plan. Treatment for this part of the system occurs at the Winslow Wastewater Treatment Plant. The sewer service area for the Southend System is also designated in the City's General Sewer Plan. Treatment for the Southend System occurs at the KPUD wastewater treatment

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plant pursuant to an interlocal agreement.

GOAL U-13

Ensure that adequate, cost effective, and reliable sewer service is provided to those areas of Bainbridge Island served by public sewer systems and designated in the General Sewer Plan for future public sewers.

Policy U 13.1

Emergency service or other minor modifications to sewer service areas may be allowed with approval by the City Council via resolution so long as there is sufficient sewer facility capacity, and, with regard to the Southend System, sewage quality meets the standard outlined in the interlocal agreement with Kitsap County Sewer District #7.

Policy U 13.2

Within public sewer system service areas, new construction should provide for eventual connection to public sewer systems.

Policy U 13.3

Sewer connections will not be required where septic systems are fully functional and maintained, except as provided by law.

Policy U 13.4

In planning and establishing a service area for a new public sewer facility, or major expansion of an existing public sewer facility, service area boundaries should be evaluated with consideration of impacts to the environment, support for existing development and the expansion of affordable housing options.

Policy U 13.5

When utilities plan, renovate, or build treatment facilities, utilities should consider constructing facilities that facilitate the re-use of treated wastewater for irrigation, recharge, and other non-potable uses. Require that facilities be consistent with health and safety considerations and consider financial impacts to ratepayers and taxpayers.

Policy U 13.6

Improve the quality and reduce the quantity of effluent discharged to Puget Sound.

Policy U 13.7

Adopt a pre-treatment policy that responds to the specific characteristics of the Island's sewer collection and treatment system and results in the reduction or postponement of large-scale centralized treatment capacity upgrades.

Policy U 13.8

Investigate the development of tertiary wastewater treatment and the beneficial re-use of wastewater.

Policy U 13.9

Study and advance consolidation or joint ownership of sewer collection and treatment systems owned by the City and KPUD. Develop timeframes for a joint ownership agreement of the Fort Ward Wastewater Treatment Plant.

STORM AND SURFACE WATER

The City of Bainbridge Island operates a City-wide storm and surface water utility that is regulated through the State of Washington's National Pollution Discharge and Elimination System (NPDES) municipal stormwater permit. The revenue collected from all residents in the City contribute to the systems operations and maintenance, including minimizing property damage, promoting and protecting public health, safety, and welfare, minimizing water quality degradation by preventing siltation, contamination and erosion of the city's waterways, protect aquifers, and ensuring the safety of city roads and rights-of-way.

GOAL U-14

Manage stormwater runoff to protect life, property and habitat from flooding and erosion; to channel runoff to minimize impacts to daily activities; to protect the quality of groundwater, surface water, and the waters of Puget Sound; and to provide recharge of groundwater where appropriate.

Policy U 14.1

Follow the guidance outlined in the Stormwater System Plan when identifying problems, proposing solutions, providing a strategy for implementation and funding, and establishing design and development guidelines.

Policy U 14.2

Require new development to provide both on-site and off-site improvements necessary to avoid adverse water quality and quantity impacts.

Policy U 14.3

Use *low impact development* standards wherein infiltration of stormwater is preferred over surface discharge to downstream systems, so as to encourage the return of uncontaminated precipitation to the soil at natural rates near where it falls through the use of detention ponds, grassy swales, and infiltration facilities.

Policy U 14.4

Design and construct stormwater systems that provide for removal of pollutants and sediment through bio-filtration or other means.

Policy U 14.5

Minimize disruption and/or degradation of natural drainage systems, minimize impervious areas by restricting site coverage, and encourage site permeability by retaining natural vegetation and buffers, and specifying use of permeable materials.

Policy U 14.6

Manage surface water through implementation of a source control program that prevents pollutants from industrial, commercial, and agricultural land uses from entering ground or surface waters.

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Policy U 14.7

Consider a program of retrofitting existing roads with water quality and quantity stormwater system improvements in order to minimize pollution from runoff from roadways to natural drainage systems and the waters of Puget Sound.

Policy U 14.8

Continue to expand a program of identifying, funding and implementing critical fish passage improvements.

ELECTRICAL

The City is currently served by Puget Sound Energy (PSE), which provides electricity generation sources, transmission, distribution and maintenance of electrical facilities throughout the island. PSE is regulated by the Washington Utilities and Transportation Commission (WUTC.) It is the commission's responsibility to ensure regulated companies provide safe and reliable service to customers at reasonable rates, while allowing them the opportunity to earn a fair profit.

GOAL U-15

Ensure adequate, cost effective, reliable, and environmentally responsible electric service to the citizens of Bainbridge Island.

Policy U 15.1

Maintain regular communications with electric service provider to ensure information needed by COBI to achieve the goals of this comprehensive plan is available.

Policy U 15.2

Ensure electric provider actions requiring permits or other approvals from COBI go through an equity evaluation, as appropriate, consistent with the City's equity policies and practices.

Policy U 15.3

Ensure adequate public outreach is conducted by electric provider for projects that will relocate, expand or provide new electrical infrastructure and ensure outreach is provided to all neighborhoods compliant with COBI equity guidelines.

Policy U 15.4

Encourage the conservation of electrical energy, especially during periods of peak usage. Increase public awareness of existing conservation programs including energy audits, discounts, tax credits, etc. offered by the energy provider or government agencies.

Policy U 15.5

Encourage the electric service provider to improve reliability, with particular attention to adding transmission redundancy and mitigating impacts on service from storms or other natural events.

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Policy U 15.6

Encourage undergrounding new and existing electric distribution power lines. Encourage the electric energy provider to develop a long-term strategy for future undergrounding, including maximizing opportunities with new construction.

Policy U 15.7

Encourage the electric service provider and electricity users to use carbon neutral electricity generation, local electricity generation, solar, and innovative technologies such as distributed energy systems that are reliable, cost effective, preserve resources, provide minimal environmental impact, and do not contribute to global warming.

Policy U 15.8

Incorporate energy conservation measures for new construction or significant remodels of taxpayer-funded buildings to the maximum extent practical within site specific and existing technology limitations.

Policy U 15.9

Encourage new development to integrate environmentally responsible and innovative energy systems.

Policy U 15.10

Work with electricity provider to ensure climate resiliency is being address for electrical equipment and infrastructure on the Island

SOLID WASTE DISPOSAL, RECYCLING AND COMPOSTING

Currently, Bainbridge Disposal, Inc., a private corporation based on the Island, is the exclusive provider of solid waste collection services to City, and the owner of the waste transfer center. Bainbridge Disposal is regulated by the Washington Utilities and Transportation Commission (WUTC), which is charged with ensuring the utility provides reliable, safe and economical service.

