2026

City of Bellingham
Stormwater Management Program Plan

Attachment to the NPDES Phase II Permit Annual Report

City of Bellingham

Public Works Department

Storm and Surface Water Utility

Bellingham, WA

March 31, 2026

FOREWARD

This document serves as an attachment to the City of Bellingham's annual report submittal to the Department of Ecology to meet the requirements of the Western Washington Phase II Municipal Stormwater Permit (WAR045550) under the National Pollutant Discharge Elimination System (NPDES) program. This Stormwater Management Program (SWMP) Plan is prepared to demonstrate the City's understanding of and commitment to fully meeting the regulatory requirements of this permit. The SWMP Plan is a dynamic document that will be updated on an annual basis and will be integral to our permit compliance.

This report will address work to be completed in the calendar year 2026, which documents and informs the public of the City of Bellingham's implementation of its municipal stormwater permit. The latest Permit was issued on August 1, 2024, and will expire in 2029. The formatting of this report has been updated to meet the new requirements of the 2024-2029 municipal stormwater permit.

In addition, is the requirement for a coordinated response to restoration of Lake Whatcom. Specific requirements are found in Appendix 2 of the Permit. The City's efforts related to this requirement are found in the Lake Whatcom TMDL Implementation Plan Annual Report, attached as an Appendix to this report.

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INTRODUCTION

Stormwater runoff from streets, parking lots, construction sites, industrial properties, and residential areas is recognized as one of the leading sources of pollution to our streams, lakes, wetlands, and Puget Sound. The City of Bellingham's (City) is committed to regional goals for keystone species protection, including endangered salmon species and resident Orca, which requires preservation of water quality in freshwater streams, lakes, and wetlands. The City recognizes the need to protect nearshore marine water quality to prevent bioaccumulation of pollutants in that same food chain. Significant effort is also put toward preserving and restoring the quality of water in Lake Whatcom, the source of drinking water for over 120,000 city and county residents.

In 1969, the Cuyahoga River near Cleveland, Ohio, caught fire. Unregulated chemical pollutants accumulated to such a dangerous concentration that the surface of the water ignited. The imagery of a river on fire captivated the Nation and inspired the U.S. Congress of 1972 to strengthen existing environmental law to create the United States' current and marquis water quality protection law: The Clean Water Act. Congress, through the Clean Water Act, intended to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters" (CWA Section 101(a)). Around this same time, the Environmental Protection Agency (EPA) was created. One of EPA's first responsibilities was to administer the Clean Water Act. With this new authority, EPA established the National Pollutant Discharge and Elimination System (NPDES) to regulate industrial and municipal stormwater runoff, and wastewater from publicly owned treatment works. EPA delegates authority to states to assist with the administration of the NPDES program. Washington State is approved by EPA to administer the NPDES program. Washington meets this responsibility through Washington State Department of Ecology (Ecology). Ecology and EPA require that municipalities, such as the City of Bellingham, meet the requirements of the Clean Water Act.

To address stormwater pollution at the local level, the City established a Storm and Surface Water Utility in 1990. In 2007, the City expanded its existing stormwater protection into a formal Stormwater Management Program (SWMP) when it was approved for permit coverage by Ecology. This permit is known as the Western Washington Phase II Municipal Stormwater Permit (Permit). The City continues to refine its stormwater program to meet the terms and conditions of the Permit, including the current requirements of the fifth version (fourth issuance) of the Permit, effective August 2024 through July 2029.

The Permit allows municipalities to discharge stormwater from municipal systems into "waters of the state" such as streams, lakes, and Puget Sound, as long as there are programs in place to reduce pollutants in stormwater to the "maximum extent practicable". Stormwater runoff from the City of Bellingham discharges to four main waterbodies: Lake Whatcom, Lake Padden, Bellingham Bay, and Chuckanut Bay.

Improving habitat and water quality in these waterbodies were identified as top priorities in the City's Legacies and Strategic Commitments to its residents. The City administers programs to meet these commitments such as the Lake Whatcom Management Program, Bellingham Water Quality

Improvement

Plans, Restoration Program, and the Downtown Renovation and Waterfront Restoration Programs. Requirements under the Permit provide the City additional opportunities to restore water quality in the City's neighboring streams, lakes, and bays.

STORMWATER MANAGEMENT PROGRAM DEVELOPMENT (S5.A and S5.B)

Permit Requirements

Sections S5.A and S5.B of the 2024-2029 Permit require the City to:

- Develop and implement a Stormwater Management Program (SWMP) within City limits, as determined in section S1.A of the Permit.
- Prepare and maintain a SWMP Plan which is to be submitted to Ecology with annual compliance reports.
- Manage an ongoing program for gathering, tracking, maintaining, and using information to evaluate the SWMP development, implementation and permit compliance and set priorities. Examples of data collected include:
    - Planned activities for each of the program components included in S5.C.
    - Any additional planned actions to meet the requirements of applicable TMDLs pursuant to S7-Compliance with Total Maximum Daily Load Requirements.
    - Any additional planned actions to meet the requirements of S8-Monitoring and Assessment.
- The SWMP shall include an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation, and permit compliance and to set priorities.
- Coordinate internally among City Departments.

