

<b>I. Permittee Information</b>	
<b>Permittee Name</b> Whatcom County	<b>Permittee Coverage Number</b> WAR045557
<b>Contact Name</b> Cathy Craver	<b>Phone Number</b> 360-715-7450
<b>Mailing Address</b> 322 N. Commercial Street Suite 301	
<b>City</b> Bellingham	<b>State</b> <b>Zip + 4</b> WA                                      98225
<b>Email Address</b> ccraver@co.whatcom.wa.us	


<b>II. Regulated Small MS4 Location</b>		
<b>Jurisdiction</b> Whatcom County	<b>Entity Type: Check the box that applies</b>	
	<b>County</b>	<b>City/Town</b>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Major Receiving Water(s)</b> Lake Whatcom and Puget Sound	<b>Other</b>	<input type="checkbox"/>

<b>III. Relying on another Governmental Entity</b>	
<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>	
<b>Name of Entity:</b>	<b>Permit Obligation(s):</b>

## 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 <u></u>	Title <u>Public Works Director</u>	Date <u>3/18/2013</u>
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____

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

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

NOTE: For clarification on how to answer questions, place cursor over cells with red flags.

NOTE: Please answer all questions.

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 #, <u>if applicable</u>
1.	<b>Attached</b> annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y			Stormwater Management Program (SWMP)
2.	<b>Attached</b> 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?	NA		There were no annexations resulting in changes to the NPDES Phase II boundaries.	
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			Stormwater Management Program (SWMP), page 9
4.	Tracked costs or estimated costs of the development and implementation of the SWMP? (S5.A.3.a)	Y			Stormwater Management Program (SWMP), page 8

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
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)	Y			Stormwater Management Program (SWMP), page 9
6.	Number of public education and outreach activities implemented:		11	5=actual events/contracts, 6= ongoing education and outreach as part of staff duties	Stormwater Management Program (SWMP), pg 11-12, APP B
7.	Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? (S5.C.2.a)	Y			Stormwater Management Program (SWMP), page 13
8.	Implemented a process for public involvement and consideration of public comments on the SWMP? (S5.C.2.a)	Y			Stormwater Management Program (SWMP), page 13
9.	Made the most current version of the SWMP available to the public. (S5.C.2.b)	Y		Whatcom County NPDES Phase II website	<a href="http://www.npdes.whatcomcounty.org">www.npdes.whatcomcounty.org</a>
10.	Posted the SWMP and latest annual report on Permittee's website. (S5.C.2.b)	Y		Whatcom County NPDES Phase II website	<a href="http://www.npdes.whatcomcounty.org">www.npdes.whatcomcounty.org</a>
11.	NOTE website address in <i>Attachment</i> field:	Y		Whatcom County NPDES Phase II website	<a href="http://www.npdes.whatcomcounty.org">www.npdes.whatcomcounty.org</a>
12.	Maintained a map of your MS4, including requirements listed in S5.C.3.a.i-iii?	Y			Stormwater Management Program (SWMP) , page 22 and <a href="http://www.npdes.whatcomcounty.org">www.npdes.whatcomcounty.org</a>
13.	Map has been made available upon request? (S5.C.3.a.iv)	Y		Whatcom County NPDES Phase II website	<a href="http://www.npdes.whatcomcounty.org">www.npdes.whatcomcounty.org</a>
14.	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4? (S5.C.3.b)	Y		ORD 2009-0057, ORD 2009-067	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
15.	Implemented an ongoing program to detect and address non-stormwater illicit discharges, including spills, and illicit connections into the Permittee's MS4? (S5.C.3.c)	Y		NPDES Phase II website, Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011	www.npdes.whatcomcounty.org
16.	Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identifying previously unknown outfalls, and detecting illicit discharges. (S5.C.3.c.ii)	Y			Stormwater Management Program (SWMP), page 15
17.	Conducted field assessments on at least one high priority water body? (S5.C.3.c.ii)	Y			Stormwater Management Program (SWMP), page 15
18.	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? (S5.C.3.c.iii)	Y		NPDES Phase II website Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011	www.npdes.whatcomcounty.org
19.	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? (S5.C.3.c.iv)	Y		Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011	www.npdes.whatcomcounty.org