GOAL U-16

Ensure adequate, convenient, cost effective, reliable, and environmentally responsible solid waste, recycling and composting service to the citizens of Bainbridge Island.

Policy U 16.1

Seek a method to provide on-island collection site for moderate risk waste or common household hazardous waste and a means for transferring these substances in a timely manner to the Kitsap County site.

Policy U 16.2

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Encourage solid waste collection policies and practices, including development requirements, that require and ensure the proper space planning for recycling and yard waste/composting options for all multi-family residential properties.

Policy U 16.3

Support outreach and education to citizens to ensure that the populace is informed about the latest waste reduction, composting, recycling and hazardous waste practices.

Policy U 16.4

Perform periodic reviews to ensure that Bainbridge Disposal is providing safe, reliable, cost effective and responsive solid waste, compost and recycling collection. Evaluate opportunities to provide improved and cost-effective services from alternative providers.

Policy U 16.5

Coordinate with Bainbridge Disposal and the County to improve access to updated information on solid waste, recycling and composting collection and disposal services. Obtain information from Bainbridge Disposal regarding where collected material is sent for recycling and reuse rates for recyclable materials. Increase visibility and outreach for special events for hard-to-recycle materials such as hazardous waste or polystyrene foam.

Policy U 16.6

Consider methods to reduce the amount of solid waste disposal, e.g. material bans, composting or compaction, or by the conversion of solid waste to energy.

TELECOMMUNICATION

Telecommunication is the technology of communication at a distance by electronic transmission of alphanumeric, audio, video and other data over wired and wireless delivery systems. On Bainbridge Island, telecommunication utilities provide telephone, television, and internet services.

Telephone utilities are regulated by the WUTC. The Federal Communications Commission (FCC) regulates wireless service providers.

Comcast (d.b.a Xfinity) and CenturyLink are the largest telecommunication service providers on Bainbridge Island.

KPUD also provides broadband services to a growing service area on Bainbridge Island.

GOAL U-17

Ensure adequate, cost effective, reliable, and environmentally responsible telecommunication service to the citizens of Bainbridge Island.

Policy U 17.1

Encourage shared use of facilities and the use of existing utility corridors, public rights-of-way and city owned properties.

Policy U 17.2

Require the placement of cellular and/or wireless communication facilities in a manner that minimizes the adverse impacts on adjacent and surrounding land uses.

Policy U17.3

Encourage major telecommunication utility providers to work with the City to identify potential sites for infrastructure and facility expansion to address future growth and development and meet the demands for additional utility service.

Policy U 17.4

Encourage all providers to serve all parts of the City equally well, including providing options for telecommunications that retain service during power outages.

Policy U 17.5

Evaluate the capacity of their facilities regularly to ensure that new facilities are installed in a timely basis to meet new and future demand. Providers are expected to provide facilities to accommodate growth within the City.

Policy U 17.6

Pursue internet and cellular service of the highest standards for governmental and educational institutions, business and commerce and personal use.

Policy U 17.7

Require new development to have underground conduits suitable for existing and foreseeable new utilities such as cable and broadband.

Policy U 17.8

Ensure that emergency communication services are universally available to assist residents in emergencies. Work with cell phone providers to ensure more robust coverage at all emergency neighborhood hubs and emergency response facilities.

Policy U 17.9

Perform periodic reviews to ensure that various telecommunication providers are providing safe reliable, cost effective, and responsive telecommunication services. During such reviews, evaluate opportunities to obtain improved and cost-effective services from alternative providers.

UTILITIES IMPLEMENTATION

To implement the goals and policies in this Element over the 10-year period leading up to the next Comprehensive Plan update, the City must take a number of actions, including adopting or amending regulations, creating partnerships and educational programs, and developing staffing plans and budgets. Listed following each action are the comprehensive plan policies that support that action – some actions are identified as “high” priorities.

November 17, 2025

U Action #1 (HIGH) – Utilize the equity and climate lens “toolkits” on relevant projects and programs and engage the Utility Advisory Committee in the evaluation process and decision-making.

GOAL U-1

Ensure that reliable and equitable utility services are available to all Bainbridge Island residents, businesses and institutions.

GOAL U-5

Ensure that new or major renovations to existing utility facilities are designed to minimize adverse impacts on residents and the environment.

U Action #2 (HIGH) – Fund and prepare a utility rate study every 3-years in accordance with the City’s financial policies and engage the Utility Advisory Committee in the evaluation process and decision-making.

GOAL U-9

Ensure that sufficient staff and financial City resources are provided to implement the above goals by adopting systems and processes for meaningful and timely review of utility service performance, cost, scope, risk, resilience and opportunity, and by assigning to the Utility Advisory Committee (UAC) or other city organizations the responsibility for advising the City Council on matters regarding all utility services on Bainbridge Island.

U Action #3 (HIGH) – Fund the action items identified in the Water System Business Plan and the Groundwater Management Plan that advance the coordination and consolidation of water systems.

Policy U 12.1

Maintain maps of public water systems service areas and evaluate modifications to their system boundaries based on maintaining sufficient and sustainable capacity to meet the present and future needs of the service areas.

Policy U 12.2

Evaluate becoming a state approved Satellite System Management Area (SMA), so the City may elect to provide water system management services to other utility providers.

Policy U 12.6

Encourage, facilitate, and devote resources to consolidation of water systems, with emphasis on mergers of contiguous and small systems, to manage water resources and systems more efficiently, economically, and safely.

Policy U 12.7

Conduct a study of consolidation of water systems owned by the City and Kitsap Public Utility District. Pursue long-term consolidation of water systems under City management or ownership.

U Action #4 – Fund the completion of the preliminary and final design of the Wastewater Beneficial Re-use project.

Policy U 13.5

When utilities plan, renovate, or build treatment facilities, require utilities to consider

November 17, 2025

constructing facilities that facilitate the re-use of treated wastewater for irrigation, recharge, and other non-potable uses. Require that facilities be consistent with health and safety considerations and consider financial impacts to ratepayers and taxpayers.

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Improve the quality and reduce the quantity of effluent discharged to Puget Sound.

Policy U 13.9

Study and advance consolidation or joint ownership of sewer collection and treatment systems owned by the City and KPUD. Develop timeframes for a joint ownership agreement of the Fort Ward Wastewater Treatment Plant.

U Action #4 – Implement the recommendations in the Stormwater System Plan.

Policy U 14.1

Follow the guidance outlined in the Stormwater System Plan when identifying problems, proposing solutions, providing a strategy for implementation and funding, and establishing design and development guidelines.

U Action #5 – Continue organizing annual, or more regular, coordination meetings between the City and Puget Sound Energy in accordance with the Memorandum of Understanding.