Program Overview

The City's Storm and Surface Water Utility (SSWU) Section in the Natural Resources Division of the Public Works Department holds the primary responsibility for developing and implementing the stormwater program and tracking Phase II Permit requirements. Within the Public Works Department, the Engineering and Operations divisions also hold integral roles in implementing the components of the stormwater program. The program is also supported by Planning & Community Development, Fire, Police, and Parks and Recreation. Internal coordination between these city departments occurs regularly as issues arise (e.g. handoff between construction inspectors and the private facility inspector, incident response and follow-up actions to stormwater violations) and more formally through Operations and Engineering coordination meetings.

Plans for Program Activities in 2024-2029 Permit Cycle

- Develop and implement a municipal street sweeping program to target high priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.
- Documenting illicit discharge tracking and cross-connection screening for the City’s existing infrastructure.

- Submit mapping documentation to include all known outfalls in a standard template and format.
- Continuing a required Source Control Program for existing businesses.
- Update the Bellingham Municipal Code to incorporate changes required through the Permit.
- Addressing Lake Whatcom Total Maximum Daily Load Implementation Plan requirements detailed in Appendix 2 of the Permit.

1.0 STORMWATER PLANNING (Permit Section S5.C.1)

1.1 Summary of Permit Requirements

The Stormwater Planning program is intended to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.
The Stormwater Planning Permit conditions require the City to:

- Convene an interdisciplinary team of subject experts to inform and assist in the development, progress, and influence of the Stormwater Planning program.
- Coordinate with long range plan updates, such as the City of Bellingham 2020 Surface and Stormwater Comprehensive Plan. Specific requirements are as follows:
    - Describe in the SWMP how stormwater management needs and protection/improvement of receiving water health are, or are not, informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in the City jurisdiction.
    - Describe in the SWMP the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning or consider stormwater management needs or limitations.
- Implement planning codes to require Low Impact Development (LID), which shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff. The City shall enforce these LID principles though ordinances and annually identify and remove barriers to compliance.
- Develop a Stormwater Management Action Planning (SMAP) program for a new high priority catchment area or additional actions for an existing SMAP.
- No later than March 31, 2027, develop a new Stormwater Management Action Plan (SMAP) for at least one new priority watershed or additional actions for an existing SMAP. The SMAP shall include the following:
    - A description of needed stormwater facility retrofits.
    - Land management and development actions to improve water quality.
    - Targeted and enhanced elements of the City SWMP program.
    - Changes needed to long range plans to meet SMAP priorities.
    - A proposed implementation schedule and budget for short-term and long-term actions.
    - Actions in the SMAP that may benefit overburdened communities, including specifically vulnerable populations and highly impacted Communities.
    - A process and schedule to assess and improve the SMAP.

1.2 Program Overview

A NPDES Permit Coordinator position, who will be responsible for the City's Permit compliance, has been filled as of 2022. The City operates multiple programs that combine to provide ad-hoc stormwater planning across departments. As of 2025, the City plans for stormwater impacts through its Watershed Plans and its 2020 Surface and Stormwater Comprehensive Plan.

Land use planning within the City also aims to address future development impacts to water quality by formalizing Low Impact Development (LID) as the standard for land development. LID includes site development elements, such as clustering subdivisions and limiting street width, and specific engineered best management practices such as rain gardens, permeable pavement, green roofs, and low-impact foundations. LID requirements may only be waived if the project proponents demonstrate that using LID is not feasible.

1.3 Plans for Program Area in 2026

The basin prioritization and infrastructure study projects will continue. The city will continue to evaluate each of the priority watersheds identified in the SMAP process. The city will also develop a new Stormwater Management Action Plan (SMAP) for at least one new priority watershed or additional actions for an existing SMAP This information will help the City plan for the next round of improvements, known as Stormwater Management Actions (SMAs) for implementation in the future.

2.0 PUBLIC EDUCATION AND OUTREACH (Permit Section S5.C.2)

2.1 Summary of Permit Requirements

Section S5.C.2 Permit requires the City to address the following public education and outreach elements:

- Develop a program that targets specific audiences including public, businesses, homeowners, landscapers, property managers, engineers, contractors, developers, and City employees including review staff and land use planners.
- Develop a program that aims to create general awareness, promote positive behavior change and create public stewardship opportunities. Elements of this program include:
    - Selecting a new topic annually for general outreach and behavior change, based on target audiences for high-priority pollutants or behaviors.
    - Evaluating an existing behavior change program implemented in the previous permit.
    - Updating the evaluated behavior change effort based on the results of the evaluation.
    - Measure improvements in the target audience's understanding of the problem and what they can do to solve it. Use this information to improve the education program.
    - Track and maintain records of public education and outreach activities.

2.2 Program Overview

The City implements a comprehensive stormwater education and outreach program with two main goals: to increase awareness of stormwater pollution issues and to provide tools, assistance, and incentives to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. City staff emphasize the importance of environmental education and technical assistance in daily interactions with the Bellingham community.

Through both broad-based educational efforts aimed at the public, and targeted resources for residents, specific businesses, contractors, stormwater facility owners, and/or municipal staff, the City compiled a library of resources ready for scheduled presentations or available on hand as outreach opportunities arise. Pollution prevention factsheets and brochures are routinely distributed to specific audiences and many of the resources are available on the City's website.

