

## MS4 Annual Report Phase II Western

Number	Permit Section	Question
1	S9.D.6	Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.
		<b>Not Applicable</b>
2	S5.A.2; S9.D.1	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)
		<b>Bellingham 2025 SWMP Final_2_02282025083756</b>
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.
		<b>Yes</b>
4	S5.A.5.b	Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)
		<b>Yes</b>
5	S9.D.4	If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)
		<b>Not Applicable</b>
6	S5.C.1.a	Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)
		<b>Yes</b>
12	S5.C.1.c.i	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)
		<b>Yes</b>
13	S5.C.1.c.i(a)	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)

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		<b>No</b>
19	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)
		<b>Yes</b>
19a	S5.C.2	If yes, list the elements, and the regional program.
		<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 coordinated education campaigns with one of our staff sitting on the STORM Steering Committee.</b>
20	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.
		<b>General Awareness Efforts 2025_20_02242025085035</b>
24	S5.C.2.a.iii	Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.
		<b>Yes</b>
24a	S5.C.2.a.iii	Attach a list of stewardship opportunities provided.
		<b>2025 stewardship opportunities_24a_02242025085035</b>
25	S5.C.3.a	Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP.
		<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>
25a	S5.C.3.a.i	Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i)
		<b>City Council meetings, community meetings, public hearings, neighborhood association meetings, focus groups, community surveys, and webpage communications are all offered to overburdened communities in the City of Bellingham. The City uses</b>

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		<p><b>the Washington State Department of Health Washington Environmental Health Disparities Map to help distinguish overburdened communities within the city limits. This map organizes communities based on census tracts and averages a variety of data to rank these communities. However, some factors such as 22% of Bellingham residents (2023 Census data) being below the poverty line are spread throughout the city and make pinpointing specific communities within the city less effective as means of reaching overburdened individuals and families. Therefore, a variety of outreach methods are used to provide these opportunities to Bellingham residents. No communities within the city limits meet the definition of a "highly impacted community."</b></p>
26	S5.C.3.	<p>Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)</p> <p><b>Yes</b></p>
26a	S5.C.3.	<p>List the website address in Comments field.</p> <p><b><a href="https://cob.org/services/planning/environmental/stormwater-program">https://cob.org/services/planning/environmental/stormwater-program</a></b></p>
27	S5.C.4.	<p>Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?</p> <p><b>Yes</b></p>
32	S5.C.5.b	<p>Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)</p> <p><b>Yes</b></p>
32a	S5.C.5.b	<p>Describe actions in Comments field. (S5.C.5.b)</p> <p><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</b></p>

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		<b>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>
33	S5.C.5.c	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.
		<b>Yes</b>
35	S5.C.5.d.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.
		<b>Yes</b>
35a	S5.C.5.d.i	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.d.i(a)	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)
		<b>37</b>
36a	S5.C.5.d.i(a)	Cite field screening techniques used to determine percent of MS4 screened.
		<b>Catch basin/manhole inspections</b>
37	S5.C.5.d.ii	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)
		<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>
38	S5.C.5.d.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.
		<b>Yes</b>

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39	S5.C.5.e	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.
		<b>Yes</b>
40	S5.C.5.f	Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.
		<b>Yes</b>
41	S5.C.5.g	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13.
		<b>2024IDDECorrected_41_01172025102053</b>
42	S5.C.6.b.i-iii	Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.
		<b>Yes</b>
44		Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?
		<b>No</b>
45	S5.C.6.b.i.	Number of adjustments granted to the minimum requirements in and Section 5 Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) of Appendix
	1	<b>Not Applicable</b>
46	S5.C.6.b.i.,	Number of exceptions granted to the minimum requirements in and Section 6 Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) of Appendix
	1	<b>Not Applicable</b>
47	S5.C.6.c.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)
		<b>Yes</b>
47a	S5.C.6.c.i	Number of site plans reviewed during the reporting period.