Policy U 15.1

Maintain regular communications with electric service provider to ensure information needed by COBI to achieve the goals of this comprehensive plan is available.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

November 21, 2025

Blair King, City Manager
City of Bainbridge Island
280 Madison Ave N
Bainbridge Island, WA 98110

Re: **Phase II Municipal Stormwater Permit No. WAR045503 Audit Findings**

Dear Blair King:

On September 16, 2025, representatives from the Washington State Department of Ecology (Ecology) conducted a detailed on-site audit of the City of Bainbridge Island's (Bainbridge Island) Stormwater Management Program. Enclosed please find a report summarizing key findings from the day-long audit. The report is organized by Permit element and provides specific Key Findings, Recommendations for Program Improvement, and Areas of Potential Non-Compliance.

Background

The audit was designed to evaluate Bainbridge Island's compliance with the NPDES Phase II Municipal Stormwater Permit (Permit) and to assess the clarity and effectiveness of Permit language and its requirements. It was performed pursuant to 40 CFR Sec. 122.41(i), 40 CFR Sec 123.26, and RCW 90.48.

The Bainbridge Island audit focused on three major Permit programs within the city:

- Municipal separate stormwater sewer system (MS4) mapping,
- Illicit Discharge Detection and Elimination (IDDE), and
- Operations and Maintenance (O&M) of Bainbridge Island's MS4.

The audit process included background materials reviewed by Ecology staff, in person interviews with key Bainbridge Island program staff and managers, and an inspection of Bainbridge Island's decant facility.

Please see the enclosed full audit report for details.

City of Bainbridge Island
Audit Date: September 16, 2025

Permit No. WAR045503

In closing, we wish to express our appreciation for the time and focused attention you have dedicated to this effort. Both Stella Collier and Paul Nylund deserve special recognition for their efforts to prepare background materials for Ecology's review in advance of the audit. We look forward to working with your staff to address any outstanding issues and to ensure Bainbridge Island's ongoing and full compliance with the requirements of the Permit. If you have questions, please contact Roger Chang at (425) 758-5096 or at Roger.Chang@ecy.wa.gov.

Sincerely,



Jay Fennell
Watershed Protection Unit Supervisor
Northwest Region Office

Enclosures: Bainbridge Island Audit
Report Bainbridge Island Audit Announcement Letter
 Bainbridge Island Decant Facility Inspection Report
 Bainbridge Island Audit Day of Agenda

cc: Stella Collier, City of Bainbridge Island
 Roger Chang, Department of Ecology
 Rachel McCrea, Department of Ecology
 PARIS: City of Bainbridge Island; WAR045503

WA Department of Ecology
NPDES Municipal Stormwater Permit Phase II Western WA Audit
City of Bainbridge Island, WA
September 16, 2025
9:30 AM-3:45 PM

Introduction

On September 16, 2025, the Department of Ecology (Ecology) conducted an audit of the City of Bainbridge Island's (Bainbridge Island) Municipal Separate Storm Sewer (MS4) Program. Discharges from Bainbridge Island's MS4 are regulated under the *Western Washington Phase II Municipal Stormwater Permit (effective: August 1, 2024)* (Permit) issued by Ecology. Bainbridge Island was first covered under the Phase II Permit on January 17, 2007, and maintains permit coverage under its current permit (Permit WAR04-5503) until July 31, 2029.

This MS4 program audit was conducted as part of Ecology's municipal stormwater permit compliance assurance program to evaluate City and County Permittees' compliance with the Permit and to assess the clarity and effectiveness of Permit language and its requirements. This report summarizes the findings of the audit.

Background

The City of Bainbridge Island is located in Kitsap County, Washington, and is home to approximately 25,000 residents. Governed by a seven-member City Council and managed by a City Manager, the local government includes departments such as Planning & Community Development, Police, and Public Works. The Public Works Department holds the primary responsibility for coordinating and implementing the MS4 Permit. This department is staffed to manage infrastructure, with specific staff dedicated to storm sewer maintenance and Permit compliance efforts.

Audit Logistics

Ecology notified Bainbridge Island by letter on July 17, 2025 (see Appendix A) that it had been selected at random for a detailed on-site evaluation. The evaluation was scheduled for Tuesday, September 16, 2025. The notification letter included a detailed information request concerning 12 items for Bainbridge Island to document and submit to Ecology in advance of the in-person audit visit (See Appendix A). Ecology staff reviewed the submitted documents prior to the on-site evaluation. The audit was structured to focus on the City's MS4 Mapping, Illicit Discharge Detection and Elimination (IDDE), and Municipal Operations and Maintenance (O&M) Programs. Ecology conducted interviews of select staff (See Table 1 below). An additional field component of the audit focused on inspecting a municipal operations facility (Appendix B). See Appendix C for the Day of Agenda.

Table 1. The primary representatives participating in the daylong audit include:

City of Bainbridge Island			
Name	Title	Phone	Email
Stella Collier	Stormwater Management Program Coordinator	(206) 780-3724	scollier@bainbridgewa.gov
Paul Nylund	Development Engineer/Water Resources Manager	(206) 780-3783	pnylund@bainbridgewa.gov
Ray Navarette	Public Works Utilities Supervisor	(206) 780-3582	rnavarette@bainbridgewa.gov
Tom Edwards	Assistant Public Works Director	(206) 780-3584	tom.edwards@bainbridgewa.gov
Chris Wierzbicki	Public Works Director	(206) 842-2016	cwierzbicki@bainbridgewa.gov
Department of Ecology			
Roger Chang	Dept. of Ecology, Municipal Stormwater Permit Planner	(425) 758-5096	Roger.chang@ecy.wa.gov
Angela Vincent	Dept. of Ecology, Municipal Stormwater Permit Planner	(360) 407-6276	Angela.vincent@ecy.wa.gov
Amy Waterman	Dept. of Ecology, Municipal Phase I Permit Writer	(360) 338-5831	Amy.waterman@ecy.wa.gov
Evan Dobrowski	Dept. of Ecology, Industrial Stormwater Inspector	(425) 213-4230	Evan.dobrowski@ecy.wa.gov

MS4 Mapping and Illicit Discharge Detection and Elimination (IDDE)

Overview of Permit Requirements Under Review

Section S5.C.4.a of the Permit requires that City/County Permittees map their MS4s on an ongoing basis. The Permit's ongoing mapping requirements specify that the following features must be mapped:

- Known MS4 outfalls and discharge points, including outfall size and material, where known,
- Receiving waters, other than groundwater,
- Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee,
- Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters,
- 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, including the features and attributes specified in the Permit,
- Connections between the Permittee's MS4 and other municipalities or public entities,
- All connections to the MS4 authorized or allowed after February 16, 2007,
- And all known connections from the Permittee's MS4 to a privately owned stormwater system.

The 2024 Permit also includes new mapping requirements with implementation dates beginning March 31, 2026.