City educators are active in STORM, the Stormwater Outreach for Regional Municipalities group, participating in meetings, roundtable discussions, and giving presentations with one of our staff sitting on the STORM Sterring Committee.

Through the Homeowner Incentive Program (HIP), the City provides technical and financial assistance to residents living in the Lake Whatcom watershed. Outreach services provided through HIP include one-on-one site assessments, project design resources, and permitting assistance. HIP-eligible projects protect water quality by reducing sources of phosphorus, improving stormwater treatment, encouraging infiltration, or a combination of best management practices for phosphorus control. Project examples include native planting areas, phosphorus-limiting rain gardens, infiltration trenches, media filter drains, and dispersion systems.

Through experiences, lessons learned, and public feedback, the City continues to improve its outreach program. In particular, the use of audience surveys, both pre- and post-contact, have helped measure improvements in the target audience's understanding of the problem and document behavioral changes.

2.3 Plans for Program Area in 2026

To build general awareness about low-impact development principles and LID Best Management Practices (BMPs), the City will run ad campaigns about our self-guided Stormwater Discovery Tours, about what stormwater is (This Drains Here), about how to report spills (Spills Happen), as well as participate in regional Puget Sound Starts Here advertising campaigns and STORM

To effect behavior change, the City will continue our We Scoop pet waste campaign, the Lake Whatcom Homeowner Incentive Program (HIP), and the Natural Yard Care program. In 2026, the City will continue its commitment to pet waste management and disposal. In addition, the Natural Yard Care program will continue, and staff will provide local stores with the Manage Weeds Naturally booklets and present materials at events as appropriate.

The We Scoop program will seek to expand its efforts to reach new audiences while continuing to engage pet owners through our city-wide events, annual photo contest, and prize drawing. These initiatives promote regular scooping and proper disposal, supported by a pledge and trash tote sticker. "We will also continue to strategically increase volunteer opportunities in parks and find ways to collaborate across departments and divisions to promote pledges and behavior change. In 2026, HIP will continue to engage new and existing homeowners to actively steward Lake Whatcom and its surrounding watershed.

To provide stewardship opportunities, the City will continue our partnership with Parks to engage community members in habitat restoration work parties, as well as dog-related volunteer events in parks through the Bark Stewards Program.

We will also continue efforts to grow Bellingham's tree canopy cover, especially in areas of the city where tree canopy cover is lowest.

3.0 PUBLIC INVOLVEMENT AND PARTICIPATION (Permit Section S5.C.3)

3.1 Summary of Permit Requirements

Section S5.C.3 of the Permit requires the City to address the following public involvement and participation elements:

- Provide ongoing opportunities for public involvement in the SWMP and SMAP process through committees/commissions and updating the SWMP to reflect input.
- Make the SWMP and Annual Compliance Report available to the public, including posting it on the City's website.

3.2 Program Overview

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. The City also solicits public comment through press releases specific to projects and code updates, and leisure guide advertisements. Status reports on the Stormwater Management Program were presented at the monthly Public Works Committee meetings.

3.3 Plans for Program Area in 2026

In 2026, the Bellingham public will continue to be invited to participate in stormwater decision making. These opportunities include the City Council meetings, community meetings, public hearings, neighborhood association meetings, focus groups, community surveys, and webpage communications. In addition, the current SWMP and Annual Compliance Report were made available to the public by posting downloadable versions on the City's website and a copy is available for public review at City Hall.

4.0 MUNICIPAL SEPARATED STORM SEWER SYSTEM (MS4) MAPPING AND DOCUMENTATION (Permit Section S5.C.4)

4.1 Summary of Permit Requirements

The Permit requires the City to implement the following related to mapping and documentation:

- Continue ongoing mapping projects begun under previous permits, including the documentation of the location of all outfalls, discharge points, receiving waters, water quality and flow control BMPs, conveyances (pipes/ditches) to all outfalls larger than 24" diameter, and certain connections to the MS4.
- Create mapping for the following:
    - Using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties.
    - MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
    - Using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.
- Maintain mapping projects that identify and display:
    - All outfalls, including those smaller than 24" which were exempt from past permit requirements.
    - All known connections to the City's MS4 from privately-owned stormwater systems from any date.

- The ability to display of all data in an electronic mapping format that follows well-defined standards and uses industry-standard software.
- The ability to share all created maps with Ecology, recognized Tribes, and other municipalities and NPDES permit holders.

4.2 Program Overview

The City of Bellingham Public Works Department includes a workgroup of Geographic Information System (GIS) mapping specialists who continually update maps and their data sources to ensure an accurate electronic mapping system is available for use by City staff and the public. This mapping tool, known as City IQ, includes layers dedicated to stormwater infrastructure, including BMPs and the areas for which they provide treatment. Our mapping includes most private facilities, especially those in our inspection program, and all public facilities that are operated and maintained by Public Works Operations Crews. Through this program, outfalls are mapped as they are identified by field staff, infrastructure details such as sump depth of catch basins are field-verified, and new/retrofit water quality and flow control BMPs are integrated into the treatment network upon completion.

