City of Ferndale

Stormwater Management Program

2025

Western Washington Phase II Municipal Stormwater Permit
#WAR045552

Contents

Introduction

This document is prepared by City of Ferndale Public Works Stormwater staff and formatted as a response to specific conditions within the Western Washington Phase II Municipal Stormwater Permit, which authorizes the City of Ferndale to discharge stormwater to the waters of the State of Washington. This program summary will be updated each year and will be available to the public. Comments are welcome and may be directed to City of Ferndale Stormwater staff.

S5.C.1 Stormwater Planning

The city shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. This program shall include:

- An interdisciplinary team to inform and assist in the development, progress, and influence of this program.

- Coordination with long-range plan updates to determine how stormwater management needs and protection/improvement of receiving water health are informing the planning update process and influencing policies and implementation strategies.

- Low Impact Development (LID) principles and Best Management Practices (BMPs) will continue to be required when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents. The intent shall be to make LID the preferred and commonly-used approach to site development. Development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.

- Adoption and implementation of tree canopy goals and policies to support stormwater management by December 31, 2028. Consideration shall be given to how existing or future tree canopy can support stormwater management and water quality improvements in receiving waters and a long-term goal of canopy, existing or future projection, shall be established to be used for stormwater management. Specific considerations for canopy for stormwater management on City of Ferndale-owned lands shall, at minimum, include maintaining or increasing canopy in overburdened communities and maintaining existing mature canopy. Considerations, reasoning, and rationale for goals and policies shall be documented.

- Conduct a similar process and consider the range of issues outlined in the *Stormwater Management Action Planning Guidance* (Ecology, 2014; Publication 24-10-027) for one new priority catchment or additional actions for an existing Stormwater Management Action Plan (SMAP) which shall be completed and submitted by March 31, 2027.

Plans for 2025:

The City of Ferndale inter-disciplinary team shall continue to assist in the development, progress, and influence of the Stormwater Planning program, including assessment and planning for 2024-2029 stormwater permit implementation. City staff shall continue to assess and document any newly identified administrative barriers to implementation of LID Principles or BMPs since local codes were updated, and measures adopted to address identified barriers. The Stormwater Management Action Plan for Schell Creek and Stormwater Comprehensive Plan Update were completed in 2023 and will continue to inform project planning and stormwater management actions. The city will begin work on a new SMAP for an additional priority catchment.

S5.C.2 Public Education and Outreach

The education and outreach program is designed to:

- Build general awareness about methods to address and reduce impacts from stormwater runoff
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts
- Create stewardship activities that encourage community engagement in addressing impacts from stormwater runoff

The city implements an education and outreach program for the area served by the municipal separate storm sewer system (MS4). Staff will explore ways to advance regional outreach opportunities and develop and share resources and information in support of reducing stormwater impacts.

General Awareness:

Priority Audiences: General Public (including overburdened communities, or school age children), and businesses (including home-based, or mobile businesses).
Subject Areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces
- Low impact development (LID) principles and LID Best Management Practices (BMPs)
- Awareness of bacterial pollution problems and proper pet waste management

Plans for 2025:

Staff will maintain resources on the city's website about the impacts of stormwater on surface waters, including awareness of bacterial pollution and proper pet waste management. The Charity Carwash Kit Loan Program is promoted on the city's website.

The city will contract with a local third-party organization with specific education and outreach, behavior change campaign, and social marketing experience for assistance with development and implementation of its Public Education and Outreach program.

Priority Audiences: Engineers, contractors, developers, or land use planners.
Subject Areas:

- Technical standards for stormwater site and erosion control plans
- LID principles and LID BMPs
- Stormwater treatment and flow control BMPs/facilities

Plans for 2025:

Staff will work with engineers, contractors, developers and land use planners during the development, permitting, and construction processes to enforce the stormwater ordinances, and continue education and assistance regarding erosion control, and Low Impact Development Best Management Practices.