Section S5.C.5.c directs Permittees to implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater illicit discharges into their MS4. Permit language describes allowable and conditionally allowable discharge types. The Permit also requires that the ordinance include escalating enforcement procedures and actions. In accordance with Section S5.C.5.e, the Permittee is required to implement a compliance strategy that includes the escalating enforcement procedures and actions.

S5.C.5.d requires Permittees to implement an ongoing program to detect and identify non-stormwater discharges and illicit connections to the MS4. These requirements include procedures for conducting investigations of the MS4, a publicly listed and publicized hotline for public reporting or illicit discharges, and an ongoing training program for all municipal field staff who might observe an illicit discharge/illicit connection as part of their normal job responsibilities. The training program must address the proper procedures for reporting and responding to illicit discharge/connection, and records must be kept of the trainings provided and staff trained.

S5.C.5.e requires Permittees to implement a program to address illicit discharges into the MS4. These requirements include procedures for characterizing, tracing, and eliminating illicit discharges and connections, including specific timeframes for responding and special procedures for the post-emergency clean-up of firefighting activities.

S5.C.5.f requires Permittees to train staff who are responsible for implementing the IDDE program, and to document and maintain records of the training provided and the staff trained.

Section S5.C.5.g requires Permittees to track and maintain records of all activities conducted to meet the requirements of the IDDE section of the Permit.

Key Findings

Bainbridge Island's MS4 mapping and documentation does not fully comply with all of the requirements specified in Permit section S5.C.4.a. The City acknowledged that its GIS MS4 mapping data is not fully correct or complete and that it has not been updated since 2018. To meet mapping requirements, the City hired a GIS Technician in January 2025. Ecology understands that the City's GIS technician is currently assisting with the City's MS4 mapping and documentation backlog and making ongoing improvements.

The City currently uses both Ecology and King County mapping standards. Although these standards are fully described, the City is reviewing and updating the standards in real time.

Bainbridge Island stated that it does not have areas served by the City's MS4 that do not discharge stormwater to surface water. Specifically, Bainbridge Island staff indicated that they do not have a series of closed basins. Stormwater collected within the City infiltrates or is conveyed to discharge into surface water. However, because the City has not distinguished between outfalls and discharge points within their maps, it is unclear whether the City has met this permit requirement. Further investigation is needed to determine if the City has "geographic areas served by the MS4 that do not discharge stormwater to surface water." These "geographic areas...that do not discharge stormwater to surface water" are related to the City's discharge points. A discharge point means "the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate."

In the event of an illicit discharge of hazardous materials, BIMC 15.22.060.G requires notification of emergency dispatch services (911) and the City's Public Works department. However, the City currently advertises a regional spill hotline (Kitsap1) for direct public report, rather than a dedicated City Public Works number.

The City maintains a rotational on-call staff roster of 2 to 3 personnel for IDDE response and commits to a one-hour response timeframe upon receiving IDDE notification.

Due to the City's geographical characteristics, the majority of IDDE incidents are linked to residential construction activities. Furthermore, the City maintains a franchise agreement with Puget Sound Energy (PSE) that clarifies responsibility for spills originating from PSE utility assets.

The City verbally described a logical stepwise protocol for investigation, containment, characterization, and correction of IDDE incidents. The City manages incident tracking using a combination of the WQWebIDDE database and an internal folder for “SeeClickFix” web forms, with all web form incidents designated for final entry into the WQWebIDDE database to ensure comprehensive record-keeping.

The City has a clear, stepwise progressive enforcement approach. This process begins with pursuing voluntary compliance through education and technical assistance (Notice of Warning of Violation). If voluntary compliance is unsuccessful, the City progresses to issuing a Notice of Violation, followed by a second Notice of Violation or Notice of Infraction, which may include civil and/or criminal penalties. Staff have reported that IDDE incidents are resolved through voluntary compliance after a Notice of Warning of Violation was issued.

The City has developed an in-house IDDE refresher training program provided to Public Works staff annually. This training has been extended to other City department personnel. Employee training records are documented and maintained.

Bainbridge Island verbally stated that the City had performed its own internal audit and discoveries to improve its stormwater program. Ecology obtained the City’s report “Stormwater Systems Plan” through the City’s public website. Ecology reviewed the report which further confirms the findings above.

Recommendations for Program Improvement

Mapping

- We strongly encourage Bainbridge Island to implement the MS4 mapping and documentation recommendations included in its Stormwater System Plan (SWSP) (October 2024).

IDDE

- We strongly encourage Bainbridge Island to implement the IDDE recommendations included in its SWSP (October 2024).
- 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 S5.C.5.e.v.(d).
- 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.
- 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.

Areas of Potential Non-Compliance

Based on the information reviewed, it appears that the City is not in compliance with the following permit conditions:

MS4 Mapping

- The City does not have a current GIS map of their MS4 assets and has not maintained this map since 2018. (S5.C.4.a).
- 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).
- 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).

Operations & Maintenance

The City of Bainbridge Island owns or operates 196 permanent stormwater treatment and/or flow control BMPs/facilities and 1978 catch basins. Maintenance standards established for these facilities generally match those in the Stormwater Management Manual for Western Washington (2019). The City owns and operates one maintenance facility, and one decant facility. The City O&M staff are responsible for numerous activities, including maintaining control structures, catch basin grates, repairing pipes, addressing erosion issues, vactoring (small volumes), cleaning up storm debris, pipe inspection, street sweeping, catch basin vactoring, storm filter replacement and pond maintenance.

Overview of Permit Requirements Under Review

Section S5.C.9.a requires Permittees to develop and implement maintenance standards for all municipally owned or operated stormwater treatment and flow control BMP/facilities and catch basins. It also lays out timeframes for completing necessary maintenance.

S5.C.9.b requires Permittees to implement a program to verify adequate long-term O&M of non-municipally owned stormwater facilities that were permitted pursuant to S5.C.6 of the permit. The requirements include an ordinance or other enforceable mechanism that identifies the party responsible for meeting the maintenance standards and timeframes established under S5.C.9.a, require annual inspections of facilities by qualified personnel, and establish recordkeeping requirements.

Section S5.C.9.c describes inspection requirements and options for municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, requires spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events, describes catch basin inspection requirements and options, and clarifies that Permittees are expected to establish inspection programs designed to achieve 95% of all required system inspections.

Section S5.C.9.d requires Permittees to establish practices, policies, and procedures to reduce stormwater impacts associated with runoff from lands owned or maintained by the Permittee, as well as with certain road maintenance activities.

Section S5.C.9.f requires Permittees to implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or stormwater yards and material storage facilities owned and operated by the municipality that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity.

Section S5.C.9.g requires Permittees to implement and document an ongoing training program for employees whose primary construction, operations, or maintenance job functions may impact stormwater quality.

