

## Annual Report

Number	Permit Section	Question
1	S5.A	<p>Attach a copy 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.</p> <p><b>Not Applicable</b></p>
2	S5.A	<p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)</p> <p><b>Bellingham 2024 SWMP_2_03262024202331</b></p>
3	S5.A	<p>Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.</p> <p><b>Yes</b></p>
4	S5.A.5.b	<p>Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)</p> <p><b>Yes</b></p>
5	S5.C.1.	<p>Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020</p> <p><b>Yes</b></p>
14	S5.C.1.b	<p>Did you submit a report as described in S5.C.1.b.i(b)? (Required to submit no later than January 1, 2023)</p> <p><b>Yes</b></p>
15	S5.C.1.c	<p>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)</p> <p><b>Yes</b></p>
16	S5.C.1.c	<p>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)</p> <p><b>No</b></p>
20	S5.C.2	<p>Did you choose to adopt one or more elements of a regional program? (S5.C.2)</p> <p><b>Yes</b></p>
20a	S5.C.2	<p>If yes, list the elements, and the regional program.</p> <p><b>This year, the City of Bellingham participated in the Stormwater Outreach for Regional Municipalities group, which shares findings and resources for more effective and coordinating education campaigns. Our entire work group attended this year's STORM Symposium, held in Woodinville, WA.</b></p>

Number	Permit Section	Question
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.  <b>General Awareness Efforts 2024_21_03262024203656</b>
24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)  <b>Yes</b>
25	S5.C.2	Attach the report developed in accordance with S5.C.2.a.ii(e), which evaluated the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the program in order to be more effective. (Required no later March 31, 2024)  <b>Changes In Understanding_25_03252024103321</b>
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.  <b>Yes</b>
26a	S5.C.2	Attach a list of stewardship opportunities provided.  <b>Promoted Stewardship Opportuni_26a_03262024203656</b>
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)  <b>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.</b>
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)  <b>Yes</b>
28a	S5.C.3.	List the website address in Comments field.  <b><a href="https://cob.org/services/planning/environmental/stormwater-program">https://cob.org/services/planning/environmental/stormwater-program</a></b>
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?  <b>Yes</b>
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)  <b>Yes</b>
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).  <b>NPDES2023_Outfalls_30a_03212024144019</b>
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)  <b>Yes</b>

Number	Permit Section	Question
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)  <b>Yes</b>
33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.  <b>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 quarterly stormwater meetings to ensure our agency is educated and aware of any and all stormwater regulations, illicit discharges, and proper disposal of wastes.</b>
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.  <b>Yes</b>
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.  <b>Yes</b>
35a	S5.C.5	Cite field screening methodology in Comments field.  <b>Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020)</b>
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)  <b>83</b>
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.  <b>Catch basin/manhole inspections</b>
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)  <b>100</b>
38	S5.C.5	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)  <b>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 cob.org/StormwaterHotline.</b>
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
		<b>Yes</b>
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.
		<b>Yes</b>
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.
		<b>Yes</b>
42	S5.C.5	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 12.
		<b>2023IDDE_42_03142024161301</b>
43	S5.C.6.	Implemented 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.
		<b>Yes</b>
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)
		<b>0</b>
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)
		<b>0</b>
47	S5.C.6.	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)
		<b>Yes</b>
47a	S5.C.6.	Number of site plans reviewed during the reporting period.
		<b>297</b>
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?
		<b>Yes</b>
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?
		<b>Yes</b>
		Comment: Unable to validate the report without answering this question despite answering "no" on the previous question.
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.
		<b>Yes</b>

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. <b>1039</b>
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? <b>Yes</b>
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) <b>Yes</b>
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) <b>Yes</b>
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii) <b>96</b>
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi) <b>Yes</b>
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d) <b>Yes</b>
55	S5.C.6.	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) <b>Yes</b>
56	S5.C.7.	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.7.a.? <b>Yes</b>
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a) <b>No</b>
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard. <b>Yes</b>

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.  <b>Not Applicable</b>
60	S5.C.7.	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 (S5.C.7.b.i (a))?  <b>Yes</b>
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)  <b>Yes</b>
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)  <b>Reduced Inspection Frequency f_61a_03262024203820</b>
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)  <b>Yes</b>
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)  <b>Yes</b>
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)  <b>961</b>
63b	S5.C.7.	Number of facilities inspected during the reporting period.  <b>961</b>
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.  <b>327</b>
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.  <b>Not Applicable</b>
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.  <b>Yes</b>
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)  <b>Yes</b>
66a	S5.C.7.	Number of known catch basins?