Behavior Change:

Priority Audiences: Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based and mobile businesses).
Subject Areas:

- Use and storage of pesticides, fertilizers, and/or other household chemicals
- Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials
- Yard care techniques protective of water quality
- Prevention of illicit discharges
- Carpet cleaning
- Repair and maintenance Best Management Practices (BMPs) for vehicles, equipment, and/or home/buildings
- Pet waste management and disposal
- Low impact development (LID) principles and LID Best Management Practices (BMPs)
- Stormwater facility maintenance, including LID facilities
- Dumpster and trash compactor maintenance
- Litter and debris prevention
- Sediment and erosion control
- (Audience specific) Source control BMPs
- (Audience specific) Locally-important, municipal stormwater-related subject areas

Social marketing campaign development: Based on the recommendation from the 2024 evaluation and report, the city will follow social marketing practices and methods to develop a campaign that is tailored to the community, including development of a program evaluation plan by July 1, 2025.

By September 1, 2025, the city will begin to implement a strategy and schedule to implement the existing behavior change campaign more effectively.

Plans for 2025:

The city will contract with a local third-party organization with specific education and outreach, behavior change campaign, and social marketing experience for assistance with development and implementation of its Public Education and Outreach program.

Stewardship:

The city will continue to provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community.

Plans for 2025:

The city will contract with a local third-party organization with specific education and outreach, behavior change campaign, and social marketing experience for assistance with development and implementation of its Public Education and Outreach program.

S5.C.3 Public Involvement and Participation

The city will create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and update of the Stormwater Management Program (SWMP) and Stormwater Management Action Plan (SMAP). The Stormwater Management Program (SWMP) and annual report shall be posted to the City of Ferndale website no later than May 31 each year. Public hearings are held for all ordinances adopted by City Council. Public comments regarding the SWMP are encouraged and may be directed to City of Ferndale Stormwater staff. The city will document outreach measures for overburdened communities and specifically, highly impacted communities.

The city will document methods used to identify overburdened communities by December 31, 2026.

S5.C.4 MS4 Mapping and Documentation

The City of Ferndale Stormwater Management Program includes an ongoing program for mapping and documenting the Municipal Separate Storm Sewer System (MS4) which includes:

Ongoing Mapping:

Maintain data for the following features:

- Known MS4 outfalls and known MS4 discharge points
- Receiving waters, other than ground water
- Stormwater treatment and flow control BMPS/facilities owned or operated by the Permittee
- Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters

- Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following attributes are mapped:
    - Tributary conveyance type, material and size, where known
    - Associated drainage areas
    - Land use
- Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities
- All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007
- All known connections from the MS4 to a privately owned stormwater system

New Mapping*:*

- No later than March 31, 2026, the city will submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report and will report the size and material of the outfalls, where known.

- No later than December 31, 2026, using available, existing data, the city will map tree canopy to support stormwater management on city-owned or operated properties. The city will develop and follow a methodology to intentionally identify canopy for stormwater management purposes.

- No later than March 31, 2028, the city will implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the city. The city will submit with the March 31, 2028 Annual Report a map and table with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the city.

- No later than December 31, 2028, using available, existing data the city will map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on city-owned or operated properties.

Mapping will be performed in the city's Geographic Information System. To the extent consistent with national security laws and directives, the city shall provide maps depicting the information required above to the Washington State Department of Ecology. The city shall also, upon request and to the extent appropriate, provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees.

Plans for 2025:

Staff will continue to fill in existing data gaps in the stormwater inventory and update the stormwater layers of the city's GIS as development/redevelopment occurs.

S5.C.5 Illicit Discharge Detection and Elimination

The city's Stormwater Management Program includes an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the Municipal Separate Storm Sewer System (MS4). The program includes:

- Procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.
- Informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- A prohibited discharge ordinance developed to effectively prohibit non-stormwater, illicit discharges to the city's municipal separate storm sewer system (MS4) to the maximum extent allowable under state and federal law. The ordinance specifies allowable and conditionally allowable discharges and includes enforcement provisions.
- A requirement that commercial, industrial, and multi-story residential structures constructed or renovated between the years 1950 and 1980 be assessed for PCB-containing building materials prior to routine external building washdown to the MS4. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.
- Coordination with firefighting agencies/departments that serve the areas that discharge to the MS4 to notify the city when PFAS-containing AFFFs are used during emergency firefighting activities by December 31, 2026.
- Updating and implementing procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4 by January 1, 2027.
- A publicly listed and publicized illicit discharge hotline for public reporting of spills and other illicit discharges: 360-685-2357 and stormwater@cityofferndale.org. The city keeps records of calls received and follow-up actions taken.
- An Illicit Discharge Detection and Elimination Program Manual (available upon request), developed in 2011 to assist city staff in implementing the IDDE program. The purpose of the procedures outlined in the manual is to detect and address non-stormwater discharges, including spills, and illicit connections into the city's storm sewer system.
- An Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual revised in May 2020 and prepared for King County and the Washington State Department of Ecology by Herrera Environmental Consultants, Inc. and Aspect Consulting, LLC.
- Training for all municipal field staff responsible for identification, investigation, termination, cleanup, and reporting illicit discharges, including spills, improper disposal, and illicit

connections. Follow-up training shall be provided as needed to address changes in procedures, techniques, or requirements. The city documents and maintains records of the training provided and the staff trained.

- Recordkeeping to document activities conducted by the city to meet the requirements of the Permit.

- Submitting data for the illicit discharges, spills, and illicit connections including those that were found by, reported to, or investigated by the city during the previous calendar year in the Annual Report as required by the Permit.

Plans for 2025:

Staff will continue to evaluate and update the Illicit Discharge Detection and Elimination Program manual as necessary, and provide training to, and solicit feedback from, operations and maintenance staff during field work and investigation. In order to provide consistent data, the city will implement the reporting responses to illicit discharge reports via the Department of Ecology WQWebIDDE Water Quality Portal application. Staff will begin to coordinate with local firefighting agencies/departments to meet permit requirements.

S5.C.6 Controlling Runoff from New Development, Redevelopment and Construction Sites

The goal of this program is to reduce pollutants in stormwater runoff to the City's municipal separate storm sewer system (MS4) from new development, redevelopment, and construction site activities. The program applies to private and public development, including transportation projects. The program includes:

- The Stormwater Control Ordinance, which addresses runoff from new development, redevelopment, and construction site projects. The city has adopted the Department of Ecology Stormwater Management Manual for Western Washington, as amended by Sections 1-7 of Appendix 1 of the Western Washington Phase II Municipal Stormwater Permit, as the city's technical stormwater reference manual.

- A permitting process with plan review, inspection, and enforcement capability to meet the standards, which is detailed in the ordinance.

- Keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities are maintained by the city.

- Copies of the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" available through the City's website to representatives of proposed new development and redevelopment.

- The City continues to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

The city ensures that 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, are trained to conduct these activities. Follow-up training will be provided as needed to address changes in procedures, techniques, or staffing.

Plans for 2025:

City staff will continue to review all proposed development and redevelopment, and inspect all construction sites to ensure compliance. Ongoing training will be provided to staff regarding permitting, plan review, construction site inspections, enforcement, best management practices, and Low Impact Development. The Stormwater Control Ordinance (Ferndale Municipal Code 13.34) addresses runoff from new development, redevelopment, and construction site projects.

Consistent with FMC 13.34.030, the 2024 Stormwater Management Manual for Western Washington shall be considered the current manual to meet the requirements of the permit, and shall apply to all applications submitted:

- On or after January 1, 2025
- Prior to January 1, 2017, that have not started construction by July 1, 2022.
- Prior to July 1, 2022, that have not started construction by July 1, 2027.
- Prior to July 1, 2027, that have not started construction by July 1, 2032.

S5.C.7 Stormwater Management for Existing Development

The city will implement a program to control or reduce stormwater discharges to waters of the state from areas of existing development. The program shall aim to focus on strategic stormwater investments over longer planning timeframes

The city shall implement stormwater facility retrofits, or tailored SWMP actions that meet required criteria using one or a combination of the following:

- Strategic stormwater investments identified in Stormwater Management Action Plan(s), or similar stormwater planning process; and/or

- Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.