While many features are available in the City IQ and GIS system, the City also has developed a customized application of the Western Washington Hydrology Model version 3 (WWHM3) to evaluate the hydrology and hydraulics of the City's stormwater system components. The updated model includes characterization of marine outfalls and their capacity and feasibility for capital improvements in their upstream conveyances.

4.3 Plans for Program Area in 2026

The GIS workgroup has several Permit related projects planned for 2026. In conjunction with the Natural Resources Division, the GIS workgroup will develop and follow a methodology to identify canopy for stormwater management purposes utilizing previously gathered mapping data on tree canopy within the City. The GIS workgroup will also be developing a plan in coordination with the Stormwater Maintenance workgroup to more efficiently document and schedule the upcoming street sweeping requirements in the Permit. Also, additional source control BMP checklists will be added to the existing source control database to improve the overall effectiveness and consistency of source control inspections. These checklists will provide more detailed inspection reports with business sector specific BMPs. The GIS workgroup will also continue to provide support in tracking Permit related costs by leveraged the City’s asset management software.

5.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION (Permit Section S5.C.5)

5.1 Summary of Permit Requirements

The Permit requires the following related to illicit discharge detection and elimination (IDDE):

- Develop an ongoing program to prohibit, prevent, detect, and remove illicit discharges, connections, and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City.
- Inform public employees, businesses, and the public of the hazards associated with illicit discharges to the storm sewer system.
- Implement an ordinance that prohibits illicit discharges.
- Implement a program to detect and address illicit discharges and connections. The following are

specific elements of this program:
    - Procedures for conducting investigations.
    - Publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges.
    - Maintain an ongoing training program for staff pertaining to proper IDDE spill identification, investigation, clean-up, and response procedures.
    - Procedures for characterizing the nature of, and responding to, any potential public or environmental threat posed by illicit discharges.
    - Procedures for the post-emergency clean-up of firefighting activities.
    - Procedures for tracing the source of an illicit discharge.
    - Procedures for eliminating illicit discharges including inspections, technical assistance, and compliance and enforcement measures.
- Track all spills, illicit discharges and connections reported to the City and response actions taken, including enforcement actions.
- Screen the MS4 system for illicit connections at a rate of at least 12% of the system each year.

5.2 Program Overview

The City implements a program to detect and remove illicit discharges and connections into the City's Municipal Separate Storm Sewer System (MS4).

Bellingham Municipal Code 15.42.050.C prohibits non-stormwater illegal discharges, and/or dumping into the City's MS4. The enforcement of all stormwater code provisions including illicit discharges is provided for in BMC 15.42, subsections 070-110. Illicit discharges were prohibited in the 1995 adopted code; this language was refined in the 2009 ordinance update to fully reflect the NPDES permit language. The City is active in the enforcement City code to prevent and respond to illicit discharges.

The City engages in interdepartmental coordination to report and respond to illicit discharges. City staff utilize many methods to discover and trace illicit discharges and IDDE problems including visual observation and chemical analysis, dye testing, internal pipe video inspection, observations during pipe cleaning, stormwater outfall monitoring/dry weather monitoring, and source control inspections. The City also uses customer information to identify and resolve stormwater issues.

A stormwater hotline number (360-778-7979) is posted on the City's website and publicized on storm drain markers throughout the City. SSWU staff are ready to record and respond to all calls regarding illicit discharges or spills that are received on the hotline. All reports that are found to represent illicit discharges or connections are followed up as necessary to resolve the issue. Follow-up actions are tracked, and feedback is given to the reporting party as well as Ecology, as necessary. The City both receives and sends information through the Ecology-administered Environmental Response Tracking System (ERTS) and responds similarly, providing closure information back to Ecology. When accidental discharges occur as part of the City's provision of services (for example, during water main breaks or as a result of contractor inaction on City capital projects) the City self-reports these incidents to ERTS if they have reached our MS4. In the cases where City staff observes a potential illicit discharge as part of their daily work duties, these staff contact the stormwater hotline and/or ERTS as appropriate for the event.

SSWU staff respond to most stormwater incidents to assess the situation and plan follow-up actions to resolve them. For discharges that reach the MS4, SSWU staff work with the Storm Operations crew and a vacuum truck (or other appropriate tools and equipment) is used if needed. Fire and Police are often the first responder; however, if it is not a hazardous materials situation, they are trained to call SSWU

responders and the Storm Operations crew. All Public Works Operations vehicles have spill kits for containment and cleanup of small spills. The Storm Operations crew receives training on spill response and addresses any additional questions or concerns through the stormwater committee. The City of Bellingham Emergency Response Plan for Public Works Operations: Water, Wastewater, Stormwater: Chapter 8 Water Quality Contamination, and Checklists 10 and 11 Hazardous Materials Spill to Streets or Storm Water System cover procedures for spill response.

In addition to responding to illicit discharge incidents, the City is proactive in tracing the source of illicit discharges. The City started utilizing system video inspection in 2003 to both discover illicit discharges and trace the sources as well as to detect maintenance issues. The crew is trained to look for signs of non- stormwater discharges from private piping entering our system. Signs of staining, foam, and/or discolored discharges are all indications that would be part of the condition report of the piping system.

