

City of Bellingham
National Pollution Discharge Elimination System (NPDES)
Phase II Municipal Permit
2008 Annual Report



The City of Bellingham is required to provide an annual report on the status of our compliance with the National Pollution Discharge Elimination System (NPDES) Phase II Municipal Permit. This permit has requirements phased in from 2007 until 2012. In general, the City of Bellingham is well on its way toward full compliance with all of the permit requirements. Our 2007 report has been reviewed by Ecology and has been accepted as meeting the required goals of the program. At the end of this permit cycle in 2012 Ecology will either renew the existing permit or will write a new permit with additional requirements.

Instructions on Filling out the Western WA Phase II Permit Annual Report Form--Excel worksheet version

1. Complete all TABS in the worksheet: (1) Permittee Information; (2) Certification; (3) ANNUAL REPORT (Section VI); (4) Info Collection (Section VII-A); (5) Info Collection (Section VII-B); (6) Info Collection (Section VII-C); and (7) Info Collection (Section VII-D).
2. The Certification form/TAB must be signed and certified by the responsible official(s). All TABs (except the INSTRUCTIONS) must be printed out and mailed to Ecology.
3. Answer every question. Use the *Comments* and *Attachment* fields only when necessary to provide additional information.
4. Type in a 0 (zero) in the # field of the ANNUAL REPORT tab if no activity has occurred. Do not leave the field blank. Do not type in NA (not applicable).
5. Do not add text to shaded fields.
6. Use the following tables to guide filling out the Y/N/NA field. The NA response is only available for certain questions. See below.
7. Save your completed Annual Report and email the Excel worksheet PLUS attachments to: PH2_WAnnRpt@ecy.wa.gov. **Ecology cannot accept incomplete or partially completed Annual Report forms.**

For questions in the ANNUAL REPORT and INFO COLLECTION tabs, select the category below that best describes your program's implementation status for the reporting year.	If your answer is "YES"...	If your answer is "NO"...
Did you <u>fully</u> meet the permit requirement <u>by</u> the deadline noted in the permit?	Mark <u>Y</u> in the Y/N/NA field. You may choose to provide additional detail about activities from the previous year in the <i>Comments</i> field.	Mark <u>N</u> in the Y/N/NA field. Provide following information in <i>Comments</i> field: "reasons why, corrective steps taken and proposed, and expected dates that the deadline will be met." [See S9.E.2.d for full description of required additional information.]
Did you <u>fully</u> meet the permit requirement <u>in advance of</u> the permit deadline?	Mark <u>Y</u> in the Y/N/NA field. You may choose to note in <i>Comments</i> that this requirement has been met ahead of the permit deadline.	Mark <u>N</u> in the Y/N/NA field if you have not fully met this requirement and note in <i>Comments</i> that the requirement deadline is not yet due.

For those questions that accept an NA (not applicable) response...

<i>For questions 87-92 in Section VI and questions 1-4 in Section VII, Part D:</i> If this question does not apply to you...	Mark NA in the Y/N/NA field. Note in the <i>Comments</i> field that the requirement does not apply.
<i>For questions 1-6 in Section VII, Part B:</i> If you are not yet implementing BMPs for a component of the SWMP...	Mark NA in the Y/N/NA field. Note in the <i>Comments</i> field that you are not yet implementing this SWMP component.

REMINDER: Proceed to the **Permittee Information (I-III) tab next.**

I. Permittee Information	
Permittee Name City of Bellingham	Permittee Coverage Number WAR04-5550
Contact Name William M. Reilly	Phone Number 360-778-7900
Mailing Address Bellingham Public Works Dept. 210 Lottie Street	
City Bellingham	State Zip + 4 WA 98225-4009
Email Address wreilly@cob.org	

II. Regulated Small MS4 Location							
Jurisdiction City of Bellingham	Entity Type: Check the box that applies						
	<table border="1"> <thead> <tr> <th>County</th> <th>City/Town</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>	County	City/Town	Other		X	
County	City/Town	Other					
	X						
Major Receiving Water(s) Bellingham Bay, Chuckanut Bay, Whatcom Creek, Squalicum Creek, Silver Creek, Padden Creek, Chuckanut Creek							

III. Relying on another Governmental Entity	
<p>If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. <i>Attach a copy of your agreement with the other entity to provide additional detail.</i></p>	
Name of Entity:	Permit Obligation(s):



IV. Certification

All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees. Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Name _____

Name Daniel V. Pike Title Mayor City of Bellingham Date _____

PLEASE label any information in attachments with corresponding question numbers.