Section S5.C.9.h requires Permittees to maintain records of all activities conducted to meet the requirements of this section.

Key Findings

Bainbridge Island lacks a formalized training program for its O&M staff. Staff currently receive on-the-job training, where newer staff are paired with senior level staff. However, the City does not track or record these on-the-job training occurrences. The City does require and track staff participation in certified courses, including Certified Erosion and Sediment Control Lead (CESCL) and 40-hour HAZWOPER training.

Bainbridge Island does not currently utilize a formal asset management system, relying instead on Excel spreadsheets for stormwater asset data tracking. The City has initiated efforts to integrate a new asset management solution using Survey123 and ArcGIS platforms, which is intended to improve tracking of inspections and maintenance needs.

Bainbridge Island O&M staff standardized their checklists for stormwater facility and catch basin inspections. These checklists incorporate maintenance standards derived from the 2019 Ecology Stormwater Management Manual for Western Washington (2019 ECY SWMMWW). Inspection data is currently entered into an Excel spreadsheet. When maintenance is required, staff indicated that issues are resolved prior to the deadline required by the Phase II Permit. Stella Collier internally monitors compliance with these maintenance timelines via the tracking spreadsheets.

Bainbridge Island annually inspects all publicly owned and regulated stormwater treatment and flow control BMPs/facilities. The City reports that it meets the requirement to inspect at least 95% of its catch basins every two years, utilizing the standard inspection approach.

Bainbridge Island has developed and utilizes an official manual documenting O&M practices, policies, and procedures for staff to reference during field activities.

Bainbridge Island staff shared that the City does not utilize or store pesticides or herbicides. The City reports past noxious weed abatement was provided by Kitsap County; however, with the discontinuation of that service, the City uses contractors on an as-needed basis to manage noxious weeds and control pests. Further, the City reports: “Herbicides are not used by any of our contract companies per City policy” (T. Edwards, personal communication, 10/14/2025).

Completed inspection checklists for publicly owned and regulated stormwater facilities and catch basins were not provided to Ecology prior to the September 16, 2025, meeting. These required documents were subsequently submitted as a post-meeting follow-up and were reviewed by Ecology staff.

Key Site Inspection Observations

The audit team was joined by Ecology Industrial Stormwater Inspector Evan Dobrowski and conducted a site visit to the City-owned and operated decant facility located at 6400 Don Palmer Avenue. This facility serves as the primary consolidation point for liquids and solids generated from street sweeping, line cleaning, and road maintenance. It is also utilized for storage of surplus vehicles, general materials, and clean raw materials (e.g., sand, gravel, and mulch). Liquids generated from maintenance activities are stored in subsurface settling vaults totaling approximately 7,000 gallons. Solids generated from maintenance activities are stored on the concrete pad within the decant facility. Both solids and liquids are covered by a canopy structure.

The property is adjacent to a capped landfill and a privately owned transfer station (Bainbridge Island Disposal). No equipment maintenance or exterior vehicle washing occurs at this location, and there is no accessible sanitary sewer connection nearby. The washing of the interior debris holding tanks on street sweepers occurs within the covered areas of the facility. Materials generated from ditches, catch basins, line cleaning and road maintenance are stored on site and are tested in accordance with the Decant facility’s health department permit to determine whether the material stored is hazardous.

The facility’s historical discharge path of decanted liquids involved a treatment train consisting of an oil/water separator, sand filter, biofiltration swales, and a final stormwater detention pond. Currently, the City vacuums liquids from subsurface settling vaults and disposes of them via a vector truck into an off-site sanitary sewer manhole. Solid waste is managed in accordance with the facility’s specific permit issued by the Kitsap County Health Department.

Decant Facility

- The on-site SWPPP, maintained in the office building on site, was found to be inaccurate. Specifically, the document fails to reflect the current liquid disposal practices, which involve trucking to the sanitary sewer, and does not document the disuse of the previously utilized oil/water separator, sand filter, biofiltration swales, and detention pond treatment train.

- Operational Source Control BMP Observations
 - Storage of uncovered erodible materials outside the covered area is subject to stormwater and would lead to discharge without treatment to the City’s MS4 conveyance system.
 - In the inspection reports, from 2021 and earlier, reviewed by Ecology, the City consistently answered “No” to the following question on its form: “Are all uncontained material piles stored in a manner that does not allow discharge of impacted stormwater?”
 - Drums and storage containers on-site, including those that appeared empty, lacked proper labeling. Surplus vehicles stored on site still contain residual fluids, are not stored on an impervious surface, and one vehicle was observed to be leaking.
 - Soil stockpiled within the decant facility containment area was observed to be above the height of the six-foot concrete stem walls.
 - Track out of sediment and debris was observed from the covered portion of the decant facility to the rest of the site.
- Illicit Discharge Event
 - During the site visit, the audit team discovered decant liquid leaving the subsurface settling vaults and entering the sand filter. The sand filter was observed to be saturated with water and ponded water was observed at the outlet from the sand filter to the biofiltration swale. No evidence of water was observed further downstream of the biofiltration swale or in the stormwater detention pond.
 - After a City-led investigation following the site visit, they determined that a valve leading from the decant liquid vault to the sand filter was inadvertently opened. The duration that this valve was opened is unknown. Based on the bright green vegetation in the biofiltration swale during the dry season (contrasting with dry grass around it), visual evidence suggests that this discharge has been occurring for some time. The City has since capped the outlet from the vault to the sand filter to prevent this from occurring again.

Recommendations for Program Improvement

O&M Program

- 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.

- 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.
- 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.

Decant Facility

- We strongly encourage the City store stockpiled materials generated from maintenance activities below the six-foot concrete stem walls of the decant facility.

Areas of Potential Non-Compliance

Based on the information reviewed, it appears that the City is not in compliance with the following permit conditions:

O&M Program

- The City lacks documentation of O&M staff on-the-job training. (S5.C.9.g).

Decant Facility

- 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).
- 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. (S5.C.9.f.ii).
- 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).
- 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).
- Leaking vehicles on site do not have proper secondary containment, nor have spills been cleaned up. (S5.C.9.f.v).

Conclusion

Ecology values its partnership with Bainbridge Island and remains available to provide technical assistance to support successful permit implementation. If Bainbridge Island staff have any questions about the results of this report, please contact your permit manager, Roger Chang at Roger.Chang@ecy.wa.gov, or at (425) 758-5096.

Please follow up with your Ecology Permit Planner upon receipt of this report. If the City confirms that any permit requirements were not met, General Condition G20 of the Permit requires submittal of a non-compliance notification within 30 days of becoming aware of the non-compliance. If the City determines that a non-compliance notification is not required for any Areas of Potential Non-Compliance identified, please include your reasoning in an email to your Ecology Permit Planner within 30 days.

