



# Water Quality Program

## Permit Submittal Electronic Certification

**Permittee:** BELLINGHAM CITY

**Permit Number:** WAR045550

**Site Address:** 210 LOTTIE ST  
BELLINGHAM, WA 98225

**Submittal Name:** MS4 Annual Report Phase II Western

**Version:** 1

**Due Date:** 3/31/2026

### Questionnaire

Number	Permit Section	Question	Answer
1	S9.D.6	Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A.2; S9.D.1	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)	2026 SWMP Plan_2_03202026094039
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b) no later than March 31, 2026.	S5.A.5.b Internal Coordination_4a_03042026082249
5	S9.D.4	If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)	Not Applicable
6	S5.C.1.a	Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)	Yes
12	S5.C.1.c.i	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes
13	S5.C.1.c.i(a)	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
19	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes

19a	S5.C.2	If yes, list the elements, and the regional program.	The City of Bellingham participated in the Stormwater Outreach for Regional Municipalities (STORM) group, which shares findings and resources for more effective and coordinated education campaigns with one of our staff sitting on the STORM Steering Committee.
20	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	S5.C.2.a.i. General Awareness _20_03042026084320
21	S5.C.2.a.ii(b)	Developed a behavior change campaign that is tailored to the community in accordance with S5.C.2.a.ii(b)? (Required no later than July 1, 2025)	Yes
21a	S5.C.2.a.ii(b)	Attach the strategy and schedule developed in accordance with S5.C.2.a.ii.(b).	S5.C.2.a.ii.(b) Behavior Chang_21a_03042026084320
22	S5.C.2.a.ii(c)	Began implementing strategy outlined in S.5.C.2.a.ii(b). (S5.C.2.a.ii(c)) – Required by September 1, 2025)	Yes
24	S5.C.2.a.iii	Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
24a	S5.C.2.a.iii	Attach a list of stewardship opportunities provided.	S5.C.2.a.iii Stewardship Oppor_24a_03042026084321
25	S5.C.3.a	Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP.	The Bellingham public is invited to participate in stormwater decision making. Opportunities include the City Council meetings, community meetings, public hearings, neighborhood association meetings, focus groups, community surveys, and webpage communications.
25a	S5.C.3.a.i	Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)	Understanding and Reaching Bellingham's Overburdened Communities  The City of Bellingham encompasses diverse communities and neighborhoods exhibiting varying classifications of "underserved" and "socially vulnerable" populations. We have

numerous efforts specifically tailored to address the unique challenges in these areas. Though all areas within the City limits experience social vulnerability to a certain degree, Downtown Bellingham, the Roosevelt Neighborhood, and the Birchwood Neighborhood are identified as having the highest rankings on the Social Vulnerability Index within City limits, according to data from the Washington Department of Health.

#### Birchwood Area Vulnerability Profile

In the Birchwood area, significant challenges are observed in housing type and transportation, evidenced by a score of 9/10 for "housing with 10+ units" and 8/10 for "no access to a private vehicle." Within the "household composition and disability" section, the Birchwood area scores 10/10 for the percentage of single-parent households. Additionally, the "Race, Ethnicity, and Language" category shows a ranking of 8/10 for this area.

#### Downtown Bellingham Vulnerability Profile

Downtown Bellingham demonstrates high vulnerability in the "household composition and disability" section, scoring 10/10 for both the percentage of the population with a disability and the percentage of single-parent households. Pertaining to housing type and transportation, Downtown Bellingham also ranks 10/10 in the

percentage of housing with 10+ units, the percentage of people with no access to a private vehicle, and 10/10 in the percentage of the population living in group quarters.

#### Roosevelt Vulnerability Profile

The Roosevelt neighborhood ranks highest (9/10) in socioeconomic determinants, with a 10/10 ranking in the percentage of the population living in poverty. They also rank 9/10 in the percentage of the population with no high school diploma. In the housing type and transportation section, they rank 8/10 in access to a private vehicle and 9/10 in overcrowded housing.

#### Tailoring Outreach to Overburdened Communities

To address these disparities and enhance community reach, the City implements, or is planning to implement, a series of strategic initiatives and programs.