5.3 Plans for Program Area in 2026

In 2026, the City plans to continue its illicit discharge and spill response program utilizing the Stormwater Hotline and the SeeClickFix application as the primary means of notification from the public. City staff will also continue to refine response methods and equipment as new technology becomes available. The video inspection program will continue the effort to detect illicit discharges while also providing valuable insight into the maintenance needs of the system not otherwise visible from conventional types of inspection. IDDE training for new City staff working in the field will continue with additional training being provided for staff hired that perform day to day IDDE functions.

6.0 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES (Permit Section S5.C.6)

6.1 Summary of Permit Requirements

The Permit requires the following elements regarding controlling runoff from new development, redevelopment, and construction sites:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff discharging to the municipal separate storm sewer system from new development, redevelopment, and construction site activities.
- Adopt an ordinance to address runoff from new development, redevelopment, and construction activities from both public and private sites that meets requirements within Appendix 1 of the permit. (See also Stormwater Planning requirements under section S5.C.1 of the Permit).
- Adopt local requirements to apply stormwater controls on construction sites. The City's local requirements are more stringent than those required within the Permit.
- Maintain the legal authority to inspect and enforce maintenance standards for privately owned stormwater facilities which discharge to the City storm sewer.
- Implement a permitting process for public and private projects which includes site plan review, inspection, and enforcement capability to meet Permit standards.
- Provide copies of the Notice of Intent (NOI) for construction or industrial activities to representatives of the proposed new development and redevelopment and post a link to the online electronic version of the NOI.
- The program shall enforce local stormwater control ordinances controlling runoff from sites that are also covered by Ecology-issued stormwater permits.
- Provide training to staff that implement the program to control stormwater runoff from new

development, redevelopment, and construction sites.

- Develop a process to record and maintain all inspections and enforcement actions by staff.

6.2 Program Overview

The City implements and enforces a program to control runoff from new development, redevelopment, and construction sites. In 2006 and 2009, the City updated its stormwater code to address construction runoff control from both public and private sites using language consistent with the "Minimum Technical Requirements" in Appendix 1 of the Permit. However, since the adoption of the City's initial stormwater ordinance in 1995, a permitting, inspection, and enforcement program has been in place that is more restrictive than the Appendix 1 thresholds. The City requires some form of erosion control on all projects that exceed 120 square feet of impervious surfaces or disturb more than 500 square feet of soil. These local requirements have been retained as the City continues to regulate stormwater from smaller sites or at lower thresholds than required pursuant to section S5.C.6 of the Permit. Sites that trigger the Appendix 1 thresholds receive more detailed reporting, increased inspection frequencies, and additional compliance items as necessary to meet the Permit requirements.

The City previously followed the planning process and BMP selection and design criteria outlined in the 2005 Stormwater Management Manual for Western Washington (the Manual). The 2012 and 2019 Manuals were adopted by the City automatically at the time they were adopted by Ecology. Our permitting process includes site plan review, inspection, and enforcement capability. Copies of the Notice of Intent for construction or industrial activities are provided to project proponents. City databases are used to record permit activity and maintain a record of all inspections and enforcement actions taken by staff.

All permitted development sites are inspected by qualified Public Works Department Inspectors for proper erosion and sediment controls and appropriate enforcement actions are taken as necessary to ensure compliance. The City's inspection program includes site visits before, during, and after construction. Verbal warnings are often given during inspections and corrections are made when the inspector is present. When necessary, stormwater permit correction notices are issued listing the items that do not comply with City codes along with required corrective actions. Stop-work orders are issued in cases where non-compliance persists, and they remain in effect until additional inspections show compliance. All permitted development sites are inspected upon completion and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls and to verify that a maintenance plan is in place. The City uses an escalating enforcement strategy of corrective warnings, monetary ticketing, and if necessary, the case is transferred to the City's legal staff.

Site plan reviewers, inspectors, city engineers and SSWU staff have had stormwater code training, Ecology Manual training, and have attended permit overview workshops.

6.3 Plans for Program Area in 2026

The City is planning a comprehensive municipal code update to address significant changes in Appendix 1 of the 2024-2029 Permit. This update is required to take effect by June 30, 2027. The municipal code update process will include coordination among the City Public Works Natural Resources and Engineering divisions in addition to the City Planning and Community Development Department. In addition, continued training opportunities are being provided to City staff involved in new development, redevelopment, and construction site permit review.

7.0 STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT (Permit Section S5.C.7)

7.1 Summary of Permit Requirements

The Permit requires the City to implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program will focus on strategic stormwater investments over longer planning timeframes including:

- Implement stormwater facility retrofits, or tailored SWMP actions.
- Provide a list of planned individual projects scheduled for funding or implementation during this Permit term.
- No later than March 31, 2028, fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report.
- Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term.

7.2 Program Overview

New to the 2024-2029 Permit, The City is required to fully fund, start construction, or completely implement projects that meet the assigned 15 equivalent acres. Equivalent acres are calculated as a measure that compares the project area and BMPs with standards for LID, flow control, or runoff treatment BMPs where appropriate. The 15 equivalent acre assignment is based on Bellingham's population of 93,910 (taken from the Office of Financial Management data for 2022). The stormwater investments meant to meet this requirement can be strategic stormwater investments identified in SMAP, or opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.