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
		<b>15371</b>
66b	S5.C.7.	Number of catch basins inspected during the reporting period? <b>12793</b>
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? <b>1517</b>
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii. (a)-(c)) <b>Not Applicable</b>
68	S5.C.7.	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.7.d) <b>Yes</b>
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) <b>Yes</b>
71	S5.C.7.	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.7.f) <b>Yes</b>
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) <b>Yes</b>
74a	S5.C.8	Number of total sites identified for the inventory. <b>672</b>
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). <b>Yes</b>
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). <b>Yes</b>
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. <b>SUMMARY OF ACTIONS FOR SOURCE _77_02052024101955</b>
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. <b>2023 Source Control Inspection_78_03212024145235</b>

Number	Permit Section	Question
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? <b>Yes</b>
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) <b>No</b>
80a	S7	List any requirements that were not met. <b>Appendix 2, item (5) b.: "With the March 2024 annual report, the City shall submit new loading capacity based on new models." • Whatcom County began a multi-year effort in 2020 to update the CE-QUAL W2 model to further refine phosphorus loading reduction targets into Lake Whatcom to achieve water quality standards for dissolved oxygen for the Lake Whatcom Total Maximum Daily Load (TMDL). The project is referred to as the Lake Whatcom TMDL Reassessment. The draft report is currently in its review stage, and the updated loading capacity will not be completed to submit to Ecology by March 31, 2024. This was determined on February 27, 2024, after a project update from the consultant formalized recent updates to the draft and provided proposed adjusted timelines. Additionally, Ecology has proposed to expand its review timeframe substantially from their original timeframe assessment due to the complexity of the project. Steps that have been and will be taken to reach compliance with Appendix 2, item (5) b.: • Estimated date of draft report of the Lake Whatcom TMDL Reassessment to be submitted to the Environmental Assessment Group Program for review is June 2024 (proposed by Whatcom County). • Estimated timeline of Environmental Assessment Group's Program's completion of the technical review of the CE-QUAL W2 model update is July 2024-July 2025 (proposed by Department of Ecology).</b>
81	S7	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) <b>2024 Appendix 2_81_03262024210237</b>
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.) <b>Yes</b>
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)? <b>Yes</b>
87	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, 2021.) <b>Not Applicable</b>
88	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) <b>Yes</b>
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A. <b>Yes</b>



Number	Permit Section	Question
90	Compliance with standards	<p>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)</p> <p><b>No</b></p> <p>Comment: The City of Bellingham filed a G20 notice for an S4.F notice that was deemed to be submitted after the 30-day window had passed. See the response for question 94a for details.</p>
91	Compliance with standards	<p>If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.</p> <p><b>Not Applicable</b></p>
92	Compliance with standards	<p>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)</p> <p><b>Not Applicable</b></p>
93	G20	<p>Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)</p> <p><b>Yes</b></p>
94	G20	<p>Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.</p> <p><b>2</b></p>
94a	G20	<p>List permit conditions described in non-compliance notification(s).</p> <p><b>In accordance with the City of Bellingham's (City) National Pollution Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit (WAR04-5550) general condition G20 (Notification of Non-compliance), the City is providing you with this notice that special condition S4.F was not met. The details of our non-compliance with special condition S4.F is described as follows: • On November 29, 2023 the City received a press request from a Western Washington University (WWU) student regarding an ongoing sewer leak at WWU. The City did an internet search of the leak and found two news publications had run stories about an ongoing sewer leak at WWU. • On November 29, 2023 the City called Ecology to ask about the sewer leak. The City expressed their concerns about a lack of communication and coordination and to understand the nature and extent of the leak. Ecology was unable to provide any details about the leak. Ecology said that an Environmental Tracking System (ERTS) notice had been submitted by WWU and sent to Ecology. The City informed Ecology that the ERTS was never sent/forwarded to the City for investigation or response. • On November 29, 2023 the City emailed WWU and Ecology requesting confirmation if the sewer leak made it to the City's stormwater system and if so, for how long and what was the estimated flow rate and volume of sewage leaked. • On November 30, 2023 WWU responded to the City's email and said WWU identified the leak and that the leak was first detected on October 17, 2023. WWU staff said that they can provide the approximate flow rate now that they have identified the source. (The City has never received the flow rate from WWU). • On November 30, 2023 Ecology emailed WWU and the City regarding the status of the leak. Ecology also asked WWU to confirm that the source of the leak had been found and if repairs were scheduled. Ecology asked WWU if additional work was being done to detect any more sewer leaks. Ecology also asked for confirmation that the leak was contained within WWU's stormwater detention vault and that a S4.F notice was not required if the leaked sewage didn't make it to the stormwater system. • On November 30, 2023 WWU responded to Ecology that they believe they fixed the main leak and they are scoping other lines to look for leaks. WWU clarified Ecology's understanding by saying the stormwater detention vault was never going to work because it serves the entire south campus and the mixed volumes of stormwater and sewage were too much to store. WWU also stated that there were two stormwater lines that</b></p>

