

# City of Bellingham

To: Washington State Department of Ecology  
Water Quality Program

From: City of Bellingham, Washington; Municipal Stormwater Permit Holder #WAR-04-550  
Contact: Jason Porter, Storm and Surface Water Manager  
City of Bellingham Public Works, Natural Resources  
360-778-7800, jporter@cob.org

RE: 2024-2029 National Pollutant Discharge Elimination System (NPDES) Phase II Permit  
Comments

Thank you for the opportunity to submit comments pertaining to the reissuance of the 2024-2029 National Pollutant Discharge Elimination System (NPDES) Phase II Permit (Permit). The City of Bellingham would like to provide the following input regarding the draft Permit, for your consideration and for the benefit of the public record. Thank you.

Comment: Please consider the following request regarding Appendix 2 Language for the Lake Whatcom Multi-parameter Total Maximum Daily Load (TMDL) Response outlined in the draft Permit.

The City of Bellingham proposes that Appendix 2 Requirements be developed in coordination with ongoing Lake Whatcom Watershed restoration planning efforts, as was the case in the initial 2019 publication of the Lake Whatcom Appendix 2 Requirements. Details of that proposed process include:

- 1) Ongoing completion of Lake Whatcom TMDL Response actions as outlined in the approved TMDL Implementation Plan, as adopted in the 2019-2024 NPDES Permit's Appendix 2.
- 2) Submittal of proposed 2025-2029 Implementation Actions prior to December 31, 2023, as per the current Permit.
- 3) Development of the Lake Whatcom Cooperative Management Program's 2025-2029 Lake Whatcom Work Plan, with formal adoption by Bellingham City Council prior to the end of 2024.
- 4) Coordination with Ecology staff to incorporate actions developed in the processes above in the final Appendix 2 Requirements prior to final publication in August 2024.

The City of Bellingham requests that language describing a proposed process for collaborative development of the Lake Whatcom Appendix 2 Requirements be inserted to replace the entirety of the existing language found in the draft version of the Permit, in the Lake Whatcom TMDL Section in Appendix 2. Thank you.



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## Public Works Department City of Bellingham

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