NOTE: Items that have future compliance dates must still be answered to indicate status.

NOTE: Some [bracketed language] is included to provide clarification or to address errors.

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y		The City has indicated within the SWMP our understanding of meeting	Attachment SWMP
2. Attached 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, and implications for the SWMP as per S9.E.3?	N		There have been no annexations that have occurred since February 2007	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	Y		The City has tracking systems for stormwater activities.	
4. Began tracking costs or estimated costs of the development and implementation of the SWMP? (<i>Required</i> no later than January 1, 2009, S5.A.3.a)	Y		Due to the advanced state of the City's stormwater program, we are unclear if past costs should be included into tracking.	
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? (S5.C.1)	N		See SWMP for activities provided prior to the required date for this element.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
6.	Distributed appropriate information to target audiences identified in the area served by the MS4? (<i>Required</i> by February 15, 2009, S5.C.1.a)	N		See SWMP for activities provided prior to the required date for this element.	
6b.	Please mark a Y next to audiences targeted in Y/N/NA box:				
i	General Public	Y			
ii	Home-based business	N			
iii	Elected officials	Y			
iv	Developers	Y			
v	Contractors	Y			
vi	Permittee Employees	Y			
vii	Residents	Y			
viii	Businesses	N			
ix	Policy makers	Y			
x	Engineers	Y			
xi	Property managers	N			
xii	Homeowners	Y			
xiii	Mobile businesses	N			
xiv	Industries	N			
xv	Landscapers	N			
xvi	Planning Staff	Y			
7.	Tracked the types of public education and outreach activities implemented? (<i>Required</i> by February 15, 2009, S5.C.1.b and S5.A.3.b)	Y		Some tracking has been provided of education elements to date. See SWMP for list of education subjects	See SWMP Page 5
7b.	Number of activities implemented:		12		
8.	Measured the understanding and adoption of the targeted behaviors among targeted audiences? (<i>Required</i> by February 15, 2009, S5.C.1.b)	N		This element is a major challenge for education to meet in the next year. Some focus group work is happening in 2008 along with surveys in 2007 and 2008.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
9.	Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? <i>(Required by February 15, 2008, S5.C.2.a)</i>	N		Most critical decisions regarding the SWMP occurred in 2006 with the adoption of our present stormwater code.	
10.	Developed and implemented a process for public involvement and consideration of public comments on the SWMP? <i>(Required by February 15, 2008, S5.C.2.a)</i>	Y		See SWMP for details	
11.	Made the most current version of the SWMP available to the public? (S5.C.2.b)	N		SWMP will be provided for review in Bellingham City Hall 2nd Floor Public Works Administration on March 31,2008	
12.	Posted the SWMP on your website? (S5.C.2.b)	N		SWMP is to be posted by April 30, 2008 with comments collected and acted on by City for next year SWMP	
12b.	NOTE website address in <i>Attachment</i> field:	Y		www.cob.org	www.cob.org
13.	Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? <i>(Required August 19, 2011, S5.C.3)</i>	N		Program not required at this point but City has conducted dry weather monitoring for over 50% of City at this point. See SWMP for areas of review.	
14.	Developed and currently maintain a map of your MS4? <i>(Required by February 15, 2011, S5.C.3.a)</i>	N		City is well progressed in this area and may be in compliance. Any necessary changes to mapping will be incorporated prior to 2011	
14b.	[Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? (S5.C.3.a.ii)]	Y		City has initiated this work but it is not complete at this time.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
15. Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? (<i>Required</i> by February 15, 2011, S5.C.3.a.i)	N		City is progressing well to meeting this requirement. Draft mapping is available for review.	
16. Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? (<i>Required</i> by February 15, 2011, S5.C.3.a.i)	N		Currently the City has GIS coverage showing all publicly owned storm mains. The majority of the systems have been populated with size, material, slope, invert and age data. Some systems do not yet have size data.	
17. Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? (<i>Required</i> by February 15, 2011, S5.C.3.a.iii)	N		While not required at this time, Bellingham is a Combined Sewer Overflow city. Some buildings, parking lots and streets remain connected to sanitary sewer. Removal of these areas has been ongoing for 50 + years. 2008 project to remove a portion of residential water from sewer underway.	
18. Map has been made available upon request? (S5.C.3.a.iv)	N		While not required at this time, GIS Mapping to date of City of Bellingham storm system is available upon request.	
19. Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illegal discharges, and/or dumping into the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.3.b)	N		Bellingham has a current code prohibiting all illicit discharges to stormwater. Currently the definition of illicit discharge is taken from 1992 manual. Code provides for penalties for noncompliance. City water and fire operations have been brought into compliance. Other discharges are dealt with as found.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
20. Developed and implemented an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the Permittee's MS4? (<i>Required</i> by August 19, 2011, S5.C.3.c)	N		Bellingham Watershed Master Plan conducted stream assessments in 1994 to identify issues. City began work toward illicit discharge removal in 2004 with a dry weather monitoring program. Program is scheduled to evaluate all outfall points in City.	
21. Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in spills? (<i>Required</i> by August 19, 2011, S5.C.3.c.i)	N		While not required at this time, City of Bellingham is a grant recipient of the DOE 2008-09 source control partnership. City will be hiring a source control specialist to evaluate small businesses.	
22. Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? (<i>Required</i> by August 19, 2011, S5.C.3.c.ii)	N		While not required at this time, Bellingham Watershed Master Plan conducted stream assessments in 1994 to identify issues. City began work toward illicit discharge assessment and removal in 2004 with a dry weather monitoring program. Program is scheduled to evaluate all outfall points in City.	
23. Prioritized receiving waters for visual inspection? (<i>Required</i> by February 15, 2010, S5.C.3.c.ii)	N		While not required at this time, City prioritized and implemented as follows: Lake Whatcom Whatcom Creek Basin, Padden Creek Basin, Squalicum Creek Basin. Remaining to do and priority. Silver Creek Basin, Chuckanut Creek Basin, Bellingham Bay, Chuckanut Bay	
24. Conducted field assessments for three high priority water bodies? (<i>Required</i> by February 15, 2011, S5.C.3.c.ii)	N		See Above	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>	
25.	Conducted field assessments on at least one high priority water body? (<i>Required</i> annually after February 15, 2011, S5.C.3.c.ii)	N		See Above	
26.	Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? (<i>Required</i> by August 19, 2011, S5.C.3.c.iii)	N		While not required at this time, City currently actively pursues ERTS reports as well as other illicit discharges or spills that are known. The City (State Certified) lab is called on frequently to process samples for the assessment of potential water quality violations.	
27.	Developed and implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? (<i>Required</i> by August 19, 2011, S5.C.3.c.iv)	N		While not required at this time, see above. Also City has trained field staff available to conduct investigations. Methods include investigation of public and private systems using visual system tracing, lab analysis and use of dedicated stormwater scan equipment.	
28.	Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? (<i>Required</i> by August 19, 2011, S5.C.3.c.v.)	N		While not required at this time, City has usually met the implementation standards of this element. Work on written procedures should be provided in the future.	