7.3 Plans for Program Activities in 2026

The City is planning construction for the Phase 1 Lake Whatcom Vault Retrofits stormwater treatment project in 2026. This project aims to protect and improve water quality in Lake Whatcom by reducing pollution impacts from existing infrastructure and development. This will be done by retrofitting three existing stormwater treatment facilities to reduce the amount of phosphorus and bacteria entering Lake Whatcom, Bellingham's drinking water source. Between the three facilities, this project is expected to treat polluted runoff (stormwater) from 60 acres of residential development, removing approximately 17 pounds of phosphorus from the watershed each year. This project is also intended to reduce the long-term operation and maintenance costs for the existing facilities.

8.0 SOURCE CONTROL FOR EXISTING BUSINESSES (Permit Section S5.C.8)

8.1 Summary of Permit Requirements

The source control for existing businesses Permit requirements aim to reduce or eliminate pollutants from running off public and private properties during storm events into the municipal stormwater system. This section of the Permit contains escalating requirements of the City over the term of the Permit. Specific requirements for this Permit element include:

- Require pollution reducing best management practices (BMPs) be utilized on properties with the

potential to discharge pollutants to the storm sewer.

- Inspect sources of pollution from private and public sites, including institutional, commercial, and industrial lands within the City.
- Enforce violations of local codes or other permits that limit pollution from these land uses.
- Implement practices to reduce runoff of fertilizers, herbicides, or pesticides that are found entering the storm sewer.
- The City must have an inventory of properties that have a potential to discharge to the municipal storm sewer.
- The City must implement an inspection and enforcement program of those properties identified in the inventory.

8.2 Program Overview

The source control for existing developments requirements from the Permit are met by the City through an expansion of an existing pollution prevention program. Providing information and assistance to owners of commercial properties with pollution prevention due to the outside storage of equipment, materials, machinery, wastes, or high volume of traffic are the primary objectives for this new program. With the addition of new source control for existing business Permit requirements, the City rebranded its existing Pollution Prevention Assistance (PPA) Program into the Business Pollution Prevention Assistance Program (BPPA). The BPPA program is used to meet Permit requirements and PPA contract requirements with the Washington Department of Ecology (Ecology). The City began conducting the newly expanded BPPA visits on January 1st, 2023.

The BPPA program will provide technical assistance to businesses which covers a broad array of topics. With the addition of Permit required stormwater pollution source control inspections, the newly expanded BPPA program focuses on assessing the implementation of Ecology approved stormwater best management practices (BMPs). While the Permit now requires stormwater BMP outreach to local businesses, the City has elected to maintain its Pollution Prevention Assistance (PPA) Partnership with the Department of Ecology. The PPA program is voluntary and is in place to assist the State with meeting its dangerous waste reduction requirements; however, it still serves as a key component of the City's efforts to reduce pollutants from entering the storm sewer and meeting our Permit requirements. The City values the cross-jurisdiction information sharing and resources provided by Ecology through the PPA partnership. BPPA site visits with businesses include in-depth surveys of current practices, assessment of compliance with source control BMPs, including outdoor storage, catch basin maintenance, and the potential for stormwater contamination. Follow-up letters are sent to establishments highlighting existing good practices and itemizing practices that need to be corrected along with recommendations on how to remedy them. Certain high priority environmental issues, such as evidence of pollution reaching the City stormwater system, trigger an automatic follow-up visit. Dye testing is used in cases where questions arise about the source of the pollutants entering the stormwater system. If documented pollution continues to enter the stormwater system, after outreach and technical assistance efforts are unsuccessful, then the City follows its established escalating enforcement procedures including, but not limited to, letters from City attorneys and fines.

Since the program's inception in 2008, the PPA program focused technical assistance visits on sectors including boat repair, chiropractors, printers, photo processors, dry cleaners, hotels, landscapers, nail salons, nurseries, dentists, veterinary clinics, gas stations, painters, pharmacies, auto body, auto repair shops, wood workers, metal workers, property managers, grocery stores, restaurants, and scrap recyclers. The visits resulted in significant reductions in stormwater pollution along with reduction in improper disposal of hazardous waste materials.

8.3 Plans for Program Activities in 2026

During 2026, the City will implement an outreach strategy to the business community. Outreach efforts will be focused on informing business sectors of the program goals, requirements, and an estimate about when City staff may conduct a BPPA site visit. The source control inventory will also be refined throughout the year based on information gathered from site inspections on pollutant generating activities, through complaints, and businesses entering or leaving the City.

The BPPA program will be focusing primarily food service, gas stations, and multifamily properties in 2026. Food service visits will be focused on managing waste fryer oil, preventing floor mat and hood vent cleaning outside, and good housekeeping around dumpsters. Gas station visits will ensure that proper controls are in place during the event of a gas spill. Visits with multifamily properties will help ensure that pesticides, herbicides, and fertilizers are applied in a manner to prevent run-off into the City stormwater system. A letter will be sent by mail to new target business sectors inform of upcoming site inspections and provide a BMP list for review.

