



Public Works Department City of Bellingham

Public Education and Outreach

S5.C.1.b

Many municipalities, such as the City of Bellingham, use biennium budgets with annual appropriations. The proposed 9 months may make financial support for the revised requirement difficult. One year is more appropriate for the new evaluation. The proposed 18 month period from effective date to use community based social marketing methods should be changed to two years for the same reason.

S5.C.1.c

Why not specifically say in the permit what was explained in the fact sheet? "...begin to implement the strategy developed in S5.C.1.b, which may include the start of audience research or other early tasks that inform the behavior change program, but does not necessarily mean the program must roll out to the target audience." The proposed Permit language is vague without the expanded explanation from the fact sheet.

S5.C.1

This language is unclear to me. Does the last sentence stand alone or is it qualifying the sentence about regional collaboration? Specifically, is each permittee require to develop regional programs at the local jurisdiction? I'm assuming not, since that would be in opposition to the first sentence in that paragraph saying requirements can be met individually or as a member of the regional group. Maybe there's some way to clarify that the last sentence or make it part of the second sentence, such as, "If collaborating in a regional effort on general awareness or behavior change programs, or both, each Permittee shall implement what is developed regionally at the local jurisdiction, including developing a consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to affect behavior change."

S5.C.1.b

Can an evaluation of a regional program we participate in work for this? If so, how specific would the evaluation need to be of our local jurisdiction? Would it just need to include some audience members in our jurisdiction? Does this mean we conduct a new evaluation on the same program we evaluated in the 2013-18 permit? If not, maybe it should say; "Conduct a new evaluation of the effectiveness of an ongoing behavior change program."

S5.C.1.e

Why is this under the behavior change section? It seems like the three prongs of raising awareness, behavior change, and stewardship are meant to be called out more independently in this permit revision. Should this be S5.C.1.iii instead?

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Illicit Discharge Detection and Elimination

S5.C.3.f

Ecology will need to provide training and support to Permittees on the WQWebIDDE portal with the reissuance of the Permit and prior to the Annual Report.

S8.A

We agree with the narrowed focus of the submittal requirements so long as sufficient detail and supportive Focus Sheets are provided by Ecology. Just clearly say what Ecology wants and avoid the continued use of ambiguous language within the Permit.

Source Control Program for Existing Development

The City of Bellingham has been a participant of the Ecology Local Source Control program since its beginning. The funding support pays for one full time equivalent (FTE) employee and has helped the City by providing supportive services for our local businesses in regards to waste and stormwater management. Though the LSC program does not have an enforcement component, the definition for Illicit Discharge and the Illicit Discharge and Detection Program required by our existing Phase II Municipal Stormwater Permit makes enforcement possible if a business is found to be polluting. Ecology's position that the "LSC Program does not include an enforcement component, and therefore does not fully meet this permit requirement" does not seem look at existing Phase II Permit requirements.

If the LSC Program does not meet the Permit requirement, the City will have to cancel its participation and will lose the \$89,000 of annual funding.

Ecology must provide a cost analysis of this program. How much will it cost a Municipality and how much will it cost businesses. This appears to be another unsupportive mandate from Ecology without consideration of the total cost.

Based on Appendix 8 - Businesses and Activities that are Potential Sources of Pollutants, from the existing Phase I Municipal Stormwater Permit, there are ~2,650 businesses in Bellingham that would be included in the inventory list. The proposed requirement of 20% of businesses on the inventory list must be inspected annually will result in ~530 inspections per year. Based on our past experience with the Local Source Control Program, the time necessary to perform one source control inspection is ~4 hours. This time includes research, development of forms and mailings, database and records, outreach, scheduling, etc. Inspecting 530 businesses will take ~2120 hours. Usually, a work day is eight hours and an employee can expect to work 52 weeks. Multiply eight hours by five days a week to get a 40 hour work week, then 40 hours times 52 weeks equals 2,080 hours a year. In order to meet this requirement the City will need ~1.5 FTEs at a general cost of ~\$150,000 annually. Our existing Stormwater Utility Rate structure was not developed to include the necessary resources to implement the program. The additional costs of this program will need to be absorbed by the stormwater utility rate payers and local businesses. As Ecology and the State are fully aware the cost of living index in

Western Washington communities is high and this requirement will only make it higher. The City of Bellingham and other communities are battling homelessness and continuing to increase the cost of living is only making the issue more difficult to address. Also, the City of Bellingham and other Municipalities have Stormwater Utilities to fund the Stormwater Management Program and other requirements of the NPDE Municipal Stormwater Permits. This additional program will either require municipalities to undertake Stormwater Utility Rate Studies and justify a utility rate increase to our elected officials and community members or to cut other stormwater program activities in order to maintain a viable utility rate structure.