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
29. Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? <i>(Required by August 19, 2011, S5.C.3.d)</i>	N		While not required at this time, City has provided stormwater education to some public employees. Other targeted education has included concrete industry, equipment rental companies, general contractors, engineers, architects and designers. General education programs for the public have included print and television advertisement on many topics.	
30. Distributed appropriate information to target audiences identified pursuant to S5.C.1? <i>(Required by August 19, 2011, S5.C.3.d.i)</i>	N		See above	
31. Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? <i>(Required by February 15, 2009, S5.C.3.d.ii)</i>	NA		Stormwater Hotline will be publicized and in place by required date.	
31b. Number of calls received:		0	Calls are by referral only	
31c. Number of follow-up actions taken:		0		
32. Tracked the number and type of spills? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N		The City is working on the development of an adequate tracking and reporting system.	
32b. Number of spills:		3	Approximate number	
33. Tracked the number of illicit discharges identified? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N		The City has information on illicit discharges that were dealt with in 2007. The information is not in a readily addressable system. This will be accomplished by 2011.	
33b. Number of illicit discharges identified:		0	Information unknown	
34. Tracked the number inspections made for illicit connections? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N		The City does have records on all outfall investigations from our Dry Weather Monitoring program.	
34b. Number of inspections:		0	Information unknown	
35. Received feedback from [IDDE] public education efforts? <i>(Required by August 19, 2011, S5.C.3.e)</i>	N		Work is forthcoming in this area.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
36 Attached report on [IDDE] public education efforts? (Required by August 19, 2011, S5.C.3.d, S5.C.3.e)	N		Work is forthcoming in this area.	
37 Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? (Required by August 15, 2009, S5.C.3.f.i)	N		While not required at this time the City has provided training for operational and engineering staff associated with this work. Total numbers of staff and trainings will be provided in 2009 report	
37b. Number of trainings provided:		0	Did not accurately track training	
37c. Number of staff trained:		0	Did not accurately track training	
38 Provided follow-up training as needed to address changes in procedures, techniques or requirements? (Required by August 15, 2009, S5.C.3.f.i)	N		Initial training is not complete.	
38b. Number of trainings provided:		0	Did not accurately track training	
38c. Number of staff trained:		0	Did not accurately track training	
39 Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? (Required by February 15, 2010, S5.C.3.f.ii.)	N		Some training has been provided but it needs to expanded to include all field employees including fire, police and parks.	
39b. Number of trainings provided:		0		
39c. Number of staff trained:		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
40	Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? (<i>Required by August 15, 2009, S5.C.4</i>)	Y		The City of Bellingham believes that we are compliant in this area. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached.	Attachment A
41	Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (<i>Required by August 15, 2009, S5.C.4</i>)	Y		The City of Bellingham believes that we are compliant in this area. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached.	Attachment A
42	Applied stormwater runoff program to private and public development, including roads? (<i>Required by August 15, 2009, S5.C.4</i>)	Y		The City of Bellingham believes that we are compliant in this area. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached.	Attachment A
43	Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (<i>Required by August 15, 2009, S5.C.4</i>)	Y		The City of Bellingham believes that we are compliant in this area, with the exceptions of some minor code modifications that are necessary such as requirement for CESL. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached.	Attachment A
44	Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? (<i>Required by August 15, 2009, S5.C.4.a</i>)	Y		The City of Bellingham believes that we are compliant in this area, with the exceptions of some minor code modifications that are necessary such as requirement for CESL. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached.	Attachment A