The city shall provide a list of planned, individual projects scheduled for funding or implementation during this permit term for the purpose of meeting the assigned equivalent acreage. This list shall include at a minimum the required information and use the formatting specified by Ecology. No later than March 31, 2028, the city shall fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report.

Plans for 2025:

The city will engage with its consultant, retained to produce the 2023 Stormwater Comprehensive Plan, SMAP, and receiving water assessment and prioritization studies. The city will work toward identifying a project which is optimally opportune and effective with regard to the assigned equivalent acreage.

S5.C.8 Source Control Program for Existing Development

The city shall continue to implement a Source Control Program for existing development to prevent and reduce pollutants in runoff from areas that discharge to the City's municipal separate storm sewer system (MS4). This includes:

- Application of source control Best Management Practices (BMPS), and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
- Inspection of pollutant generating sources at publicly and privately owned institutional, commercial, and industrial sites to enforce implementation of required BMPs to control pollution discharging into the municipal separate storm sewer system (MS4).
- Enforcement of a city ordinance requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities, including sites with discharges authorized by a separate NPDES permit.
- Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from applicable sites.
- Ongoing training for staff who are responsible for implementing the source control program.
- Update of the business/site inventory at least once every 5 years.

Plans for 2025:

The city will update its business/site inventory and train staff as needed to maintain compliance.

S5.C.9 Operations and Maintenance

The goal of this program is to conduct maintenance activities to prevent or reduce stormwater impacts.

The program includes:

- Maintenance standards for stormwater facilities that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington.

- Annual inspection of all stormwater treatment and flow control BMPs/facilities that discharge to the city's municipal separate storm sewer system (MS4) and were permitted by the City in accordance with city's Municipal Stormwater Permit. The annual inspection requirement may be reduced based on inspection records.

- Annual inspection of all city-owned or operated permanent stormwater treatment and flow control facilities. Appropriate maintenance actions are performed in accordance with the adopted maintenance standards. Responsible parties shall be identified, and records of inspections, maintenance activities, and enforcement actions shall be maintained. The annual inspection requirement may be reduced based on inspection records.

- Spot checks of potentially damaged permanent treatment and flow control facilities (other than catch basins) after major (greater than 24-hour-10-year recurrence interval rainfall) storm events. If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards as required.

- Cleaning of all catch basins and inlets owned or operated by the city once before the end of the NPDES Permit term. Visual inspection during cleaning will determine if maintenance action is necessary.

- Practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the city, and road maintenance activities under the functional control of the city. Lands owned or maintained by the city, include but are not limited to: streets, parking lots, roads, highways, buildings, parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. The following activities are addressed:

    - Pipe cleaning
    - Cleaning of culverts that convey stormwater in ditch systems
    - Ditch maintenance
    - Street cleaning
    - Road repair and resurfacing, including pavement grinding
    - Snow and ice control
    - Utility installation
    - Pavement striping maintenance
    - Maintaining roadside areas, including vegetation management
    - Dust control
    - Application of fertilizer, pesticides, and herbicides, including the development of nutrient management and integrated pest management plans
    - Sediment and erosion control
    - Landscape Management and Vegetation Disposal
    - Trash and pet waste management
    - Building exterior cleaning and maintenance

        - For city-owned buildings built or renovated between 1950-1980, update policies, practices, or procedures to include source control BMPs to minimize PCBs from entering the MS4. Washdown water shall not be discharged to the MS4 if the building is confirmed or suspected to have PCB-containing materials.
    - Preparing permittee-owned buildings for renovation or demolition
        - Update policies, practices, or procedures to include source control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

- Development and implementation, no later than July 1, 2027, of a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters. The following program elements shall be included:

    - Priority areas: Apply a street sweeping program to curbed municipal streets that discharge to outfalls and meet any of the following criteria:
        - High traffic streets, such as arterials or collectors.
        - Streets that serve commercial or industrial land use areas.

    - Program timing: Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the city to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required between July and December.
        - Compliance during this permit term shall be determined by records of a sweeping program designed to sweep all priority areas identified and sweeping at least 90% of priority areas each sweeping event
        - The city may document reasoning for alternative sweeping timing and frequency based on local conditions (e.g., climate) and estimated pollutant deposition quantities. Documentation shall also be based on actual maintenance experience and certified in accordance with G19 – *Certification and Signature.*

    - Operational Procedures: Procedures to follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.