#### Language Access

The City of Bellingham's official website provides comprehensive webpage translation services, making all content accessible in 103 non-English languages. To further improve engagement with residents whose primary language is not English, the City is developing a language access plan. This plan includes provisions for language services, such

as Spanish translation services for all City Council meetings and most public events. The City is also considering cultural competency training for staff to better serve diverse populations.

Furthermore, the plan will also consider public engagement strategies to ensure all residents, including English Language Learners (ELL) and non-English speakers, have accessible notices and opportunities for participation in multiple languages.

In April-May 2025, during preparations for potential utility rate increases, the City conducted a statistically valid, customer-wide utility survey. This survey aimed to gauge community satisfaction with water, stormwater, and wastewater utility services and to assess the potential impact of rate increases on resource-challenged residents. To ensure adequate representation and enable meaningful comparisons from overburdened community members, the consultant was instructed to prioritize and oversample non-English first language speakers. Data analysis from this survey is ongoing and will directly inform the development of strategic community engagement plans.

Reaching multi-unit properties

To effectively reach residents in apartments and other multi-unit buildings, we partner with an external vendor for our mailing needs. Our existing mapping

data provides building addresses, but it doesn't include specific unit numbers. This partnership allows us to send mail directly to individual tenants, ensuring that important information relevant to them reaches every unit, not just the property owner.

To ensure the availability of robust and inclusive data, particularly for multifamily and multi-unit structures, the City is actively working to enhance its procurement of mailing addresses used for outreach. Current City IQ data, while providing building-level information, often lacks individual unit details (e.g., apartment numbers for units within a building). Recognizing this limitation, the City has engaged a consultant to develop a more complete and accurate address dataset that includes all individual apartment and unit numbers within these structures. This comprehensive address data is crucial as it enables more precise focused of outreach efforts and ensures equitable distribution of resources to all residents.

Inclusive educational programming

As shared in our previous NPDES report, the Public Works Department offers a comprehensive Water School education program designed for 5th-grade students, focusing on watersheds and the water treatment process from Mt. Baker to Bellingham Bay. The

curriculum specifically covers Lake Whatcom and its watershed, stormwater pollution and prevention, water treatment and distribution, and wastewater collection and treatment. Our main goal is to provide consistent and equitable education to all students. We fully fund the program for every school, including covering transportation costs like buses. This ensures that schools with fewer resources can still participate and that every 5th grader in Bellingham receives this vital water education, regardless of their school's financial situation.

#### Strategic Pollution Prevention Efforts

We're taking several steps to reduce pollution and support businesses in overburdened communities, aligning with Department of Ecology policy. These initiatives are carried out through our state-funded Pollution Prevention Assistance (PPA) Program and are designed to tailor outreach and prioritize areas with the greatest need.

Identifying Key Businesses: We use the Washington Tracking Network Information by Location (WTN IBL) tool to identify and prioritize businesses in areas with higher health and environmental risks. This allows us to target our outreach and resources more effectively, ensuring we're assisting businesses in the most vulnerable communities.

Replacing Harmful Products: Our Product Replacement Program (PRP) helps businesses replace health-hazardous chemicals and equipment. For example, we're helping businesses transition from receipts containing Bisphenols (BPA and BPS) before the January 1, 2026, statewide ban. We prioritize businesses with high WTN IBL scores (9 or 10) to help reduce health risks in overburdened communities.

Focusing on High-Impact Areas: For the upcoming contract period, a PPA contract element focuses on three key business areas within the lower Squalicum Creek Watershed—Northwest Avenue, Sunset Square, and Irongate. These areas have been identified as having a historically increased pollutant load in stormwater. By concentrating our efforts here, we're addressing a known source of environmental concern in an overburdened area.