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
45	Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4?	Y		The City will retain current codes but may not assume greater record keeping, monitoring or inspection requirements that may be associated with the Phase II permit. If the City should do so it would be as a voluntary effort only.	Attachment A
46	The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? (<i>Required</i> by August 15, 2009, S5.C.4.a.i)	N		The City of Bellingham believes we are compliant in this area, with exception of minor code modifications necessary such as requirement for CESL. Please see SWMP informaton and/or copy of Bellingham Stormwater code attached. The City believes that we have an equal or more stringent requirement for redevelopment.	
47	The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		Criteria is similar but should be updated to conform to Appendix 1.	
48	Were exceptions or variances to the minimum requirements in Appendix 1 granted? (<i>Required</i> by August 15, 2009, S5.C.4.a.i., and Section 6 of Appendix 1)	N		None known and tracking not required at this time.	
48b.	If so, how many were granted?		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
49 The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? (<i>Required</i> by August 15, 2009, S5.C.4.a.ii)	N		City adopted 2005 Manual including site planning process. We believe we will be compliant prior to deadline.	
49b. Cite documentation to meet this requirement in <i>Attachment</i> field:	y		City ordinance attached for information only.	Attachment A
50 The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? (<i>Required</i> by August 15, 2009, S5.C.4.a.iii)	N		Not required at this time but it is believed the attached ordinance provides sufficient authority.	Attachment A