If the City fails to comply with the conditions of your permit, Ecology may take formal administrative enforcement action, including issuing orders and penalties. Ecology's enforcement authority for NPDES permits is governed by Chapter 173-220-230 of the Washington Administrative Code (WAC).

Appendix A: Audit Announcement Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

July 17, 2025

Blair King
City of Bainbridge Island
280 Madison Ave N
Bainbridge Island, WA 98110

**RE: City of Bainbridge Island,
Phase II Municipal Stormwater Permit #WAR045503 – NOTICE OF AUDIT**

Dear Blair King:

This letter provides formal notification that the Washington Department of Ecology (Ecology) intends to conduct an audit of your Stormwater Management Program that is required by the NPDES Phase II Municipal Stormwater Permit. The audit will be performed pursuant to 40 CFR Sec. 122.41(i), 40 CFR Sec. 123.26, and RCW 90.48.

For this audit, Ecology will review specific components of the Municipal Stormwater Management Program (rather than a comprehensive audit of a jurisdiction's entire program). We plan to review your MS4 Mapping, IDDE, and Municipal O&M Programs. The audit will consist of interviews with appropriate staff members, file reviews, and inspection of a municipal operation yard. Appropriate and knowledgeable staff will need to be available to ensure an accurate audit of your program.

We have tentatively scheduled the audit to take place on **Tuesday, September 16, 2025**, and would like to start at 9:30 a.m. at your offices. If this date and time is not feasible for you and your staff, please respond within **five working days** to re-schedule. In addition, please provide a suitable meeting location for all parties to meet.

To prepare for this audit, we request that you provide the information listed below, **at least 10 business days prior to your scheduled audit**. If any of this information cannot be provided in advance because of your record types or formats, let us know and be prepared to present the requested information at our meeting.

Program Organization

1. A copy of the organizational structure showing staff/positions responsible for implementing the stormwater programs under review.
 - a. A description of how these stormwater programs are implemented within your organization (e.g., workflow or narrative).
 - b. If these records do not exist, ensure appropriate and knowledgeable staff will be available at the meeting.

S5.C.4. Mapping

2. A current map showing the city's MS4 features per Special Condition S5.C.4.a.

S5.C.5. Illicit Discharge Detection and Elimination

3. A copy of or a link to the local ordinance or other regulatory mechanism to effectively prohibit illicit discharges (S5.C.5.c.).
 - a. Documentation of the enforcement/compliance strategy to implement the ordinance or regulatory mechanism above (S5.C.5.c.iv.).
4. A description of the procedures you use to characterize, trace and eliminate illicit discharges, including spills and illicit connections (S5.C.5.e.i.).
5. A copy of your local stormwater hotline for public reporting of spills and illicit discharges, including reports of spills, illicit discharges, and illicit connections that your jurisdiction received between January 1, 2025, and June 30, 2025 (S5.C.5.d and g).
6. A summary of all staff training related to IDDE, from June 30, 2024-June 30, 2025. Include list(s) of attendees at each training and copies of session agendas, if available (S5.C.5.d.iii and f).

S5.C.9. Municipal Operations and Maintenance

7. Provide documentation of how inspections are conducted and how maintenance is documented. Provide an example of a municipal stormwater treatment and flow control BMP/facility inspection record where required maintenance was identified for reporting year 2024. Provide a second example inspection record where BMP/facility maintenance was not needed (S5.C.9.c.i).
 - a. NOTE: If you have reduced the inspection frequency of any municipal stormwater treatment and flow control BMPS/facilities, please include such documentation as well. (S5.C.9.c.i.)
 - b. Note which facilities are subject to spot-checks after major storm events and records of any qualifying storm events that triggered this check. (S5.C.9.c.ii)
8. Provide examples of inspection and maintenance records, including checklists or forms used for such inspections for stormwater treatment and flow control BMPs/facilities regulated by the Permittee for the reporting year of 2024 (S5.C.9.b.i(b)). Provide an example of when maintenance was required and when maintenance was not required.
 - a. NOTE: If you have reduced the inspection frequency of any municipal stormwater treatment and flow control BMPS/facilities, please include such documentation as well. (S5.C.9.b.i(b)).
 - b. Include documentation of the ordinance or other enforceable mechanism that identifies responsibility for maintenance of regulated facilities, requires inspection, and establishes enforcement procedures (S5.C.9.b.i(a)).

9. Provide examples of inspection and maintenance records, including checklists or forms used for such inspections, for all catch basins and inlets owned or operated by the Permittee for the reporting year of 2024 (S5.C.9.c.iii).
 - a. NOTE: If you follow an alternative inspection frequency, please include such documentation as well (S5.C.9.c.iii(a-c)).
10. Documentation of practices, policies, and procedures employed to reduce stormwater impacts associated with runoff from lands owned or maintained by the city and road maintenance activities under the functional control of the City/County (S5.C.9.d.).
11. Copies of SWPPPs developed for any heavy equipment maintenance or storage yards, or material storage facilities owned or operated by the City/County in accordance with S5.C.9.f.
12. Records of 2024-2025 O&M trainings conducted for employees whose primary construction, operations, or maintenance job functions may impact stormwater quality. Include list(s) of attendees at each training and copies of training session agendas, if available (S5.C.9.g).

If any of the documents requested are too large, are not available in electronic format, or are otherwise impractical to export and transfer electronically, please let me know. We may ask you to have those documents available on-site for review.

We look forward to your cooperation and discussing your program with you. If you have any questions or need to reschedule the audit date, please call me at 425-758-5096 or email me at: ROGC461@ECY.WA.GOV.

Sincerely,



Roger Chang
Municipal Stormwater Permit Manager
Northwest Region Office

cc: Stella Collier, City of Bainbridge Island (by email)
Abbey Stockwell, Phase II Permit Writer (by email)
SWRO/NWRO permit file

Appendix B:
Decant Facility Inspection Report



Permit Compliance Inspection Report

Water Quality Program

Northwest Region Office

A. General Information

Facility Name and Address: City of Bainbridge Island Decant Facility
 6400 Don Palmer Ave
 Bainbridge Island, WA 98110

Permit Type: Municipal Stormwater Phase II Western WA GP Permit Number: WAR045503

Permit Effective Dates: August 1, 2024, to July 30, 2029

Inspection Date and Time: September 16, 2025, 01:11 PM to 02:55 PM

Discharge to: Surface Water, Groundwater, MS4

Receiving Water: Puget Sound

Type of Inspection: Announced
 Facility Inspection

Weather: Sunny, 80°F

Photographs Taken: Yes No Samples Taken: Yes No

B. Personnel Information

Ecology Representatives: Roger Chang (Lead Inspector)
 Amy Waterman (Co-inspector)
 Angela Vincent (Co-inspector)
 Evan Dobrowski (Co-inspector)