    - No later than March 31, 2028, submission with the Annual Report of the following information about the priority areas:

        - Priority areas swept identified on a map (i.e. streets that are considered high traffic (estimated number of vehicles served/or arterials or collectors, and streets serving commercial or industrial land use).
        - Sweeping date(s)
        - Sweeping frequency
        - Type of sweeper

- Total curb miles of priority areas and curb miles swept
- Approximation of street waste solids removed for each sweeping event (indicate unit of measurement and wet or dry weight, where available).

- Implementation of a Stormwater Pollution Prevention Plan (SWPPP) for the Public Works Operations Shop, Parks Yard, and Stormwater Decant Area. A schedule for implementation of structural BMPs is included in the SWPPP. The SWPPP includes periodic visual observation of discharges from the facility to evaluate the effectiveness of the BMPs.

- An ongoing training program for employees of the city whose construction, operations, or maintenance job functions may impact stormwater quality. Follow-up training will be provided as needed to address changes in procedures, techniques, or requirements.

- Maintenance of records of the activities conducted to meet the requirements of this section.

Plans for 2025:

City staff will begin the process of identifying all city-owned buildings built or renovated between 1950-1980 and updating policies, practices, or procedures to include source control BMPs for building materials to prevent PCBs from entering the MS4.

City staff will begin development and implementation of a municipal street sweeping program which meets the requirements of the permit.

S7. Compliance with Total Maximum Daily Load Requirements (TMDL)

***Name of TMDL**:* Nooksack River Watershed Bacteria

***Area where TMDL Requirements Apply**:* TMDL coverage includes areas served by an MS4 draining to the Nooksack River or its tributaries, Fishtrap Creek, Bertrand Creek, Double Ditch drain, Duffner Ditch, Bender Road ditch, between Nugents Corner and Marine Drive.

***Parameter**:* Fecal coliform and/or E. coli

Actions Required*:*

Business Inspections: The city will inspect facilities with SIC Industry Group no. 074, 075, including NAICS Major Group 1152xx, and NAICS 325315 (composting facilities) as part of its ongoing inspection program identified in S5.C.8.

Public Education and Outreach: The city will include public education and outreach activities that increase awareness of bacterial pollution problems and promote proper pet waste management as a BMP.

Operations and Maintenance: The city will maintain pet waste collection stations at city owned or operated lands that are reasonably expected to have domestic animal (dog and horse) use and potential for pollution to stormwater.

Illicit Connection/Illicit Discharge Detection and Elimination: When conducting IDDE field screening during normal course of business in a TMDL area, city staff will obtain a grab sample to screen for bacteria sources when at the drainage circuit's most downstream sampling location if there is water flow. The city will follow its adopted IDDE procedures to conduct source tracing efforts if bacteria levels and/or observations trigger a response. Qualitative and quantitative information about the source identification and elimination activities, including procedures followed, sampling locations, and results (including documenting no flow) will be annually documented in TMDL reporting in the Annual Report.

Plans for 2025:

- Staff will identify any businesses associated with applicable SIC/NAICS codes to be inspected and will conduct inspections as required.
- The city will continue to provide education and outreach to the public to promote proper pet waste management and will contract with a local third-party organization to assist in meeting associated permit requirements.
- The city will continue to maintain pet waste collection stations on city owned or operated lands and will identify any additional opportunities to collect and properly manage pet waste according to the applicable criteria.
- City staff have identified sampling locations per TMDL requirements and will begin collecting samples and source tracing according to the applicable criteria.

S8. Monitoring and Assessment

The city conducts water quality monitoring required for compliance with the Nooksack River Watershed Bacteria TMDL, pursuant to section S7 Compliance with Total Maximum Daily Load Requirements. Additionally, the City makes annual payments into a collective fund to implement regional monitoring and studies, and into the collective fund to implement Stormwater Management Program (SWMP) Effectiveness studies and Source Identification Studies.