#### Pet Waste Management in Bellingham

In 2025, Public Works and Planning departments developed a more active partnership with the Downtown Bellingham Partnership to reduce barriers to pet waste disposal. This collaboration involves providing branded materials for new pet waste stations being installed throughout downtown. Additionally, the City's Pollution

			Prevention Assistance program will focus on engaging multi-family units in the downtown area to further educate residents on the importance of picking up pet waste. This year, we also provided 1,100 pet waste bags to the Bellingham Food Bank, which helps reach citizens experiencing food and/or financial insecurity and ensures that essential resources are available to all community members.
26	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
26a	S5.C.3.	List the website address in Comments field.	<a href="https://cob.org/services/planning/environmental/stormwater-program">https://cob.org/services/planning/environmental/stormwater-program</a>
27	S5.C.4.	Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?	Yes
28	S5.C.4.b.i	Attach file that lists all known outfall locations, sizes, and materials no later than March 31, 2026. The data shall be in one of the following formats, per S5.B.3.a.viii: <ul style="list-style-type: none"> <li>• ESRI file geodatabase template (feature class in a .gdb): <a href="https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.gdb.zip">https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.gdb.zip</a></li> <li>• Shapefile template: <a href="https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.shape.zip">https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.shape.zip</a></li> <li>• ArcGIS Online template (sharing template a or b via ArcGIS Online).</li> <li>• Excel template: <a href="https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.excel.xlsx">https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4GP.Mapoutfall.prelim.excel.xlsx</a></li> </ul>	MS4GP.Mapoutfall.prelim.gdb (1_28_03162026105750)
32	S5.C.5.b	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)	Yes

32a	S5.C.5.b	Describe actions in Comments field. (S5.C.5.b)	<p>The City of Bellingham, through the Pollution Prevention Assistance (PPA) Program, offers technical assistance to small businesses in order to prevent pollution and improve the state's water quality. PPA assistants work with local businesses to explain hazardous waste regulations and ensure all waste is being handled properly. PPA assistants also review spill prevention practices, provide best management practices for stormwater management, and educate local businesses on preventing illicit discharges. The City of Bellingham, through our Stormwater Hotline, receives calls concerning illicit discharges. We take this opportunity to educate and inform the general public of what illicit discharges are, and any hazards associated with them. All calls are investigated and either resolved by the Natural Resources group or referred to the appropriate party. Our team also employs stormwater meetings to ensure our agency is educated and aware of any and all stormwater regulations, illicit discharges, and proper disposal of wastes.</p>
33	S5.C.5.c	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5.d.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes

35a	S5.C.5.d.i	Cite field screening methodology in Comments field.	Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020)
36	S5.C.5.d.i(a)	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	92
36a	S5.C.5.d.i(a)	Cite field screening techniques used to determine percent of MS4 screened.	Catch Basin/Manhole Inspections
37	S5.C.5.d.ii	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	Ads promoting stormwater hotline on Whatcom Transportation Authority buses and at Pickford Film Center. "Spills happen. Help us find them." Promoted program in Bellingham Water, Sewer, Surface and Stormwater utility bill insert – goes out to roughly 25,000 homes. Also, at the City of Bellingham public website at <a href="http://cob.org/StormwaterHotline">cob.org/StormwaterHotline</a> .
38	S5.C.5.d.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
39	S5.C.5.e	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
40	S5.C.5.f	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.	Yes
41	S5.C.5.g	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13.	2025IDDE_41_0302202 6110830
42	S5.C.6.b.i-iii	Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44		Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?	No
45	S5.C.6.b.i. and Section 5 of Appendix 1	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0

46	S5.C.6.b.i., and Section 6 of Appendix 1	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.c.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.c.i	Number of site plans reviewed during the reporting period.	583
48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii?	Yes
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii.	963
49b	S5.C.6.c.iv	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.c.viii	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)	75
53	S5.C.6.c.vi	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.d	Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.e	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e)	Yes

56	S5.C.7.b	Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)	2025 Appendix 12 Report_56_0311202615 0211
57	S5.C.8.b	Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years)	Yes
57a	S5.C.8.b	Number of total sites identified for the inventory.	523
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d.	S5.C.8.a-d. SUMMARY OF ACTIONS_58_0304202 6135746
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d.	Copy of 2025 Inspections Final_59_03112026150 227
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e?	Yes
61	S5.C.9.a	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.9.a?	Yes
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a)	No
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes
64a	S5.C.9.a.ii	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
65	S.5.C.9.b.i(a)	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)?	Yes
66	S5.C.9.b.i(b)	Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)	Yes
66a	S5.C.9.b.i(b)	Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?	Yes
66b	S5.C.9.b.i(b)	If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).	Not Applicable