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
20.	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? (S5.C.3.c.v.)	Y		Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011	www.npdes.whatcomcounty.org
21.	Provided updated information to public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? (S5.C.3.d)	Y		Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011 , AND Local Source Control Program, AND Stormwater University "Preventing Water Pollution" brochure series	www.npdes.whatcomcounty.org, Stormwater Management Program (SWMP), page 10 and 14
22.	Distributed appropriate information to target audiences identified pursuant to S5.C.1? (S5.C.3.d.i)	Y		Local Source Control Program, Stormwater University "Preventing Water Pollution" brochure series	Stormwater Management Program (SWMP), page 10 and 14
23.	Publicized and maintained a hotline or other local telephone number for public reporting of spills and other illicit discharges? ( S5.C.3.d.ii)	Y		Whatcom County NPDES Phase II website	www.npdes.whatcomcounty.org
24.	Number of hotline calls received:		3	3 phone calls and 4 ERTS notifications	SWMP, page 15
25.	Number of follow-up actions taken in response to calls:		3	3 follow-up actions to calls, 4 ERTS follow-up actions	SWMP, page 15
26.	NOTE hotline number in <i>Comments</i> field	y		360-715-7460	
27.	Number of illicit discharges identified (S5.C.3.e):		6	1 follow-up resulted in naturally occurring foam in streambank and no illicit discharge.	
28.	Number of inspections made for illicit connections (S5.C.3.e):		0	All inspections regarding discharges and not connections.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
29.	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? (S5.C.3.f.i)	Y			Stormwater Management Program (SWMP), page 14-15
30.	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? (S5.C.3.f.ii.)	Y		Whatcom County Illicit Discharge and Elimination System Program - Policy and Procedures Manual, August 2011	Stormwater Management Program (SWMP), page 14-15
31.	Applied stormwater runoff program to private and public development, including roads? (S5.C.4)	Y		ORD 2010-003	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>
32.	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? (S5.C.4)	Y		ORD 2010-003	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>
33.	Implemented a regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? (S5.C.4.a)	Y		ORD 2010-003 and Whatcom County Code 20.80.735-Water Resource Special Management Areas	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a> , and <a href="http://www.codepublishing.com/wa/whatcomcounty/">http://www.codepublishing.com/wa/whatcomcounty/</a>

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
34.	Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? (S5.A.4)	Y		Whatcom County Code 20.80.735-Water Resource Special Management Areas	<a href="http://www.codepublishing.com/wa/whatcomcounty/">http://www.codepublishing.com/wa/whatcomcounty/</a>
35.	Number of exceptions to the minimum requirements in Appendix 1 granted (S5.C.4.a.i and Appendix 1)?		0		
36.	Number of variances to the minimum requirements in Appendix 1 allowed (S5.C.4.a.i and Appendix 1)?		0		
37.	Implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (S5.C.4.b)	Y		ORD 2010-003	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>
38.	Reviewed <b>Stormwater Site Plans</b> for new development and redevelopment projects that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of development or sale? (S5.C.4.b.i)	Y		ORD 2010-003	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>
39.	Number of site plans reviewed during the reporting period:		12		
40.	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 <b>Determining Construction Site Sediment Potential?</b> (S5.C.4.b.ii and v)	Y		ORD 2010-003	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a>



Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
41.	Number of qualifying sites inspected prior to clearing and construction during the reporting period:		213		
42.	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? (S5.C.4.b.iii and v)	Y		ORD 2010-003 and Whatcom County Code 20.80.735-Water Resource Special Management Areas	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a> , and <a href="http://www.codepublishing.com/wa/whatcomcounty/">http://www.codepublishing.com/wa/whatcomcounty/</a>
43.	Number of sites inspected during the construction phase for the reporting period:		213		
44.	Based on inspections at new development and redevelopment construction projects, enforced requirements related to the proper installation and maintenance of erosion and sediment controls? (S5.C.4.b.iii and vi)	Y		ORD 2010-003 and Whatcom County Code 20.80.735-Water Resource Special Management Areas	<a href="http://www.whatcomcounty.us/council/code/main_ord_res.jsp">http://www.whatcomcounty.us/council/code/main_ord_res.jsp</a> , and <a href="http://www.codepublishing.com/wa/whatcomcounty/">http://www.codepublishing.com/wa/whatcomcounty/</a>
45.	Number of enforcement actions taken during the reporting period:		30	16 Correction Notices, 12 Notice of Violation Cases	
46.	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? (S5.C.4.b.iv and v)	Y			
47.	Number of qualifying sites known during the reporting period:		86		
48.	Number of qualifying sites inspected during the reporting period:		213		

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
49.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying permitted development sites (S5.C.4.b.iv)	Y		Whatcom County Development Standards, Ch 2: Stormwater Management, Section 220, 221 AND 2005 and 2012 SWMMWW maintenance standards. (2012 Manual adopted in August 2012.)	<a href="http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf">http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf</a>
50.	Enforced regulations to ensure proper installation of permanent stormwater controls? (S5.C.4.b.iv)	Y		Same as question 49.	<a href="http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf">http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf</a>
51.	Number of enforcement actions taken during the reporting period:		0		
52.	Implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities permitted and constructed pursuant to S5.C.4.a. and b.? (S5.C.4.c)	Y		Same as question 49.	<a href="http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf">http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf</a>
53.	Annually inspected all post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects permitted according to S5.C.4.b. (unless maintenance records justify a different frequency)? (S5.C.4.c.iii)	Y			Stormwater Management Program (SWMP), page 15
54.	If using reduced inspection frequency, <b>Attached</b> documentation as per S5.C.4.c.iii?	NA			
55.	Performed timely maintenance of post-construction stormwater facilities and BMPs as per S5.C.4.c.ii?	Y			Stormwater Management Program (SWMP), page 17
56.	<b>Attached</b> documentation of any maintenance delays. (S5.C.4.c.ii)	NA			

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57. 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? (S5.C.4.c.iv)	Y		Whatcom County Development Standards, Chapter 2: Stormwater Management, Section 220	<a href="http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf">http://www.whatcomcounty.us/publicworks/engineering/documents/ch2stormwater.pdf</a>
58. Number of facilities inspected during the reporting period:		3		
59. 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? (S5.C.4.d)	Y		Maintain internal reporting through Tidemark.	
60. Provided copies of the <b>Notice of Intent for Construction Activity</b> and <b>Notice of Intent for Industrial Activity</b> to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y		NOI verified at time of pre-construction meetings.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
61.	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? (S5.C.4.f)	Y			Stormwater Management Program (SWMP), page 17
62.	Performed timely maintenance as per S5.C.5.a.ii?	Y			
63.	<b>Attached</b> documentation of any maintenance delays. (S5.C.5.a.ii)	NA			
64.	Implemented a program designed to annually inspect and maintained all stormwater treatment and flow control facilities (other than catch basins)? (S5.C.5.b)	Y			
65.	Number of known facilities:		9		
66.	Number of facilities inspected during the reporting period:		9	2011 report reflected 12 stormwater components of 7 facilities containing multiple bioswales within the Permit coverage area.	
67.	If using reduced inspection frequency, <b>Attached</b> documentation as per S5.C.5.a.ii? (S5.C.5.b)	NA			
68.	Conducted spot checks of stormwater facilities after major storms? (S5.C.5.c)	Y			
69.	Number of known facilities:		14		
70.	Number of facilities inspected during the reporting period:		14		
71.	Inspected 20% of municipally owned or operated catch basins at least once before the end of the Permit term? (S5.C.5.d and Permit Reference Table)	Y			