Municipal Underground Injection Control (UIC) Program

The Underground Injection Control program was created by Congress to protect underground sources of drinking water from discharges of fluids to the ground. The UIC program in the state of Washington is administered by the Department of Ecology. In 1984, the Department of Ecology adopted Chapter 173-218 WAC - Underground Injection Control Program - to implement the program. (Washington State Department of Ecology Water Quality Program. 2006. *Guidance for UIC Wells that Manage Stormwater*. Publication Number 05-01/067.)

The UIC program rule is the regulatory authority for UIC wells in Washington. The UIC program rule applies to Class V wells that receive stormwater regardless of whether a UIC well is located in a municipality permitted under the Phase I or Phase II Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit for Western Washington (MS4 Permit).

Municipalities may fulfill the source control and operation and maintenance requirements for new and existing municipal UIC wells under the following conditions:

- All areas served by municipally owned and operated UIC wells must be included in a Stormwater Management Program (SWMP) that ensures appropriate siting, treatment, design, operation, and maintenance of new municipal UIC wells as well as source control activities (including targeted education and outreach) that are well-suited for the land uses in these areas.
    - MS4 permittees may have a combined SWMP that addresses UIC and NPDES permit requirements together, or they may have two separate SWMPs for the areas served respectively by their municipal UIC wells and by their MS4.
    - In areas not covered by the MS4 permit, municipalities may create a SWMP specifically for the areas served by municipal UIC wells.

- To comply with the UIC rule, jurisdictions must implement all of the following activities and include them in their SWMP:
    - Register all UIC wells, including existing and new wells.
    - Design, construct, operate, and maintain new UIC wells according to the specifications throughout I-4 UIC Program Guidelines.
    - Operate and maintain existing wells according to the specifications throughout I-4 UIC Program Guidelines.

To meet the requirements of the UIC Program, the City of Ferndale has registered municipally owned and operated UIC wells. All municipal UIC wells must be sited, designed, constructed, managed, operated, and maintained to meet the requirements of the *2024 Stormwater Management Manual for Western Washington* I-4 UIC Program Guidelines for new and existing UIC wells.

City of Ferndale SWMP Internal Coordination Documentation (S5.A.5.b.)

City of Ferndale Public Works Stormwater staff are responsible for implementing permit requirement coordination among departments. The following table illustrates department responsibilities for permit requirements:

Stormwater Management Program (SWMP) Coordination Western Washington Phase II Municipal Stormwater Permit Requirement S5.C.		
SWMP Component	**Departments**	**Responsibilities**
1. Stormwater Planning	• Public Works • Community Development • Administrative Services	• Coordinate long-range planning with stormwater management and water quality • Continue to require LID Principles and BMPS and assess barriers to implementation • Stormwater Management Action Planning
2. Public Education and Outreach	• Public Works • Community Development • Administrative Services • Parks and Recreation	• Develop and/or share education and outreach materials • Develop and/or participate in a regional behavior change campaign • Create and/or share stewardship opportunities
3. Public Involvement and Participation	• Public Works • Administrative Services • Parks and Recreation	• Provide opportunities for public involvement and participation in the development, implementation, and update of the SWMP and SMAP
4. MS4 Mapping and Documentation	• Public Works • Community Development	• Ongoing mapping and documentation of the City's stormwater system
5. Illicit Discharge Detection and Elimination (IDDE)	• Public Works • Community Development • Parks and Recreation • Ferndale Police Department	• Respond to reports of suspected illicit connections, spills, or illicit discharges • Conduct IDDE assessments of stormwater system • Provide education and outreach to staff and the public on IDDE
6. Controlling Runoff from New Development, Redevelopment, and Construction Sites	• Public Works • Community Development	• Review plans for stormwater compliance • Inspection program to verify construction site erosion and sediment controls, and verify and inspect permanent stormwater facilities
7. Operations and Maintenance	• Public Works • Community Development	• Inspection and maintenance of City stormwater facilities • Inspection of private stormwater facilities • Reduce stormwater impacts from City lands and maintenance activities
8. Source Control Program for Existing Development	• Public Works • Community Development	• Develop and implement Source Control inspection program