Facility Representatives: Stella Collier, Stormwater Management Program Coordinator
 Email: scollier@bainbridgewa.gov Phone: 206-780-3724

Paul Nylund, Development Engineering/Water Resources Manager
 Email: pnylund@bainbridgewa.gov Phone: 206-780-3783

Ray Navarette, Public Works Utilities Supervisor
 Email: rnavarette@bainbridgewa.gov Phone: 206-780-3582

Tom Edwards, Assistant Public Works Director
 Email: tom.edwards@bainbridgewa.gov Phone: 206-780-3584

Responsible Party/Official: Blair King, City Manager
 280 Madison Ave N
 Bainbridge Island, WA 98110
 Email: bking@bainbridgewa.gov Phone: 206-780-8620

Inspector Signature



Roger Chang
MS4 Permit Planner

11/20/2025

Date

Reviewer Signature



Jay Fennell
Watershed Protection Unit Supervisor

11/20/2025

Date

C. Facility Description and Background

This inspection was conducted as part of an audit of the City of Bainbridge Island's Stormwater Management Program to assess compliance with parts of the Western Washington Phase II Municipal Stormwater Permit (MS4 Permit). The MS4 Permit requires implementation of 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 another NPDES permit. The SWPPP must include:

- A detailed description of the Best Management Practices (BMPs) in use at the facility, which must be consistent with the Stormwater Management Manual for Western Washington (SWMMWW)
- Annual inspections of the facility
- An inventory of materials and equipment stored on-site, and the activities which could result in stormwater pollution
- A site map showing the facility's drainage, discharge points, and areas of potential pollutant exposure
- A plan for preventing and responding to spills at the facility which could result in an illicit discharge

The Bainbridge Island Decant Facility is located at 6400 Don Palmer Ave and serves as the City of Bainbridge Island's (City) primary staging and consolidation site. The facility manages liquids and solids generated from street sweeping, line cleaning, and road maintenance. The facility also serves as storage for surplus vehicles, excavated materials from road maintenance, construction materials (PVC and concrete), and clean materials such as sand, gravel, and mulch.

The facility neighbors a capped landfill managed by Kitsap County Health, and a privately owned waste transfer station operated by Bainbridge Disposal.

D. Inspection Narrative and Observations

1. Permit Documentation and Records Review

Ecology's audit team reviewed the Stormwater Pollution Prevention Plan (SWPPP) for the decant facility in advance of the site visit. The SWPPP addresses essential Best Management Practices (BMP) categories, including operational source control BMPs, good housekeeping, preventative maintenance procedures, spill prevention and Emergency Cleanup Plan, and protocols for employee training, inspections, recordkeeping, and illicit discharges. Additionally, the document includes descriptions of structural BMPs, such as structural source control, treatment BMPs, structural peak runoff rate and volume control BMPs, and erosion and sediment control BMPs. The SWPPP, however, does not mention the current disposal method for collected decant liquids, specifically vector trucking the liquids to sanitary sewer.

Inspection records provided to the audit team only contained records up to the year 2021. The City confirmed after the site inspection that they were unable to locate inspection records for 2022, 2023, or 2024. While the City verbally confirmed that, at a minimum, they performed annual inspections, they are missing documentation that verifies this. Additionally, according to SWPPP's Appendix B, the City moved to a monthly inspection frequency starting in 2024 but again lack the records from that year to verify this.

2. Site Walkthrough

Decant Facility and Surrounding Yard

The main decant area measures approximately 11,880 square feet and is protected by a canopy structure, which prevents stormwater intrusion. The area features a concrete foundation and slab, including at-grade solids handling areas and below-grade settling vaults. The slab slopes towards the vaults, ensuring liquid containment within the facility's footprint. A concrete stem wall with controlled openings separates the at-grade and below-grade sections; the vaults facilitate suspended solids settling from collected street waste liquids. Six-foot concrete stem walls enclose the facility on three sides aiding in storage, material drying, and weather protection, and preventing stormwater from contacting decant liquids and solids (photo 1-2).

The floor within the covered decant facility is sloped towards the vaults ensuring any liquid spilled will be diverted to the vaults (photo 3). There are two underground storage vaults that house an estimated total of 7,000 gallons of liquids (photos 4-5). Sweeper and vactor trucks back up to the vaults and release combined liquids and solids into two liquid discharge areas which are mirror images on either side of the center axis of the building (photo 3). Each side has an initial liquid discharge area, first stage settling trench with openings to the second stage settling trench with weirs, and a solids holding/drying area. Liquids are drained to the vault while the solids are mechanically separated and stored (photo 2 and 6). Solids are segregated based on origin and moisture content: street sweeping and catch basin material are stored separately from road and ditch maintenance or excavated material (photo 2). According to the City solid materials are then tested in accordance with the decant facility's permit for solid waste management issued by Kitsap County Health. Evidence of soils stockpiled above the top of the six-foot concrete stem wall was observed (photo 7). We also observed evidence of sediment track out and debris from the covered area onto the adjacent paved surfaces of the decant facility yard (photos 8-9).

The adjacent yard areas are surfaced with asphalt concrete and are sloped to direct runoff away from the decant structure. An underground storm drainage system captures runoff from the surrounding areas. This system conveys stormwater through biofiltration swales then into a stormwater detention pond located on the east side of the property before eventual discharge to surface water.

Liquid Disposal

According to the City, vactor trucks transfer the liquid collected at the decant facility to an off-site sanitary sewer connection for disposal at the publicly owned treatment works (POTW). The City combines and accesses the liquids from both storage vaults through a grated singular vault for vactor removal (photo 10). City staff indicated this procedure has been main disposal method for over ten years. This disposal method is not documented in the current SWPPP. The SWPPP instead describes a historical method involving the use of an onsite oil/water separator, sand filter treatment BMP, biofiltration swale, and stormwater detention pond (photos 11-15).

Material Storage

Various stockpiles of soil and other clean materials are stored across the site. While some stockpiles are covered, (photo 16), others remain exposed. Specifically, a large asphalt storage area downhill from the decant facility contains uncovered stockpiles of clean materials such as sand, gravel, and mulch, leaving them exposed to rainwater and stormwater (photos 17-18). There is no berm or other structural BMP to prevent material carried by runoff from this asphalt storage area from entering two downhill catch basins, which convey untreated stormwater to the on-site stormwater detention pond.

The City stores surplus vehicles in the yard on gravel and vegetation rather than on the impervious asphalt surface. City staff confirmed these vehicles still contain fluids, and an Ecology inspector observed a fluid leak from one vehicle (photos 19-20). Additionally, the City stores miscellaneous equipment, materials, and containers uncovered near the decant facility entrance, including unlabeled empty drums, totes, lawn mowers, PVC and concrete materials (photo 21).