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51 The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? (<i>Required</i> by August 15, 2009, S5.C.4.a.iv)	N		Not required at this time but it is believed the attached ordinance provides sufficiently for those elements.	Attachment A
52 If the ordinance or regulatory mechanism allows construction sites to apply the Erosivity Waiver in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is <i>required</i> by August 15, 2009, S5.C.4.a.v)	N		City has reviewed one project in the City for erosivity waiver and it was not applicable. Decision is pending by City on future use of this waiver.	
53 Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (<i>Required</i> by August 15, 2009, S5.C.4.b)	Y		City has been permitting all development since 1995	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
54	Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by August 15, 2009, S5.C.4.b)</i>	Y		City has been permitting all development since 1995	
55	Reviewed Stormwater Site Plans for new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.b.i)</i>	Y		City has been reviewing and permitting all development since 1995.	
55b.	Number of site plans reviewed during the reporting period:		574	Number corresponds to number of permits issued in 2007. Does not include reviews of plans that did not require permitting.	
56	Inspected, prior to clearing and construction, all known development sites 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 Potential? <i>(Required by August 15, 2009, S5.C.4.b.ii)</i>	Y		City currently inspects all sites for compliance with erosion controls.	
56b.	Number of [qualifying] sites inspected [prior to clearing and construction] during the reporting period:		0	Number of qualifying sites unknown. Number of sites that called for inspection prior to clearing is not readily available and would not be applicable without qualifying information. Requirement to provide this information in Not applicable at this time.	