Number	Permit Section	Question
--------	----------------	----------

the sewage drained to, and that both of these lines drain into the City's stormwater system. • On December 11, 2023 Ecology emailed the City asking if the City's stormwater system drains to a creek and if we've identified any impacts from the leak. • On December 15, 2023 Ecology emailed WWU and the City that they had reviewed permit language and have concluded that WWU and the City need to submit S4.F notices since the sewer leak is causing or contributing to a known or likely violation of water quality standards in Padden Creek. Ecology said that no samples have been taken but based on the volume of the sewer leak and the length of time the sewer leak happened that it likely exceeded water quality standards in the receiving creek. Ecology said that S4.F notices are due 30-days of becoming aware of the water quality violation and suggested the deadline for the S4.F notice be December 30, 2023. • On January 2, 2024 Ecology emailed the City saying that we missed the December 30, 2023 deadline and that the City needs to now submit a G20 Notice of Permit Violation. • On January 9, 2024 the City called Ecology to discuss the S4.F and G20 notices. City staff expressed their frustration with the poor level of communication, coordination, and cooperation about the sewer leak and told Ecology that neither Ecology or WWU have provided the City with any detailed information about the leak and that we got almost all of our information from reading the news stories. The City also shared their position that the information that the City requested on November 30, 2023 has never been provided and that information was fundamental in understanding if the leak is causing or contributing to a known or likely violation of water quality standards in Padden Creek. The City explained that the contributing basin area for the stormwater outfall to Padden Creek drained ~260 acres, including a mixed use of development types as well as forest and open space areas. The City also explained that the stormwater outfall for the system was a 48 inch diameter pipe and that there are continuous groundwater base flows in pipe. The City explained that water quality standards are based on concentrations and without knowing the flow rate, volume, and duration of the leak, like were requested on November 30, 2023, and the large drainage basin, that we didn't believe we had credible site -specific information sufficient to determine if the leak is causing or contributing to a known or likely violation of water quality standards in Padden Creek (dilution). • NPDES Permit special condition S4.F: "A Permittee shall notify Ecology in writing within 30 days of becoming aware, based on credible site-specific information that a discharge from the MS4 owned or operated by the Permittee is causing or contributing to a known or likely violation of Water Quality Standards in the receiving water. Written notification provided under this subsection shall, at a minimum, identify the source of the site-specific information, describe the nature and extent of the known or likely violation in the receiving water, and explain the reasons why the MS4 discharge is believed to be causing or contributing to the problem. For ongoing or continuing violations, a single written notification to Ecology will fulfill this requirement. • On January 18, 2024 Ecology emailed the City and said they generally disagree dilution made much of a difference. Ecology said they still believe that an S4.F notice should have been submitted and since we missed the recommended deadline that a G20 Notice of Permit Violation is needed. • On January 19, 2024 the City emailed Ecology regarding the City's position on the S4.F and G20 notice requirements and told Ecology that the City still has not received any information from either Ecology or WWU about the sewer leak. The City said that it still believes the lack of information shared with the City makes it problematic to impossible for us to determine if an exceedance of water quality standards in the receiving water body occurred, or to be able to report the minimum reporting requirements for an S4.F notice. The City said that though in disagreement, the City will provide S4.F and G20 notices. • On January 19 the City emailed WWU again requesting the estimated duration, flow rate, and volume of the sewer leak. • On January 23, 2024 WWU emailed the City saying they are having a hard time estimating and that they've discovered more degraded sewer pipes. They said they are doing more scoping and are working through repairs. Steps that have been and will be taken to reach compliance with special condition S4.F. • The City has submitted an S4.F notice to Ecology for the sewer leak at WWU that drained into the City's stormwater system. • Continue to proactively communicate with Ecology and WWU regarding the status, nature, and extent of the sewer leak. Neither entity is actively sharing information with the City. • Continue to offer City assistance to WWU to investigate and mitigate the sewer leak. • Perform water quality sampling where WWU's stormwater enters the City's stormwater system. • Perform paired sampling at the outfall of the City's stormwater system where WWU's stormwater drains to and just upstream of the outfall in the receiving waters to verify if there is an ongoing exceedance of water quality standards. In accordance with the City of Bellingham's (City) National Pollution Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit (WAR04-5550) general condition G20