Illicit Discharge

During the site visit, while observing the decant liquid removal process, the audit team and City staff accessed the oil/water separator manhole structure leading to the inactive sand filter treatment system. Although the City stated that the valve controlling the outlet leading to the treatment system was closed, the audit team observed water within access manhole and heard running water (photo 10). The audit team then confirmed that the sand filter was inundated (photo 22) with water by observing water ponding at the outlet pipe leading to the biofiltration swale (photo 23). While the audit team did not observe water flowing further downstream, the vegetation within the swale appeared distinctly greener than the surrounding area, which had dead vegetation as expected at the end of the dry summer season (photo 13).

Following the inspection, the City performed an immediate investigation and reported the findings to Ecology on September 23, 2025. The City reported that the valve controlling the flow to the sand filter was open, and that the duration and reason for the open valve is unknown. To prevent reoccurrence, the City capped the line on September 24, 2025, and confirmed that the standard operational procedure of trucking decant liquids to the sanitary sewer would continue.

General Operations and Maintenance

The City maintains several spill kits strategically located across the site, including one within the spill trailer on the asphalt pad, one at the walkway between the two decant liquid vaults, and one located at the small office building near the decant facility entrance. The site contains a total of seven catch basins outside the covered decant area, all of which collect stormwater from the uncovered yard and convey it through the biofiltration swale and into the stormwater detention pond (photos 13-14). Each of the five catch basins directly observed contained a filter sock. The City stated during the inspection that they sweep the paved yard areas quarterly and replace the filter socks as needed. The covered portion of the decant facility permanently houses a mechanical. Mobile fueling activities occur exclusively within the covered area for the mechanical loader (photo 2). The City stated no vehicle maintenance or exterior vehicle washing occurs at this facility. The city washes the interior debris holding tanks on street sweepers within the covered areas of the facility.

E. Areas of Potential Non-Compliance

Based on the information reviewed and observations made during the inspection, it appears that the City is not in compliance with the following permit requirements:

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)

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)
- Ensure that soil stockpiles are maintained below the six-foot concrete stem walls within the decant facility to preserve containment. (S5.C.9.f.ii)
- 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 S102 BMPs for Preventative Maintenance and Good Housekeeping. (S5.C.9.f.v)
- Prevent track out of sediment and debris from the decant facility to the adjacent paved surfaces in accordance with the SWMMWW S102 BMPs for Preventative Maintenance and Good Housekeeping. (S5.C.9.f.ii)
- 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)

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. (S5.C.9.f.ii, S9.B)

F. Conclusion

Please follow up with your Ecology Permit Planner upon receipt of this report. If the City confirms that any permit requirements were not met, General Condition G20 of the Permit requires submittal of a non-compliance notification within 30 days of becoming aware of the non-compliance. If the City determines that a non-compliance notification is not required for any Areas of Potential Non-Compliance identified, please include your reasoning in an email to your Ecology Permit Planner within 30 days.

If you have any questions or concerns regarding this inspection report, please contact Roger Chang at Roger.Chang@ecy.wa.gov or 425-758-5096.

ADA Accessibility

The Department of Ecology (Ecology) is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at (360) 407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or (877) 833-6341. Visit [Ecology's website](#) for more information.



Photo [1]
Description: Entrance to decant facility.



Photo [2]
Description: Street waste solids storage and drying, right side of facility.



Photo [3]
Description: Decant tipping floor.



Photo [4]
Description: Decant liquid settling vault, left side of the facility.



Photo [5]
Description: Decant liquid settling vault, right side of the facility.



Photo [6]
Description: Soil stockpile generated from road maintenance activities. Loader used to move and load soil for offsite disposal. Soil stockpiled above concrete stem wall.



Photo [7]
Description: Soil stockpiled above six-foot cement stem wall containment.



Photo [8]
Description: Evidence of track out leaving the decant facility to rest of yard. Moisture on ground was due to street sweeper filling up water tank



Photo [9]

Description: Additional evidence of track out of sediment and debris leaving the decant facility to rest of the site.



Photo [10]

Description: Subsurface decant liquid vault with manhole to oil water separator. Also, location where liquid is removed for disposal.



Photo [11]

Description: Oil/water separator filled with water. We heard the sound of water moving water.



Photo [12]

Description: Sand filter down stream of oil/water separator.



Photo [13]
Description: View of sand filter and its location to decant facility.



Photo [14]
Description: Bio-filtration Swale down stream of sand filter.



Photo [15]

Description: Stormwater detention pond, down stream of bio-filtration swale.



Photo [16]

Description: Properly covered soil stockpile generated from maintenance activities. Stockpile to be removed for disposal.



Photo [17]

Description: Uncovered erodible stockpile within close proximity to a catch basin with insert.



Photo [18]

Description: Uncovered erodible stockpile located on asphalt pad south of decant facility.



Photo [19]

**Description: Equipment storage including surplus vehicles.
Located on gravel.**



Photo [20]

**Description: Evidence that one of the surplus vehicles is leaking
fluid.**



Photo [21]
Description: Construction material storage (PVC and Concrete). Connex boxes are used to store spill material, and Police Department equipment.



Photo [22]
Description: Sand filter inundated with water.



Photo [23]

Description: Ponded water at outlet from sand filter.

Appendix C:
Audit Day of Agenda

Final Agenda for MS4 Program Audit
City of Bainbridge Island, Washington
September 16, 2025

ECY Staff: Roger Chang (NWRO Permit Planner), Angela Vincent (SWRO Permit Planner), Amy Waterman (Phase I Permit Writer), Evan Dobrowski (NWRO ISGP Inspector)

Time	Agenda Topic	Staff
9:30 am - 10:00 am	Introductions, Audit Program overview, and agenda review.	All (ECY, City Staff)
10:00 am - 10:50 am	IDDE program: Interview appropriate staff and review records.	Ecology and Select City staff
10:50 am – 11:00 am	Break	
11:00 am - 11:50 am	Municipal Operations and Maintenance program: Interview appropriate staff and review records	Ecology and Select City staff
11:50 am - 12:00 pm	Morning recap and plan for afternoon field visit(s)	All
12:00 pm - 1:00 pm	Lunch	
1:00 pm – 2:30 pm	Municipal Operations and Maintenance: Visit maintenance yard	Ecology w/Evan D. and Select City staff
2:30 pm - 2:45 pm	Ecology inspectors' internal discussion	No city staff expected
2:45 pm - 3:00 pm	Closing conference: Initial observations and next steps	All



Public Works
280 Madison Avenue
Bainbridge Island, WA 98110
www.bainbridgewa.gov

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

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)
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

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)
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>

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)
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

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)
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

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)
14	<p>Decant Facility – Potential Areas of Non-Compliance:</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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:</p> <p>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:</p> <p>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.</p> <p>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

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)
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

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)
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

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)
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