



2026

City of Bellingham Lake Whatcom TMDL Response Report

Per requirements of the NPDES Phase II Permit, Appendix 2



City of Bellingham
Public Works Department
Storm and Surface Water Utility
Bellingham, WA
March 31, 2026

INTRODUCTION

Since 1992, the City of Bellingham has put special emphasis on protecting and restoring water quality in Lake Whatcom. As a partner in the Lake Whatcom Management Program (LWMP), the City works closely with Whatcom County and the Lake Whatcom Water and Sewer District to collaboratively address watershed issues. These efforts, both as a stand-alone jurisdiction and in our role in the LWMP, have culminated in a 50-year plan to restore water quality in the lake and mitigate impacts from residential development in its watershed.

The Lake Whatcom Total Maximum Daily Load (TMDL) Implementation Plan was submitted to the Department of Ecology in October 2017. Subsequently, Ecology took important portions of that plan and integrated them into regulatory requirements enforced through the City's National Pollutant Discharge Elimination System (NPDES) Western Washington Phase II Permit. Specific implementation steps are found in Appendix 2 of the NPDES Phase II Permit.

This report summarizes the work completed by the City during the current cycle, covering activities conducted in 2025. Specific permit requirements, with text from Appendix 2, are indicated with ***bold, italicized, blue*** text in the following work summary. The City is obligated to submit this report each with our annual Stormwater Management Program (SWMP) and NPDES Permit reporting as required by Ecology.

City of Bellingham Actions Required

(Reference: *Western Washington Phase II Municipal Stormwater Permit* – August 1, 2024: Appendix 2 – *Total Maximum Daily Load Requirements* – August 1, 2024, page 5)

1. Business Inspections:

The Permittee shall inspect facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities) as part of their ongoing inspection program identified in S5.C.8. If the Permittee determines, through inspections or otherwise, that a facility has failed to adequately implement BMPs to prevent bacteria source potential, the Permittee shall re-inspect the facility at least once more during the permit term to verify compliance, and/or initiate enforcement action.

Actions Completed in 2025

The City of Bellingham's portion of the Lake Whatcom watershed does not contain any businesses listed under these NAICS codes.

2. Public Education and Outreach:

Each Permittee shall include public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP under General Awareness.

Actions Completed in 2025

The City of Bellingham partners with Whatcom County and the Lake Whatcom Water and Sewer District to implement the Lake Whatcom Management Program (LWMP). The detailed annual report of activities conducted by the LWMP, including that of Program Area #9 (Education and Engagement) and the work conducted to promote proper pet waste management, is provided as an attachment to this report. Please reference the LWMP 2025 Annual Report for this information.

3. Operations and Maintenance:

Each Permittee shall maintain Pet Waste collection stations at Permittee owned or operated lands that are reasonably expected to have domestic animal (dog and horse) use and the potential for pollution to stormwater.

Actions Completed in 2025

The City of Bellingham owns and operates pet waste collection and disposal systems in public areas of the Lake Whatcom watershed. This includes Bloedel Donovan Park, the Scutter's Pond trailhead, and the public-access beach at the mouth of Silver Beach Creek. The City is also in the process of acquiring and installing additional stations where there is public access along the shoreline.

All permanent stormwater treatment facilities/BMPs within the TMDL area that treat phosphorus (sp.) shall be inspected and maintained in accordance with the requirements of S5.C.9.b and S5.C.9.c; reduced inspection frequency options do not apply.

Actions Completed in 2025

The City of Bellingham Public Works Operations Division conducts normal stormwater treatment system inspection and maintenance in the Lake Whatcom watershed.

4. Illicit Connection/ Illicit Discharge Detection and Elimination:

When conducting IDDE field screening during normal course of business (as required by S5.C.5.d for Phase II Permittees, and IC/IDDE as required by S5.C.9.c for Phase I Permittees) in a TMDL area, Permittees shall obtain a grab sample to screen for bacteria sources when at the drainage circuit's most downstream accessible sampling location if there is water flow. For the purposes of IC/IDDE, stormwater quality sampling is defined as obtaining and processing grab samples of stormwater within the conveyance system of the MS4, at discharge points, and/or outfalls (if there is flow) at each drainage circuit's most downstream accessible sampling location. Permittees shall follow their adopted IDDE Procedures to conduct source tracing efforts if bacteria levels and/or observations trigger a response (see IDDE guidance manual for bacteria trigger levels).

Qualitative and quantitative information about the source identification and elimination activities, including procedures followed, sampling locations, and results (including documenting no flow) shall be annually documented in TMDL reporting in the Annual Report.

Actions Completed in 2025

The bacteria requirements under the Lake Whatcom TMDL apply only to tributaries of Lake Whatcom. There are six City-owned outfalls that drain to Silver Beach Creek and no IDDE field screening was conducted at these locations in 2025.

5. Administration

a. By March 31, 2028, the City and the County shall submit a draft update of the "Lake Whatcom Implementation" tasks as developed under the previous permit term. The updated draft will include actions for the next permit term that build upon 2024-2029 implementation tasks. The City and the County shall finalize the Lake Whatcom Implementation tasks for 2029-2034 and submit with the March 31, 2029 Annual Report.

Actions Completed in 2025

Not applicable. This requirement does not apply until 2028

- b. Include in the Annual Report the phosphorus reduction activities based on the current accepted TMDL reassessment model and the 2024-2029 “Lake Whatcom Implementation” tasks.*

Actions Completed in 2025

The City of Bellingham partners with Whatcom County and the Lake Whatcom Water and Sewer District to implement the Lake Whatcom Management Program (LWMP). The detailed annual report of activities conducted by the LWMP, many of which are focused on reducing phosphorus and bacteria inputs to the lake and its tributaries, is provided as an attachment to this report. Please reference the LWMP report for this information.