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48	S5.C.6.c.ii	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii?
		<b>Yes</b>
49	S5.C.6.c.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.
		<b>Yes</b>
49a	S5.C.6.c.iii	Number of construction sites inspected per S5.C.6.c.iii.
		<b>883</b>
49b	S5.C.6.c.iv	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv?
		<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.c.viii	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)
		<b>129</b>
53	S5.C.6.c.vi	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)
		<b>Yes</b>
54	S5.C.6.d	Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground

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		Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d)
		<b>Yes</b>
55	S5.C.6.e	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e)
		<b>Yes</b>
56	S5.C.7.b	Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)
		<b>Appendix 12 Report_56_02192025160940</b>
57	S5.C.8.b	Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years)
		<b>Yes</b>
57a	S5.C.8.b	Number of total sites identified for the inventory.
		<b>554</b>
58	S5.C.8.a-d	Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d.
		<b>SUMMARY OF ACTIONS FOR SOURCE _58_01172025115536</b>
59	S5.C.8.d	Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d.
		<b>2024 Source Control Inspection_59_02072025085747</b>
60	S5.C.8.e	Implemented an ongoing source control training program per S5.C.8.e?
		<b>Yes</b>
61	S5.C.9.a	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater

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		Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.9.a?
		<b>Yes</b>
63	S5.C.9.a	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a)
		<b>No</b>
64	S5.C.9.a.ii	Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard.
		<b>Not Applicable</b>
65	S.5.C.9.b.i(a)	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)?
		<b>Yes</b>
66	S5.C.9.b.i(b)	Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)
		<b>Yes</b>
66a	S5.C.9.b.i(b)	Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?
		<b>Yes</b>
66b	S5.C.9.b.i(b)	If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).
		<b>Not Applicable</b>
67	S5.C.9.b.ii	Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)
		<b>No</b>
		Comment: The City of Bellingham's private facility inspector left employment in August of 2024. A replacement inspector has been hired as of January 2025. A G20 notice will be filed to address this non-compliance.

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68	S5.C.9.c.i	Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)
		<b>Yes</b>
68a	S5.C.9.c.i	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)
		<b>984</b>
68b	S5.C.9.c.i	Number of facilities inspected during the reporting period.
		<b>979</b>
68c	S5.C.9.c.i	Number of facilities for which maintenance was performed during the reporting period.
		<b>400</b>
69	S5.C.9.c.i	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.
		<b>Not Applicable</b>
70	S5.C.9.c.ii	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.
		<b>Yes</b>
71	S5.C.9.c.iii	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.9.c.iii)
		<b>Yes</b>
71a	S5.C.9.c.iii	Number of known catch basins and inlets?
		<b>15865</b>
71b	S5.C.9.c.iii	Number of catch basins and inlets inspected during the reporting period?
		<b>5824</b>
71c	S5.C.9.c.iii	Number of catch basins and inlets cleaned during the reporting period?
		<b>776</b>
72	S5.C.9.c.iii	Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.

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		<b>Not Applicable</b>
73	S5.C.9.d	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.9.d)
		<b>Yes</b>
79	S5.C.9.f	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f)
		<b>Yes</b>
80	S5.C.9.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)
		<b>Yes</b>
81	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)
		<b>Yes</b>
81a	S7.A	List any requirements that were not met.
		<b>Not Applicable</b>
82	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)
		<b>2025 Appendix 2 Report_draft_F_82_02282025085009</b>
83	S8.A.1, S8.A.2.a	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)
		<b>Yes</b>

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84	S8.A.2.a, S8.A.2.b	Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b.
		<b>Yes</b>
85	S8.B.1, S5.B.2.a or S8.B.2.c	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?
		<b>Yes</b>
86	S8.B.2.a, or S8.B.2.b.	Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b.
		<b>Yes</b>
87	S8.C.1.b and Appendix 9	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)
		<b>Not Applicable</b>
89	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)
		<b>Yes</b>
90	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.
		<b>Yes</b>
91	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)
		<b>Yes</b>
92	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.
		<b>Not Applicable</b>
93	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)

Number	Permit Section	Question
94	G20	<p><b>Not Applicable</b></p> <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>
95	G20	<p><b>Yes</b></p> <p>Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.</p>
	3	<p>Comment: 1. October 21, 2024: Per S5.C.3.b: "Each permittee shall post on their website their SWMP Plan and the annual report required under S9.A, no later than May 31 each year. All other submittals shall be available to the public upon request." 2. March 31, 2024: Per Appendix 2, item (5) b.: "With the March 2024 annual report, the City shall submit new loading capacity based on new models." 3. January 23, 2024: Per S4.F.1: "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."</p>