The BPPA program will continue to offer financial incentives to businesses to eliminate sources of toxic chemicals, pollution runoff, and purchase pollution prevention equipment. The use of chemicals such as solvents, PFAS, PCBs, PBDE flame retardants, PERC, lead, and mercury typically leads to the generation of hazardous waste and are difficult or impossible to clean up in wastewater and stormwater. The best way to reduce the generation of this hazardous waste, prevent further environmental contamination, protect water quality, and reduce human health risk is to eliminate the use of equipment and practices which use these chemicals.

9.0 OPERATIONS AND MAINTENANCE (Permit Section S5.C.9)

9.1 Summary of Permit Requirements

The Permit requires the City to implement a program which addresses the following concerning stormwater pollution prevention for operation and maintenance activities:

- Implement maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in Ecology's Stormwater Management Manual for Western Washington. For facilities not listed in the above manual, develop a maintenance standard.
- Perform annual inspections, and require maintenance as needed, of stormwater mitigation facilities regulated by the City under the new development, redevelopment, and construction site pollutant reduction program.
- Perform annual inspections, and perform maintenance as needed, of stormwater facilities owned or operated by the City.
- Develop standard operating procedures to reduce stormwater impacts associated with runoff from all lands owned by the City and municipal road maintenance activities.
- Implement an ongoing training program for City staff whose construction, operations, or maintenance functions may impact stormwater quality.
- Prepare Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance yards, storage yards, or material storage facilities that are owned or operated by the City that are not already regulated by a separate NPDES stormwater permit.
- Develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water

quality benefits to receiving waters.

9.2 Program Overview

The City implements an operations and maintenance program with the goal of preventing or reducing pollutant runoff from municipal operations and regulated private stormwater facilities. One focus of the program is the training of municipal staff on good housekeeping pollution-prevention practices that are applicable to daily City operations and activities. Other components include performing annual inspection and maintenance of public stormwater facilities, updating stormwater pollution prevention plans for City facilities, and constructing capital improvement projects that reduce pollution.

The City maintains a comprehensive program for maintaining City-owned or operated permanent stormwater treatment and flow control facilities. Maintenance standards from Ecology's Stormwater Management Manual for Western Washington were adopted by the City and are used to evaluate facilities for both private and public inspections.

Inspection and maintenance of facilities are scheduled and tracked through a maintenance management system. Maintenance is scheduled when a facility exceeds the applicable maintenance standards and corrective actions are executed as soon as practical. Catch basins and inlets owned or operated by the City of Bellingham are inspected and cleaned as necessary to comply with the maintenance standards. In addition, City Storm Operations staff have identified potentially vulnerable stormwater facilities that are monitored during and after major storm events.

The City's private stormwater facility inspection program has two major components. The highest priority is the inspection of private stormwater mitigation facilities that trigger the NPDES annual inspection requirement to ensure maintenance standards are met on post-construction private facilities. Secondarily, the City inspects and provides technical assistance to owners of smaller or older private facilities within the City's jurisdiction.

Private facilities built after 2007 that trigger the Appendix 1 thresholds are inspected annually, or biennially when they meet qualifying permit conditions. Inspection reports document conditions and itemize specific maintenance corrective actions. Notification letters are sent to the property owners along with the inspection report and a timeline for action. Typically, maintenance is required prior to the next annual inspection, however there are circumstances that call for more frequent follow-up inspections. The City continues to work with owners until maintenance issues have been resolved.

The City operates a Stormwater Hotline which allows the public to call in and report a stormwater facility maintenance issue or illicit discharge directly with a representative from the Public Works division. The public may also submit an online report through the Stormwater Hotline webpage. The City is also utilizing a "See, Click, Fix" program. This program allows the public, using a mobile app, to inform City staff of any observed stormwater maintenance issues. The program also allows the City to easily provide in-app responses and to follow up with the public as needed.

The City's street sweeper program aims to clean all city streets on a three- to four-month circuit. More frequent street sweeping occurs on arterial streets and bike lanes, in the downtown Central Business District where streets are serviced twice a week and in the Lake Whatcom watershed where streets are cleaned twice a month.

8.3 Plans for Program Activities in 2026

The City will be modifying its current street sweeping program in 2026 to meet the new requirements of the 2024-2029 Permit. Preliminary meetings between the Stormwater Maintenance workgroup, GIS workgroup, and Natural Resources Division determined that the preexisting street sweeping program generally met the new requirements. However, the scheduling and documentation of the existing program were deemed to lack efficiency in terms of reporting on Permit compliance. Leveraging asset management software to document a new route and schedule system will allow the City to continue its high level of street sweeping effectiveness while streamlining the reporting process.

In addition, the City has elected to reduce the inspection frequency of both stormwater facilities and catch basins and inlets based on maintenance records of double the length of time of the proposed inspection frequency as detailed in the Permit. This reduced inspection schedule will allow the City to realize several beneficial outcomes. The components being placed on the reduced schedule are done so with records illustrating several unnecessary inspections as maintenance was not required during this period. Decreasing unnecessary inspections allow an increased capacity for maintenance of current infrastructure, an increased capacity for additional inspections of components that generally require more frequent maintenance, and more efficient maintenance tasks in components that are more easily maintained on a more frequent basis.