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
72.	Number of known catch basins:		1857	Wilson Engineering draft report available upon request. Final report to be completed as part of larger project due in summer.	Stormwater Management Program (SWMP), page 19
73.	Number of inspections:		1797	Wilson Engineering draft report available upon request. Final report to be completed as part of larger project due in summer.	Stormwater Management Program (SWMP), page 20
74.	Number of catch basins cleaned:		1347		Stormwater Management Program (SWMP), page 20
75.	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? (S5.C.5.f)	Y		Contracted with Brown and Caldwell to develop "Whatcom County Plan for Reducing Stormwater Impacts From Road Maintenance Activities".	Stormwater Management Program (SWMP), APPENDIX C
76.	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? (S5.C.5.g)	Y		Contracted with Brown and Caldwell to develop "Whatcom County Integrated Pest Management and Nutrient Control Plan for Parks and Open Spaces".	Stormwater Management Program (SWMP), APPENDIX D
77.	Implemented an operations and maintenance (O&M) training program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (S5.C.5.h.)	Y		Contracted with Brown and Caldwell to develop "Whatcom County Property and Facility Management Plan for Pollution Reduction".	Stormwater Management Program (SWMP), APPENDIX E

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78. 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? (S5.C.5.i)	Y		Contracted with Brown and Caldwell to develop "Whatcom County Property and Facility Management Plan for Pollution Reduction".	Stormwater Management Program (SWMP), APPENDIX E
79. Complied with the specific requirements associated with approved TMDLs identified in Appendix 2? (S7.A and Permit Reference Table)	NA			
80. <b>Attached</b> status report of TMDL implementation? (S7.A and Permit Reference Table)	NA			
81. Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A and Permit Reference Table)	NA			
82. Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G3)	Y			
83. Took appropriate action to correct or minimize discharges into or from the MS4 which could constitute a threat to human health, welfare, or the environment? (G3)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>	
84.	<b>Attached</b> a summary of the status of implementation of any actions taken pursuant to S4.F and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d)	Y			
85.	Notified Ecology of the failure to comply with any permit term or condition within 30 days of becoming aware of the non-compliance? (G20)	NA			

## 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.	
2. Ongoing Lake Whatcom Tributary Monitoring for phosphorus characterization in storm flows.	Cathy Craver (360) 715-7450
3. Effectiveness monitoring of ConTech Stormwater vault located at the intersection of Cable St and Lake Whatcom Blvd.	Cathy Craver (360) 715-7450
4. Effectiveness monitoring of bio-infiltration swales on Austin St. and Morgan St. (Geneva Stormwater retrofits)	Cathy Craver (360) 715-7450
5. Effectiveness monitoring of bio-infiltration swales at intersection of Lahti Dr. and Britton Rd.	Cathy Craver (360) 715-7450
6.	



## VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

### B. SWMP Evaluation (S8.B & S9)

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. Answer **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	Tasks being implemented sufficiently.
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	Y	Tasks being implemented sufficiently. Future efforts will focus on evaluation of program/activity effectiveness, and potential coordination with other jurisdictions, organizations or entities.
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	Y	Tasks being implemented sufficiently. Currently utilizing IDDE manual prepared by OTAK for Whatcom County. Future efforts will focus on shared information on program effectiveness through NPDES coordinating committees.
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	Y	Tasks being implemented sufficiently. Future efforts will focus on shared information on program effectiveness through NPDES coordinating committees, and continued trainings on Low Impact Development .
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	Y	Tasks being implemented sufficiently. Future efforts will focus on shared information on program effectiveness through NPDES coordinating committees, and continued trainings on Low Impact Development .
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	Y	Tasks being implemented sufficiently. Currently utilizing plans for good housekeeping for M&O. Future efforts will focus on improving maintenance activity tracking and scheduling.

## 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				
2				
3				
4				
5				
6				
7				