67	S5.C.9.b.ii	Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	No
68	S5.C.9.c.i	Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	Yes
68a	S5.C.9.c.i	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)	1024
68b	S5.C.9.c.i	Number of facilities inspected during the reporting period.	935
68c	S5.C.9.c.i	Number of facilities for which maintenance was performed during the reporting period.	559
69	S5.C.9.c.i	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.	S5.C.9.c.i. Reduced Inspection_69_03112026150338
70	S5.C.9.c.ii	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
71	S5.C.9.c.iii	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.9.c.iii)	Yes
71a	S5.C.9.c.iii	Number of known catch basins and inlets?	15705
71b	S5.C.9.c.iii	Number of catch basins and inlets inspected during the reporting period?	14583
71c	S5.C.9.c.iii	Number of catch basins and inlets cleaned during the reporting period?	1238
72	S5.C.9.c.iii	Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.	S5.C.9.c.iii. Reduced Inspecti_72_03042026150730
73	S5.C.9.d	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.9.d)	Yes
79	S5.C.9.f	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f)	Yes
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)	Yes
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Yes
81a	S7.A	List any requirements that were not met.	Not Applicable

82	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	2026 Appendix 2 Report_82_0320202609 3947
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)	Not Applicable
88	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2026.)	Not Applicable
89	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Not Applicable
90	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Not Applicable
91	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Not Applicable
92	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
93	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
94	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Yes
95	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	2 Comment: In accordance with the City of Bellingham's NPDES Phase II Municipal Stormwater Permit general condition G20 (Non-compliance Notification), the City is providing you with this notification that special condition S5.C.8.c.ii was not met for the 2025 permit year. The City

was unable to inspect 20% of businesses and/or sites listed in the source control inventory to achieve compliance as defined in special condition S5.C.8.c.ii.

The details of our non-compliance with S5.C.8.c.ii is described as follows:

- To satisfy special condition S5.C.8.c.ii, the City of Bellingham employs two full-time Pollution Prevention Technicians to perform all required inspections and record keeping for the businesses and/or sites listed in the source control inventory.

- One of the Pollution Prevention Technicians was on leave for a total of 13 weeks. This extended absence resulted in the non-compliance.

- The City of Bellingham Pollution Prevention Technicians were able to complete 97 of the 105 site visits required for compliance, or 92% of the site visits required for compliance in 2025.

Steps that have been and will be taken to reach compliance with S5.C.8.c.ii:

- To satisfy special condition S5.C.8.c.ii, the City of Bellingham will continue to implement the source control program as outlined in special condition S5.C.8 in 2026. Additional support will be provided to the Pollution Prevention Technicians should extended leave of absences occur.

In accordance with the City of Bellingham's NPDES Phase II

Municipal Stormwater Permit general condition G20 (Non-compliance Notification), the City is providing you with this notification that special conditions S5.C.9.b.ii was not met for the 2025 permit year. The City was unable to achieve 80% of scheduled inspections of privately owned and operated stormwater treatment and flow control BMPs/facilities to achieve compliance as defined in special condition S5.C.9.b.ii.

The details of our non-compliance with S5.C.9.b.ii is described as follows:

- To satisfy special condition S5.C.9.b.ii, the City of Bellingham employs one full time employee (Stormwater Inspector) to perform annual inspections and record keeping requirements of all privately owned and operated treatment and flow control BMPs/facilities that discharge to the City's MS4.

- The full time Stormwater Inspector left employment with the City on July 31, 2025, and was unable to achieve 80% of the required inspections prior to leaving employment. There were 134 of the required 218 inspections completed, or 61% of the required inspections completed in 2025.

Steps that have been and will be taken to reach compliance with S5.C.9.b.ii:

- To satisfy special condition S5.C.9.b.ii, the City of Bellingham, as of November 16, 2025,

		<p>has hired a new full time employee (Stormwater Inspector) to perform annual inspections and record keeping requirements of all privately owned and operated treatment and flow control BMPs/facilities that discharge to the City's MS4.</p> <ul style="list-style-type: none"> <li>• The new Stormwater Inspector is receiving trainings and certifications to make him "qualified personnel" to perform the inspections with the goal of achieving 80% of scheduled inspections of privately owned and operated stormwater treatment and flow control BMPs/facilities in 2026.</li> </ul>
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*I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Joel Pfundt

3/26/2026 3:27:00 PM

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Signature

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Date