**Number      Permit Section      Question**

**(Notification of Non-compliance), the City is providing you with this notice that This letter serves as the G20 notification that the City will not meet the March 31, 2024 deadline to submit the new loading capacity from the CE-QUAL W2 updated model per Appendix 2, item (5) b., of the 2020-2024 Western Washington Phase II Municipal Stormwater Permit. The details of our non-compliance with Appendix 2, item (5) b. is described as follows: • Per Appendix 2, item (5) b.: "With the March 2024 annual report, the City shall submit new loading capacity based on new models." • Whatcom County began a multi-year effort in 2020 to update the CE-QUAL W2 model to further refine phosphorus loading reduction targets into Lake Whatcom to achieve water quality standards for dissolved oxygen for the Lake Whatcom Total Maximum Daily Load (TMDL). The project is referred to as the Lake Whatcom TMDL Reassessment. The draft report is currently in its review stage, and the updated loading capacity will not be completed to submit to Ecology by March 31, 2024. This was determined on February 27, 2024, after a project update from the consultant formalized recent updates to the draft and provided proposed adjusted timelines. Additionally, Ecology has proposed to expand its review timeframe substantially from their original timeframe assessment due to the complexity of the project. Steps that have been and will be taken to reach compliance with Appendix 2, item (5) b.: • Estimated date of draft report of the Lake Whatcom TMDL Reassessment to be submitted to the Environmental Assessment Group Program for review is June 2024 (proposed by Whatcom County). • Estimated timeline of Environmental Assessment Group's Program's completion of the technical review of the CE-QUAL W2 model update is July 2024-July 2025 (proposed by Department of Ecology).**

**Attachments:**

View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
<a href="#">View</a>	WAR045550_78_03212024145235	2023 Source Control Inspection_78_03212024145235	.xlsx	1513381	1904996	wqwebportal
<a href="#">View</a>	WAR045550_42_03142024161301	2023IDDE_42_03142024161301	.xml	1510857	1904996	wqwebportal
<a href="#">View</a>	WAR045550_81_03262024205004	2024 Appendix 2_81_03262024205004	.pdf	1514643	1904996	wqwebportal
<a href="#">View</a>	WAR045550_81_03262024210237	2024 Appendix 2_81_03262024210237	.pdf	1514645	1904996	wqwebportal
<a href="#">View</a>	WAR045550_2_03262024202331	Bellingham 2024 SWMP_2_03262024202331	.pdf	1514639	1904996	wqwebportal
<a href="#">View</a>	WAR045550_25_03252024103321	Changes In Understanding_25_03252024103321	.docx	1513951	1904996	wqwebportal
<a href="#">View</a>	Submitted Copy of Record for City of Bellingham	Copy of Record CityofBellingham Thursday March 28 2024	.pdf	1515670	1904996	wqwebportal
<a href="#">View</a>	Submitted Cover Letter for City of Bellingham	Cover Letter CityofBellingham Thursday March 28 2024	.pdf	1515671	1904996	wqwebportal
<a href="#">View</a>	WAR045550_21_03262024203656	General Awareness Efforts 2024_21_03262024203656	.pdf	1514640	1904996	wqwebportal
<a href="#">View</a>	WAR045550_30a_03212024144019	NPDES2023_Outfalls_30a_03212024144019	.xlsx	1513374	1904996	wqwebportal
<a href="#">View</a>	WAR045550_26a_03262024203656	Promoted Stewardship Opportuni_26a_03262024203656	.pdf	1514641	1904996	wqwebportal
<a href="#">View</a>	WAR045550_61a_03262024203820	Reduced Inspection Frequency f_61a_03262024203820	.docx	1514642	1904996	wqwebportal
<a href="#">View</a>	WAR045550_77_02052024101955	SUMMARY OF ACTIONS FOR SOURCE _77_02052024101955	.docx	1490460	1904996	wqwebportal

Close