10.0 TOTAL MAXIMUM DAILY LOAD REQUIREMENTS (Permit Section S7 and Appendix 2)

10.1 Summary of Permit Requirements

Total Maximum Daily Load (TMDL) pollutant limitations and permit requirements must be met by the City if the City storm sewer discharges to a waterbody an Ecology approved TMDL in place. Lake Whatcom is protected by a multi-parameter TMDL for dissolved oxygen, fecal coliform bacteria, and phosphorus. Lake Whatcom receives stormwater from part of the City storm sewer which triggers the following permit requirements found in Appendix 2 of the Permit:

- Inspect facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities) as part of the ongoing source control inspection program.
- Public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP.
- 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.
- When conducting IDDE field screening during normal course of business 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.

10.2 Program Overview

While the effort to restore water quality in Lake Whatcom has been ongoing since 1992, the formal regulations that require action on the lake first became embedded in the 2019 – 2024 Permit term. As a result, the City and Whatcom County launched an ambitious 50-year plan, the first 10 years of which are outlined in the Lake Whatcom TMDL Implementation Plan. The TMDL Implementation plan and the annual report describing the activities completed in 2024 is attached in Appendix A of this report.

10.3 Plans for Program Activities in 2026

In 2026, the City will continue the public education and outreach activities to that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP. In addition, the City will continue to maintain Pet Waste collection stations at City owned or operated lands that are reasonably expected to have domestic animal (dog and horse) use and the potential for pollution to stormwater.

11.0 MONITORING AND ASSESSMENT (Permit Section S8)

11.1 Summary of Permit Requirements

The Permit requires the City to engage in regional and local measures to monitor water quality and assess the efficacy of the City's water quality improvement programs. To meet permit requirements, the City elects to contribute to a regional fund to conduct both "Regional Status and Trends" and "SWMP Effectiveness" monitoring studies through the Stormwater Action Monitoring (SAM) Program, formerly Regional Stormwater Monitoring Program (RSMP), through the Department of Ecology. The City also engages in local water quality monitoring to assess the water quality of its stormwater discharges.

11.2 Program Overview

The Regional SAM studies are very efficient and produce locally applicable results which the City may employ when making stormwater planning decisions. These studies also help identify sources of pollution which the City may address through its SWMP programs. To-date, the City has utilized SAM derived data to make decision when creating ordinances and updating the SWMP, Capital Improvement Plan, and the Surface and Stormwater Comprehensive Plan.

Locally, The City of Bellingham has conducted routine water quality monitoring for 30 years through our Urban Streams Monitoring Program. This program was initiated in 1990 with the purpose of collecting data and maintaining a record of stream conditions at up to 19 separate stream sites on the 5 major creeks within Bellingham. In addition, the City sponsors an in-depth water quality program focused on the Lake Whatcom watershed. The program began over 50 years ago due primarily to the City's requirement as a purveyor of water to test the quality of incoming water to our water treatment system. The program continues to grow and expand in scope as additional parameters and studies are deemed necessary. In recent years, the City focused not only on the lake quality but also on the nature of the water entering the lake through creeks and large storm drains. Western Washington University (WWU) is commissioned by the City to provide ambient lake monitoring and stormwater input monitoring from the various creeks. Current water quality research information is available online at www.lakewhatcom.whatcomcounty.org and under the Lake Whatcom tab at WWU's Institute for Watershed Studies website www.wwu.edu/iws/.

A third facet of the City's program involves stormwater monitoring. For over 15 years, the City has tested inflows to creeks primarily in the Lake Whatcom Watershed following storm events. Monitoring started with the inclusion of the Park Place stormwater wet pond in the WWU Lake Monitoring study. Today, the City's stormwater monitoring program has expanded to test a variety of BMP's for effectiveness in removing common pollutants and high priority pollutants such as phosphorus. Analysis of systems in Lake Whatcom is used to typify phosphorus removal rates for TMDL compliance. This program is of regional significance because it provides credible information for evaluating new

stormwater treatment and infiltration techniques that are specific to Western Washington. Best management practices (BMPs) used in the Lake Whatcom watershed, including filter cartridges, proprietary devices, and infiltration facilities are approved by the Department of Ecology for use to treat phosphorus.

11.3 Plans for Program Activities in 2026

The City's Urban Stream Monitoring Program and Lake Whatcom Monitoring programs will continue to collect data through 2026.

The City of Bellingham, with technical support from the City of Seattle, is proposing a SAM funded project to address and reduce the impact of Polychlorinated Biphenyls (PCBs) on Municipal Stormwater systems regulated by the Phase I and Phase II NPDES Permit. The results of this research will provide guidance to Permittees across the State of Washington as they work to limit PCBs in building materials from entering their regulated MS4s. The research will evaluate the effectiveness of BMPs in reducing the impact of two known sources of PCBs to the MS4: (1) "passive" contributions in stormwater runoff from PCB containing exterior building materials and (2) non-stormwater discharges from washing PCB-containing building exteriors (referred to hereinafter as "active" contributions). Ultimately, this study will facilitate a meaningful update to statewide guidance documents and give jurisdictions the tools they need to better comply with PCB-related Permit requirements.