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57 Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? <i>(Required by August 15, 2009, S5.C.4.b.iii)</i>	Y		All permits are inspected multiple times	
57b. Number of sites inspected during [the construction phase for] the reporting period:		10,000 +	Exact number is unavailable for this reporting period.	
58 Enforced as necessary based on the inspection at new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.b.iii)</i>	Y			
58b. Number of enforcement actions taken during the reporting period:		0	Number of enforcements unknown due to nature of enforcement. Occupancy is generally withheld for a variety of code deficiencies. It is viewed as a punchlist procedure where we note deficiencies based on walk throughs and they must complete all prior to oc	
59 Inspected [qualifying] permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? <i>(Required by August 15, 2009, S5.C.4.b.iv and v)</i>	N		All sites are customarily inspected to be finalized.	
59b. Number of [qualifying] sites known during the reporting period:		0	Information not required for this year but estimate could be prepared if required by Ecology	
59c. Number of [qualifying] sites inspected during the reporting period:		0	Information not required for this year but estimate could be prepared if required by Ecology	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
60	Y		All qualifying projects are required to submit a maintenance plan prior to sign off of stormwater permit. Plan includes responsible party.	
61	Y		All qualifying projects are required to submit a maintenance plan prior to sign off of stormwater permit. Plan includes responsible party. City withholds occupancy permits until stormwater permit requirement are complete.	
61b.		0	Number of enforcements unknown due to nature of enforcement. Occupancy is generally withheld for a variety of code deficiencies. It is viewed as a punchlist procedure where we note deficiencies based on walk throughs and they must complete all prior to occupancy.	
62	N		Final strategy not required yet. The City uses a variety of tools for enforcement including correction notices, notices of non-compliance, fines and court actions. Occupancy as indicated above is also important tool.	
63	N		The City is uncertain of our allowance for waivers.	
63b.		0		
64	N		This program is fairly complete for any public sector facilities. Private sector facility inspection program and O & M compliance plan is pending. The City may limit this program to facilities required by the Permit only.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
65 Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? <i>(Required by August 15, 2009, S5.C.4.c.i)</i>	N		The City believes that we are close to compliance with this per our attached permit.	
66 Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? <i>(Required by August 15, 2009, S5.C.4.c)</i>	N		This program is fairly complete for any public sector facilities. Private sector facility inspection program and O & M compliance plan is pending. The City may limit this program to facilities required by the Permit only.	
66b. Number of sites inspected during the reporting period:		160	Currently the City program has a mix of single facility and multiple facility designations. True site number is not known at this time.	
66c. Number of structural BMPs inspected during the reporting period:		160	Currently the City program has a mix of single facility and multiple facility designations. True structural BMP number is not known at this time.	
66d. Number of enforcement actions taken during the reporting period:		1	Private facility known to be out of compliance was acted on.	
67 Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington ? <i>(Required by August 15, 2009, S5.C.4.c.ii)</i>	Y		City of Bellingham has adopted the 2005 manual for this purpose.	
68 Performed timely maintenance as per S5.C.4.c.ii? <i>(Required by August 15, 2009, S5.C.4.c.ii)</i>	N		City owned facilities maintained on an established timeline. Private facilities require further program development.	
68b. Attached documentation of any maintenance delays. <i>(Required by August 15, 2009, S5.C.4.c.ii)</i>	N		None known for City facilities.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
69	Annually inspected all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? <i>(Required by August 15, 2009, S5.C.4.c.iii)</i>	N		City owned facilities inspected and maintained at least annually. Private facilities require further program development.	
70	If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii? <i>(Required by August 15, 2009, S5.C.4.c.iii)</i>	N			
71	Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? <i>(Required by August 15, 2009, S5.C.4.c.iv)</i>	N		City requires one year maintenance period for all stormwater facilities dedicated to City. Residential developments stormwater facilities in most cases are owned and maintained by the City. During house construction inspection City also reviews facilities for status.	
71b.	Number of facilities inspected during the reporting period:		0	Number unknown for 2007	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable	
72	Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? (<i>Required</i> by August 15, 2009, S5.C.4.d)	N		While not required at this time the City has a system of record keeping.	
73	Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y		These documents have been placed within our permit center with advertisement and information provided.	
74	All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (<i>Required</i> by August 15, 2009, S5.C.4.f)	N		While not required at this time the City has been conducting these activities since 1995. Current training methods are being reviewed.	
74b.	Number of trainings provided:		6	Training methods at this time are generally one on one with twice monthly staff meetings used for joint training. Number of trainings approximate.	
74c.	Number of staff trained:		9	Training methods at this time are generally one on one with twice monthly staff meetings used for joint training.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
75 Developed and implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (<i>Required</i> by February 15, 2010, S5.C.5)	N		Training of staff has occurred but tracking and reporting of training is not complete.	
76 Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington ? (<i>Required</i> by February 15, 2010, S5.C.5.a)	Y		City has adopted the 2005 manual and the maintenance standards contained therein as the minimum requirement for publicly owned and maintained facilities.	
77 Performed timely maintenance as per S5.C.5.a.ii? (<i>Required</i> by February 15, 2010, S5.C.5.a.ii)	Y		Scheduled maintenance occurs for all City facilities.	
77b. Attached documentation of any maintenance delays. (<i>Required</i> by February 15, 2010, S5.C.5.a.ii)	N		None Known	
78 Annually inspected and maintained all stormwater treatment and flow control facilities (other than catch basins)? (<i>Required</i> by February 15, 2010, S5.C.4.c.iii)	Y		Scheduled maintenance occurs for all City facilities on an annual basis.	
78b. Number of known facilities:		160	As noted above this number reflects a combination of single and multiple facility site records. These records will be modified by required date to better represent total facilities.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78c. Number of facilities inspected during the reporting period:		160	As noted above this number reflects a combination of single and multiple facility site records. These records will be modified by required date to better represent total facilities.	
79 If using reduced inspection frequency, Attached documentation as per S5.C.5.a.ii? <i>(Required by February 15, 2010, S5.C.5.b)</i>	N			
80 Conducted spot checks of stormwater facilities after major storms? <i>(Required by February 15, 2010, S5.C.5.c)</i>	N		While not required at this time storm patrols generally include checks on major facilities. This will be further reviewed for completeness.	
80b. Number of known facilities:		0	Unknown	
80c. Number of facilities inspected during the reporting period:		0	Unknown	
81 Inspected municipally owned or operated catch basins at least once before the end of the Permit term? <i>(Required by February 15, 2010, S5.C.5.d)</i>	N		City should have no problem in meeting this expectation. Data shown is not for year of interest	
81b. Number of known catch basins:		17,023	Number is approximate based on GIS	
81c. Number of inspections:		9,226	2005 Data for information only	
81d. Number of catch basins cleaned:		9,226	2005 Data for information only	
82 Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? <i>(Required by February 15, 2010, S5.C.5.f)</i>	N		Most items on the list of activities have been addressed but not all. Work will continue toward the goal.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
83 Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? (<i>Required by February 15, 2010, S5.C.5.g</i>)	N		Not required at this time but many informal policies are in place. Need to make policies permanent and provide reporting in a future year.	
84 Initiated or implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (<i>Required by February 15, 2010, S5.C.5.h.</i>)	N		Not required at this time but most training components have already been addressed through staff meetings, participation in video conferences, etc.	
84b. Number of trainings provided:		2	Approximate number	
84c. Number of staff trained:		30	Approximate number	
85 Initiated or 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 the Industrial Stormwater General Permit? (<i>Required by February 15, 2010, S5.C.5.i</i>)	Y		The process has been initiated. Discharge points have been identified. Storage areas have been identified and capital investment was made in providing sheds for erodible materials.	
86 Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N		None at this time	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
87	N			
88	N			
89	N			
90	Y		City responded to major spill/illicit discharge of gasoline on Sunset Drive working closely with Ecology. More minor spills and/or discharges have been dealt with through the ERTS system.	
90b.	N		No known discharges in exceedance of Water Quality Standards other than those potential issues identified through the 303(d) listings. Excluded from this are water quality determinations by the DOE through the NPDES Construction Permit.	
91	N		No orders received from Ecology	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>	
92	Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an eminent threat to human health or the environment? (G20 and S4.F)	Y		Major gasoline discharge on Sunset Drive dealt with through joint management process. Small sewer spills were reported and dealt with through ERTS system. Threats to safety, health and environment were addressed in all.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part A for all annual reports.

NOTE: Please note in Row 1 of the table if you have no information to report.

NOTE: Please limit your entries to 255 characters per cell. You may include additional information in your Supplemental Documentation attachment and reference it below with the page number.

A. Information Collection

Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)	Who/how to contact for additional information?
1. Illicit Discharge Monitoring Whatcom Creek 2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org
2. Stream Monitoring for City of Bellingham, 2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org
3. Miscellaneous Phosphorus Studies for Lake Whatcom,2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org
4. Miscellaneous Phosphorus Tests for Small Drainage Areas, 2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org
5. Lake Whatcom Stormwater Facility Monitoring, 2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org
6. City of Bellingham Comprehensive Stormwater Plan, 2007	Bill Reilly SSWU Manager, 360-778-7900 or wreilly@cob.org

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

B. SWMP Evaluation

You are required to assess the appropriateness of the BMPs you have selected to implement your SWMP. This evaluation is necessary to evaluate whether the MEP standard set by the permit is protective of water quality in your receiving water bodies. This assessment may be entirely qualitative. Select “NA” if you are not yet implementing BMPs for a component of the SWMP. (S8.B.2., and S9)

Question	Y/N/NA	Comments (50 word limit)
1. Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	Y	The City has used a diverse number of methods to reach target groups.
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	NA	
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	NA	The City is presently using Dry Weather Monitoring and system scanning. These are appropriate but they do not constitute a full IDE program
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	Y	The City of Bellingham is using the 2005 Manual and our ordinance based on the manual for this purpose. It is to be considered appropriate and adequate.
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	NA	This program is not fully complete but our present BMP's indicated in the report are appropriate in our opinion.
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	NA	This program is not fully complete but our present BMP's indicated in the report are appropriate in our opinion.

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part C for all annual reports.

C. Changes in BMPs or objectives (S8.B)

If any of the BMPs or objectives is being changed, list the old BMP and objective, the new BMP and objective, and a justification for the change below. (S8.B.2., and S9)

NOTE: You may choose to attach additional documentation justifying Changes in BMPs or objectives. Note such attachments in the *Justification for change* field.

	Old BMP	Old Objective	New BMP	New Objective	Justification for Change
1	NA	NA	NA	NA	No BMP Changes being reported
2					
3					
4					
5					
6					
7					

VII. Information Collection, BMP Evaluation, and Monitoring

D. Preparation for future, long-term monitoring

Complete section D for the fourth annual report only.

Question	Y/N/NA	Comments (50 word limit)	Name of Attachment? Page Number?
1. Identified outfalls or conveyances for long-term stormwater monitoring?			
1b. Attach site maps and descriptions. (S8.C.2.a)	y		
2. Identified at least two questions for SWMP effectiveness monitoring and developed monitoring plans? (S8.C.2.b)			
2b. Attach the proposed questions and monitoring plans for SWMP effectiveness monitoring.	y		
3. Monitoring plan developed for each question? (S8.C.1.b.iii)			
3b. Attach a copy of the monitoring plan.	y		
4. Identified sites in preparation for future, long-term monitoring? (S8.C.1.a., and S8.C.2.b)			
4b. Attach a summary of the status of site identification for long-term stormwater monitoring; proposed questions for SWMP effectiveness monitoring; and status of developing the SWMP effectiveness monitoring plans.	y		